



Hueck Folien

Code of Conduct of Hueck Folien

In effect since 1 January 2025



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1. Management's commitment

Hueck Folien GmbH, Hueck Folien Vertrieb & Service GmbH and Hueck Folien Ltd. Hong Kong (together **Hueck Folien**) are reliable, dynamic partners within their networks and are aware of their social responsibility as enterprises acting on the global stage. For this reason, Hueck Folien expressly commits itself to a corporate policy that is based on competence, openness, trust and absolute integrity.

This is the basis for the further consolidation and development of Hueck Folien's competitiveness and market position on a long-term basis. Sustained commercial success requires not only high-quality products, reliability, efficient structures and a high level of motivation but also compliance with the applicable rules and legislation. Responsibility and ethical principles are a precondition for sustained success.

Staff know-how and loyalty are essential strengths of Hueck Folien. We are loyal and legally correct, comply with applicable laws, internal guidelines and staff regulations, and treat business and trade secrets confidentially. We avoid conflicts of interests, protect the assets of the enterprise and reject all manifestations of corruption. We comply with both competition law regulations and international export restrictions. This avoids risks and damage not only for Hueck Folien (for instance fines, liability or loss of reputation), but also personally for the staff affected. The consequences of corruption include not only the possibility of punishment but also the loss of trust in the enterprise and the distortion of competition.

The present Code of Conduct reflects the Hueck Folien business principles. These are the basis for every thought, deed and decision taken in Hueck Folien's name.

2. General section

2.1 Overview

The Code of Conduct describes the Hueck Folien business principles and constitutes the essential elements of our corporate culture. This code serves as the basis for further guidelines to define the specific standards for staff actions and conduct. In addition, in various sectors of the enterprise, there are different staff instructions that must be complied with.



Code of conduct



2.2 Entry into effect

This Code of Conduct entered into effect on 1 October 2023.

2.3 Addressees

This Code of Conduct is addressed to all Hueck Folien white-collar and blue-collar workers, leasing staff and members of the management, as well as to all those who act on behalf of or on the instructions of Hueck Folien (hereinafter referred to briefly as **members of staff**).

In its relationships with business partners, Hueck Folien will refer to this Code of Conduct and expect that business partners will also respect these business principles.

2.4 Responsibility

Compliance is not only the task of Hueck Folien but also the task of each individual member of staff. Compliance infringements can have personal consequences under civil and criminal law for each individual, and ultimately also cause serious damage to Hueck Folien. Each Hueck Folien employee must assume responsibility for his/her actions. This also includes every employee's obligation to comply with the Code of Conduct, the guidelines and staff regulations and to act in accordance with the laws (compliant conduct).

The Code of Conduct has been prepared in order to help employees to develop compliance awareness, find their way in everyday business life and avoid uncertainty.



3. Compliance Officer

3.1 Independence

The Compliance Officer is independent and not subject to instructions in the performance of his/her functions. He/she is directly responsible to the management board.

The Compliance Officer is appointed by the management board. Transfer or removal from this position is only possible in the event of a criminal conviction or by a justified resolution of the entire management board.

The Compliance Officer's functions have been performed by **Mr Mag. Hartmuth Pelger** since 1 January 2025.

3.2 Description of function

The Compliance Officer assists the Hueck Folien employees with respect to compliance with the Hueck Folien business principles as laid down in the Code of Conduct. He/she is the person responsible for all issues concerning the applicability and interpretation of the relevant standards and in this field is the internal contact person for all employees. However, each employee is responsible for adhering to the compliance regulations.

In addition, all Hueck Folien managerial staff will assist the departments for which they are responsible in implementing their obligations under the compliance provisions, and in daily business life will actively encourage compliance with the business principles set out here.

3.3 Powers

In order to be able to perform his/her functions completely and correctly, the Compliance Officer has unrestricted rights of inspection, access and information at all times with respect to all documents, books, records and personnel data.

The Hueck Folien staff are subject to a comprehensive information and notification obligation vis-à-vis the Compliance Officer. No employee is permitted to refuse to surrender compliance-relevant documents or to provide compliance-relevant information. Infringements will be documented and notified to the responsible superior or, in the event of repeated infringements, the responsible member of the management board.



