

CODE OF CONDUCT

OF TREIBACHER GROUP

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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 stakeholders. 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. To improve readability, gender-neutral wording is used throughout this document. This document explicitly applies equally to all employees, board members, executive directors, corporate bodies and managers/leaders of the 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 promote the dignity of every person and are committed to protecting and upholding international human rights. It goes without saying for us 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 oppose verbal abuse and bullying.

DISCRIMINATION

We do not use any form of discrimination against our employees on the grounds of ethnic origin, sex, age, marital status, religion or belief 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

The Treibacher Group stands for integrity, fairness, and

transparency. Corruption, bribery, and any form of improper granting or acceptance of advantages are strictly prohibited. Employees must avoid conflicts of interest and must not allow their decisions to be influenced by private benefits.

GIFTS AND INVITATIONS

- Small promotional items of minor value (e.g., pens, calendars) and occasional, non-regular gifts of up to EUR 60 per occasion are permitted, as are appropriate customary business hospitality events.
- Benefits that, individually or in total over a 12-month period from one giver, reach a value between EUR 60 and EUR 250 are permitted only with approval from the HR department; anything above this threshold is prohibited. If prior approval from HR is not possible but refusing in a social situation is not reasonable, a corresponding report must be made to the HR department without undue delay; HR will decide on the further handling of the benefit.
- Benefits that, individually or in total over a 12-month period from one giver, exceed a value of EUR 250, as well as cash, vouchers, or stored-value/gift cards, are always prohibited.
- Employees in purchasing, tendering/awarding, or procurement may not accept any gifts or invitations, except for individual low-value promotional items or appropriate customary business hospitality.
- Responsible office: Head of the HR Department, Treibacher Industrie AG. Email for notifications: ethik@treibacher.com (HR@treibacher.com)

Dealings with public officials are subject to particularly strict rules: granting advantages is generally prohibited. Only low-value tokens permissible by law are allowed, never with the aim of influencing decisions.





DONATIONS AND SPONSORING

- Donations may be made only to non-profit organizations with a clear, verifiable purpose.
- Sponsoring is permitted only if there is a clear consideration in return (e.g., advertising services).
- Political parties, organizations, and elected officials must not receive any benefits whatsoever.

COOPERATION WITH THIRD PARTIES

When engaging intermediaries, consultants, or partners, special care applies: services must be clearly defined, compensated at market rates, and governed by contract. Payments to offshore or non-transparent / non-traceable accounts are prohibited.

BINDING NATURE AND TRAINING

These rules form part of the „**Code of Conduct**“ and are binding for all employees. Regular training sessions address typical risk situations and practice correct behavior.

WHISTLEBLOWER SYSTEM

Suspected cases or violations can be reported via treibacher.integrityline.com - also anonymously - and are handled by an independent body. All reports are treated confidentially and in accordance with legal requirements.

