Compliance Management
Code of Conduct
10/25

SWIETELSKY

EN

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The Compliance Management System of SWIETELSKY is subject to regular audits by an external organisation. Swietelsky AG and its subsidiaries have been certified by Austrian Standards in accordance with the definitive ISO standards ISO 37301 "Compliance Management System - Antitrust Law" and ISO 37001 "Anti-Corruption Management System - Anti-Corruption" since the beginning of 2022. These internationally recognised certificates are proof of the highest quality attributes of Swietelsky's compliance management.

We work for people.
We shape the future.
We are part of the solution.
Building ever better.

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Foreword

Dear Sir or Madam,

SWIETELSKY is a leading construction company in Central and Eastern Europe with the driving force of around 12,000 employees, more than 3.4 billion euros in sales and a decentralised organisational structure. We are an international player, a national winner, and a local champion. For around 90 years, our development has been characterised by sustainability and sound prosperity, so that the Group today offers its entire range of construction services with the highest quality, flexibility and adherence to schedules.

The positive development of the company is the result of the willingness of the employees to continuously grow and accept challenges with a view to the future. In the same way, we also face up to new legal frameworks and ethical standards in order to maintain our good reputation as a reliable, competent and law-abiding partner.

Fairness, respect, and integrity within the company as well as towards clients and competitors set us apart.

For this legally, ethically and morally impeccable conduct, we have drawn up a Code of Conduct as a guideline, which forms a central element of our certified compliance management system (certified according to ISO standards 37301 and 37001). Compliance with the principles set out therein applies to all employees at Swietelsky, regardless of their position. Undoubtedly, our conduct in our daily professional life is one of the most important factors influencing the company's reputation. Each individual is therefore required, in his or her own interest, to take the following principles into account, thereby ensuring joint economic success.

The Management Board

DI Dr. Peter Krammer
CEO

Harald Gindl, MBA
CFO

DI Klaus Bleckenwegner
COO International

August Weichselbaumer
COO Austria

Principles

This Code of Conduct is a document applicable to all employees of the Swietelsky Group (“SWIETELSKY”) and establishes the framework for legally, ethically and morally impeccable behaviour. SWIETELSKY observes national laws and international conventions, in particular the United Nations Universal Declaration of Human Rights, the European Convention for the Protection of Human Rights and Fundamental Freedoms and the standards of the International Labour Organization (ILO). The Code of Conduct reflects SWIETELSKY's commitment to the principles of the UN Global Compact and the achievement of the Sustainable Development Goals (SDGs).

This Code of Conduct is also the basis for other internal regulations in the Group and its companies, branches and factories.

Further policies or internal regulations should therefore substantiate or extend this Code of Conduct. Management at all levels are called upon to inform themselves and their employees of the content of this Code of Conduct and the other internal policies and to ensure compliance therewith.

It may be that additional regulations are required to take country-specific characteristics into account. Should supplementary regulations therefore be required in the respective country, these must in no way be contrary to the principles of this Code of Conduct.

Scope of application

This Code of Conduct applies to all employees of SWIETELSKY without any exception. Every new employee will also be familiarised with this Code of Conduct and be obliged to observe it.

The Code of Conduct can be accessed on the intranet by all employees. If employees detect violations or should questions arise in certain circumstances, they should contact their superior in confidence or, if necessary, the Local Compliance Officer (LCO) responsible for them or the Chief Compliance Officer (CCO) responsible for the Group as a whole.

All reports and queries will be dealt with in the strictest of confidence and examined carefully. The specific steps for reporting infringements of rules are described in a later chapter of the Code of Conduct.

It also applies to any companies in which Swietelsky AG has a direct or indirect controlling interest of at least 50%. In the case of other SWIETELSKY participating interests where, due to the ownership structure, no controlling influence can be exercised and a comparable set of rules to this Code of Conduct does not already exist, the implementation and effectiveness of the Code will be insisted upon within the existing decision-making structures.