3.4 Functions of the Compliance Officer

3.4.1 Implementation, ongoing risk evaluation and monitoring

The implementation and ongoing updating of the Code of Conduct and corresponding guidelines and staff regulations are the responsibility of the Compliance Officer. He/she shall be assisted by the managerial staff of the various departments.

The Compliance Officer is required to monitor ongoing developments, document and analyse potential compliance risks and suggest the legally necessary or appropriate changes to the management board.

A well-functioning risk management requires each Hueck Folien employee to cooperate (see notification obligations, p. 26 or questions and proposals for improvement, p. 28).

3.4.2 Training and management support

All employees are regularly informed by the Compliance Officer or external consultants about the content of and changes to this Code of Conduct, the guidelines, staff regulations and the applicable statutory provisions.

In the Hueck Folien business departments not directly in contact with external persons, this information can also be communicated by the relevant superiors.

3.4.3 Other functions of the Compliance Officer

- Contact person for compliance-relevant questions
- Monitoring of the observance of the compliance regulations and random checks
- Development of internal guidelines and processes
- Annual report to the management board

4. Hueck Folien business principles

4.1 Health, safety, and quality

Hueck Folien creates safe and pleasant working conditions for its employees and for this purpose operates a certified worker safety and health management system.



The employees are referred to the applicable in-company agreements with respect to the consumption of alcohol and drugs.

Hueck Folien delivers a maximum level of quality combined with optimum product reliability and efficiency. Our products stand for innovation and quality. In order to consistently satisfy these high expectations, individually developed and effective systems for quality management and property security are applied in Hueck Folien production.

4.2 Social responsibility and environmental protection

The assumption of responsibility towards society is an essential factor for our sustained corporate success. Through our products and services, our investments and our role as employer, Hueck Folien performs an important function wherever the enterprise operates. Hueck Folien supports non-profit-making projects in its social environment.

Every employee is responsible for the careful handling of the resources available. Everyone contributes to ensuring that sustainability is constantly experienced as an element of our corporate culture.

4.3 Fairness towards each other

We cultivate fairness with colleagues, customers, suppliers and competitors. Everyone is treated with respect and esteem. Hueck Folien rejects any kind of unequal treatment, discrimination or racism. No one will be treated unjustly or disparagingly because of his/her origin, his/her gender, his/her age or other personal characteristics or preferences.

Hueck Folien employees behave honestly and fairly. They do not retain or conceal information to procure a benefit for themselves; they do not set out facts wrongly and do not manipulate information.

4.4 Anti-corruption

Hueck Folien rejects corruption in all its manifestations worldwide. It is unlawful (in particular Secs. 153 and 309 of the Criminal Code), involves high and long-lasting risks, is irresponsible to the enterprise and society and is detrimental to performance. There is corruption if power that has been entrusted is misused in order to procure a benefit. It is irrelevant whether the benefits are provided directly or indirectly (e.g. to family members).



Hueck Folien conducts business in a legally and ethically correct manner. Hueck Folien expects the same from its employees and regularly checks the transactions concluded. Hueck Folien also demands compliance with this principle from its business partners, suppliers and customers.

These anticorruption provisions are intended to sensitise employees in their relationships with contract partners and public officials, in particular employees of public enterprises and employees of entities that are subject to control by the court of auditors, because the Act Amending Anti-Corruption Legislation 2012 tightened the provisions concerning active and passive conduct in the public and private sector. The Act Amending Anti-Corruption Legislation 2023 which came into force in September 2023 has further tightened the provisions on combatting corruption.

Before commissioning marketing agents, Hueck Folien conducts a background check of the person concerned to identify any corrupt conduct in the past or other risks. If it becomes apparent that a collaboration with the marketing agent might lead to an excessive risk for Hueck Folien, Hueck Folien declines the collaboration.

4.4.1 What is a personal benefit?

A personal benefit can take many forms and may be pecuniary or non-pecuniary in nature:

- Cash, vouchers
- Gifts
- Business meals
- Invitations to events
- Employment of a daughter or son as a summer intern at a business partner's company
- ...

