



**HASSLACHER
NORICA TIMBER**

From **wood** to **wonders**.

Code of Conduct of the HASSLACHER group

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Introduction

1.1 Introduction and purpose

As a globally active company, HASSLACHER Holding GmbH and its affiliated companies ("HASSLACHER group") is aware of its responsibility to stand up for and promote legally and ethically impeccable conduct. The trust of our customers, employees, owners and the public as well as the performance and integrity of our company are particularly important to us. A key component of our company's success is that we consider responsible and legally compliant behavior as an indispensable part of our corporate culture.

Lawful conduct, morals, ethics, the environment and safety are essential foundations of our business activities and we must ensure that we behave in accordance with applicable rules at all times and in all places. The conduct and integrity of each individual is essential to the success of the HASSLACHER group. Behaving in accordance with the rules protects us from considerable legal and economic risks and strengthens trust in our group of companies.

We have summarized the values and binding rules of conduct that apply within the HASSLACHER group in our Code of Conduct. In addition, this Code of Conduct is further specified by individual guidelines.

The management of the HASSLACHER group and the Works Council are fully committed to the standards and principles of this Code of Conduct. We expect all employees to familiarize themselves with our binding Code of Conduct and to comply with its principles. We also expect our business partners to share our standards and principles and have therefore drawn up a separate Supplier Code of Conduct, which needs to be accepted and confirmed by our suppliers.

Let us work together to ensure the reputation and thus the economic success of the HASSLACHER group in the long term through compliant and morally correct behavior in our day-to-day business.

1.2. Questions and misconduct

If you have any doubts about how to behave in a particular situation, please contact your superior and/or Legal & Compliance. It is also necessary to seek advice and support in the event of questions or uncertainties or suspected or observed misconduct. In this case, please contact your superior and/or Legal & Compliance.

We support an open dialog and ensure absolute confidentiality about the identity in justified situations.

Thank you very much!

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Area of application

The entire management and all persons who are employed by the HASSLACHER group under an employment contract or who are attributable to the HASSLACHER group on the basis of another legal relationship, such as a consultant, sales representative or temporary work contract, must comply with all laws and all applicable guidelines and regulations and behave in accordance with our values and rules of conduct set out in this Code of Conduct in their day-to-day business.

2.1. Responsibility

Each individual employee is responsible for complying with and implementing this Code of Conduct. The values and principles of this Code of Conduct must be taken into account in every business decision.

Every employee is encouraged to seek advice and support from their superior or, if deemed necessary, from Legal & Compliance in order to comply with the rules set out in this Code of Conduct.

2.2. Consequences

If, after a thorough investigation, it is determined that the principles of this Code of Conduct or any HASSLACHER group policy based on it have been violated, depending on the severity of the misconduct, this may result in serious consequences for the person concerned under applicable labour law (notwithstanding any potential criminal or civil law consequences), which may include termination of the employment relationship without notice.

2.3. Incident management

We encourage all employees to report any reasonable suspicion of violations of our Code of Conduct. Our whistleblower system is also available to employees for this purpose, where every report is first examined by an independent, external body before being forwarded to the HASSLACHER group's Compliance Department.

The HASSLACHER group will not tolerate discrimination or retaliation against anyone who raises concerns, asks questions or reports suspected misconduct. We invite you to join us on this journey, to help uphold our corporate values and to ensure that the HASSLACHER group continues to be perceived as a reliable and trustworthy group of companies.

A close-up photograph of a green pine branch, likely a spruce or fir, with numerous sharp, needle-like leaves. The leaves are covered in small, clear water droplets, suggesting a misty or dewy environment. The background is dark and out of focus, making the vibrant green of the needles stand out.

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Principles

3.1. Legal compliance

We comply with all laws, rules and regulations applicable to us in all countries in which the HASSLACHER group operates and are obliged to act in accordance with the law at all times.

3.2. Human rights and fair working conditions

We respect and protect human rights in all our activities. We do not tolerate child or forced labour or any other form of discrimination. We guarantee fair and safe working conditions and respect the right of employees to organize and bargain collectively. Detailed principles on the subject of human rights are set out in a separate HASSLACHER group guideline on human rights, which must also be complied with.

3.3. Inclusion, global diversity and equal opportunities

We are committed to promoting equal opportunities and inclusion, and to making a positive contribution to society. We create and respect a work environment free from harassment and discrimination, where mutual respect prevails and all contributions are valued. We promote an inclusive environment that attracts and retains people from different cultures. Detailed principles on this topic are set out in a separate HASSLACHER group policy on diversity and inclusion, which must also be complied with.

3.4. Health and safety

The health, safety and well-being of our employees is an essential part of our daily work and a core value of the HASSLACHER group. Occupational health and safety is an integral part of all operational processes and everyone is obliged to avoid hazards.

Detailed health and safety principles are set out in other guidelines of the HASSLACHER group (Health and Safety Policy), which must also be observed in connection with this Code of Conduct.

3.5. Environment

We attach particular importance to the protection of the environment. In addition to complying with all environmental legislation and regulatory requirements, we are committed to using resources responsibly and minimising environmental impact. We are constantly working on optimising our products to minimise negative environmental impacts. Further information can be found in the HASSLACHER group policy regarding the "commitment to sustainable action".

3.6. Fair competition (antitrust and competition law)

We are committed to the principles of fair competition as the basis of our business activities and strictly reject anti-competitive behaviour. We do not take any action that restricts fair competition. In particular, we do not enter into agreements with competitors on prices or other terms, nor do we enter into agreements to allocate markets or customer segments. We also do not share any confidential information that could restrict fair competition, and we expressly reject any unfair competitive practices.

In markets where we have a dominant market position, we do not abuse this position.

All employees working in sales and other relevant positions must complete our annual competition law compliance training.

3.7. Corruption prevention

We always pursue the highest standards of integrity and ethics. Illegal business practices, including corruption, bribery, extortion or other criminal behaviour, will not be tolerated in any form.

3.8. Protection of assets and confidential information

The assets and trade and business secrets of the HASSLACHER group must be protected from loss, theft or misuse. We therefore expect all assets to be handled with care. In addition, confidential information of the HASSLACHER group as well as the confidential information of our business partners must be treated confidentially and with the utmost discretion and protected from unauthorised disclosure.

3.9. Data protection and cyber security

Personal data must be protected and all relevant data protection legislations must be complied with.

To protect data integrity and system availability, all employees must comply with the rules established by IT regarding the use of IT systems.

3.10. Avoidance of conflicts of interest

We always make business decisions in the best interests of the HASSLACHER group and not on the basis of personal interests. We act objectively and professionally and transparently disclose even potential conflicts of interest.

3.11. Sanctions

We do not violate applicable sanctions and do not do business with sanctioned countries, companies or individuals.

3.12. Business partner due diligence

We select our business partners carefully and verify their integrity in order to avoid any negative consequences for the HASSLACHER group arising from the business relationship.