

**Code of
Conduct
for Business
Partners**



**CODE OF CONDUCT
FOR BUSINESS PARTNERS**

Introduction

Dear business partners,

As defined in our mission, we stand for high capacity, precision, reliability, and sustainability. These values shape our products and services as well as our business relationships. Thanks to our strong commitment and the outstanding quality of our products, Plasser & Theurer has earned an excellent reputation over the years.

To protect this reputation in an ever more complex business world, this Code of Conduct for Business Partners has been prepared. It provides you with the most important rules and principles of conduct, which apply to all our business partners.

We expect our business partners to identify with Plasser & Theurer's corporate principles and to act according to these values. We encourage our business partners to implement an effective compliance management system. This system should meet the requirements stipulated in this Code of Conduct. Our business partners communicate our principles both in their organisations and to their business partners along the supply chain. Our corporate principles – high capacity, precision, reliability, and sustainability – are defined in our Corporate Policy, which can be accessed at www.plassertheurer.com.

Johannes Max-Theurer, CEO
Günther Binder, CFO
Winfried Büdenbender, CTO
Thomas Schöpf, CSO
Stefan Peiker, COO

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Respectful conduct and equal treatment

Plasser & Theurer stands for the fair and equal treatment of its members of staff. Motivation and commitment give each and every individual the opportunity to advance within the company. We hire staff because of their professional competence and not because of their nationality, religion, age, gender, sexual orientation, health condition, political convictions, or trade union membership. We take a clear stand against child labour, forced labour, harassment, and discrimination. We support the freedom of assembly. We expect the same conduct from our business partners.

Our business partners need to respect the personal dignity and privacy of every individual and must not tolerate harassment, regardless of its form. Executives are seen as role models and have particular responsibility.

It is our duty to protect the health and safety of our members of staff.

Our business partners protect the health and safety of their staff. As our business partner, you are expected to remedy dangerous conditions immediately to prevent accidents at work.

Health and safety

Working conditions

We create fair working conditions for our members of staff and comply with legal provisions on collective labour agreements, minimum wage, working conditions, and working safety as well as the Core Labour Standards of the International Labour Organisation (ILO). We expect the same conduct from our business partners.

Environmental awareness in all areas of production and operation is important to Plasser & Theurer. In particular, we comply with the regulations applicable to the handling of hazardous substances, handling and disposal of waste, water and waste water management, as well as emissions and their effects. In addition, we optimise our use of resources (see our certifications at www.plassertheurer.com). As our business partner, you have to comply with the applicable environmental regulations and must use resources responsibly.

Environment

Business partners

We are in close contact with our business partners and expect integrity, ethical conduct, and compliance with this Code of Conduct for Business Partners.

Corruption

We take a clear stand against all forms of corruption as it may impair the ability to take objective and fair decisions. We expect our business partners to comply with all forms of anti-corruption legislation.

■ Interaction with public officials

All over the world, business activities with public officials are strictly regulated. The term *public officials* refers to officials, public employees, civil servants, or persons in a sovereign capacity. The term also includes relatives of public officials.

We place utmost importance on honest and proper ethical conduct towards public officials. The compliance with legal regulations governing collaboration is required at all times. This is also true for our business partners, particularly for those who maintain contact with public officials on our behalf.

■ **Interaction with business partners**

We follow a proper business policy not only when it comes to business relationships with public authorities but also with the private sector. We are convinced that business decisions must be based on objective criteria.

For this reason, any conduct that could give the impression of exerting undue influence on a business partner's decisions is prohibited. The compensation of consultants must be reasonable and must not be used to provide third parties with undue or improper advantages. We expect our business partners to take measures to ensure proper conduct in their companies, particularly, if they act on behalf of Plasser & Theurer.

■ **Interaction with political parties**

As a non-political company, independence is crucial to Plasser & Theurer. Therefore, it is not allowed to support political parties or party officials using company funds or to provide services for political purposes on behalf of Plasser & Theurer.

Competition

We are committed to fair competition. The violation of competition legislation and anti-trust legislation can have serious consequences for Plasser & Theurer. Therefore, strict compliance with national and international legislation and regulations regarding competition and anti-trust is a central element of our business policy. This also holds true for the relationship to our business partners.

We expect our business partners to be familiar with the regulations regarding their business sector.

■ **We respect the competition with regard to our suppliers**

Plasser & Theurer takes purchasing decisions on the basis of objective criteria. We expect fair conduct and fair competition from our business partners to ensure that our business relationship is based on trust and mutual respect. In particular, we expect that our business partners do not misuse their market position, take anticompetitive measures, or make arrangements with competitors. This is also true for specialist associations events.

Export control

There are worldwide regulations, such as embargoes against certain countries or sanctions against individuals or companies. In addition to high penalties, the violation of export restrictions can have severe consequences for future business activities. As a global export company, Plasser & Theurer is aware of this responsibility. Plasser & Theurer places great importance on the compliance with such regulations and checks the lawfulness of exports, particularly in risk-prone countries and with materials from conflict regions. We expect our business partners to take the measures required to ensure compliance with laws and the applicable export regulations and to support Plasser & Theurer in obtaining approvals.

Conflicts of interest

Conflicts of interest arise if personal interest is incompatible with the interests of the company. To protect our company from negative consequences, we expect our business partners to prevent conflicts of interest in their company or to inform us of such conflicts in writing.

Conflicts of interest

Prevention of money laundering; tax legislation

Plasser & Theurer fulfils its legal obligation to prevent money laundering and expects the same conduct from its business partners. We call on every business partner to have unusual financial transactions in their own company or at Plasser & Theurer checked by the Compliance Officer, particularly, when such transactions involve cash and could give rise to the suspicion of money laundering.

Plasser & Theurer complies with the applicable tax legislation and issues invoices that specify the underlying transaction correctly to ensure that we do not participate in tax evasion or tax fraud. We expect the same conduct from our business partners.

To further improve on our leading position through our know-how, it is of the utmost importance that all business partners treat the company's property, intellectual property rights, and confidential information with particular care. This aims to prevent loss, theft, misuse, or damage. Plasser & Theurer's company assets are used to fulfil business objectives. The private use of company assets requires the express written consent.

Protection of intellectual property

Our business partners must protect the intellectual property of Plasser & Theurer and prevent its disclosure to unauthorised third parties. At the same time, Plasser & Theurer undertakes to respect trade secrets and the intellectual property rights of others. Our business partners comply with industry standards and supply products of high quality and original products (Original Equipment Manufacturer, OEM).

Information and data protection

Plasser & Theurer complies with data protection laws and regulations. We expect the same conduct from our business partners. Information and data obtained by our business partners in connection with their work must be treated as confidential. In the event that company information has to be submitted to third parties, a non-disclosure agreement is considered appropriate.

Protection of
company assets
and information

Compliance with the Code of Conduct and information about violations

Serious violations of this Code of Conduct, which can cause considerable damage to Plasser & Theurer, must be reported to the Compliance Officer and can result in consequences.

Any such report will be treated as confidential. Business partners who report possible violations in good faith need not fear consequences.

Should you need assistance in complying with this Code of Conduct, it is your responsibility to inform us accordingly. For assistance, please contact compliance@plassertheurer.com.



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