All these cases may involve a personal benefit that can influence the recipient of the gift in his/her decision-making capacity.

Influence mostly depends on many factors, but in particular on the amount of a benefit. An invitation to a skiing holiday for the business partner together with his/her family will probably put the partner in an unpleasant situation and should therefore never happen. In contrast, with low-value benefits or subject-related invitations, a possible influence is not so obvious. In order to provide Hueck Folien employees with clear instructions, easy-to-handle criteria have been laid down that employees can use to decide whether they are allowed to grant/accept gifts or issue/accept invitations. In critical cases, consent is to be obtained from the Compliance Officer.



4.4.2 Cash

Cash is money in physical form, such as coins and banknotes. Cash equivalents are in particular bank transfers, savings books, credit or prepaid cards, vouchers, cryptocurrencies, cheques and discounts that are not normal commercial practice. Securities such as shares and bonds as well as funds are also comparable to cash.

The criterion for differentiation is whether something can be used as a means of payment or as a security. Everything that can be used to pay is to be treated like cash (e.g. vouchers). Anything that can be kept in a securities deposit account is likewise to be treated as cash.

Both accepting (passive corruption) and offering or giving (active corruption) cash or the equivalent as a gift is prohibited without exception, even in small amounts.

4.4.3 Invitations to events

Specialist events include invitations from business partners to attend events that are clearly of a specialist nature (e.g. training courses, corporate or product presentations). The invitee's attendance at these events is justified due to the subject matter or his/her employment, i.e. attendance is in the interests of the employer. Specialist events also include appropriate **catering** during the event (e.g. drinks and a small buffet). **Travel costs** and moderate **accommodation costs** for participants are also included in specialist events, but must be set out separately and recorded for each participant.

Accompanying programmes are often offered alongside a specialist event (entertainment character) and are to be treated like a leisure event.

Example: A visit to the Brucknerhaus concert hall, an invitation to a restaurant in the region, a visit to an exhibition, a tour of the city, an invitation to the Oktoberfest.

Leisure events include invitations to events where the specialist character is not apparent in the foreground (e.g. sponsoring, marketing or sales events) or to events without any specialist nature. The arrangements for the non-business part of the event must be appropriate and take account of the external effect. Examples of leisure events are invitations to the Salzburg Festival, invitations to concerts at Clam Castle, theatre invitations, or invitations to a football game.

If the objectively legitimate interest in attending the event does not predominate, hence if it is a leisure event, the benefit can nevertheless be accepted if it constitutes a low-value token of appreciation that is customary locally or in the country (Sec. 305 (4) No. 3, Criminal Code). In



this context, it should be pointed out that the legislature and judicial practice regard benefits worth EUR 100.00 as being no longer of low value.

If there are doubts as to how an event is to be classified, the superior and/or the Compliance Officer must be contacted.

Invitations to events issued by Hueck Folien must always be accompanied by a disclaimer.¹ The disclaimer obliges the recipient of the invitation to check whether the invitation can be accepted according to his/her internal guidelines. Different disclaimers can be used depending on the **person value of the leisure event**. The costs for a specialist event are not taken into account (merely those for the accompanying programme).

¹ A supplementary statement for compliance law reasons

**Disclaimer 1** (if < 100.00 Euro):

Most enterprises and organisations today apply compliance rules that lay down internal regulations on the admissibility of accepting invitations. We would not like to embarrass you with this invitation. For this reason, we ask you to check whether you are permitted to accept this invitation. For your information, we inform you that the value of our invitation will not exceed the amount of Euro xx per person.

By registering or participating, you confirm that the acceptance of invitations of this kind is permissible according to the regulations and Code of Conduct that apply to you. Please contact us briefly if this is not the case.

Disclaimer 2 (if $\geq$ 100.00 Euro):

Most enterprises and organisations today apply compliance rules that lay down internal regulations on the admissibility of accepting invitations. We would not like to embarrass you with this invitation. For this reason, we ask you to check whether you are permitted to accept this invitation. For your information, we inform you that the value of our invitation amounts to at least Euro 100.00 per person.

