welser profile

Code of Conduct

of the Welser Profile Group

www.welser.com

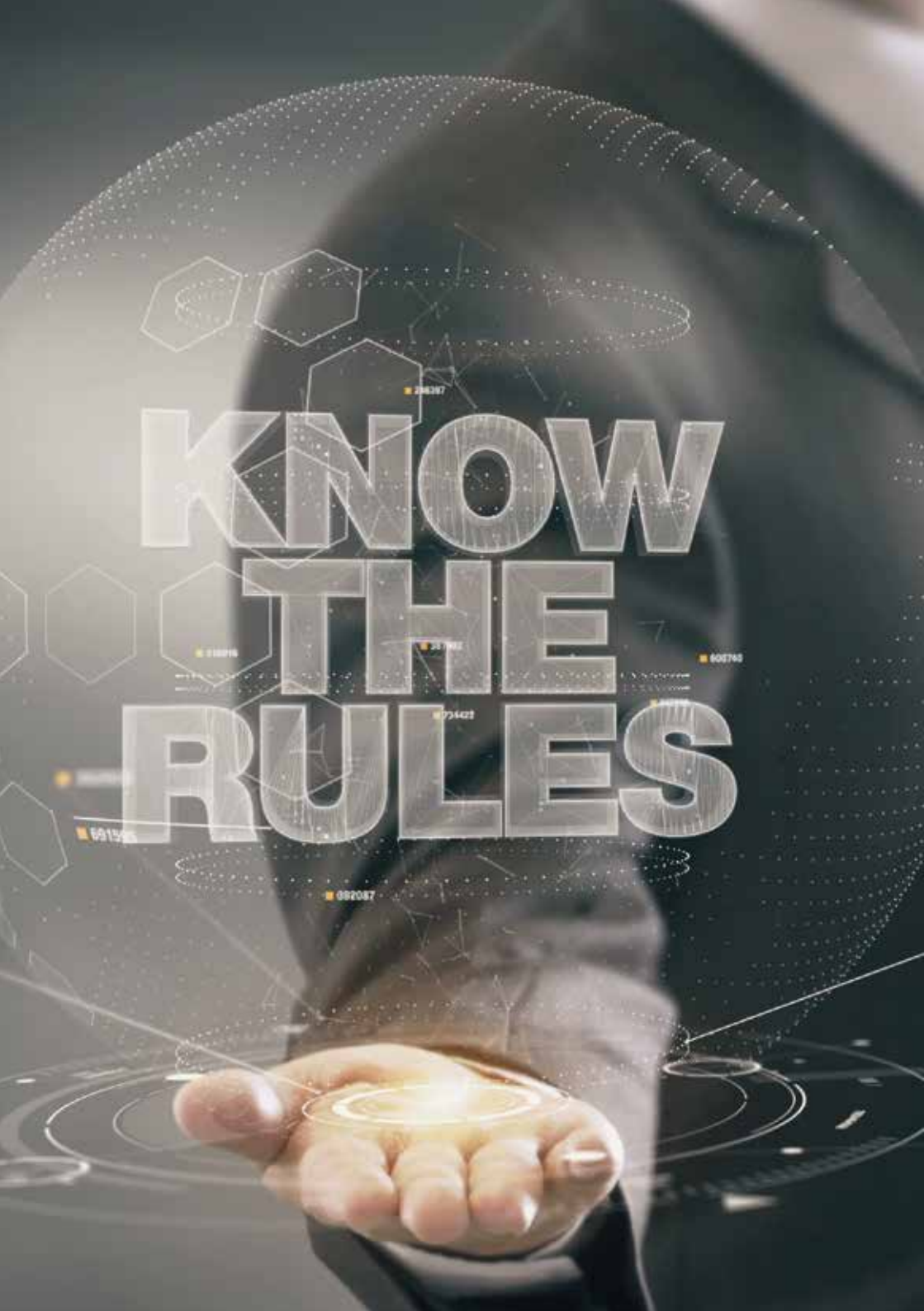

KNOW
THE
RULES

Table of contents

1. Foreword 4
2. Scope of application 5
3 Responsibility 6
4. Welser value landscape 8
5. Dealing with violations – Working together against the "wrong" 10
6. Whistleblower system 12
7. Let's talk about compliance together 13
8. Appendix – Our values in detail 14
   - 8.1. Respect and integrity 14
   - 8.2. Regionality 15
   - 8.3. Fair working conditions 15
   - 8.4. Human rights and slavery 16
   - 8.5. Sustainability (environmental and climate protection) 17
   - 8.6. Resource origin and hazardous substances 19
   - 8.7. Quality and product safety 19
   - 8.8. Anti-corruption 19
   - 8.9. Conflicts of interest 20
   - 8.10. Laws, taxes, and accounting 22
   - 8.11. Business partners and money laundering 22
   - 8.12. Foreign trade laws, customs, and export control 24
   - 8.13. Fair competition 24
   - 8.14. Information security and protection of confidential information 26
   - 8.15. Data protection and handling of personal data 28
   - 8.16. Corporate communications and external appearances 29

