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## CODE OF CONDUCT FOR ETHICAL ENTREPRENEURSHIP WITHIN THE FORSTER GROUP

### Preamble

All staff members and management of the Forster Group are bound by the rules of this Code of Conduct. The Code specifies the values, principles and dealings that govern all activities of the Forster Group. The management strives to comply with ethical standards and to create a working environment which encourages integrity, respect and fairness. A business policy which strictly conforms with the law and our principles serves to promote our long-term business interests.

This Code of Conduct has been adopted by the management of the Forster Group.

### Compliance with the laws and regulations in Austria and abroad

The Forster Group endeavours to comply in all its business decisions and activities with the applicable laws and other relevant provisions in Austria and abroad. Integrity and honesty foster fair competition, also in our relations to our customers and suppliers.

### Observance of human rights

We undertake to observe the human rights.

The human rights of greatest relevance for us are:

- freedom of assembly: right to form trade unions
- ban on discrimination in employment and occupation
- right to equal and adequate pay
- protection of privacy
- right to life, liberty, security and health
- right to collective bargaining
- ban on child labour
- right to a public hearing and fair trial
- freedom of opinion and information
- right to education
- right to rest and leisure and limitation of working hours
- ban on slavery and forced labour
- right to social security
- right to clean water and adequate nutrition
- freedom of religion
- right to own property, protection of land use rights
- protection of the rights of indigenous communities

### Obligations undertaken by the management

The Forster Group is committed to acting in an economic, social and environmentally conscious manner. It therefore endeavours to pursue its business competently and ethically and to protect fair competition in all markets in which it is active, by complying with applicable laws on the ban of cartels, on competition and on the restraint of competition. Unfair advantages over customers, suppliers or competitors must be avoided.

### Conflicts of interests

The management expects its staff members to be loyal to the Forster Group.

All staff members must avoid situations in which their personal or financial interests conflict with those of the Forster Group. Accordingly, staff members must not work, *inter alia*, for competitors, suppliers or customers nor enter into relationships with

such in their private environment, to the extent that they might lead to a conflict of interests. The interests of the Forster Group must not be impaired by conflicts.

Conflicts of interests may arise in many situations. Thus a staff member must not accept any benefits – regardless of what kind – which, when considered reasonably, might be assumed to be liable to affect business decisions or transactions of the Forster Group. Invitations must observe the limits of hospitality customary in business. Staff members must not personally obtain direct and/or indirect advantages by their access to confidential information due to their position. All staff members are required to promote the legitimate interests of the Forster Group to the best possible extent. Any competition with the Company must be avoided.

Any actual or possible conflict of interests must be reported to the line manager and discussed with the manager involved.

### **Ban on corruption**

The Forster Group rejects any and all corruption and bribes. Corruption is harmful to competition and undermines fair competition.

Corruption is understood to mean the abuse of power entrusted to an individual for a private gain. Conduct which involves business transactions by unfair means is not tolerated. Staff members who do not comply with this ban must expect strict disciplinary action and/or other measures under civil and/or criminal laws.

Requesting, accepting, obtaining promises or offering, promising or granting a benefit for taking or omitting a legal action contrary to the staff member's or agent's duty within the scope of a business transaction is punishable by law.

Staff members must not offer any perks to nor obtain or accept perks from business partners which might impair or seem to impair their objective and fair business decision-making. The Forster Group expressly prohibits its staff members any and all forms of bribing, regardless of the value or type (cash or payment in kind) thereof.

If staff members of the Forster Group should find themselves exposed to an attempt at bribery or if there is a suspicion of an improper attempt at inducement by a third party, the line manager must be immediately contacted.

### **Presents, hospitality**

The Forster Group prohibits the offering or acceptance of presents, hospitality or other benefits which might (or are intended to) unduly influence business transactions or might create the impression of undue influence.

As part of the efforts of the Forster Group to maintain good contacts with its business partners, staff members may occasionally accept or offer presents or hospitality on a minor scale up to a maximum equivalent of € 100 (such as an invitation for a business dinner or customary give-aways such as ballpoint pens, business diaries, etc.) for as long as they are not intended as nor give the appearance of unduly affecting business decisions.

Benefits in the form of cash or equivalent (such as cheques, bank transfers, etc.) must never be accepted nor offered, even when they involve only negligible amounts.

The principles laid down in this section also apply to initial business contacts.

### **Fair working conditions**

All staff members of the Forster Group must endeavour to ensure a safe and healthy working environment. Accordingly, all health and safety regulations and practices must be strictly complied with.

Being a socially responsible employer, the Forster Group considers its staff members to be a major asset. It calls for great commitment on the part of its staff members and in return shares its business success with them. Its human resources policy contributes to offering each staff member an opportunity to develop in terms of their job and personal fulfilment. An open exchange of opinions, criticism and ideas is encouraged.

The management denounces illegal discrimination or harassment of any kind whatsoever.

## Handling of internal knowledge

All staff members of the Forster Group undertake to ensure quick and smooth exchange of information within the Company. Information must be passed on correctly and completely to the relevant recipients, except in special cases, such as secrecy obligations, where superior interests prevail. Relevant knowledge must not be wrongfully withheld, falsified or passed on selectively.

Dishonest reporting within the Company or to third-party organisations or individuals is strictly forbidden. All annual accounts and annual reports, business papers and records of the Forster Group must show business transactions correctly and comply with the statutory requirements, accounting principles and internal accounting procedures.

## Handling of assets

All staff members of the Forster Group are responsible for the proper and careful handling of the Company's property. Each staff member must protect the Company's property against loss, damage, misuse, theft, abstraction and destruction. Each staff member is obliged to promptly inform their line manager of any use of assets contrary to the above.

## Confidentiality and data secrecy

A large part of the business information within the Forster Group is confidential or legally protected so that staff members are bound to secrecy. This does not apply when the publication of any information was approved by the Company or is obligatory under a law or regulation.

Confidentiality applies in particular to intellectual property. This includes business secrets, patents, brands and copyrights, as well as business and marketing plans, drafts, business papers, salary data and all other unpublished financial data and reports.

For competitive reasons, the handling of insider information similarly requires utmost care. Insider information includes, without limitations, management plans, the introduction of new products or production methods, company transactions, sales and profitability of the Forster Group, major contracts and business relationships, financial information or substantial legal disputes. The use of important non-public information may constitute a violation of the law.

Within the Forster Group, all personal information on staff members, customers, business partners and suppliers or other third parties is treated with great care and handled confidentially, in full compliance with the data protection laws. Such information must be protected with maximum care and diligence.

## Implementation and monitoring

The provisions of this Code of Conduct are at the core of the Forster Group's corporate identity. Full compliance with these principles is essential and the responsibility of each and every staff member.

If a staff member has any concerns or complaints regarding items of this Code of Conduct or receives knowledge of any violation of the guidelines contained in it they should promptly report them to their line manager for clarification. This may be done anonymously or confidentially. If a staff member is not satisfied with such clarification they may submit their concern or complaint not just to their line manager but also to the legal department or human resources department. The Forster Group does not permit any reprisals for complaints made in good faith on the basis of this Code of Conduct.

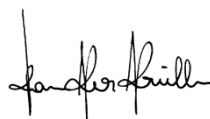
## Responsibility

All staff members and managers of the Forster Group are bound to the rules of this Code of Conduct. Any violation of this Code of Conduct will have consequences. In a grave case this may result in the termination of employment.

Waidhofen/Ybbs, 08.06.2021



C. Forster



H. Prüller



R. Reichartzeder



A. Grader