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CODE OF CONDUCT



part of



Code of Conduct of TREIBACHER GROUP

We, the executive boards of Treibacher Group's companies, maintain the core belief that compliance to strong ethical values is crucial in both private and business life. This includes showing fairness in the way we deal with each other and acting in accordance with established standards in our daily business life. We believe that since our customers' success is the key to us achieving sustainable, long-term business success and constant growth, it is clear that we must fulfill the requirements of all interest groups. As the members of the executive boards of Treibacher Group's companies, we are committed to our responsibility for ensuring a sustainable corporate strategy and its implementation. Integrity and also compliance with the law and ethical principles are key elements for safeguarding the authenticity of our company.

This „Code of Conduct“ defines how we conduct our business in an ethical and socially responsible manner. In combination with the respective management principles and the quality, safety and environmental guidelines, the Code of Conduct establishes standards and instructions that guarantee respectful and dignified treatment for our employees, safe working conditions and sustainable environmental practices. This document explicitly applies to all employees, managers, executive directors and board members of Treibacher Group.

This Code contains the following:

- how our management assumes its responsibilities,
- how we deal with our employees and colleagues,
- what behavior customers can expect from us,
- how we deal with our suppliers and
- how we behave in our dealings with communities and the environment.

Every manager and each and every employee is responsible for behaving in a manner consistent with the Code. The conduct of our managers serves as a role model because they exemplify the standards of conduct and endeavor to apply them in every situation.

Human rights

We respect and foster the dignity of all human beings and are committed to protecting and complying with international human rights. It goes without saying that we do not use any child labor and reject all forms of forced labor. We do not tolerate any working conditions that conflict with international or local laws and practices. We resolutely counter verbal abuses and harassment.

Discrimination

We do not use any form of discrimination against our employees on the grounds of ethnic origin, sex, age, marital status, religion or beliefs, disability, pregnancy, sexual orientation or membership of a union or political

party in matters of recruitment, compensation, training opportunities, promotion or dismissal and we naturally also require our employees to oppose any such discrimination.

Freedom of association and right to collective bargaining

As Treibacher Group's companies, we respect the right of all employees to join or leave associations or organizations of their choice for the purposes of promoting and protecting employees' interests, to work for and also to establish such associations or organizations and we abide by the corresponding agreements with collective representations of our employees in accordance with locally applicable laws and provisions. We fulfill collective minimum wage standards and transparently ensure the compliance with limits on working hours.

Motivation and training of employees

We consider motivated employees and their ability to identify with our company's goals a key factor in our success. Consequently, the respective management principles place special emphasis on furthering our employees. We focus on job-related training that is relevant to the company and on developing and furthering potential future managers.

Health and safety

We attach great importance to protecting the health and safety of our employees by providing a healthy and safe working environment. By complying with the safety regulations applicable within our company, each and every individual contributes to a safe and healthy working environment. Moreover, we offer our employees a voluntary health program together with training in all areas of relevance for health and safety.

Compliance with antitrust and competition legislation

Our high-quality products, innovative solutions and reliability allow us to be judged openly and fairly on global markets. Under no circumstances do we engage in illegal and/or criminal practices, such as bid-rigging, that exclude, distort or restrict competition.

Conflicts of interest and bribery/corruption

Management and employees avoid situations in which their personal or financial interests conflict with those of the company. In particular, they are prohibited from taking participating interests in companies of competitors, customers or suppliers or from engaging in business relationships with them in a private context if this would create a conflict of interests. Such a conflict always exists if the type and scope of a participating interest are likely to influence an employee's actions in any way when working for our company. Our management and employees clearly distance themselves from demanding

and accepting unjustified or illegal benefits that may influence business decisions or transactions. Similarly, when conducting all types of business transactions, none of our management or employees will offer, create or attempt to offer or create benefits to/for business partners, their employees and other third parties, or enter into corresponding agreement.

Safeguarding of assets and secrecy

It is expected that every individual will safeguard the company's tangible and intangible assets, treat business and operational secrets and also customer-related business information in confidence and comply with applicable principles on data protection. All employees adhere strictly to the applicable IT security guidelines.