1. Foreword

Dear employees[1],

The Welser Profile Group (Welser Profile for short) is a family business operating worldwide with international production sites and numerous international sales offices. We have customers from all industries. As a reliable partner, we are responsible in how we deal with our customers, suppliers, employees and other business partners. For this reason, we have drawn up a Code of Conduct to support our employees in carrying out their business activities on their own responsibility. It forms the basis for the moral, ethical, and legally correct conduct of all Welser Profile employees.

Our employees are a key part of our success as a company and are primarily responsible for our reputation and the trust placed in us by others. For this precise reason, it is important for us to establish clear principles and policies on ethics and morals in business life. This Code of Conduct is an important basis for this. If each individual follows the Code, it will become an important part of our corporate culture.

In addition to this Code of Conduct, we have set ourselves guidelines which provide for a standard that is in some cases stricter than the statutory standard and serve as a guide for our employees. Both the Code of Conduct and the defined specifications in the form of guidelines are part of a formal Compliance Management System (CMS) established at Welser Profile.

In our business activities, too, our values are always the basis and, in the form of a business partner and supplier code, the benchmark for our business relationships. Both we, the Management Board, and each individual employee of the Group are clearly committed to compliance with the principles described in the Code of Conduct.

Nicolas Longin
Managing Director, CFO

Benedikt Geusau
Compliance Officer

Markus Kepp
Compliance Officer

Tania Zaripheh
Compliance Officer

[1] For better readability, the term "employee" is used in this text for male and female employees; other gender-specific designations also apply automatically to all genders in the following text.

2. Scope of application

This Code of Conduct is the basis for collaboration at Welser Profile.

It applies without exception and is binding for all members of governing bodies (management board and supervisory board), managers and employees. It also applies to all persons who are attached to the corporate group or one of its organizational units.

It is therefore valid for the entire corporate group, and all those concerned are obliged to comply with it. The principles and regulations contained in this Code of Conduct apply in the relationship between the respective company of the Welser Profile Group and its employees. This does not establish rights in favor of third parties.

Similarly, we also expect our business and trading partners to behave in accordance with the rules and with integrity (see Welser Profile Business Partner and Supplier Code).

Our Code of Conduct provides the foundation and objectives for the entire compliance program and all compliance activities at Welser Profile.

3. Responsibility

We are all collectively responsible for compliance with and implementation of the Code of Conduct itself and thus make a significant contribution to our **corporate culture and values.**

Our employees play a key role in determining the company's entrepreneurial activities. Therefore, our reputation and the trust placed in us depend heavily on the behavior, actions, and demeanor of our employees.
Thus, every person attributable to the Welser Profile Group is required to ensure that their appearance in public does not harm our reputation and is in line with our values and the rules based on them.

Our managers set an example of compliance behavior to employees and thus act as **role models** in implementing the contents of the Code of Conduct. They instruct their employees in the use of the Code of Conduct, monitor compliance, and provide training with the support of the responsible departments at Welser Profile.

In interpreting the rules of the Code of Conduct, we are guided by common sense and, if necessary, question whether our conduct could give rise to criticism on ethical and moral grounds.

Country-specific standards and customs in particular must also be taken into account. There is no discretionary power as regards statutory regulations.

We undertake to strictly observe the locally applicable laws and our internal company regulations in all business actions and decisions.

We are required to inform ourselves comprehensively about the laws and internal guidelines and regulations applicable in each area of responsibility and, in cases of doubt, to contact the responsible authorities.

In the event of any ambiguities or questions, every employee can turn to his or her direct supervisor or the Compliance Officer at Welser Profile, Benedikt Geusau, and the Compliance Officer Germany, Markus Kepp, for advice as well as support in making decisions. The compliance officers are also available at any time at the general compliance email address (compliance@welser.com).

Benedikt Geusau
Compliance Officer Corporate Group
Tel.: (+43 7487) 410 - 4160
Email: b.geusau@welser.com

Markus Kepp
Compliance Officer Germany
Tel.: (+49 2383) 914 - 5055
Email: m.kepp@welser.com

Tania Zaripheh
Compliance Officer USA
Tel.: (+1 330) 225-2500 X224
Email: t.zaripheh@welser.com

4. Welser value landscape

At Welser Profile, culture and values are both the foundation and the impetus for further development. Because only if we all live reliable values together, as companies and people, will this ensure sustainable opportunities for generations to come.

We therefore attach great importance to responsible and fair dealings with our customers, suppliers, employees, and other business partners. We are therefore committed to a corporate culture and values that emphasize morally, ethically, and legally correct conduct.