The conduct of SWIETELSKY's business partners is subject to the Code of Conduct for Business Partners of Swietelsky AG and its affiliates ("Business Partner Code of Conduct"). In this document, the principles of social and ecological responsibility for cooperation within the value chain, which have always been important to SWIETELSKY, are laid out in writing for the entire Group.

Compliance and corporate policy

Responsibility towards supervisory and regulatory authorities

I. We are law-abiding

Complying with regulatory requirements

Complying with regulatory requirements

We act according to ethical principles and adhere to prevailing statutory regulations and policies. In all business processes and decisions, we strictly observe and comply with all applicable laws, standards, and practices of every country in which SWIETELSKY operates. We are obligated to familiarise ourselves with the legal regulations applicable to our area of responsibility, to seek written legal advice in cases of doubt, and to comply with said regulations.

SWIETELSKY is currently active in many European countries as well as in Australia. Our activities in these countries are subject to the widest variety of legal and political systems as well as cultural and social practices. Infringements of prevailing legal systems can lead to massive consequences, beyond calculation at the time of the infringement. Considerable penalties and compensation for damage resulting from an unlawful action may not only affect our company in material terms but may also be accompanied by reputational damage, which can lead to further negative economic consequences.

Breaches of criminal law provisions are among the most serious infringements of the legal system and generally have the most serious impact on corporate behaviour. Illicit behaviour, therefore, is not tolerated in business and especially not in our corporate culture.

Responsible business conduct does not end at the limits of criminal law, but rather far sooner. Common sense is often sufficient to determine whether conduct is lawful. We can always count on the support of our superiors if we have any doubts or uncertainties. We also have the support of contact persons in commercial administration as well as various staff units contributing their respective expertise. Additionally, our Local Compliance Officer (LCO) or the Chief Compliance Officer (CCO) responsible for the Group as a whole is available to us.

We bear in mind during our business activities and dealings that unlawful (or criminal) conduct can also seriously damage our personal integrity, our reputation and career as well as our personal and family circumstances. The consequences of infringing internal policies and legal provisions, but also moral and ethical standards, therefore not only damage the company, but also ourselves in a very personal way. Disciplinary and/or legal measures are always implemented in such cases.

We at SWIETELSKY...

... ensure that our actions are in line with the laws and practices of the respective countries.

... contact our superiors or contact persons if we have any doubts.

... avoid unlawful or criminal behaviour, since this may jeopardise both SWIETELSKY and our personal integrity.

... realise that SWIETELSKY's success is based on reliability, a sense of responsibility, and lawful conduct.

II. We see taxes as a social responsibility

Taxes and financial responsibility

A functioning tax system is a basic prerequisite for managing social, economic, and societal challenges in a country. We are committed to our obligation to make our contribution and therefore adhere without exception to the tax and fiscal laws and regulations.

Just like any other taxable entity, our company is also subject to continuous and comprehensive (financial) regulatory inspection. Suspicions relating to customers, subcontractors, suppliers and other business partners can also prompt cross-checks in our company.

Tax and subsidy fraud are neither trivial offences nor a competitive advantage. They cause billions in damage every year and contribute to states not being able to fulfil their tasks or only being able to do so inadequately. Companies that rely on public contracts feel this directly in the reduction of public tenders. Tax evasion therefore not only threatens the existence of companies, but also the jobs of their employees.

Of course, we do not contribute to or assist tax evasion in any way. All services we provide must be performed properly under tax law and we offer nobody the possibility of gaining an illegal tax advantage through improper practices.

We at SWIETELSKY...

... ensure that all services are correctly invoiced and properly accounted for under tax law.

... accept no orders for which incorrect or incomplete invoices are requested.

... immediately report any suspected tax law breaches and ensure that all transactions remain transparent and traceable to ensure the integrity of SWIETELSKY.

