

As an Austrian family business with over 370 years of company history, we live social responsibility and our economic thinking not only for the moment, but also sustainably and over generations. Creating value - that applies to us now and in the future.

A handwritten signature in black ink, appearing to read 'Franz Neuhofer', with a long horizontal line extending to the right.

Franz Neuhofer, Owner & CEO

## Code of Conduct of FN Neuhofer | Who we are and how we work

The aim of this code of conduct is to set down binding standards of conduct in order to avoid situations that might cast doubt on the legality and honesty of the company.

As an internationally successful company, FN Neuhofer Holz is among Europe's leading suppliers with innovative accessories and smart solutions for floors, walls and ceilings. We create products that are pioneering in their innovation and functionality. We are recognised as a "Leitbetrieb Österreich" (Leading Austrian Company) and we apply the slogan WE.KNOW.WOW! with top priority in all areas. The "We" for our performance and our striving towards joint success. To this end, the company invests heavily in, among other things, communication to ensure transparency and information flow. The "Know" is our know-how that we as a company have built up and expanded. Knowledge and skills in innovation, knowledge about solutions, quality and service. And the result of this: "Wow!" The delight, the joy, the success. We identify ourselves throughout the company with the slogan "We. Know. Wow!"

The basis of the code of conduct is provided by our values: delight in action, innovation in products and services, performance, responsibility and continuity. These values and the company and legal context and ethical standards set the rules of conduct for all employees, managers and owners and hence provide a reference framework binding on everyone. Managers have an additional responsibility to exemplify the company culture, which includes as a core element of the company's activities the observance of the code of conduct and of applicable legislation.

The code does not affect pre-existing rules relating to the employment relationship e.g. the employment contract or the provisions of employment law and is to be observed in addition to these applicable laws and regulations. It is above all an appeal to the sense of responsibility of every individual. Every employee bears his own responsibility in his own area for his own behaviour and action and in his conduct he represents our company both in a company and a personal context. Disciplinary consequences are to be expected in the event of any infringement.

### Note:

For ease of reading, the masculine form is used in the following. Of course, this refers to all people equally.

- **Compliance with laws and regulations**

For us, compliance with laws and regulations is the basic principle of economically responsible action and our top priority. We observe the applicable legal obligations and prohibitions at all times and in all places. It goes without saying that we expect all our customers, service providers, suppliers and business partners to observe and comply with applicable laws and regulations.

- **Avoidance of conflicts of interest and corruption**

Business decisions are made solely in the best interests of the company and must not be influenced by private interests or relationships. Our employees must avoid situations in which there could be a conflict between private interests and professional duties. Neither FN Neuhofer employees nor their relatives should have business, financial or other relationships with customers, suppliers, business partners, service providers or competitors that interfere with the performance of the respective employee's duties to FN Neuhofer.

FN Neuhofer does not tolerate corruption, money laundering, bribery or any other illegal granting of advantages in any form. FN Neuhofer and all business partners strictly refrain from personal dependencies or obligations to customers, suppliers or business partners resulting from bribes or other illegal payments. It is not permitted to accept or make gifts or invitations, which, from an entrepreneurial point of view, must be assumed to influence business decisions or contradict the applicable anti-corruption regulations. Agreements relating to the favouring of individuals in connection with the awarding, delivery and payment of contracts are not permitted.

Attempts by suppliers or customers to unfairly influence our employees in their decisions must be reported accordingly.

- **Fair competition**

FN Neuhofer stands for technological competence, innovative strength, customer orientation and motivated employees who act responsibly. This is the basis of our recognition by all our partners and the sustainable economic success of the family business in international competition. We comply with the competition laws in the countries in which we operate. Deviant behaviour, informal discussions or informal agreements which have the purpose or effect of restricting competition are prohibited.

No employee of FN Neuhofer may engage in any communication (whether written, electronic or personal/verbal) with a competitor in which an attempt is made to fix prices and discounts or credit terms and master agreements in an anti-competitive and/or otherwise unlawful manner, to exchange confidential business information, to divide contracts, customers or contract territories among themselves or to divide specific customers or suppliers.

- **Confidentiality, data protection and data security**

FN Neuhofer acts at all times in accordance with the General Data Protection Regulation (GDPR).

You can find and read full information on the subject of data protection on the data protection declaration on our website <https://www.fnprofile.com/de/datenschutz>.

