



TRADITION, QUALITY, KNOW-HOW. SINCE 1925

Code of Conduct

1. Introduction

This Code of Conduct is a guideline, it establishes principles and rules to which BERTSCHenergy is committed internally and towards third parties and on the basis of which it will align its actions.

Expressions used in this Code of Conduct to denote individuals shall comprise both the male and female forms.

This Code of Conduct equally commits both employees and executives of the BERTSCHenergy.

Every employee receives a copy of this Code of Conduct and ensures that it will be observed.

Executives are given particular responsibility for implementing this Code of Conduct. They set an example by observing the principles and rules contained therein and demand that also their employees do the same.

2. Our Business Partners

Our business partners and our relations with them are important to us. We want to be a reliable and fair partner to our customers and our suppliers. This includes shared commitment to honesty and integrity and the rules of this Code of Conduct.

We select our business partners only in reliance on objective and entrepreneurial criteria.

We are committed to the highest quality so that we can meet our customers' demands in an optimal manner.

We are also committed to observing all laws and regulations applicable to us.

We are committed to fair competition. We do not wish to take part in anti-competitive practices and are opposed to bribery and corruption. We neither offer nor accept bribes.

It is important to us to protect business and trade secrets and intellectual property. We treat as confidential business and trade secrets and respect intellectual property of our business partners and that of third parties.

We pay heed to the data protection provisions. We collect and process personal data only for the purpose of fulfilling our contractual obligations vis-à-vis our business partners and ensure that these data are treated confidentially.

3. Our Staff

We create a good and modern working environment for our employees.

Our employees receive fair and decent wages. We treat our employees with respect and decency and expect

them to interact with each other and with executives in the same manner.

We do not tolerate mobbing, harassment or discrimination. We do not discriminate based on our employees' nationality, sex, age, ethnic affiliation, religion, political conviction, sexual orientation or disability.

We protect our employees' health and safety by observing protection on the job and prevention of accidents regulations.

We create an environment, which allows our employees to continue to develop and undertake training in order to improve their individual skills for our and our customers' benefit.

As with our business partners, we do not tolerate any form of corruption or bribery, neither in practice nor in acceptance, among our employees.

We expect our employees always to act in the interest of the BERTSCHenergy and to report any conflicts of interest immediately. We expect our employees to handle corporate property carefully and to subject it to moderate private use, if permitted by individual agreements or works council agreements.

4. Our Environment

It is important to us to protect the environment and it goes without saying that we are respecting the relevant laws and regulations.

We make efficient and sustainable use of resources and respect the environment. We fully take advantage of every recycling option.

5. Violations of this Code

We will not tolerate any violation of this Code and impose disciplinary sanctions and actions, including termination of employment.

All employees and executives are invited and obliged to report any potential or actual violation of this Code to the compliance representative at:

compliance@bertsch.at.

We will protect all employees and executives who have reported potential or actual violations against retaliation measures. Should these individuals themselves be involved in a reported violation, we will appropriately take into account their contribution in establishing the facts of a violation.

Contact

Bertsch Energy GmbH & Co KG

Herrengasse 23 | 6700 Bludenz, Austria

T + 43 5552 6135-0 | F + 43 5552 663 59

bertschgroup@bertsch.at | www.bertsch.at