Responsibility towards stakeholders

III. We accept neither corruption nor bribery

Anti-corruption and anti-money laundering

We, as employees and authorised representatives of the company, commit ourselves not to grant, either directly or indirectly, any improper advantages or benefits to business partners, or to solicit such advantages in the course of business, if this is intended to unduly influence business transactions or could even create the mere impression of such influence.

Payments made to advisors or intermediaries for services actually rendered must always be proportionate to the services provided and must be documented in a transparent and comprehensible manner. Improper commissions must neither be agreed nor paid, let alone be accepted.

Corruption and bribery - i.e. giving money or non-cash benefits with the aim of influencing decisions - are not acceptable to us. These practices hamper free and fair competition. We place great importance on the quality of our services, our ability to honour contracts and deadlines, fair competitive prices, and the reliability and outstanding qualifications of our employees so that we can hold our own against the competition.

Accordingly, we engage in fair competition by these means and strictly reject bribery and corruption that could improperly distort such competition.

It is therefore forbidden for each and every one of us to offer or grant benefits to third parties, either directly or indirectly, in any form whatsoever, if this could even create the impression that a business decision is being improperly influenced or that such a grant is being made for this purpose. This is also the case if a benefit intends to influence a decision-maker in performing his or her duties or to reward a wrong decision.

This also applies to the reverse case: If a SWIETELSKY employee is offered a benefit in order to encourage certain behaviour. The active or passive granting of money or monetary benefits to employees of companies, as well as to public officials and public servants, constitutes a particularly serious offence and is therefore strictly prohibited.

We at SWIETELSKY...

... do not make any payments to public officials or public servants for the purpose of influencing their activities or controlling the awarding of contracts.

... do not grant or accept gifts, hospitality or invitations to trips or events that are inappropriately generous, that do not comply with standard business practices or that exceed the business context.

... do not give cash or gifts that could create the impression that they are intended to influence decisions.

... do not issue discounts that are not available to all employees.

... seek the approval of our superiors if the value of a gift exceeds EUR 100 or if there is any doubt as to whether it is appropriate.

Donations and sponsorships

We at SWIETELSKY are acutely conscious of the fact that it is difficult to realise cultural, social and humanitarian projects without donations or sponsorship. Funding for selected events, as well as support of aid organisations and charitable institutions is a societal concern for us.

We regard contributions in the form of donations as a way of supporting organisations or institutions so that they can continue their work. No return service is required or expected. Our donations are used solely for the promotion and support of these organisations and their activities.

We ensure, for example, that the list on the website of the Federal Ministry of Finance is consulted when making donations in Austria. This list includes all donation-eligible institutions or organisations that are explicitly mentioned in the Income Tax Act (EStG) pursuant to Section 4a para. 1. These institutions are essentially the same as the organisations we consider worthy of support. We always align our donations with the principles of proportionality and reasonableness.

We refrain from making donations to political parties, party-political advocacy groups or individual politicians, be it directly or indirectly. No donations may be made to events organised by politicians.

We distinguish between donations and sponsorships. We use the term sponsorship to refer to donations aimed at advertising or image cultivation. In this context, organisers of sporting, cultural, charitable or other events are given financial support by SWIETELSKY in exchange for which our company receives advertising services. Sponsorships are in principle a permissible contribution provided that no unauthorised influence is exerted on public officials or other decision-makers.

We ensure that sponsorship agreements are always compatible with fair competition and do not create any improper dependence on the conduct of a public official or functionary. We are prohibited from utilising sponsorship as a means of personal enrichment or to influence official business.

We at SWIETELSKY...

... ensure that donations are made exclusively to organisations eligible for donation in accordance with national regulations, and that the amount of each donation is appropriate.

... strictly oppose donations to political parties, politicians or events that are politically motivated.

... ensure that sponsorships are only made in return for advertising services and are in line with fair competition, without exerting any undue influence on the behaviour of public officials or functionaries.