[OUR PURPOSE]

Passionate people
create opportunities
for generations.

As we are aware of our current, but also future responsibility, the following four pillars of the Welser "value landscape" form the basis of our holistic approach.

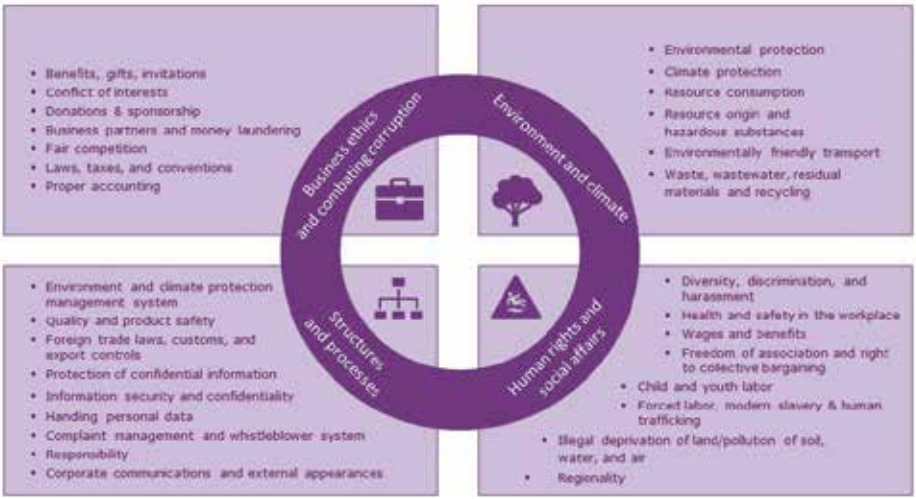


Fig. 1: Welser value landscape

The four pillars with the topics and challenges they contain reflect our understanding of holistic ethical (business ethics and anti-corruption), economic (governance), social (human rights and social affairs) and ecological (environment and climate) responsibility.

In dealing with the principles and rules of our value landscape, we are always guided by the Welser backbone.

It is our framework of orientation, to which everything is aligned. It speaks about where we come from, what defines our core, and how we want to shape our future. Everyone, both individually and together, is responsible for making this orientation framework come to life, inspiring people, and creating new possibilities daily – for now and for future generations.

In order to live up to this credo (our purpose), we always base our actions on the following aspirations:

- uncompromising compliance with the legal requirements
- permanent consideration of our own ethical and moral demands and standards

VISION
Where do we want to go

STRATEGY
How do we want to achieve that

PURPOSE
What makes us unique

VALUES
What is important to us and how do we act

BRAND
How we are recognized

HISTORY
What do we build on

- ensuring the transparency and traceability of our actions
- ongoing evaluation and further development of own measures and standards
- proactive contribution to a sustainable future (environment, climate, human rights, and social justice)

IMPORTANT: For full details and background on the contents of our values landscape, see the appendix "Our Values in Detail!"

5. Dealing with violations –

In the event of a violation of laws, policies, directives or this Code of Conduct, the individual concerned will face disciplinary consequences. Violations may also result in criminal and civil law consequences, such as claims for recourse and damages for the respective party.

It may happen that we discover violations of provisions of the Code of Conduct, of other internal guidelines and directives, or of legal requirements. If we identify such misconduct, we are required to report it immediately.

The following options are available for this purpose:

- details to the direct superior or
- details to the management of the respective subsidiary or
- details to the compliance officers.

This duty to report exists whenever the management board, a manager or an employee notices something or has concerns that a colleague, supplier, customer or other professional contact is behaving illegally or unethically.

A dedicated email address (compliance@welser.com) has been set up for this purpose. It is managed by the compliance officer. Complete confidentiality is assured. All concerns will be handled with the utmost care and will be followed up with appropriate independence and the necessary discretion.

Together against the “wrong”

In order to promote open and trusting communication, it is expressly stated that employees who report identified violations of laws, the Code of Conduct or other internal guidelines and regulations by other persons will under no circumstances expect negative consequences from doing so, unless it is a deliberately false accusation. In the event of such intentional misreporting, the respective employees will face disciplinary and criminal action.

Compliance only works if we all work together to ensure that our rules are followed. Engaging in illegal or unethical activities, or even looking the other way, are not options in our company.

6. Whistleblower system

In addition, there is an anonymous whistleblower system which is part of our external website (see www.welser.com/en/company/compliance/whistleblower-system) and is also managed by the compliance organization.

Whistleblowers can report information digitally (anonymously, directly, and in writing via the whistleblower system), by phone (anonymously, using the interface phone number), and in person (by booking an available appointment with the responsible compliance officer). You are free to choose whether to make a report anonymously or to provide contact details.