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

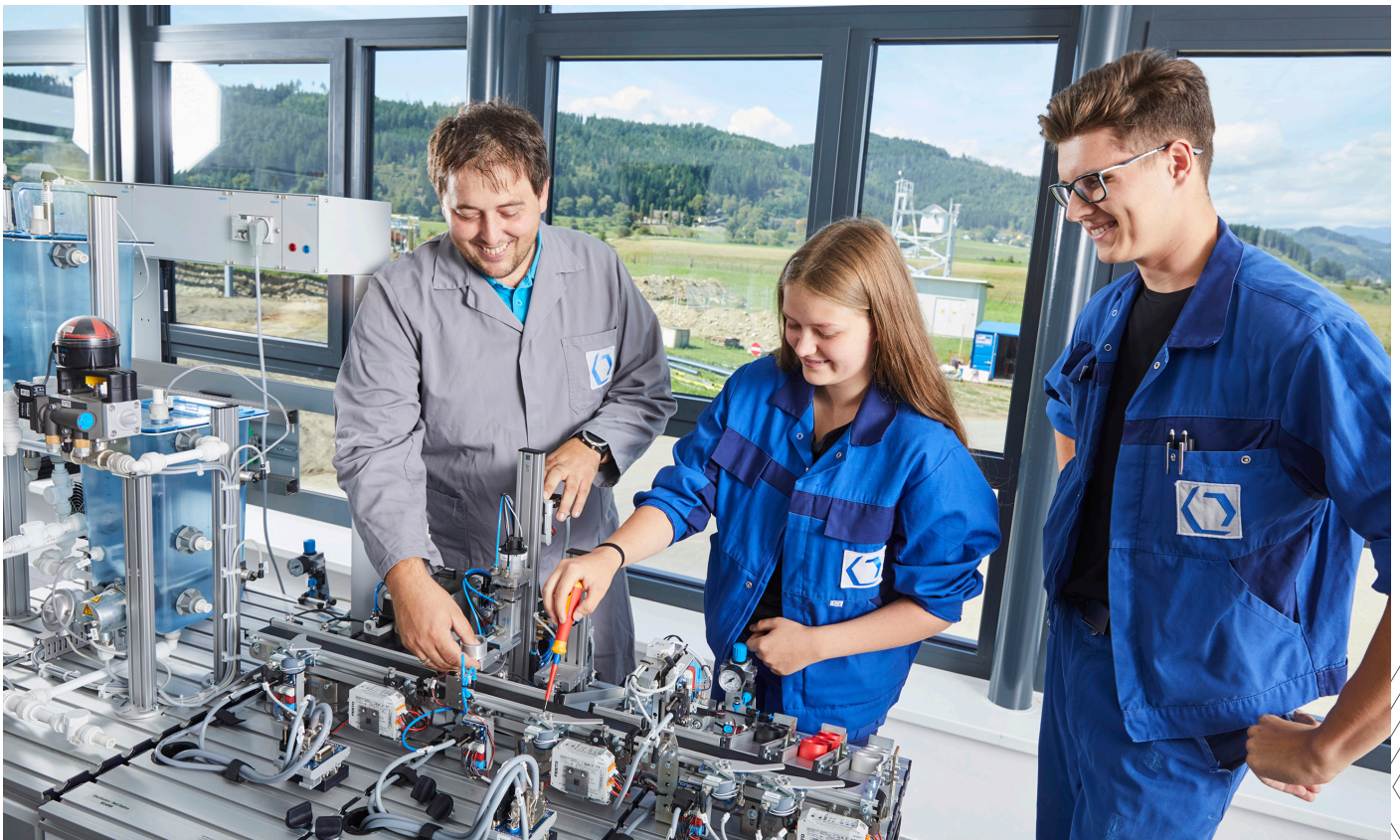
For us, sustainability extends beyond the boundaries of our own system. We rely on strong partnerships with suppliers and customers. One of our main concerns is to establish and maintain long-term relationships with all our suppliers.

With regard to conflict minerals, we follow nationally and internationally recognised guidelines, such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We are implementing the requirements of the European Conflict Minerals Regulation (EU) 2017/821, which lays down supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores, and gold originating from conflict-affected and high-risk areas. Our policy regarding conflict minerals and the due diligence report are published on our company website for the interested parties.

COMPLIANCE

The present „**Code of Conduct**“ has been approved by the executive board of each company and has been brought to the attention of the management and all employees. Management, directors and employees must comply with this Code without exception in the performance of their duties. Stricter or more detailed guidelines may apply to certain regions, countries or functions, but these must always be consistent with these corporate principles. Questions regarding the application or interpretation of this Code, or reports of potential violations, should be directed to the appropriate line manager.

We promote a culture of openness in which reports of any behaviour that may be inconsistent with the values of this „**Code of Conduct**“ are expressly welcomed. All reports, whether made by employees, suppliers or other stakeholders, will be treated confidentially and investigated carefully. Procedures, practices or actions that are inconsistent with this Code will be dealt with consistently and appropriately.



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