IV. We behave fairly towards our business partners

Fair competition and antitrust law

Here at SWIETELSKY, we are aware that honest and respectful interaction with customers, subcontractors, suppliers and competitors is essential for ensuring our long-term success. A fair and transparent competitive environment comes naturally to us, which is why we are committed to complying with all legal requirements.

We refrain from misleading our customers regarding the quality or availability of our products and services, and from making derogatory remarks about our competitors. Our business practices foster fair competition and respect the rights of all market participants.

We refrain from improper practices, such as colluding on prices, terms, or discounts, and from any conduct that could restrict, distort, or alter free competition. Such practices are not only unethical but also legally prohibited and can lead to both criminal consequences for individuals and significant fines and exclusion from public contracts for SWIETELSKY.

We are committed to a corporate culture that permits the exchange of information with competitors only in accordance with competition rules. Information relevant to our business, such as prices, cost structures, our customer base or strategic business decisions, is treated as confidential business knowledge and is not passed on without explicit consent.

We at SWIETELSKY...

... always act in line with the principles of fair competition.

... do not collude on prices, terms, or discounts with competitors.

... do not share markets, sales territories, or customers with competitors and we avoid any form of market allocation.

... do not enter into any agreements or coordination of bids or product strategies with competitors.

... ensure that our competitive endeavours do not influence or skew the outcome of any competition.

... protect our confidential business information and ensure that it is not disclosed to competitors without permission.

Sourcing responsibly

Compliance with all relevant legal requirements in the procurement of raw materials, goods and services takes top priority for us. We also advocate for responsible procurement that takes both social and environmental aspects into account. Our decisions are not only driven by price and quality, but also by ethical standards, fair working conditions, and environmental protection. We strive to engage with business partners who, in equal measure, promote sustainable practices and respect the rights of workers. This responsible approach aims to help promote social equality and reduce negative environmental impacts along the value chain. Our high standards for legally, ethically and morally sound conduct on the part of our business partners in the value chain are set out in writing in our Business Partner Code of Conduct.

We at SWIETELSKY...

... ensure that all legal requirements are adhered to when procuring raw materials, goods and services and also take ethical standards and environmental protection into account.

... select business partners who encourage sustainable practices and guarantee fair working conditions.

... verify whether our business partners fulfil the high standards for legally, ethically and morally irreproachable conduct in accordance with our Business Partner Code of Conduct.

V. We avoid conflicts of interest

Conflicts of interest

In our day-to-day work, situations can arise where the interests of SWIETELSKY conflict with personal interests. We actively avoid conflicts of this kind. Should a potential or actual conflict of interest nevertheless arise, we must inform our superiors without delay.

We do not engage in outside employment that is contrary to the interests of SWIETELSKY, particularly if it conflicts with competitive interests, unless this has been explicitly authorised by management. Our business decisions are never swayed by personal interests.

We document our decisions clearly and in a comprehensible manner. The best decision is transparent and is always made in the interests of SWIETELSKY.

We avoid conflicts of interest or even the appearance thereof, particularly where business relationships exist with persons who are close or extended family members or close friends. There is also a conflict of interest if these persons are involved in a significant role or have a stake in a company, just as there is a conflict of interest if we ourselves have a stake in such companies or if we benefit from these companies.

We at SWIETELSKY...

... do not commission companies at especially favourable terms and conditions in the private domain, if this is obviously intended to influence our decision-making in business transactions in favour of this company. We will inform our superiors immediately before such commissioning.

... do not make a business decision in favour of a business partner, no matter how committed we feel to that partner. We always liaise with our superiors in such cases.

... inform our superiors immediately if a conflict of interest develops or if we suspect that one will.

... ensure that our personal interests never influence the business interests of SWIETELSKY, and that no company assets are used for secondary employment.

