

Date: 19.12.2023

CODE OF CONDUCT

1. WHO WE ARE:

From carriage to space travel

The history of Gföllner dates back to the 19th century. In 1895 the foundation for the company as it is today has been laid. The farrier and cartwright establishment has grown into an international company.

We are proud to be part of this history.

Gföllner is firmly established in Upper Austria and is constantly expanding its capacities. The education, hard work, and creativity of the people who live here make this worldwide success possible!

2. WHAT WE DO:

Made-to-measure work with a future

Our continual customer focus and our decades-long experience make us a strong and reliable partner.

As specialists in our field, we offer our clients first-class and high-value products, which are tailored to their needs, to not only fulfil their requirements, wishes and expectations, but to exceed them.

Our solutions stand out due to individual and precise conception, with comprehensive and personal consultation and on-time delivery. Because we are only satisfied when our customers are satisfied.

3. HOW WE WORK:

Code of Conduct

Gföllner is aware of its social responsibility. In addition to a sustainable growth, Gföllner set its prime objective to implement and meet the following eco-social aspects. We demand that these aims are met by all of our stakeholders—that is to say our employees as well as our business partners customers, suppliers, and distributors—who are hereinafter referred to as Partners.

1. Human rights

1.1. Prohibition of child labour and forced labour

Our Partners are obligated to adhere to the recommendations of the International Labour Organization, especially to the recommendations on the minimum age of employees or the employment of children. In any case, this minimum age must not be less than 15 years.

In every phase of the employment, each employee has the right, in consideration of an appropriate period of time, to terminate the employment. It is not allowed to demand an ID, passport, work permit or residence permit of the employees as prerequisite of an assurance of employment.

1.2. Diversity and prohibition of discrimination

Discrimination of employees is not permissible. Gföllner always ensures that all employees have the same opportunities regardless of their gender, skin colour, disability, union membership, political opinion, origin, religion, age, pregnancy or sexual orientation.

2. Health and safety policy

2.1. Health and safety

Gföllner's highest priorities are occupational safety and health protection of the employees as well as the safety at sites including its buildings and facilities.

The safety and health management system of Gföllner is an integral part of the entire management system and is regularly inspected and constantly improved.

Our business partners, suppliers, and customers, who stay due to business-related matters at our site, are also obligated to adhere to the guidelines of the safety and health management concept of Gföllner.

In each phase of the production chain, we expect from our Partners adherence to occupational safety and health protection at work site, at least within the bounds of the national regulations.

2.2. Company health management

Besides the inspection of work practices, equipment and materials required for work, voluntary external audits are used to observe the physiological and psychological impacts of the working processes on the employees. Appropriate measures shall be taken and the employees shall be trained accordingly. This minimizes the risks and reduces accidents, occupational diseases as well as health-related disabilities on a constant basis. A commission for health and safety with **representatives** of the **employees and employers** is an **essential part** of Gföllner's health and safety policy.

In addition, employees are trained on a constant basis regarding risks, stress and noise exposure at work. This reinforces the employees' personal responsibility towards their own health and the health of their colleagues.

Possible negative physiological and psychological impacts on employees shall be counteracted proactively by a continuous employment of a company doctor. Within the framework of this measure, medical examinations shall be carried out in order to detect occupational diseases early on and ensure the employees' capacity to work. This control measures shall be observed continuously on its effectiveness.

2.3. Personnel policy

2.3.1. Onboarding

The selection, acquisition and integration of new employees are central factors in Gföllner's success. A transparent recruiting process creates an open, transparent and performance-orientated recruitment procedure for all candidates and guarantees equality of opportunity for all applicants.

The personnel selection is of importance for a long-term, sustainable company development and, therefore, belongs to the top management level.

The following behaviours are in the centre of attention at Gföllner: result-orientated working, efficient team work, innovative leadership and constant improvement, external customer-orientated focus, and acting responsible and on one's own authority.

Furthermore, Gföllner opts for a transparent and fair leadership style as well as a transparent system of remuneration that complies entirely with the collective agreement and legal requirements.

2.3.2. Personnel development and remuneration

The long-term education of apprentices and students reinforces the employee-employer relationship and allows the employees to develop their behaviour, competences and skills according to their individual strengths.

A regular evaluation of the employees via their direct superiors results in development of individual skills, pursuit of an individual career plan and creation of an individual and transparent remuneration policy. Internal mobility plans, training plans and the reduction of the individual workload are amongst other things the subjects of these meetings and shall be discussed in detail.

In order to ensure a work-life balance, agile working models, high flexibility of work organization as well as flexibility in terms of space and time are in the centre of attention at Gföllner. Individual models regarding working hours, working place and consideration of the employees' personal needs as well as an individual holiday scheduling have been

implemented to make it possible for the employees to individually perform their tasks for Gföllner and deliver the best possible performance for our Partners.

2.4. Compliance with law and social partner agreements

Gföllner obliges itself and expects of its Partners to inspect the compliance with the legal regulations on a regular basis. Gföllner has implemented the conditions and requirements of the collective agreement of the iron and metal producing and processing industry in its entirety.

A system of cooperation and social partnership, and inclusion of staff council and representatives of employees maintain a structured and constructive relationship between the employers and employees.

2.5. Risk management and information safety

Gföllner protects company and production facilities as well as data and intellectual property from unauthorized access, and from loss of company-relevant data including data from Partners.

The access to buildings and internal information is subject to a strict set of rules and regulations. In order to prevent possible damage, risks are analysed continuously and suitable measures are taken. The effectiveness of these measures is checked regularly.

Constant trainings of acting employees strengthen the information safety and increase the sensibilization regarding potential violations of information safety and data protection.

3. Environmental standards

3.1. Environmental responsibility

Within the framework of responsibility for sustainability, Gföllner focuses on the selection of strategies, processes and undertaking of the day-to-day business activities. These responsibilities also apply to our Partners. We demand ecological responsibility and compliance with international environmental standards along the entire value chain of our suppliers, subcontractors, and customers.

3.2. Environmentally friendly products and production

Gföllner guarantees an appropriate level of environmental protection during all phases of production. Negative consequences for the environment caused by accidents or ongoing production processes shall be avoided and minimized, and potential sources of danger shall be constantly analysed.

We oblige our suppliers to comply with environmental standards of the respective market segment and the international valid environmental standards during the manufacturing of products along the supply chain. This includes all materials and substances used during the production process.

4. Business ethics

4.1. Anti-corruption policy

Gföllner has a zero-tolerance policy towards violation of compliance and business ethics. Gföllner demands the maximum amount of integrity in all business activities and relationships. Corruption, bribery, the granting of an undue advantage and embezzlement in any form is strictly forbidden and has to be reported immediately.

The superior or the management has to be informed immediately if a Partner is suspected of money laundering. Partners need to undergo a risk assessment at the beginning of the business relationship.

Monitoring procedures, internal control systems and awareness-raising among acting persons in relevant company divisions help to expose potential corruption or bribery attempts.

4.2. Gifts, hospitality, invitations

The decisions of Gföllner's employees as well as Partners must not be influenced by acceptance of favours. Employees are only allowed to accept invitations to hospitalities within the ordinary course of business. Employees are strictly forbidden to accept or offer gifts, regardless of their value.

4.3. Conflict of interest

If conflicts of interest arise in the day-today business during the pre-contractual phase or completion of supply or service contracts with suppliers, customers and other business partners, the superiors or the responsible management must be informed immediately.

5. Information/communication

All Partners shall adequately communicate this Code of conduct within their facilities as well as their international facilities.

The content of this Code of conduct is available on our www.gfoellner.at.