

Code of Conduct

Foreword by the owners

By presenting the Code of Conduct, we at J. Christof Gesellschaft m.b.H. are not moving with the times, but are openly declaring what we have stood for since our foundation in 1966. Since its launch as a one-man business, a few immutable principles have defined the company's directives.

As a family-run business, open and positive interaction with employees has always been a central concern. Many of our employees have worked in the group for decades. This constancy and reliability ensure trust and quality, especially towards our customers, some of whom we have been supporting for many years.

Our regional ties with Graz and Styria have been an unmistakable part of our business relationships for many decades and form the backbone of our successful growth abroad. Our receptiveness to other cultures, customs and traditions without prejudice is an important basis for our success. Without losing its grip on reality, the group now generates more than 50 % of its sales abroad.

The group's commitment to innovation lays the foundations for its ongoing development, with an emphasis on customer satisfaction.

We do not just pay lip service to taking responsibility for the environment, but have been following this principle for decades. Based on our industrial experience, we have developed technologies that are environmentally-friendly and sustainable. Our commitment to keeping our ecological footprint as small as possible determines both our purchasing policy and our activity in general.

In this sense, this Code of Conduct reflects our identity that has been evolving over many years and will continue to guide us in the future.

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Stefan Christof Dep. Chairperson of the Supervisory Board

Scope of application and values -What we stand for

We believe in a sustainable company policy that is based on the pillars of economy, ecology and social responsibility, and does not represent any contradictions for us in terms of corporate growth and free competition. Therefore, publishing a Code of Conduct for our company is just another logical step forwards

We are aware that most of the obligations in this Code of Conduct have been a matter of course for us and our employees for years. However, we also know that there is always a need for further development and that, above all, the sections referring to external stakeholders in particular need to be continuously improved in this regard. In many areas, sustainability requires a whole new way of thinking, which is initiated by the clear commitment of our managing directors and owners and by our management acting as role models.

Our Code of Conduct was developed in the 2011/2012 financial year under a company-wide process led by the CSR team at Christof Holding AG, with external experts also being brought in to give advice in some areas. The Code of Conduct was presented to, and unanimously approved by, the Executive Board of Christof Holding AG in March 2012. The latest version of the Code of Conduct is available on the website of J. Christof Gesellschaft m.b.H. (www.jchristof.com) and on the intranet. When they start work, new employees receive the Code of Conduct in person from the relevant Human Resources department or their manager. Our Code of Conduct applies uniformly to everyone who works at J. Christof Gesellschaft m.b.H. Foreign subsidiaries may take national circumstances into consideration when implementing the Code of Conduct, provided that these do not override its basic rules of behaviour.

Our Code of Conduct is to be understood as a binding basis for building trust, reliability, transparency and quality in connection with our internal and external stakeholders, and serves as a point of reference for conducting operational and strategic business. In this respect, the Code of Conduct fulfils two tasks. On the one hand, it is intended to encourage our employees to take responsibility for their actions, and on the other, it reflects the maxims of our corporate activities.

In our business relationships, we strive, together with our national and international partners, to disseminate the rules of behaviour of the Code of Conduct, for example in the areas of occupational safety and human rights. Although the Code of Conduct is an internal document, we believe that it is also suitable for conveying our values and behavioural principles to external stakeholders. However, it should be noted that no third-party claims may be derived from the Code of Conduct.

The Code of Conduct is based on the fundamental values of our company, which have been established in 11 strategic polices and are an integral part of the annual Corporate Social Responsibility report. In addition, our Code of Conduct is based on the regulations of the Austrian Code of Corporate Governance, the ILO's (International Labour Organization) Declaration on Fundamental Principles and Rights at Work, the UN Global Compact, the UN's Universal Declaration of Human Rights and the general declaration of the European Convention for the Protection of Human Rights and Basic Freedoms (ECHR).

Business ethics

As a company operating internationally, we are committed to upholding ethical principles in our business policy. It is in our own interest and that of our employees to avoid conflicts of interest or loyalty.

Our guiding principles in the area of business ethics:

- » Our employees must disclose potential conflicts of interest and, in accordance with their employment contract, may not participate directly or indirectly in a company that has a business relationship with us or with our customers or suppliers.
- » Our employees may only receive gifts of negligible value. This also includes hospitality invitations within the scope of normal social practice.
- » We are committed to fair, international competition and oppose all forms of corruption.

All the business activities we engage in as a company are subject to laws and regulations and to standards based on them. We are required to observe both international and national regulations as well as regional and local rules, which, for example, concern occupational safety or environmental standards, and sometimes differ from one another. We have made it our goal to operate within this constantly changing framework and also expect our employees to conduct themselves accordingly. As a matter of course, we take all measures to inform our employees about the relevant laws and regulations and to instruct them in their application and implementation.



However, we do not only operate within the legal framework, but are also governed by social, cultural and social rules in our various markets. We also include these in our decisions and actions wherever possible.



Our conduct towards customers and suppliers

Our conduct towards our employees

As a provider of comprehensive solutions and services in industrial pipework and plant construction, one of our top priorities is to meet and, where possible, exceed our customers' requirements and expectations.

"We aim to provide our customers with appropriate, efficient, reliable, cost-efficient and sustainable solutions in longterm business relationships."