Protection of corporate values and confidentiality

VI. We protect the assets of the company

Safeguarding assets and intellectual property and protecting against plagiarism

We treat the resources with which we are entrusted with the utmost care and in accordance with their intended purpose. We protect the assets of SWIETELSKY against theft, negligence, waste and excessive wear and tear. We use all operating resources solely for professional purposes. Private use in excess of what is necessary is only permitted with the explicit consent of our superiors.

In every area of our business, we have operating resources at our disposal to fulfil our tasks, and these are often of considerable value. We respect the property of SWIETELSKY and treat the resources with which we are entrusted just as carefully as we would our own property. We do not tolerate any offences against property or assets such as theft.

We are committed to respecting intellectual property, such as inventions, designs, trademarks, symbols, names and images, while also actively safeguarding against plagiarism and counterfeit materials.

We at SWIETELSKY...

... use the resources with which we are entrusted solely for professional purposes and obtain authorisation from our superiors for any private use.

... do not pass on any operating resources to third parties without approval, nor do we use them for private gain or outside the company.

... respect intellectual property and protect SWIETELSKY against plagiarism and counterfeiting.

VII. We treat business documents and information confidentially

Confidentiality of business documents and information

We ensure that all company information is securely stored and protected against unauthorised access or inspection by third parties. Corporate information includes all financial data, strategy documents, contracts, plans, correspondence and the like, regardless of the form and medium in which they are used or saved. We handle information marked as “confidential” with particular care and ensure that it is not left freely accessible in the workplace.

Confidential information that we acquire during the course of our professional activities must never be used for our own interests or made accessible to third parties. Our obligation to maintain confidentiality extends to both the duration of the employment relationship and after its termination.

We at SWIETELSKY...

... store company information in a secure manner and protect it against unauthorised access.

... treat confidential information with the utmost care and ensure that it cannot be freely accessed.

... never use confidential information for personal purposes and do not disclose it to unauthorised persons - this obligation continues to apply even after our employment relationship has ended.

VIII. We observe IT security and data protection standards

Data protection and security

We always store IT devices securely and protect them with a password wherever technically possible. We never share personal passwords with employees or third parties. We use all suitable and appropriate technical and organisational means to protect corporate data as well as personal data of business partners and staff from unauthorised access, misuse, loss and premature destruction.

We at SWIETELSKY...

... protect company and personal data against unauthorised access and misuse by taking appropriate technical and organisational measures.

Economic sanctions and export controls

We recognise that economic sanctions and export controls can place restrictions or prohibitions on doing business with certain countries, regions, companies, organisations, and individuals. Infringements of these regulations result in considerable penalties. This is also applicable to the export or import of certain goods, services, or technologies. We have the necessary organisational and regulatory frameworks in place to ensure compliance with all applicable export controls and economic sanctions.

We at SWIETELSKY...

... strictly adhere to all applicable export controls and economic sanctions.

... regularly check whether our business practices are in line with current economic sanctions and export controls.

Respect for human rights and social responsibility

IX. We respect human rights and assume social responsibility

Human rights

We respect the personal dignity, privacy and individual personality of all people in accordance with the European Convention for the Protection of Human Rights and Fundamental Freedoms.

Prohibition of child, forced, and compulsory labour and slavery

We prohibit any form of child labour, forced labour, compulsory labour, and slavery. This includes all practices restricting the freedom and dignity of people, including human trafficking and modern slavery. We are dedicated to ensuring that our labour practices and supply chains are free from such abuses and that all employees are treated fairly and with respect.

Anti-discrimination & anti-harassment

We undertake to create a working environment that is free from discrimination and harassment. Discrimination on the grounds of national or ethnic origin, gender, sexual orientation, religion, age or disability is not tolerated. Any form of harassment, be it physical, verbal or emotional, including sexual harassment and bullying, is not permitted. We foster a culture of respect and inclusion that treats all employees fairly and with respect.

Diversity and equal opportunity

We recognise the steadily increasing diversity in the society where we live and do business. We build on the diversity of ideas and perspectives supporting us in mastering the challenges of a rapidly changing world.

