

CODE OF CONDUCT – Suppliers

Table of Contents

1. General information.....	4
2. Principles of Conduct	4
3. Sanctions.....	5

Preliminary Remarks by the Management

We understand compliance as a standard for integrity and sustainable entrepreneurship as well as a classic obligation to adhere to general legal conditions.

The present Code of Conduct shapes our generally applicable rules for successful and trusting cooperation. By describing our principles of conduct, we ensure that TGW cooperates with its partners in a legally compliant manner.

Compliance concerns everybody. We set a good example.

1. General Information

Compliance is not an obstacle to business success but it will support TGW and its partners in being successful in its processes and every business relationship. That is why we commit our partners to comply with the present Code of Conduct.

2. Principles of Conduct

Our principles of conduct provide our partners with the appropriate guidance for a successful cooperation with TGW.

- a. We treat each other equally and promote diversity as well as tolerance, since diversity leads to maximum productivity, creativity and economic success. Our partners do not discriminate against anybody and respect as well as protect the applicable regulations regarding the protection of human rights and the prohibition of child labour.

Origin, age, religion, race, sexual orientation, gender, illness, etc. do not lead to any disadvantage whatsoever. **(Equal opportunities/human rights)**

- b. Our partners adhere to the legal regulations regarding occupational health and safety at work and ensure that the employees are paid appropriately and according to law. **Safety in the workplace/minimum wage)**
- c. Our partners assume responsibility regarding environmental protection and adhere to the applicable law and legal regulations. Corresponding issues are included in technical, economic and social considerations. **(Environmental protection)**
- d. Our partners maintain transparent financial, accounting and business records that fully and accurately reflect all transactions and businesses in which they engage, according to applicable laws, accounting principles, policies and practices such as the valid IFRS standards. **(Standards for invoicing and reporting)**
- e. We promote and expect professional performance of services. Our partners adhere to all applicable legal regulations on product safety and requirements, especially legal requirements regarding safety, identification labels and packaging of products as well as the use of dangerous materials and substances.

Our partners fulfil all valid quality standards and are constantly working to improve their products. **(Professionalism/product safety)**

- f. Our partners adhere to the law and commit themselves to the principles of fair competition. Corruption, bribery and cartel agreements are not a means to implement projects. We do not accept any kind of concession of benefit that is contrary to the general understanding of integrity.

Gifts are given and accepted in accordance with our guidelines.

Illegal actions in whatever form must not be taken (e.g. money laundering, breach of trust, fraud, wrongful trading, etc.). This also includes compliance with export-relevant regulations and export controls (compliance with and consideration of embargos, etc.). **(Fair competition and compliance with the law)**

- g. The inadmissible use of third-party company property (e.g. patents, know-how, trade secrets, other industrial property rights, etc.) is prohibited. Our partners commit themselves to handle company property as well as business and company secrets with care and in an appropriate way. This includes TGW tools, TGW software, etc. that must not be used without the consent of TGW. Damages, loss and unauthorised use by contractual partners and third parties are immediately reported to TGW. **(Protection of company and intellectual property)**
- h. Our partners commit themselves to handle personal data of natural persons trustfully and carefully. **(Data protection)**

3. Sanctions

- 3.1. We pursue a **zero-tolerance policy** which means that appropriate measures have to be taken if our principles are violated. This also includes the possibility of an extraordinary termination of contractual relationships as well as the reporting of criminal conduct to the responsible public prosecutor's office.
- 3.2. It is at our discretion whether we take such measures, alternative actions or refrain from acting at all.

Marchtrenk, on 1 July, 2019



Jörg Scheithauer
CFO



Harald Schröpf
CEO



Christoph Wolkerstorfer
CSO