In accordance with the EU Directive on the Protection of Persons Who Report Breaches of Union Law (the "Whistleblowing Directive" for short), whistleblowers are subject to protection against disadvantages suffered by the company as a result of their report. If you knowingly make false reports and/or denounce a colleague, this is not a compliance violation and might even have legal consequences under certain circumstances.

More information can be found on our website (see link above).

7. Let's talk about compliance together

We can only achieve our common goal of compliance and values by working together as Welser Profile. Are there statements that are unclear to you, do you have suggestions for improvement, or do you believe that an area is misunderstood or not sufficiently regulated?

Our compliance officers are available at all times to answer your questions, make suggestions or address any other concerns you may have. Likewise, the door of your supervisor or other trusted person is also open to you for such matters.
Our HR department can also be your first point of contact in cases of discrimination and harassment.

For all compliance concerns and issues in general:

Benedikt Geusau
Compliance Officer
Corporate Group

b.geusau@welser.com

Markus Kepp
Compliance Officer
Germany

m.kepp@welser.com

Tania Zaripheh
Compliance Officer
USA

t.zaripheh@welser.com

On issues of discrimination and harassment:
Austria

Sigrid Kalteis
Customer Service

sigrid.kalteis@welser.com

Barbara König
Competence Center

b.koenig@welser.com

Germany

Daniela Krefting
Travel Management

d.krefting@welser.com

8. Appendix – Our values in

The following sections contain a more in-depth description of the background and detailed content on the values and principles of our value landscape.

8.1. Respect and integrity

Our corporate culture recognizes and embraces the fact that each person is unique, valuable, and to be respected for their individual abilities. In our daily interactions, we all contribute to a corporate culture that is characterized by appreciation and tolerance as well as openness and honesty.
Diversity and variety are fundamental values for us.
Our company is opposed to any kind of **discrimination**, in particular on the basis of age, gender, skin color, race, sexual orientation, religion or disability, and will not tolerate discriminatory actions within the corporate group under any circumstances.

For our employees, we promote full **equality of opportunity** and an environment characterized by fair conduct and freedom from harassment of any kind.

detail

All employees, managers, and managing directors agree that any circumstance perceived as **sexual harassment**, both in the private sphere and in the workplace, constitutes a serious impairment and violation of the rights of each individual. We condemn all forms of sexual harassment. Affected employees can report at any time to the responsible contacts listed at the end of the document or within the framework of a protected whistleblower system.
Respect and integrity are the minimum standards for us, which is why we have a strict zero-tolerance policy here. These principles also apply to conduct towards external partners.

8.2. Regionality

Despite our global business activities, as a traditional family business our roots are in the region. We are aware of this responsibility and are happy to accept it.
Through **regional procurement and production**, we strengthen the economic power of our home region as a reliable employer and regional business partner.
Through our **social and regional commitment**, we promote and support a wide variety of charitable groups and organizations.

8.3 Fair working conditions

The Welser Profile Group strives to offer all employees **fair, just, and equal working conditions**. The physical integrity and healthy well-being of our employees are a central concern. That is why we invest continuously in awareness and sensitization measures, as well as in safety precautions in the workplace.

All national, European, and international **labor and social law standards** are complied with. Such legally compliant behavior is also expected from all our business partners. In addition to these labor and social law standards, we are committed to appropriate and fair **wage and salary agreements** and compliance with **work time protection**, and also respect our employees' right to **collective agreements as well as social partnerships**.

8. Appendix – Our values in

An important concern of Welser Profile is **health and safety in the workplace**, so that all our employees can perform their work without endangering their health. We are always concerned with maintaining a healthy and hazard-free work environment for our employees by complying with the legal rules and regulations on health and safety in the workplace. Each employee shares responsibility for occupational health and safety in his or her area. The consumption of **alcohol, drugs, and other substances that impair consciousness** during working hours is therefore strictly prohibited.

As a traditional family business, now in its 11th generation, handing down our experience in metal-working has top priority. The training of our specialists in our own company ensures that the technical know-how of long-standing employees is passed on and continuously expanded. That is why we place particularly high value on the **promotion and further development (training and further education)** of our employees.

All employees are required to protect the property of Welser Profile, as well as that of our business partners, against **loss, theft, and misuse**. The resources provided are company property and can only be used for the business activities of Welser Profile. These resources must also be left as one would want to find them oneself; cleanliness and consideration are essential factors here.

8.4. Human rights and slavery

Based on the UN Charter and the European Convention on Human Rights, **human rights** are considered fundamental values that we must respect and observe.