Customers & Suppliers

As suppliers of our customers, we ensure, that all our products are fully and properly registered, labelled, packed and dispatched. We comply strictly with local customs and import laws, rules and procedures of government authorities. Likewise, we place high expectations on our suppliers and require that, when managing their businesses and in particular when dealing with employees, they abide by the same strict principles that we ourselves apply.

Environment & recycling

As a chemical and metallurgical company, we also have a responsibility toward nature. We protect our environment by operating state-of-the-art facilities. Every employee contributes to ensuring that high quality products are manufactured using processes that protect the environment. We conserve environmental resources by energy generation and resource extraction from secondary raw materials.

Corporate citizenship

We are deeply aware of our responsibility as a citizen of the communities in which our plants operate and are committed to open communication with all authorities and with social and public interest groups.

Due diligence along the supply chain

For us, the issue of sustainability goes beyond the boundaries of our own system. In this area, we rely on strong partnerships with our suppliers and customers. Long-term cooperation with all of our suppliers, and the establishment of sustainable relationships, are key concerns for us.

With respect to conflict minerals, we adhere to nationally and internationally recognized guidelines, such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

We have implemented the relevant requirements of the European Conflict Minerals Regulation (EU) 2017/821 establishing supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores and gold from conflict-affected and high-risk areas. Our Conflict Minerals Policy and Due Diligence Report are published on our corporate website for anyone who is interested.

Compliance

This „Code of Conduct“ has been approved by the board and executive directors of all companies and notified to all employees and management. Without exception, all management and employees comply with this Code when carrying out their work. Although more stringent or more detailed policies may apply to certain regions, countries or functions, such policies are in principle in compliance with these corporate principles. Questions concerning application or interpretation and also reports of potential violations should be addressed to the relevant supervisor. Conduct, practices or actions that are in conflict with this Code must be rectified and will be subject to disciplinary measures.

For the management:

Rainer Schmidtmayer & René Haberl
Board members of Treibacher Industrie AG

Ingomar Rogler & Katharina Kumerschek
Executive directors of Mittlere Gurk Immobilienbesitz- und
Infrastrukturdienste GmbH

Gudrun A.Lassnig & Josef Miklautsch
Executive directors of Evonik Treibacher GmbH

Stefan Greimel & Rainer Schmidtmayer
Executive directors of Tribotec GmbH

Wolfgang Eisenberg & Dominik Uhlich
Executive director of Leuchtstoffwerk Breitung GmbH

Companies of Treibacher Group

TREIBACHER INDUSTRIE AG

Auer-von-Welsbach-Strasse 1
A-9330 Althofen, Austria, Europe
phone +43 (0) 4262 505-0
fax +43 (0) 4262 2005
treibacher@treibacher.com
www.treibacher.com



MITTLERE GURK IMMOBILIENBESITZ- UND INFRASTRUKTURDIENSTE GMBH

Auer-von-Welsbach-Strasse 1
A-9330 Althofen, Austria, Europe
phone +43 (0) 4262 505-0
fax +43 (0) 4262 2005
treibacher@treibacher.com



EVONIK TREIBACHER GMBH

Auer-von-Welsbach-Strasse 1
A-9330 Althofen, Austria, Europe
phone +43 (0) 4262 505-574
fax +43 (0) 4262 505-406
etg@treibacher.com
www.evonik-treibacher.com



TRIBOTECC GMBH

Headquarters:
Industriestrasse 23
A-9601 Arnoldstein, Austria, Europe
phone +43 (0) 4255 21200
fax +43 (0) 4255 2092
office@tribotecc.com
www.tribotecc.com

Office:
Fleischmarkt 3-5
A-1010 Wien, Austria, Europe
phone +43 (0) 1 512 5611-0
fax +43 (0) 1 512 7839
office@tribotecc.com



LEUCHTSTOFFWERK BREITUNGEN GMBH

Lange Soemme 17
D-98597 Breitungen, Germany, Europe
phone +49 (0) 36848 840
fax +49 (0) 36848 8490
info@leuchtstoffwerk.com
www.leuchtstoffwerk.com