Our guiding principles for customers:

- » We treat our customers fairly with a focus on service by addressing their needs and wishes to the greatest extent possible.
- We support fair competition and explicitly reject any obstructions to lawful competition such as price fixing.
 Suppliers that do not meet the required quality criteria or fail to appropriately consider the guidelines regarding
- » We provide our customers with comprehensive, truthful and up-to-date information.
- » By adapting our range of services and providing ongoing training and education for our employees, we always endeavour to keep pace with the times and remain at the cutting edge of technology. This includes, for example, the use of environmentally-friendly equipment or alternative technologies.

With our partner companies and suppliers, we primarily strive to achieve long-term business relationships based on mutual respect, trust and reliability. We join forces with our suppliers to work on optimal solutions for our customers and are also committed to sustainability in our relationship with our suppliers.

We do not maintain any business relationships with suppliers who are generally known to violate the principles underlying the UN Global Compact.

Our guiding principles in the area of suppliers:

- » We treat our suppliers and subcontractors as equal partners.
- » Procurement procedures are transparent and despite long-term business relationships – based on the principle of free competition.
- » Suppliers that do not meet the required quality criteria or fail to appropriately consider the guidelines regarding occupational health and safety and remuneration are excluded from the tender process.

As a family-run company, we have traditionally felt a close connection to our employees. We offer long-term employment contracts with interesting areas of responsibility, and promote personal careers in the individual companies with the aid of personal development programmes. For example, in the spirit of a "Leadership Pipeline", we are able to find managers and specialists from among our own ranks, thus ensuring the retention and transfer of knowledge within the group.

We employ around 500 people worldwide with different cultures and local distinctions. Therefore, our managers have specific responsibility not only for our company, but also for our employees. They act both as role models for responsible conduct and as points of contact for their team members should any conflicts arise. We are committed to recruiting people from our host countries as employees. For us, it goes without saying that the same standards of employee protection, occupational medicine and safety technology apply to these employees as to our employees working in Austria.



We also provide partner companies with assistance in implementing the high standards that are a must for us in the areas mentioned above.

Our guiding principles regarding employees:

- » All our employees are treated equally and fairly. We do not tolerate any discrimination with regard to ethnicity, gender, sexual orientation, cultural background or age.
- » The way we interact with each other in our company is characterised by mutual respect, fairness and professionalism. The individual personality of each of our employees is taken into account, with attention paid to encouraging a healthy work-life balance wherever possible. We see this basis as an essential prerequisite for a permanently high level of motivation, and therefore as an important contribution to our corporate success.
- » We support our employees in their professional and personal development wherever possible and set ambitious but realistic targets with them.

"We support our employees "

Occupational safety and accident prevention

Many of our employees work in industrial environments with an increased risk of danger, where even brief moments of inattention or failure to follow safety guidelines can have fatal consequences for the employees themselves or for others. For this reason, the areas of occupational safety and accident prevention are particularly important for us.



Our guiding principles in the areas of occupational safety and accident prevention:

- » We provide our employees with ongoing training in occupational safety and accident prevention. As part of our lessons-learned approach, we also record and evaluate near-miss incidents in order to identify potential hazards in good time and "defuse" them in future projects. All safety guidelines must be strictly followed, with the same safety standards applying to subcontractors as to ourselves.
- » The consumption of alcohol and otherintoxicants and narcotics during working hours is prohibited and violations are severely punished.
- We have made the decision to declare our business premises non-smoking areas in the interests of preventive healthcare and occupational safety.
- There is a strict ban on smoking when handling explosive and/or hazardous substances on our premises or on those of our customers. Violations are severely punished.

Environment and sustainability

We are aware that our international business activities also leave behind a not insignificant ecological footprint. All natural raw materials that we consume need, for example, a certain amount of space to grow back, and nature has to deploy its resources to degrade the waste we produce. Therefore, we endeavour to contribute to reducing our ecological footprint by taking a conscious approach to sustainability. Our company is ISO 14001:2015-certified in order to further evolve within the scope of an integrated environmental management system with regard to environmental protection and sustainability.

Our guiding principles:

- » We use our resources sparingly and try to further reduce consumption and minimize emissions as much as possible through ongoing optimisation in the technical area.
- » We are optimising our purchasing processes to further increase the proportion of recycled materials in new procurements and to introduce more environmentally-friendly auxiliary materials (pickling agents, lubricants, etc.).
- » We have been meticulously separating our waste for many years and sending it to various recycling centres.





UN Global Compact - principles and social responsibility

We have integrated the principles of the UN Global Compact into our Code of Conduct by committing to full compliance with human rights, labour standards, environmental protection and anti-corruption measures in all our companies. We expect the same of our internal and external stakeholders.

We are committed to social responsibility in our role as an employer and see ourselves as a responsible member of the respective community at national and international level. We promote social development through social, ecological and cultural initiatives and also support the voluntary commitment of our employees in this regard. We see sponsorship and support for initiatives in social and environmental matters as instruments for fulfilling our social responsibility. Transparency is a must for us.



We advocate the elimination of discrimination in respect of employment and occupation. 6) We support a precautionary 7 We undertake initiatives at home and abroad to promote greater environmental responsibility. (8) We promote the development and dissemination of environmentallyfriendly technologies and are involved in this ourselves to a certain extent with our own developments. 9

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