We support all employees irrespective of gender, religion, sexual orientation, age, ethnicity or disability. We create the conditions that allow everyone to realise their full personal and professional potential.

We regard diversity management as a strategic tool that strengthens the long-term efficiency of our business activities.

We encourage our employees to embrace diversity as an opportunity to achieve competitive advantages. We cultivate an empathetic working environment and create framework conditions that fulfil the goals of inclusion.

In particular, we actively promote women in construction-related work and management positions, support the employment of older workers in line with their needs, and are committed to training young people – both as an operational necessity and as a social responsibility.

We at SWIETELSKY...

... respect all people and their rights. We always act with respect and ensure that discrimination and degrading treatment are not tolerated in any form.

... guarantee that no forms of child labour, forced or compulsory labour, or slavery are involved in our work processes. We immediately report any infringements or suspicions to the responsible authorities.

... make an active contribution to leveraging diversity as a competitive advantage and are committed to gender equality and the inclusion of older employees and young people in our industry.

... respect different perspectives and foster an inclusive working environment where everyone is able to fulfil their potential.

X. We ensure a safe working environment

Occupational health and safety

We ensure that our working environment is always safe and healthy and strictly abide by all relevant accident prevention regulations. Regular training courses raise the safety awareness of all employees and strengthen the preventative effect of our measures. Information regarding legal requirements and internal regulations is available to us at all times.

We work closely with occupational physicians and safety specialists to ensure that we meet our high standards for the health and safety of every employee. Every employee plays an active role in ensuring a safe working environment and makes sure that all safety regulations are observed.

We do not carry out any work without the necessary personal protective equipment. The use of protective equipment undergoes regular checks and, where necessary, immediate action is taken to ensure compliance with safety regulations.

SWIETELSKY has implemented an occupational health and safety management system in accordance with the internationally recognised ISO 45001 standard with the aim of ensuring a high standard of occupational health and safety. This system is firmly anchored in our integrated management system and is subject to regular monitoring by safety experts and occupational health physicians.

Working hours

We make sure that working time regulations are complied with and foster a good work-life balance. We ensure that all employees adhere to their legally prescribed breaks and rest periods. Flexible working time models help our employees to structure their working hours to suit their individual needs.

Fair pay, freedom of association as well as the right to collective bargaining

Our strategy is based on promoting fair and performance-based pay as well as providing secure employment. High labour and social standards are more to us than just legal requirements – they are a fundamental concern. We also pass this commitment on to our business partners and verify compliance with the relevant regulations in the legally required form and in a reasonable manner. We do not tolerate violations of national legal provisions, such as in Austria in particular breaches of the Employment of Foreign Nationals Act (AuslBG), the Wage and Social Dumping Prevention Act (LSD-BG), or social security fraud.

We respect the freedom of association and the right of our employees to collective bargaining. We believe that these rights are indispensable components of a fair and balanced corporate culture. We encourage dialogue and cooperation between our employees and company management so that we can find joint solutions and protect the interests of all those involved.

We at SWIETELSKY...

... make an active contribution to ensuring that our working environment remains safe by complying with all safety regulations and regularly participating in training courses. If we have any questions regarding safety regulations, we use the information available or seek support from our superiors.

... stick to the specified working hours and break regulations and ensure that we comply with the agreed rest periods.

... are committed to fair pay and ensure that all employment and social law regulations are observed.

XI. We continue to develop

Training and development

We know that the continuous further development of our employees is a decisive factor for the long-term success of SWIETELSKY. We encourage the professional and personal development of every individual in order to create innovative solutions and technologies for our customers. We draw on the experience gained from a wide range of construction projects to ensure continuous improvements to our machines and internal processes. We invest in internal and external training to give our employees the best possible preparation for their tasks and to develop their skills.

We at SWIETELSKY...

... recognise training and development as an opportunity to constantly improve our professional and personal skills and in doing so, contribute to the sustainable success of SWIETELSKY.

