



## Code of conduct

### General

Corporate responsibility constitutes an essential part of our corporate philosophy. The following defines the values, principles, and methods that govern our business activities. Our objective is to comply with the rights of the employees and to respect ethical standards, and to create a work environment that fosters integrity, respect, and fair behavior.

Moreover, we wish to emphasize that motivation and a high level of professionalism are essential pillars of our company. The following fundamental rules of conduct apply to the management, all employees and partners in Austria and abroad, and to all our contracting partners. (e.g. manufacturers).

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We encourage all employees to consult the Management in case of any doubts as to the lawfulness and appropriateness of any measures.

Sven Krumpel (Managing Director)

Karin Krumpel (Managing Director)

Perchtoldsdorf, 30.5.2018



## **1. Equal opportunities**

CODICO commits itself to protecting and safeguarding human rights. We reject any form of discrimination based on race, color, gender, and religion or any other characteristics (e.g. nationality, age). We regard equal opportunities for all as a matter of course, and all our business decisions are free of any form of discrimination.

## **2. Harassment**

CODICO will not under any circumstances or in any form tolerate any kind of harassment. In addition to any kind of psychological and verbal harassment, this also applies to physical and in particular sexual harassment. Such harassment includes obvious advances, contemptuous comments, offensive gestures, or the display of relevant image and video material in the company and its environment. A certain behavior can also be classified as harassment even if this was originally not intended as such by the acting individual and the latter cannot be accused of any intent.

## **3. Employee health and safety**

CODICO is aware that health, safety, and the environment are essential factors for the success of the company. Everyone working for CODICO is responsible for a sensible approach toward health, safety, and the environment.

CODICO will not tolerate any compromises with regard to health protection and safety of its staff at the workplace. No CODICO employee is allowed to expose himself or herself and other employees to high-risk situations that may harm their physical and mental health.

Health promotion also means guaranteeing a proper work environment. The Management and the employees must undertake all necessary measures to create and maintain a harmonious work environment in which the dignity of each individual is respected.



#### **4. Environmental protection**

One of the objectives that also forms an integral part of our corporate policy is the preservation of a clean environment.

Of course, CODICO meets all official and mandatory requirements, but we also endeavor to achieve the above objective through diverse activities extending beyond that.

CODICO applies the following fundamental principles:

- not to pollute the environment
- to constantly optimize the use of resources.

CODICO is very keen on maintaining the public's confidence in the integrity of its activities, be it through transparent reporting or consulting with other people so as to improve its understanding of issues relating to internal and external health, safety and the environment.

#### **5. Assets**

All employees and partners of CODICO GmbH are responsible for the proper and prudent use of the company's property. They are expected to make efficient and appropriate use of the assets and resources of the company to which they have access or they are entrusted with so as to protect their value.

#### **6. Corruption and bribery**

All CODICO employees, partners, and contracting partners commit themselves to the highest integrity, honesty, and decency in all internal and external relationships. No person shall directly or indirectly accept, request, offer or grant bribes or kickbacks, other "perquisites" (including gifts and perks, with the exception of business articles generally accepted in the international business environment) or other benefits, even under unlawful pressure.

Against this background, it is forbidden to offer business material, gifts, or the like that is in violation of any laws or regulations or in conflict with this Code of Conduct or may cause damage to (the image of) CODICO if it were to become publicly known.



## **7. Prohibition of child labor**

CODICO expects its suppliers to exclusively employ individuals who are at least 15 years of age. This minimum employment age is based on the conventions of the International Labor Organization (ILO) and the UN Convention on the Rights of the Child. These conventions provide for internationally valid minimum limits. It is forbidden to employ individuals who are under the age of 15 (or 14 in those countries in which the law allows for this) or below the minimum working age prescribed by law in countries in which this is higher than 15 years.

We only accept a minimum age of 14 years by way of exception if a mandatory minimum age of 14 years applies on the basis of Convention no. 138 of the International Labor Organization (ILO) in the country in which the supplier concerned has its permanent establishment.

In addition, all statutory limitations with regard to the employment of individuals under the age of 18 must be complied with. Please note that, according to the UN Convention on the Rights of the Child, every individual who has not yet completed 18 years of age is considered a child. We recognize the right of all children to be protected against economic exploitation, against work that is hazardous or detrimental to the children's education or may harm their health or physical, mental, intellectual, moral, or social development.

## **8. Choice of contracting partners (e.g. manufacturers)**

In order to ensure the highest level of customer satisfaction, CODICO selects contracting partners based on criteria such as quality, innovation, costs and services. Since it is of utmost importance for CODICO that its partners share the values of this Code of Conduct, all contracting partners must be selected on the basis of suitable and objective methods which, in addition to quality, innovation, costs and services, also take into account the values described in the Code of Conduct.

Our employees are invited to establish and maintain sustainable, transparent, and partnership relationships with our contracting partners.

## **9. Embargo provisions and export controls**

CODICO undertakes to ensure that its business activities do not under any circumstances violate any international embargo regulations or export controls in the countries in which it operates.



## **10. Business secrets**

A major part of CODICO's business information is confidential or legally protected, and is therefore subject to a secrecy obligation. Confidential information and confidential documents may not be disclosed or made accessible in any other way to third parties without authorization, unless such authorization was granted or the information is publicly available.

The secrecy obligation applies in particular to intellectual property. This includes, among others, business secrets, contracts, business and marketing plans, drafts, business documents, salary data, customer data as well as all other non-published financial data and reports.

## **11. Compliance**

CODICO endeavors to comply with all applicable laws and other relevant provisions in Austria and abroad in all its business decisions and actions. Integrity and sincerity in the relationship to both our customers and our suppliers constitute an essential foundation of our company. CODICO keeps a legal register to record and provide an overview of all legal requirements the company needs to meet. This register ensures behavior in conformity with the law and compliance with all applicable legal standards.

## **12. Data protection**

We attach great importance to the protection of personal data. Therefore, we process personal data of our employees, customers, prospects, and business partners in accordance with the applicable legislation for the protection of personal data and data security.

In a separate data protection policy, CODICO describes the nature of the personal data collected, how these data are used, to whom they are transferred, and which options and rights data subjects have with regard to our processing of the data. In addition, we describe the measures we take to guarantee data security, and how data subjects can contact us when they have questions concerning our data protection practices.

This policy governs the processing of information in compliance with data protection and the respective responsible positions at CODICO. All employees are obliged to comply with this policy.