

CODE OF CONDUCT

FOR BUSINESS PARTNERS



This code of conduct defines the ethical principles and general requirements that the Pankl Group expects of its suppliers, service providers, consultants, independent contractors, representatives or other third parties acting on its behalf ("business partners") with regard to their responsibility for people and the environment. The Pankl Group also conducts its economic activities in accordance with these guidelines, which is why it also requires that its business partners comply with these standards.

For future collaboration, Pankl AG or one of its affiliated companies therefore agrees with its business partners to apply the following regulations, which are considered to be the basis for the successful structuring of business relationships. Business parties undertake to comply unswervingly with the principles and requirements of the code of conduct.

Pankl AG hereby reserves the right to make changes to this code of conduct if required. The current version of this code of conduct is available on the Pankl AG website and on its affiliated companies' websites.

1.

RESPONSIBLE AND LAWFUL CONDUCT

The Pankl Group expects high ethical standards, both within the Group and from its business partners. Business partners of the Pankl Group must always act with integrity and comply with laws, regulations, other legislation and standards, regardless of where they do business. In addition, business partners should in turn require their own business partners, such as suppliers, service providers and subcontractors, to comply with the requirements of this code of conduct.

The laws which business partners must comply with are extensive and vary depending on the legal system. The relevant laws of the respective applicable legal system(s) must always be complied with, in particular antitrust laws, fiscal regulations and export control regulations. In addition, business partners must keep a comprehensive and accurate record of their transactions.

Business partners do not engage in or tolerate any form of modern slavery. Employment relationships are on a voluntary basis and can be terminated of their own volition, subject to a reasonable notice period.

Unacceptable treatment of workers such as mental hardship, sexual and personal harassment or discrimination is not tolerated by business partners. Conduct (including gestures, language and physical contact) which constitutes sexual harassment, or is threatening, coercive, abusive or exploitative shall not be condoned under any circumstances.

Business partners undertake to provide adequate remuneration and to pay the national minimum wage as defined by law, to comply with the maximum working hours defined by law in the country in question and to comply with the legal framework with regard to working hours, social benefits, overtime and rest periods.

To the extent permitted by law, business partners will recognize and respect the employees' right to freedom of association and collective bargaining, and will neither favor nor disadvantage members of workers' organizations or trade unions.

2.

CORRUPTION, EXTORTION AND BRIBERY

Business partners undertake to comply with the applicable national provisions to combat corruption, as well as international guidelines or recommendations (e.g. the UN Convention against Corruption, the OECD Guidelines for Multinational Enterprises), and not to tolerate or otherwise engage in any form of corruption, extortion or bribery, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision-making in violation of law.

4.

BAN ON CHILD LABOR

Business partners must comply with the United Nations regulations on human rights and children's rights and with the provisions of the Convention concerning the Minimum Age for Admission to Employment (Convention 138 of the International Labor Organization) and the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor (Convention 182 of the International Labor Organization) and undertake not to recruit persons under the age of 15 and to comply with the restrictions on the employment of persons under the age of 18. In countries which fall under the developing countries exemption in ILO Convention 138, the minimum age of employment may be reduced to 14 years.

3.

RESPECT FOR THE FUNDAMENTAL RIGHTS OF EMPLOYEES

Business partners must promote equal opportunities and equal treatment of their employees, regardless of their skin color, race, nationality, social background, any disability, sexual orientation, political or religious conviction, gender or age, and must respect the personal dignity, privacy and personal rights of every individual.

Business partners will not employ anyone against their will or force anyone to work against their will.

5.

OCCUPATIONAL HEALTH AND SAFETY

Business partners must assume responsibility for the health and safety of their employees and visitors, reduce risks and ensure the best possible precautionary measures to prevent accidents and occupational illnesses, offer training or instruction and ensure that all employees are competent in the subject of occupational health and safety. In addition, business partners must establish and implement an appropriate occupational health and safety management system.

6.