When registering for the event, please confirm by email or in the letter of acceptance that the regulations and Code of Conduct that apply to you allow you to accept this invitation. Please contact us briefly if this is not the case.



In summary, the following principles can be stated with respect to invitations to events:

- An invitation to **specialist events** without accompanying programme can always be given/accepted.
- An invitation to **leisure events** in conformity with local custom or a specialist event with an accompanying programme of a value below **EUR 100.00** can be given/accepted if
 - the invitation to a specialist event with accompanying programme has been approved (administratively) IN ADVANCE by the superior by means of an application for business travel.

In addition, if Hueck Folien issues the invitation to a specialist event with an accompanying programme or leisure event,

- Disclaimer 1 needs to be included.
- Invitations to **leisure events** or a specialist event with an **accompanying programme** of a **value of EUR 100.00** or more must not be given/accepted. In exceptional cases (e.g. invitation to the opera or on the occasion of the Danube Festival and if no public official is to be invited), a request can be submitted to the Compliance Officer for approval IN ADVANCE.
 - If approval has been granted by the Compliance Officer, the invitation can be issued/accepted.

In addition, if Hueck Folien issues the invitation,

- Disclaimer 2 needs to be included.
- In the case of an invitation to a **leisure event** or a specialist event with an **accompanying programme** of a **value of EUR 100.00 or more**, the Compliance Officer must
 - check whether an exception (e.g. in order to make new contacts) applies
 - check whether the invitation could lead to influence or whether there might be an appearance of influence
 - decide whether the invitation can be issued/accepted (approval)
 - justify and document any approval given in exceptional cases.
- Each year, the Compliance Officer must submit a report to the management board. The following information must be included in this report:
 - A list of all leisure events and specialist events with an accompanying programme of a value of EUR 100.00 or more that have been approved (broken down into invitations issued and received)
 - The results of random checks as to whether the classification as specialist or leisure event and the valuation have been correct.
- In the event of special enquiries or events, the Compliance Officer reports immediately.



4.4.4 Business meals

A **business meal** is a breakfast, brunch, lunch or dinner with a business partner where the specialist character is to the fore. It is irrelevant whether the meal takes place in the company's own canteen or a restaurant. Drinks, biscuits, fruit or small snacks provided during a discussion are not considered business meals.

The following business principles apply to invitations by Hueck Folien (active) and to invitations issued to Hueck Folien employees (passive).

- **No influence:**

An invitation must never be offered or given in order to influence an action or a decision by the recipient. Nor should it be capable of causing the recipient to feel obliged to the person giving the gift.

- Nor may the invitation create the **appearance of influence**.

- Invitations must never be issued or accepted in breach of an instruction by a superior or a decision by the Compliance Officer.

- **Appropriateness:**

The invitation must occur within reasonable limits. This depends on what is generally usual in the situation (business travel, negotiations, conclusion of a contract,...), in the country in question, in the trade sector, with the type of meeting and the circle of persons attending. Luxury invitations must always be avoided.

- Offering/accepting catering during a professional appointment is permissible provided that it is appropriate.

- **Inviting/accepting an invitation to a business meal** (catering) with a business partner is permissible if:

- the invitation serves professional purposes
- the invitation occurs within reasonable limits.

With invitations to meals, there are huge differences in price levels between the various regions of the world. For this reason, there are no fixed value limits in place. The responsibility of the individual employee issuing the invitation is, therefore, all the greater.

4.4.5 Dealings with public officials

A particularly strict standard applies to gifts and invitations to public officials and candidates who eventually take office. The applicable rules are stricter and more restrictive than with employees in the private sector. The mere attempt to influence a public official can have far-reaching



consequences under criminal law (cf. Sec. 307 of the Criminal Code, which imposes up to 3 years of imprisonment for offering, granting or promising a benefit to a public official for acting in breach of duty). Accordingly, particular caution is required when dealing with Austrian and foreign public authorities and public officials.