Protection of the environment

XII. We respect the environment and protect habitats

Responsible approach to the environment

We recognise the significant role that the construction industry plays in the use of energy and resources, and we take responsibility for the environmental impact of our activities. The sustainable and resource-efficient use of our environment is a central part of our corporate strategy. We use environmentally friendly processes and equipment during all phases of our projects, with the aim of minimising energy consumption and reducing the use of fossil fuels. We are actively making a contribution to the transformation towards a more sustainable economy by increasing the use of renewable energies.

In order to meet our high standards with regard to environmental protection, we have implemented an environmental management system in accordance with EN ISO 14001 within our integrated management system. These requirements are applicable both on construction sites as well as in the production and recycling of materials.

We are firmly committed to making efficient use of natural resources, fostering a circular economy, and striving to reduce greenhouse gas emissions. We also ensure that hazardous substances are handled safely by means of careful storage, transport, and use. In doing so, we ensure that all hazardous substances are recycled or disposed of in accordance with legislation.

We use regular analyses to determine environmental impacts and identify opportunities for continuous improvement in environmental protection. We are implementing targeted environmental protection projects within the scope of our activities in order to minimise our ecological footprint and achieve our sustainability goals.

Biodiversity

We are actively committed to protecting and promoting biodiversity in all our projects. In doing so, we are mindful of the need to preserve biodiversity and the habitats of plants and animals, both on our construction sites and in the surrounding area. We ensure that our construction projects do not have a negative impact on the environment and apply environmentally friendly practices wherever possible in order to preserve biodiversity. Even though, as a construction service provider, we often have only limited scope for action and decision-making authority, we incorporate measures to promote biodiversity into our projects to ensure that every construction project contributes to the long-term preservation and strengthening of the ecological balance.

We at SWIETELSKY...

... use environmentally friendly processes and equipment. We are reducing energy consumption and placing increasing emphasis on replacing fossil fuels with renewable energies across all projects.

... protect biodiversity. We also take measures to preserve biodiversity and avoid negative impacts on the environment, even with limited influence.

Notifications of infringements of the rules

Should Group employees violate this Code of Conduct, internal regulations or (national) legal provisions, employees may contact the following contact person/organisation as soon as possible:

- Direct superiors
- Departmental management of the respective Group company or branch management
- Management Board
- Local Compliance Officer (LCO)
- Chief Compliance Officer (CCO)

Whistleblower platform: swietelsky.integrityline.com

Apart from reporting to a contact person, all employees also have the option of submitting a report via the web-based whistleblowing system. This system is available 24/7 and can be accessed from any location at https://swietelsky.integrityline.com.

Your reports and information about rule violations will be carefully examined.

We recommend using the web-based whistleblowing system to ensure that anonymous reports are also handled carefully and as effectively as possible. Depending on the case in question, anonymous reports, unless they are submitted by using the web-based whistleblower system, have the disadvantage that questions cannot be asked or supplementary information obtained. Your identity will in any case be treated confidentially.

You can also be assured that no negative consequences shall arise for you following your reporting of the case since in so doing you are assisting us in ensuring conformity with this Code of Conduct, the prevailing legal provisions, and other internal regulations. Persons who contribute to the investigation of rule violations by providing information in the course of such investigations likewise enjoy this protection of legitimate expectations.

However, it should be expressly noted that disciplinary measures may be taken if it is found that reports contain false accusations made intentionally or through gross negligence.

Whistleblower platform:
swietelsky.integrityline.com

Declaration of consent

I, _____, hereby expressly acknowledge the Code of Conduct of Swietelsky AG and its Group companies. Compliance with the guidelines and principles of the Swietelsky Group companies as outlined herein are as much a natural obligation for me as the observance of national laws and regulations. I therefore consider myself bound to this Code of Conduct without any restrictions and confirm this by my signature.

_____ _____

Place, date Signature

Contact information:

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Chief Compliance-Officer (CCO)

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