CONFLICTS OF INTEREST

Business partners must ensure that the personal interests of board members, managers and employees do not jeopardize the interests of the company. Situations in which conflicts of interest may arise must therefore be avoided. In the event of potential or actual conflicts during the course of their activities with Pankl AG or its subsidiaries, business partners must disclose all facts relating to the conflict of interest.

7.

ENVIRONMENTAL PROTECTION

Business partners undertake to protect the environment and comply with all legal standards and international standards in this connection. They will establish and implement an appropriate environmental management system, ensuring in particular that environmental impacts are minimized and environmental protection is continuously improved. Furthermore, business partners undertake to operate in an environmentally friendly manner in the manufacturing of products and not to conclude or implement business or projects which endanger the environment in the long term.

Business partners will promote opportunities for energy savings and the use of renewable energies. In addition, measures to safeguard the quality of water and water saving measures must be taken and good air quality must be promoted through appropriate measures, in particular through routine monitoring and treatment, where necessary, of general emissions from operations and greenhouse gas emissions prior to their release. Furthermore, business partners must monitor their waste gas purification systems and find economical solutions to reduce emissions to a minimum.

In addition, business partners must reduce or avoid the use and consumption of resources during production and the generation of waste of all types, including water and energy. Business partners must identify chemicals or other materials which pose a danger when released into the environment and handle them in such a way that safety is always ensured during transportation, storage, use, recycling or reuse and disposal.

8.

AVOIDANCE OF THE FINANCING OF ARMED GROUPS AND CONFLICTS

Business partners undertake to use only raw materials the extraction, transportation, trade, processing or export of which does not contribute either directly or indirectly to the financing of conflicts and human rights violations for the manufacturing of products.

Business partners shall ensure that customers, suppliers, organizations and persons with whom they intend to enter into or continue a business relationship are not on a sanctions list or anti-terrorism list. Business partners must carry out screening of their own business partners to this end. If a (potential) business partner is on a sanctions list or anti-terrorism list, then it may not receive goods, services or financial assistance under any circumstances.

9.

DATA PROTECTION AND DATA SECURITY

Business partners must process personal data responsibly and ensure a level of data protection which complies with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). Business partners must also comply with all applicable national data protection laws.

10.

PROTECTION OF CONFIDENTIAL INFORMATION AND RESOURCES

Business partners will ensure the safekeeping of all business-related data and documents, will maintain confidentiality in connection with confidential information and will not make use of information which they should not be party to. Business partners undertake to conclude appropriate confidentiality or non-disclosure agreements with their own business partners in order to maintain confidentiality within the supply chain and to adequately protect confidential information belonging to Pankl AG and its affiliates.

11.

FAIR COMPETITION AND ANTITRUST LAW

Business partners are committed to the principles of fair competition and business practices. In particular, they will refrain from colluding with competitors or any other activity affecting prices or conditions and will comply with all competition and antitrust laws.

12.

BENEFITS

Business partners are prohibited from offering, promising or granting benefits to employees of Pankl AG or its affiliates (for example in the form of gifts, invitations of any kind, discounts or donations) in order to bring about a business decision or to unduly influence it. Business practices, such as catering within the context of meetings, are permitted provided that they are offered only occasionally.

13.

SUPPLY CHAIN

Business partners hereby declare that they will provide appropriate support to their own business partners in relation to compliance with the content of this code of conduct and that they will in particular contractually require their business partners to comply with standards in their sustainability policy which at least comply with the relevant regulations. Business partners undertake to identify and minimize risks within their supply chain and to observe the principles of non-discrimination in the selection of and dealings with their own business partners.

14.

WHISTLEBLOWING AND PROTECTION AGAINST RETALIATORY MEASURES

Business partners undertake to maintain an internal whistleblowing system in accordance with the requirements of Directive (EU) 2019/1937 and the national laws adopted (or to be adopted) for this purpose, which enables whistleblowers to (anonymously) report a suspicion or concrete indication. Business partners must ensure that all whistleblowers are fully protected against any reprisals resulting from the reporting of wrongdoing.



If you have any questions or uncertainties concerning the code of conduct, please contact the legal department at: recht@pankl.com

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