

As an Austrian family firm with almost 370 years of history, we put corporate responsibility and our commercial thinking into practice not just for the moment but long-term and across generations. Creating values – that applies to us now and in the future.

A handwritten signature in black ink, appearing to read 'Franz Neuhofer', with a long horizontal flourish extending to the right.

Franz Neuhofer, Owner & CEO

Code of Conduct of FN Neuhofer | Who we are and how we work

The aim of this code of conduct is to set down binding standards of conduct in order to avoid situations that might cast doubt on the legality and honesty of the company.

As an internationally successful company, FN Neuhofer Holz is among Europe's leading suppliers with innovative accessories and smart solutions for floors, walls and ceilings. We create products that are pioneering in their innovation and functionality. We are recognised as a "Leitbetrieb Österreich" (Leading Austrian Company) and we apply the slogan WE.KNOW.WOW! with top priority in all areas. The "We" for our performance and our striving towards joint success. To this end, the company invests heavily in, among other things, communication to ensure transparency and information flow. The "Know" is our know-how that we as a company have built up and expanded. Knowledge and skills in innovation, knowledge about solutions, quality and service. And the result of this: "Wow!" The delight, the joy, the success. We identify ourselves throughout the company with the slogan "We. Know. Wow!"

The basis of the code of conduct is provided by our values: delight in action, innovation in products and services, performance, responsibility and continuity. These values and the company and legal context and ethical standards set the rules of conduct for all employees, managers and owners and hence provide a reference framework binding on everyone. Managers have an additional responsibility to exemplify the company culture, which includes as a core element of the company's activities the observance of the code of conduct and of applicable legislation.

The code does not affect pre-existing rules relating to the employment relationship e.g. the employment contract or the provisions of employment law and is to be observed in addition to these applicable laws and regulations. It is above all an appeal to the sense of responsibility of every individual. Every employee bears his own responsibility in his own area for his own behaviour and action and in his conduct he represents our company both in a company and a personal context. Disciplinary consequences are to be expected in the event of any infringement.

Note:

For the sake of greater readability, the masculine form will mostly be used below. Of course, such forms cover both male and female employees.

- **Observance of the law and legislation**

The observance of legislation and regulations is for us the basic principle of commercially responsible action and our overriding imperative. We observe the applicable legal duties and prohibitions at all times and places. We of course also expect the observance and respect of applicable legislation and regulations by all our customers, service providers, suppliers and business partners.

- **Avoidance of conflicts of interest and corruption**

Business decisions are taken exclusively in the best interests of the company and must not be affected by private interests or relationships. Our employees must avoid situations which might give rise to a conflict between their private interests and professional tasks. Neither employees of FN Neuhofers nor their relatives should maintain business, financial or other relationships with customers, suppliers, business partners, service providers or competitors that would restrict the fulfilment by the employee concerned of his tasks on behalf of FN Neuhofers.

FN Neuhofers will not tolerate in any form corruption, money laundering, bribery or any other illegal granting of benefits. FN Neuhofers and all its business partners refrain from strictly personal relationships or obligations with customers, suppliers or business partners that give rise to bribes or other illegal payments. It is not permitted to accept or give gifts or invitations where from a company perspective it would have to be assumed that they might influence business decisions or would be in contravention of the applicable anticorruption regulations. Agreements that relate to favouring individuals in connection with the placement, supply and payment of orders are not permitted.

Attempts by suppliers or customers to dishonestly influence our employees in their decisions are to be reported as appropriate.

- **Fair competition**

FN Neuhofers stands for technological expertise, innovation, customer orientation and motivated employees acting in a responsible manner. Our standing with all our partners and the long-term commercial success of this family firm in international competition are based on this. We observe the competition laws in the countries in which we operate. Any anomalous conduct, informal discussions or informal agreements aimed at restraining competition or that might have such an effect are forbidden. No employee of FN Neuhofers may participate in communication (be it written, electronic or face-to-face/verbal) with a competitor, in which an attempt is made to determine prices or discounts or credit terms and framework agreements in a manner in restraint of competition and/or otherwise illegally, to exchange confidential business information, to apportion contracts, customers or contract areas among themselves or specific customers or suppliers.

- **Confidentiality, data protection and data security**

FN Neuhofers acts at all times in conformity with the General Data Protection Regulation (GDPR).

You can find and read full information on the subject of data protection on the data protection declaration on our website <https://www.fnprofile.com/de/datenschutz>.