Avoiding adverse impacts on human rights that could be caused by us or our business activities is therefore always central in everything we do. We respect the right to self-determination and we strictly reject any kind of forced labor as well as **modern slavery, child and youth labor, compulsory and forced labor,** and all other forms of exploitation and inhumanity or human trafficking.

detail

Human trafficking and the recruitment, transportation, transfer or reception of vulnerable persons for exploitative purposes by means of coercion or the use of force, abduction or fraud are strictly prohibited. Any work or any employment relationship must be characterized by voluntary acceptance and be able to be terminated by workers at any time.

We also speak out against any **abusive use of security forces**, the **unlawful deprivation of land,** and the impairment of the quality of life through **pollution of soil, water, and air**.

We expect the same behavior from each other and, in our external contacts, from our customers, suppliers, and all other business partners along our value chains. Further information on this can be found in our Business Partner and Supplier Code.

8.5 Sustainability (environmental and climate protection)

Both in the development and in the manufacture of our products, we take care to avoid all types of **waste** as far as possible. However, since this cannot be completely avoided, we at Welser Profile are committed to reusing materials and waste **(recycling)** and to disposing of residual materials in a safe and environmentally friendly manner **(disposal)** in order to make our contribution to maintaining our environment.

Attention is paid through various measures to the **responsible use of water and energy** as well as the **appropriate disposal of wastewater, waste, and residual materials**.

8. Appendix – Our values in

In addition, the focus is on an ongoing reduction of these resources **(energy and resource conservation)** in order to reduce our own **CO_2 footprint** as well as that of our products and the transport they require.
Various **control and management systems (environmental and climate protection, energy and emissions, quality and product safety, etc.)** have been implemented in order to better present our own ecological and economic activities at Welser Profile and to make them comparable. Our aim here is to make ourselves and our activities measurable and to show whether and to what extent the defined sustainability targets have been achieved, where there is potential for improvement, and how we can implement this.

A **sustainability report** is also prepared every three years to explain the defined goals and to communicate the achievement of objectives. It is of great concern to us at Welser Profile that all employees consciously act in the spirit of sustainability. It is therefore essential that each individual is continuously informed about the activities we undertake to contribute to a more sustainable future. Further details can be found in the current sustainability report.

detail

8.6 Resource origin and hazardous substances

Resource-efficient and environmentally friendly production is a central pillar of our philosophy, improving working conditions, minimizing risks, and reducing production costs and **raw material requirements**.

This also includes a clear commitment to the **non-use of conflict minerals** (Dodd-Frank Act) as well as the avoidance and restriction of chemical substances (RoHS, REACH, TSCA) and the sustainable handling of chemicals.

8.7 Quality and product safety

Quality and product safety are a matter of course for us. We continuously monitor for actual or potential hazards that could emanate from our products and uncompromisingly prioritize the protection of our customers as well as the users of our products.

We at Welser Profile are aware of the responsibility for ensuring high product quality and safety. Because of this, compliance with national, European, and international regulations is seen as essential for our success.

8.8 Anti-corruption

We are committed to fair and equal competitive conditions and it is therefore of particular concern to us to take a stand against any kind of **corruption**. We do not tolerate the granting or acceptance of **benefits, gifts or invitations** if this is intended to influence specific or future business transactions in an improper manner or could even create such an impression. Particular care must be taken when dealing with potential **public officials** or **politically exposed persons (PEPs)**, as they are subject to stricter regulations regarding benefits, gifts, and invitations.

8. Appendix – Our values in

We also take special care when dealing with **cost transfers** that we assume or that are acquired on our behalf (e.g., plant visits, order meetings, etc.). The only exceptions are gifts of minor value and hospitality within the scope of customary business practices. All other gifts must be refused or returned and the supervisor notified.

If there is any doubt about the appropriateness and permissibility (exceeding a de minimis level), the compliance officers must always be consulted immediately.

Offering or accepting **cash** or monetary benefits is not permitted under any circumstances.

With regard to **donations and sponsoring**, we are aware of our social responsibility and want to fulfill it as long as it is in line with our corporate values. In principle, we engage in selective sponsorship for the general public good. There is a clearly defined process flow that must be followed exactly by each employee.

More specific instructions and rules of conduct regarding benefits and invitations can be found by all our employees in the "Anti-Corruption and Conflicts of Interest" policy and the "Donations and Sponsorship" policy.

In any case, national laws and customs must be taken into account and, in the case of a stricter standard, take precedence over our guidelines (applicable law must be complied with without compromise).

8.9. Conflicts of interest

In the course of doing business, it is possible that we may encounter situations in which our personal or economic interests conflict or may conflict with the interests of the company. This applies above all to situations in which personal interests (or those of close people) interact with the interests of Welser Profile, colleagues or superiors.

detail

In these situations, we undertake to act exclusively in the interests of the company. Since such conflicts of interest cannot always be ruled out, we deal with these issues transparently.
In the event of any actual or potential conflict of interest, even if only the appearance of such a conflict of interest may arise, we will fully disclose the matter to the appropriate supervisor immediately and without request, and seek specific approval if necessary.

