

A series of blue and red geometric lines forming a stepped, abstract shape on the left side of the page. The blue lines create a large, irregular polygon, while a red line forms a smaller shape at the bottom left.

# Supplier Code of Conduct

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# Preface

We at TEUFELBERGER act and live by principles of conduct based on a vision. Sustainability should not only be practiced within the enterprise but should be viewed as a holistic concept. Thus, sustainability should also be front and center in the procurement of our purchased materials and services.

We strongly believe that it is in the mutual interest of ourselves and our business partners to live up to the present and future requirements of our markets and society.

This Code of Conduct submitted by TEUFELBERGER is an appeal to our suppliers to assume responsibility in terms of observing human rights, occupational safety, and environmental protection, and a non-negotiable minimum standard forming the basis of our business relationship.



Mag. Florian Teufelberger  
CEO





## Social measures and principles

This Code of Conduct for suppliers and business partners is based on social, ecological, and ethical standards and principles.

### 1. Human rights

We expect our suppliers and business partners to observe and protect the globally applicable provisions on the protection of human rights as fundamental and universal guidelines.

- » No child labor
- » No human trafficking
- » No forced or illegal labor
- » Compliance with minimum-age provisions

### 2. Humane workplace

We support the right to good and fair working conditions. All suppliers must ensure a safe work environment that meets the requirements of national regulations and laws. As a minimum, we expect:

- » No discrimination because of skin color, sex, sexual orientation, age, religion, national origin, disability, or any other legally protected status
- » No harassment or abuse
- » Freedom of association and collective bargaining, including the right of employees to unionize and to bargain collectively
- » Creation of competitive and fairly-paid jobs
- » Working hours in compliance with national laws
- » Overtime on a voluntary basis, with due compensation





## 1. Environment

We protect the human and natural environment by utilizing resources efficiently, by taking measures to prevent environmental pollution, by promoting recycling, and by using natural resources in a sustainable way. As a minimum, we see to it that pertinent national and international environmental laws are observed, and we monitor and ensure compliance with them.

Therefore, suppliers must define measures and goals with a view to:

- » reducing waste,
- » reducing emissions in the air, ground, and water,
- » reducing energy consumption,
- » handling chemicals in an environmentally compatible way,
- » eco-friendly handling, storage, and disposal of hazardous waste,
- » contributing to the recycling and reuse of materials and products.



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# Ecological measures and principles / sustainability

## 2. Ecological design of products

We expect active cooperation and research in accordance with the principle of a circular economy. Products and product packaging must be designed in such a way that they comply not only with national and international laws, but also with the guidelines of Proposition 65. Product developments and improvements towards a closed-loop recycling management are welcome.

We are committed to sustainable work processes based on clearly defined objectives and provisions. We support our suppliers in their own evolution in terms of sustainability and search for common solutions with a positive impact. We expect them to act sustainably by contributing positively towards the efficient utilization of resources, the minimization of material and product waste, the promotion of recycling, and the optimization of transport requirements.

### 3. Health and safety

The supplier is obligated to create a safe and healthy work environment to prevent accidents, injuries, and illnesses. Moreover, hazardous materials, chemicals, and substances must be identified, and safe handling including transport, storage, recycling, and disposal must be ensured.



We are committed to working sustainably  
by setting clear goals and targets.

#### 3.1 Protection and training of employees

A safe corporate environment includes the identification and prevention of all physical accidents involving employees and the minimization of health risks caused by chemical or biological hazards, as well as all other risks related to the infrastructure used.

Through the following measures, among others, all employees must be sensitized and trained in matters of safety and health protection:

- » Regular training and updates for employees: sensitization to and improved understanding of safety at work
- » Hazardous materials: provision of safe storage locations for all hazardous materials and performance of training regarding the hazardous substances used
- » Preparation for emergencies and response thereto: identification of possible emergency situations (depending on the site) and implementation of emergency plans and procedures including fire prevention
- » Maintenance: regular and proper maintenance of all machinery and training of maintenance personnel with regard to updated / modified machines

#### 3.2 Product safety

All products and services must meet the statutory requirements as well as the quality and safety criteria defined in the pertinent agreements / order documents.

The Supplier undertakes to:

- » implement the promised quality and service,
- » provide for hygiene and product safety within its supply chain,
- » use raw materials of known origin, with both raw materials and finished goods being traceable,
- » ensure that all products delivered are safe for people and the environment.

### 4. Conflict materials

We expect our suppliers and business partners to ensure, through appropriate measures, that no raw materials extracted or grown in areas of conflict or high-risk areas, or raw materials financed by armed groups violating human rights, are used for their products.

### 5. Compliance with the REACH Regulation

We expect our suppliers and business partners to register chemical substances in the central database of the respective REACH authority (Registration, Evaluation, Authorisation and Restriction of Chemicals).

# Ethical measures and principles

## 1. Confidentiality

The supplier must disclose any financial and non-financial information in accordance with the applicable statutory provisions and the prevailing industry practices and, where applicable, provide information about its workforce, health and safety practices, environmental practices, business activities, and products and services in compliance with the applicable rules and regulations.

We expect our suppliers and business partners to observe all applicable laws regarding the protection of personal data of employees, customers, suppliers, and other parties concerned. Moreover, the know-how, patents, company and trade secrets belonging to TEUFELBERGER or other third parties shall be respected.

## 2. Intellectual property

The supplier shall introduce and maintain appropriate procedures to respect and protect the intellectual property and copyrights of other business partners.

## 3. Import and export controls

The supplier must establish procedures to ensure compliance with any applicable export controls and sanctions, laws and regulations of all relevant countries. These laws and regulations provide for restrictions regarding the export or re-export of goods and services to certain countries of destination, as well as prohibitions concerning transactions with certain countries, regions, or even persons that are subject to restrictions.



Trust.  
Respect.  
Protect.

## 4. Corruption, extortion, bribery, money laundering

We expect our suppliers and business partners to respect, support, and observe national and international endeavors to this effect. In particular, they shall ensure that their employees, subcontractors, and representatives do not pay, offer, or take any bribes, payoffs, inadmissible donations, or other inadmissible payments or advantages to or from customers, officials, or other third parties.

We expect our suppliers and business partners to observe the pertinent statutory obligations regarding the prevention of money laundering.

## 5. Legal requirements

We expect our suppliers and business partners to act ethically and fairly in carrying out their business operations, to comply with all international, national, and local laws and regulations applicable to their business operations, and to obtain all necessary approvals.



## 6. Competition

We expect our suppliers and business partners to act fairly in competition and to abide by the applicable antitrust laws. Our suppliers and business partners shall refrain from making any agreements with competitors violating antitrust legislation, and from unduly benefitting from any potential dominant position.

## 7. Conflicts of interests

We expect our suppliers and business partners to make their decisions exclusively on the basis of objective criteria and to not be influenced by personal interests or relationships.



## General responsibility

We expect our suppliers to pass these requirements on to their suppliers and to adequately monitor compliance therewith. Where applicable, a corresponding document of the supplier may replace or complement our Supplier Code of Conduct, if

- » such document is a formal and controlled document,
- » such document covers all requirements stipulated in this Code of Conduct,
- » such document is shared with TEUFELBERGER representatives.

## Confirmation of the supplier or business partner

Herewith, the supplier declares as follows:

1. We have received a copy of the TEUFELBERGER Supplier Code of Conduct and undertake to observe the principles contained herein.
2. We agree that this declaration is subject to the substantive laws of Austria excluding the conflict of laws rules.

Confirmation

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Supplier

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Name, position

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Date, place

Signature & stamp