The Austrian **definition of a public official** (Sec. 74 (1) No. 4a of the Criminal Code) applies globally to all Austrian enterprises and Austrian nationals. The local definition of a public official in the country in which you are active is relevant for any prosecution abroad.

The Austrian definition of a public official covers:

- Anyone who exercises legislative, administrative or judicial functions as executive organ or employee for the federal state, a federal province, an association of local government authorities, a local government authority or any other legal entity under public law (excluding churches or religious communities). For instance a federal minister, the chairman of a public-law corporation, a member of a municipal council, or a member of parliament.
- Anyone who is otherwise empowered to carry out official transactions in execution of the law on behalf of the said bodies. A public-law corporation is either expressly created or recognised as a legal entity under public law by virtue of a law or a legal provision equivalent to a law (e.g. state treaty), or performs public governmental administration functions by virtue of its governmental remit. The term “public official” therefore also includes the employees and bodies of universities, tourism associations, the Chamber of Commerce and its sub-organisations, the chambers of the liberal professions etc. where they exercise legislative, administrative or judicial functions.
- Employees and bodies of (private sector) enterprises ...
 1. ... if $\geq 50\%$ of the enterprises' shares are directly or indirectly held by the federal state, the province, the local government authority or foreign regional authorities (e.g. ÖBB, ASFINAG, Vienna Airport, Wien Energie GmbH, Wiener Linien GmbH, Post AG) or
 2. ... that are actually controlled by one of the entities referred to under item 1 through financial or other economic or organisational measures. This is intended to cover those cases in which, although the shareholding is below 50%, there is



nevertheless actual control by means of, for instance, a syndicate agreement or other agreements.

3. ... whose management is subject to audit by the Austrian Court of Audit or a comparable Austrian or foreign control body (e.g. ORF, universities).

A list of legal entities that are subject to control by the Court of Audit can be found on the Rundfunk und Telekom Regulierungs-GmbH website (www.rtr.at). This list, currently consisting of three sub-lists and containing a total of around 5,800 legal entities, can be of use when making a first assessment. If the list does not include a particular legal entity and there is, nevertheless, a suspicion that a person might be a public official, the Compliance Officer is to be contacted.

The Austrian term "**candidate for an office**" (Sec. 74, sub-sec. 1, point 4d of the Austrian Penal Code) includes any person involved in an election campaign, application procedure or selection procedure for filling a position as public official (Sec. 74, sub-sec. 1 point 4a of the Penal Code) or a similar procedure for being appointed as a top official on the federal or provincial level or of an organ controlling the legality of law enforcement, unless filling the sought-after position is entirely unlikely.

Hueck Folien employees are not public officials.

The definition of public officials varies from country to country. Employees of public authorities and state bodies abroad are always to be regarded as public officials. Usually, employees of public service institutions (e.g. social insurance bodies) and employees of enterprises with state holdings are also to be regarded as public officials. As a rule, a particularly strict standard is applied to senior employees. In the event of doubt, please contact the Compliance Officer.

4.4.6 Summary

Hueck Folien forbids offering or accepting gifts, entertainment or other benefits if

- they (are intended to) influence business transactions in an unlawful and unethical manner, or
- only the impression arises that dishonest actions (e.g. in breach of laws, internal guidelines or instructions, or contrary to the employer's well-being) are to be obtained.

In all other cases, Hueck Folien allows the giving and receiving of small gifts up to a value of EUR 100.00 and invitations that are appropriate in business life.



- Employees are permitted to accept or offer occasional small gifts or entertainment (e.g. an appropriate invitation to a business meal, flowers on the occasion of a birthday, low-value tokens of appreciation that are customary locally and in the country, usual advertising gifts such as ball-point pens, diaries, etc.), as long as they are not intended to unlawfully influence business decisions, or even merely create the impression that they have this effect.
- Cash or the equivalent (e.g. cheques, bank transfers etc.) must under no circumstances be accepted or offered, even if the amounts are only small.
- Accepting invitations to trade events is permissible provided that such events relate to an employee's professional functions. If the entertainment character predominates (theatre or opera tickets, sports events), the benefit must not be accepted in the absence of a connection with the employee's professional functions unless these are low-value gifts that are customary locally or in the country. In the case of trade events with an accompanying programme of a value exceeding EUR 100.00, prior approval by the Compliance Officer is required for participation. In the case of trade events with an accompanying programme of a value below EUR 100.00 which can be attended according to the applicable compliance regulations, approval must be obtained in advance via the application for business travel. If there are doubts (in particular with mixed events), the Compliance Officer must be contacted.