Conflicts of interest may arise in particular in connection with the following aspects:

- **Secondary activities** may contradict our obligations or lead to a conflict of interest and therefore always require the prior written approval of the supervisor, with notification to the responsible HR department. This also applies to participation in supervisory or advisory boards of companies outside the company.
- **Economic involvement** with competitors or with business partners of Welser Profile, in particular with customers or suppliers, is not permitted (with the exception of small-scale shareholdings in listed companies, insofar as they correspond to normal asset management). Such shareholdings by close relatives must be demonstrably brought to the attention of the respective supervisor. Close relatives include the employee's spouse or partner, parents, siblings, and children, as well as other persons, provided they have lived in the same household as the employee for at least one year.
- Likewise, transactions with our business partners in which the persons involved in the business decisions on the side of the business partners or the direct negotiating partners are close relatives must be reported in good time before the start of contractual negotiations.
- Conflicts of interest may also arise from **family relationships of** employees working in the same department. Such family relationships must therefore be disclosed to the supervisor.

The supervisor or the compliance officers must be consulted immediately in the case of questions and possible doubts related to the circumstances.
The fact that conflicts of interest arise cannot always be avoided. However, it is the responsibility of each individual to do their part to ensure that they cannot have a detrimental effect on Welser Profile.

8. Appendix – Our values in

8.10. Laws, taxes, and accounting

It goes without saying that we are committed to complying with all **legal provisions and regulations** applicable to us.

We take responsibility for the fulfillment of our tax obligations. We are committed to the locally applicable **tax law** in the countries in which we operate. This includes the application of the arm's length principle as an international transfer pricing standard.

All documents and reports, such as for the purpose of accounting (e.g., financial reports), annual reports, audit reports, etc., prepared internally or externally, must be accurate and truthful **(proper recording/accounting)**.

We ensure transparency and prevent fraud by always recording all business information, data, transactions and activities accurately, completely, on time, and truthfully, whether in electronic or written form. Here too, each of us makes a significant contribution to compliance with laws, regulations and internal rules in this area.

8.11. Business partners and money laundering

In addition to customer satisfaction and the quality of our products and services, honesty and sincerity are the most important benchmark in dealing with our business partners and suppliers. We only make truthful statements to our business partners and suppliers.

The basis of our business relationships is that we want to know our **business partners**. We only do business with business partners whose identity we know.
When necessary, we screen new business partners according to defined guidelines and expect the same level of honesty as well as compliant conduct and integrity. We reserve the right to terminate business relationships if necessary or to maintain them only under certain conditions.

detail

Our **understanding of values** in the form of our Business Partner and Supplier Code is a component and common basis for business relationships because Welser Profile does not participate in any illegal activities of others. This includes making an (albeit unintentional) contribution to **money laundering and tax evasion**.

We remit money only for properly documented and rendered services and delivered goods.

Transparency **and traceability of business activities** (sales models, commissions, etc.) are always in the foreground and we do not participate in untrue representations or unusual or unauthorized practices.

We comply with all laws designed to prevent money laundering and tax evasion, and we scrutinize suspicious financial transactions, especially cash payments, payments from third countries, or other conduct where there is a possibility that funds derived from criminal activity are involved.

In our dealings with **consultants**, we pay particular attention to transparency and traceability.

8. Appendix – Our values in

8.12. Foreign trade laws, customs, and export controls

Welser Profile is a globally active company that, in its worldwide business activities, observes regulations that can regulate and restrict the free movement of goods. However, national, and international laws and regulations are the basis for trade in goods, services, and technologies as well as for the settlement of capital and payment transactions.
Every employee of Welser Profile must comply with the foreign trade and customs regulations applicable to his area of responsibility when buying or selling goods, products, services or technologies across borders.

The basis is always the complete and transparent **customs clearance of all imports and exports** as well as compliance with the applicable foreign trade laws including the **export control obligations** and **sanction and embargo restrictions** relevant for us.
To the best of our knowledge and belief, we comply with all regulations relevant to export control and strive to act in an exemplary manner with regard to export controls and to cooperate with all authorities concerned worldwide when necessary.

8.13. Fair competition

Transparent and fair conduct in the marketplace ensures our long-term interests and competitiveness. Restricting **free competition** and violating competition and antitrust regulations are incompatible with our corporate philosophy and culture or our self-image.

For these reasons, the entire corporate group is clearly committed to fair and free competition and vehemently rejects any behavior of a contrary nature.