Company and business secrets of FN Neuhofer, our customers, suppliers and service providers are subject to total secrecy and must not be passed on to unauthorised third parties. All our employees are obliged to protect non-public information and to treat all documents and information about company matters as confidential at all times. They may not be disclosed or made accessible to unauthorised third parties and they are to be secured against any form of unauthorised use, in particular against access by unauthorised third parties. Confidential information includes all strategic, financial, technical and business information that is not known to the public. This includes, among other things, organisational procedures, processes and structures, technical know-how, business strategies and financial plans, cost summaries, product developments, information about customers, service providers and suppliers, marketing strategies and sales information. This also applies to documents and information passed to us by third parties. Any passing on of confidential documents or information within the above-mentioned sense is strictly subject to the written consent of the company's managing directors.

- **Financial responsibility and handling company property**

As an independent family firm in its 10th generation we put commercial thinking into practice not just for the moment but long-term and over generations. We require appropriate careful handling of financial resources and the company's property by all employees regardless of whether they are dealing with tangible or intangible assets. They are expected to avoid damage, unnecessary costs and other losses and not to misuse the company's property.

- **Human rights and employees' rights**

FN Neuhofer respects internationally recognised human rights and supports their observance. We totally reject any form of forced labour or child labour.

The right of all employees to reasonable remuneration is acknowledged. Wages and salaries and other payments are as a minimum in line with the relevant national and local legal standards or the level of the national commercial sectors/segments and regions. We hire employees with written employment contracts and on the basis of documented employment relationships in accordance with the law.

FN Neuhofer ensures a safe working environment. This includes appropriate health and safety guidelines and appropriate measures to reduce risks and to prevent accidents. All applicable legislation on health and safety at work, hygiene, fire protection and protection from risk is observed and training is provided regularly. Strict observance of the safety regulations is an indispensable precondition. Any shortcomings are to be reported and removed without delay.

- **Discrimination and harassment**

As an internationally operating company with numerous employees with a variety of origins, cultures and mother tongues, FN Neuhofer treasures diversity and inclusion.

FN Neuhofer promises to treat existing and potential employees fairly and equally. We do not tolerate discrimination or harassment of any kind in the workplace such as offensive, indecent or otherwise undesirable behaviour that harms personal dignity or creates a humiliating atmosphere.

- **Environmental protection and sustainability**

As a company that has worked in and with nature for centuries, we undertake to deal with natural resources in a responsible manner. Thus, for instance, since 2004 FN Neuhofer has been ISO 14001 certified, which guarantees observance of publicly acknowledged environmental standards and the active avoidance of environmental pollution and evidences the deep integration of environmental protection into the company philosophy. Moreover, FN Neuhofer is FSC and PEFC certified and as a part of the “UN Global Compact” network supports the 10 principles concerning human rights, employment standards, environmental protection and combating corruption as well as the UN’s Sustainable Development Goals.

Environmental protection of course includes observing legislative provisions, the legal disposal of waste and sustainable land use. We handle resources like energy, water and raw materials efficiently and sparingly and we also expect this of all our business partners and employees.

- **Integrity in conduct and communication with the public**

FN Neuhofer respects the right of freedom of expression and the protection of individual rights and privacy. Every employee should be aware that he may be perceived in connection with FN Neuhofer, including in his private life and he is therefore requested to safeguard the company’s image and reputation by his behaviour and appearance in public vis a vis the media, among others.

Here we would refer in particular to the new social media and networks via which the activities and comments of countless members of the online community are recorded and can be stored and accessed for an indefinite period.

Reporting misconduct

If misconduct or a breach of the law, the code of conduct or other internal guidelines or rules is discovered, this is to be reported without delay and this should be done either to a confidant at a project or strategic level or to the employee’s direct superior, who will pass on this report – in absolute confidence if so desired – to those with authority for checking and investigation.

To support open and trusting communication it is specified that the report of such breaches discovered will have no negative consequences for the person making the report. However, FN Neuhofer reserves the right to take disciplinary measures against employees who make accusations deliberately or with gross negligence.

The code of conduct is available online on the CORE internal platform to all employees of FN Neuhofer and is binding upon them. In addition, it will be issued in the company with the welcome file to every new employee for information and for binding observance in the context of the company agreement.

The code of conduct can be obtained by our customers, suppliers and business partners at any time upon request to the relevant contact person of the department.