4.5 Sponsoring and donations to promote the common good

Sponsoring and donations are an important instrument for exercising social responsibility. Essentially, this is the provision of support, in terms of material and funding, of matters for the common good that is, as a matter of principle, of a public nature.

Hueck Folien interprets sponsoring as the funding of individual persons, groups of persons, organisations or events by Hueck Folien in the form of monetary assistance and assistance in kind or any other form of material support (e.g. the provision of office premises) in the expectation of receiving in return support for its own communication and marketing objectives.

By donations, Hueck Folien understands support in the form of financial assistance or assistance in kind without receiving anything in return.



The recipients of donations are charitable institutions (associations, foundations,...) that are active in the following fields:

- Science, research and education
- Culture, art, music, theatre, museums and monument conservation
- The support of social and humanitarian organisations
- Health and sport
- Environmental protection

Donations are not made to political parties or public officials. Sponsoring and donations are always made transparently and publicly, in accordance with Hueck Folien's economic capacity, and must be approved by the management.

4.6 Avoiding conflicts of interests

Conflicts of interests can affect judgement. Hueck Folien employees avoid any situation in which there might be a conflict between their personal interests (or the interests of natural or legal persons close to them) and the interests of Hueck Folien.

In order to prevent employees and Hueck Folien from coming into acute and obvious conflicts of interests, employees are prohibited from investing or acquiring shares in suppliers, customers, competitors, consulting companies or any other business partners if such investments influence the business decisions that they take on behalf of Hueck Folien.

Employees are not permitted to assume part-time activities for or with suppliers, customers or competitors and must not be involved in part-time activities outside the enterprise that could impair their performance or judgement at work. Employees are obliged to inform their superiors about any kind of part-time activities.

Private relationships must not lead to inappropriate actions or decisions in the professional field. If there is a private relationship between an employee and a supplier, a customer or a competitor that might be capable of causing inappropriate decisions or actions to be taken, this must be disclosed to the superior. The superior documents the private relationship and ensures that inappropriate decisions are not made or that no impression is created that inappropriate decisions are made.



Particular rules apply in this sector to marketing agents. Their contracts must contain a compliance provision and are to be signed by the management (see signature rules). Background checks must be carried out by the Compliance Officer before signature.

There is no conflict of interests in this sense if an employee is a member of the collegiate body of a legal person and this employee does not exercise his/her function as a member of this body in matters that also concern Hueck Folien. In addition, there is no problem with an employee's mere membership of an association that is in a close commercial relationship with Hueck Folien.

4.7 Proper accounts and fiscal honesty

Hueck Folien maintains proper accounts and complies with the principles of proper bookkeeping and – where applicable – international accounting standards. The relevant Hueck Folien employees record all transactions completely, chronologically and according to their best knowledge and beliefs. Obviously high invoices or receipts with an unclear description of the service or an unknown recipient are immediately notified to the Compliance Officer.

Hueck Folien is fiscally honest. The existence and extent of the obligation to pay taxes is disclosed to the competent revenue authority. The circumstances of relevance for the acquisition of privileges under fiscal law and other fiscally relevant matters are documented and disclosed in accordance with the fiscal regulations. Books, records, business papers, letters and documents are, in any event, to be kept for seven years. If circumstances require, documents are also kept for longer (see working instruction AA021-12 "Document management", and Checklist CL0001, "Archiving").

4.8 Protection of assets

All Hueck Folien employees do their best to safeguard Hueck Folien assets. Under no circumstances may assets or funds be used for illegal purposes or objectives that are not related to Hueck Folien business activities. All Hueck Folien assets may only be used for legitimate business purposes. Private use is only permissible if expressly consented to by contract or the superior.