Violations of antitrust regulations can have serious consequences for Welser Profile, its management board, managers, and employees. In particular, these violations can result in heavy fines and damages, and in some countries even imprisonment. Verbal agreements and concerted practices are punished by the authorities just as much as written agreements.

detail

In the course of our business activities, we must comply in particular with the following conduct guidelines:

- No agreements may be made with competitors on business issues that determine or influence competitive behavior. This applies in particular to agreements and arrangements which have as their object or effect the fixing of prices or production capacities, the sharing of markets and customers or the boycott of a customer and other market participants.
- No unfair business practices may be used or pressure exerted on intermediaries to distribute products at a certain price.
- No agreements or understandings may be made to submit bogus bids.

In discussions and **contacts with competitors**, it is vital to refrain from discussing **confidential information** such as prices and terms of sale, costs, production capacities, stocks, etc.

Activities in syndicates and, in particular, participation in syndicate meetings provide an important basis for representing the interests of industrial and economic groups within the framework of national and international legislation. In our syndicate work, we must also observe the principles and guidelines of conduct outlined above and are obliged to conduct ourselves in compliance with antitrust law. If we become aware of behavior by other participants in such bodies or on the fringes of such syndicate events that violates antitrust law, we must immediately withdraw from these bodies and syndicates and inform our superiors.

The requirement for transparency and all applicable legal provisions must be observed in any involvement in political **lobbying**.

Further rules of conduct as well as essential topics and aspects relating to antitrust and competition law compliant behavior can be found in the "Antitrust Law" guideline, which all our employees receive and which provides guidance on conduct compliant with antitrust and competition law.

8. Appendix – Our values in

8.14. Information security and protection of confidential information

Our **information security management system** is designed to effectively counter the steadily increasing number of possible attacks and the growing risks associated with them.

Information security and the related prevention of confidential information being accessible without authorization is the responsibility of all of us, as well as of the external service providers engaged. We all have to ensure a high level of information security – adapted to respective requirements and developments – in all activities in order to live up to the trust of our customers and business partners.

We may not use **confidential information of** any kind obtained in the course of our professional activities, including information outside our own field of activity, for the pursuit of our own interests or make it available for the benefit of the interests of third parties.

Everyone must ensure that company information of any kind (documents, extracts, files, drawings, plans, forms, etc., including reproductions thereof on paper and electronic or other data carriers) is always kept safe. Protection and confidentiality must also be ensured within the context of the **disposal/ destruction of corresponding information and documents**. If such information is required outside the company for business reasons, it must be secured against inspection or access by third parties.

detail

Strict confidentiality must be maintained with regard to all **company and business secrets** and issues relevant to the company, in particular research and development processes, acquisition strategies or acquisition targets as well as significant investments – regardless of the source of the information. If external partners (e.g., suppliers, consultants) are involved, suitable non-disclosure agreements must be concluded with the involvement of the responsible legal department.
Information from which company and business secrets can be derived must also be treated as confidential and may only be made available to those employees who require it as part of their professional activities and must be stored securely. This also applies to information in which our contractual partners have an interest in secrecy, in particular if a corresponding confidentiality agreement has been concluded for this purpose.

The **disclosure of data** to market research institutes or industry services that use this data for market reporting (so-called "market information procedure") is only permitted after consultation with the management board and on condition that the reported data is treated confidentially. In particular, the organizer of the market information procedure may use the reported data only to calculate and publish statistical information about the entire market, which does not allow any conclusions to be drawn about the individual data of the individual participants. Further details are provided in the section on handling commercially sensitive information in the "Antitrust Law" guide.

If company-related sensitive data is stolen or cannot be found **(data loss and data breach**), the respective supervisor must be notified immediately. If this concerns electronic data, the blocking of passwords or other appropriate steps must be initiated immediately in consultation with the responsible IT department.

8. Appendix – Our values in

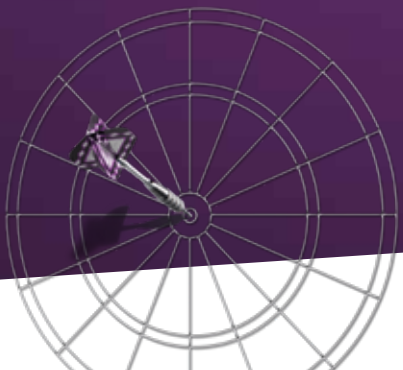
8.15. Data protection and handling of personal data

The trust of our customers, business partners and employees is central to the long-term success of our company.

The protection of the personal data of our customers, suppliers, and other business partners and employees is therefore of great concern to us. Processing personal data contrary to the applicable **data protection regulations** is not compatible with our corporate culture or our self-image. Of particular importance to us are the provisions of European and national data protection laws (especially GDPR). Since data protection can only be successful if it is taken into account in all work processes and is observed by all employees of the company, all employees of Welser Profile are obliged to comply with data protection.

In everyday office life, personal data must always be protected as well as possible by **protective measures**. Protection and confidentiality must also be ensured at all times in the context of the **disposal/destruction of** corresponding information and documents. Access to and **disclosure of personal data** may only take place to the extent permitted by law and to the extent necessary for the performance of a specific task. The existence of the necessary contractual basis is essential (order processing contract, etc.), especially in connection with **contract processors**.

