

Montanwerke Brixlegg AG (Montanwerke), its employees and business partners hereby declare that they will comply with the applicable national and international laws and regulations. The following Code of Conduct (CoC) describes the additional values that Montanwerke embodies and the behavior expected from employees and business partners. Everyone is responsible for adhering to and representing the rules and values of the CoC. Non-compliance with the provisions of this Code of Conduct may result in disciplinary action by Montanwerke.

For better readability, gender-neutral terms are used. All personal designations apply equally to all genders.

COMPLIANCE WITH LAWS

We always operate in accordance with the laws and legal systems applicable in the countries where we conduct business.

BUSINESS ETHICS

Our goal is to conduct our company and business with exemplary ethics.

HUMAN RIGHTS AND SOCIAL JUSTICE

HUMAN RIGHTS

We support and respect the protection of internationally recognized human rights. We ensure that our business practices do not violate human rights.

FORCED LABOR

We do not tolerate forced labor. This includes contracts made under duress, illegal work or methods that restrict the freedom of employees. No one should be forced to work against their will.

CHILD LABOR

We do not tolerate child labor. The minimum employment age is the age at which compulsory schooling is completed, never under 15 years. In countries that fall under the exception for developing countries in ILO Convention 138, the minimum age may be reduced to 14 years.

DISCRIMINATION

We treat people with respect. Discrimination, physical or verbal harassment and threats are not tolerated.

All employees have equal opportunities for work and training based on their skills, experience and performance.

FREEDOM OF ASSOCIATION

We respect the applicable national law of all employees to join a union to protect their interests as workers, to organize and to negotiate their wages collectively or individually.

WORK ENVIRONMENT AND SAFETY

We strive to be an attractive and respected employer. We aim to provide a good work environment, both physically and socially, and to promote the personal development of our employees.

We take responsibility for the health and safety of our employees and continuously work to mitigate risks and ensure the best possible preventive measures against accidents and occupational diseases. Mandatory occupational safety training is provided for all employees, visitors and external service providers at the company site.

WORKING AND EMPLOYMENT CONDITIONS

The working and employment conditions, including remuneration, working hours and social benefits, must meet the minimum requirements of national legislation and agreements with national unions.

ENVIRONMENTAL PRINCIPLES

Environmental protection must be in accordance with legal requirements and international standards, minimizing environmental impact and continuously improving environmental protection.

RESOURCE EFFICIENCY AND CIRCULAR THINKING

We design products and processes to use energy, natural resources and raw materials efficiently and with the aim of minimizing waste.

BUSINESS PRINCIPLES

IT SECURITY AND DATA PROTECTION STANDARDS

Employees must ensure that company information of any kind and IT devices are securely stored and protected from third-party access. IT devices must be password-protected to the extent technically possible. Personal passwords must not be shared with other employees or third parties. Personal data is being protected against loss, destruction and unauthorized access.

PROHIBITION OF CORRUPTION, BRIBERY, MONEY LAUNDERING

We do not tolerate any form of fraudulent practices such as corruption, money laundering or bribery. We do not accept illegal payment offers or benefits to individuals or companies to influence decision-making.

Employees must not accept payments, gifts or other financial rewards from third parties that could influence the objectivity of business decisions or be perceived as such.

All relevant processes are designed to actively prevent and counteract money laundering or involvement in it.

We do not conduct business with partners suspected of violating our anti-corruption rules.

TAXES

In all countries where we conduct business, we comply with the tax laws and regulations of the respective country. If the tax legislation does not provide clear guidelines, we are guided by the basic principles of our CoC.

FAIR COMPETITION

We act fairly and with integrity. We do not exchange information, conclude contracts or make agreements with competitors, customers or suppliers that could unduly influence the market or the outcome of a bidding process.

CONFLICTS OF INTEREST AND INSIDER TRADING

If a conflict of interest arises between private and professional activities, the situation must be reported to the appropriate management level, and the conflict of interest must be resolved ethically.

Individuals with access to insider information of compliance-relevant information must not engage in insider trading and must ensure the appropriate confidential handling of the information.

GOVERNANCE

The leadership team is responsible for ensuring that daily work throughout the company is conducted in accordance with the CoC.

WHISTLEBLOWER SYSTEM

All employees and business partners are encouraged to report suspected violations of the CoC directly to supervisors or through the whistleblower system.

Suspected violations must be able to be reported anonymously at any time through the whistleblower system on the company website or the intranet of the company. No penalties or other negative consequences will be imposed on individuals who report potential violations of the CoC.

The CoC was written in German and then translated into English. The document was approved at a board meeting of Montanwerke Brixlegg AG. Deviations from this CoC require approval from the board of Montanwerke Brixlegg AG.