- Company and business secrets of FN Neuhofer, our customers, suppliers or our service providers are subject to comprehensive confidentiality and may not be disclosed to unauthorised third parties. All our employees are obliged to protect non-public information and to treat all documents and information on company matters as confidential at all times. They must not be handed over or made accessible to unauthorised third parties and must be secured against any kind of unauthorised use, in particular against access by unauthorised outsiders. Confidential information includes all strategic, financial, technical and business information that is not publicly known. This includes, but is not limited to, organisational procedures and processes and structures, technical knowledge, business strategies and financial plans, cost overviews, product developments, information about customers, service providers and suppliers, marketing strategies and sales information. This also applies to documents and information given to us by third parties. Any disclosure of confidential documents or information in the aforementioned sense requires the written consent of the management.

- **Financial responsibility and handling company property**

As an independent family business in its 10th generation, we live economic thinking not only for the moment, but sustainably and over generations. We expect all employees to handle financial resources and the company's property with appropriate care - regardless of whether the assets are tangible or intangible. It is expected that damage, unnecessary costs and other disadvantages are avoided and that company property is not misused.

- **Human rights and employees' rights**

FN Neuhofer respects internationally recognised human rights and supports their observance. We strictly reject any form of forced labour and child labour.

The right to adequate remuneration is recognised for all employees. Remuneration and other benefits correspond at least to the respective national and local legal standards or the level of the national economic sectors/industries and regions. We hire workers with written employment contracts and based on documented employment relationships in accordance with the law.

FN Neuhofer ensures a safe working environment. This includes appropriate health and safety policies and measures to mitigate risks and prevent accidents. All applicable laws on occupational health and safety, hygiene, fire protection and risk protection are complied with and regular training is provided. Strict compliance with safety regulations is an indispensable requirement. Any grievances must be reported and rectified immediately.

- **Discrimination and harassment**

As an internationally active company with numerous employees of different origins, cultures and mother tongues, FN Neuhofer values diversity and inclusion.

FN Neuhofer pledges to treat existing and potential employees fairly and equally. We do not tolerate any discrimination or harassment in the workplace, such as offensive, indecent or other undesirable behaviour that violates personal dignity or creates a humiliating atmosphere.

- **Environmental protection and sustainability**

As a company that has been working in and with nature for centuries, we are committed to the responsible use of natural resources. FN Neuhofer has been ISO 14001 certified since 2004, which guarantees compliance with publicly recognised environmental standards and certifies the active avoidance of environmental pollution and the deep anchoring of environmental protection in the corporate philosophy. Furthermore, FN Neuhofer is FSC and PEFC certified and, as part of the “UN Global Compact” network, supports the 10 principles concerning human rights, labour standards, environmental protection and anti-corruption, as well as the UN's Sustainable Development Goals.

Environmental protection naturally includes compliance with legal regulations, the proper disposal of waste and sustainable land use. We use resources such as energy, water and raw materials efficiently and sparingly and expect the same from all our business partners and employees.

- **Integral behaviour and communication in public**

FN Neuhofer respects the right to freedom of expression and the protection of personal rights and privacy. Every employee should be aware that he or she can also be perceived in the private sphere in connection with FN Neuhofer and is therefore called upon to safeguard the reputation and standing of the company through his or her conduct and appearance in public, including vis-à-vis the media.

Special reference should be made here to the new social media and networks, through which activities and statements of countless members of the online community can be registered and stored and retrieved for an indefinite period of time.

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### Reporting misconduct

If a violation or misconduct against laws, the Code of Conduct or other internal guidelines and regulations is identified, this must be reported immediately, either to a trusted person at the project or strategy level or to the direct supervisor, who will forward this report - in absolute confidence if requested - to the responsible person(s) for review and investigation.

In order to promote open and trusting communication, it is stated that the reporting of identified violations will not have any negative consequences for the reporting person. However, FN Neuhofer reserves the right to take disciplinary action against employees who intentionally or grossly negligently make false accusations.

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For all employees of FN Neuhofer, the Code of Conduct is available online on the internal platform CORE and is considered binding. In addition, it is handed out to every new employee as part of the company agreement for information and binding observance with the welcome folder in the company.

For our customers, suppliers and business partners, the Code of Conduct is available at any time upon request from the respective contact person in the department.