If, despite extensive awareness and security measures, a **data protection incident (data breach)** should nevertheless occur, this must be reported immediately to the data protection officer.



detail

8.16. Corporate communications and external appearances

We take our responsibility to stakeholders and all other relevant parties very seriously. For us, corporate communications means **transparency and open communication**, although we take any confidentiality required in individual cases seriously in any case.

- Open communication is the basis for trust and appreciation.
- The open exchange of information between employees and managers makes decisions comprehensible for all involved.
- Constructive exchange with our clients and stakeholders ensures ongoing development in the interests of all.

The basis of our corporate culture is honest and respectful communication within the company. We forward information that we feel is important for a colleague or supervisor to receive. If we have concerns about the truthfulness of reports or allegations, we check them before forwarding them so that we can prevent the spread of false reports and allegations.

The **social commitment of** our employees in associations and organizations or **political activities** in public functions at municipal as well as supra-regional level is to be welcomed. However, within the scope of their personal commitment, everyone must ensure that the Welser Profile Group does not become involved in political campaigns or public disputes under any circumstances.

Social media, in particular, can also be used to make external appearances that have an impact on the public's perception of our company or the people who work for it. A separate guideline (guideline for external appearances and social media) defines what must be observed when engaging in social media activities because even postings on a social network that are intended to be private can have an impact on our company.

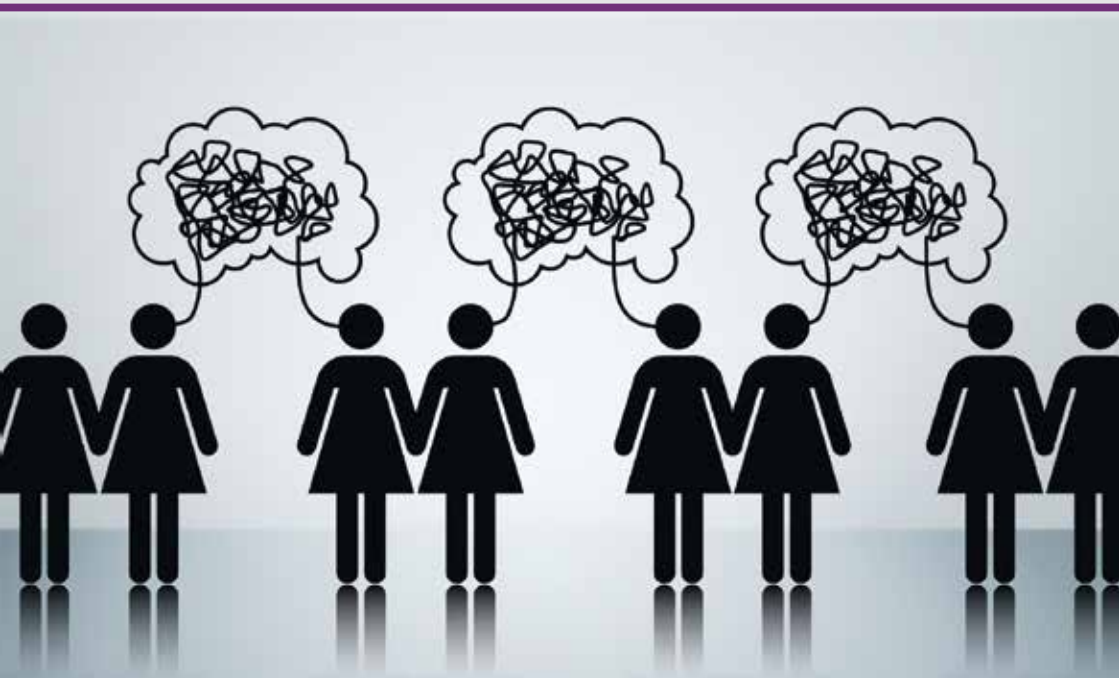
Document information and

Document:	Code of Conduct	Version:	2026.07
Author:	Compliance Organization	Date of issue:	July 2027
Release:	Management Board	Status:	Released

Versioning

Date	Change	Reason for change
10/04/2023	Version 2	Addition of a contact person
07/07/2026	Version 3	Addition of a contact person

versioning



Imprint:

Welser Profile Austria GmbH
Prochenberg 24a, A-3341 Ybbsitz, Tel.: +43 7443 800-0, Fax: +43 7443 800-4111
at@welser.com, www.welser.com

Commercial register number: FN 189291 w, Commercial register court: Regional Court St. Pölten
Further information according to ECG: firmen.wko.at, VAT Reg. No.: ATU48017809

welser profile

We bear responsibility
for our employees.

www.welser.com