Theft, misappropriation, breach of trust, fraud, carelessness and wastefulness are not tolerated. Strict measures are taken against such conduct, and may lead to the dismissal of the respective employee or the filing of a complaint to the public prosecutor.



Hueck Folien's assets include not only tangible physical goods (funds, stocks, computers, mobile phones or furniture) but also intangible goods and intellectual property (ideas, concepts or know-how) as developed by Hueck Folien employees for the enterprise. Assets also include customer and supplier lists and other market information, as well as all data and any information to which employees have access within the framework of their activity.

4.9 Confidentiality and handling information

Hueck Folien employees have access to confidential and in-company data and information. This data and information may only be used in each employee's own sphere of responsibility and must be handled confidentially. Communication to third parties is not permitted except where the business activity requires communication, and shall be backed up by a corresponding confidentiality agreement with the respective third party.

The right of access to such data is restricted in line with the type and extent of a person's own position and responsibility. Any access by external persons to Hueck Folien's confidential areas is documented. Employees shall comply with these access restrictions and handle their access data carefully in order to avoid unlawful access.

Confidential information includes:

- Information about results, forecasts and other financial data
- HR data and personal details
- Information about acquisitions or disposals
- Information about new products or orders that are not yet public
- Information about business strategies, product improvements, technical information, information about systems, inventions, business secrets or other know-how developed or acquired by Hueck Folien
- Customer information and data

Every employee is obliged to maintain confidentiality after termination of his/her employment.

4.10 Fair competition

Hueck Folien will only be successful in the long term in fair competition.



Competition laws, including anti-trust laws, serve to protect unrestricted and fair competition. As part of its global activity, Hueck Folien is committed to tough, lawful, correct and ethically irreproachable competition.

Infringements of international and national competition laws can have serious consequences both for Hueck Folien and for the employees involved. These can range from high fines to civil law actions and claims for damages from customers, competitors etc., and may also lead to criminal prosecution. Infringements of anti-trust law regulations can also have employment law consequences for the employees concerned.

Forbidden price agreements, in particular on the occasion of visits to trade fairs and trade conferences, are prohibited by anti-trust law regulations. Such agreements restrict competition. In addition, anti-trust law prohibits the abuse of a dominant position, for instance by demanding particularly low purchase prices or agreeing on unusual terms of business. In addition, pursuant to Sec. 168b of the Criminal Code, agreements restricting competition in invitations to tender are subject to imprisonment for up to 3 years. Infringements of anti-trust law provisions are to be reported to the Compliance Officer without delay.

4.11 Compliance with export controls and trade restrictions

Many national governments and international organisations have adopted rules that restrict the export of goods and the transfer of technology. As an enterprise operating worldwide, Hueck Folien will therefore regularly be confronted with trade restrictions against individual states (embargoes).

Hueck Folien complies with all provisions of countries and international organisations that apply to Hueck Folien with respect to export restrictions, embargoes and sanctions against individual countries and persons.

Information about current export bans can be found via the website of the Austrian Chamber of Commerce. If an employee is uncertain as to whether there is an export prohibition or whether it applies to a specific shipment, he/she shall contact the Compliance Officer.

An infringement of export control regulations may lead to high penalties (including confiscation and loss of goods, the confiscation of the turnover earned and the refusal of future export licences or simplified customs procedures) and a considerable loss of reputation.



4.12 Lobbying public officials

There are situations in which Hueck Folien employees conduct discussions with regional politicians or public officials. This is permissible and does not require any particular legal consideration. If, however, such discussions are specifically sought in order to submit a concrete concern of Hueck Folien to the politician or public official and in this way influence the decision-making processes within the legislature, the administration or the private-sector administration activities of a public corporation, this may be what is known as lobbying.

Indirectly influencing decision-making processes by means of advertising or participation in discussion rounds or forums in which a person's own opinion is communicated does not constitute lobbying. Nor does the submission of a tender in publicly advertised local authority proceedings amount to lobbying.

If, however, an employee performs a lobbying activity to more than a minor extent (i.e. >5% of his/her total activity) in the interests of Hueck Folien, this constitutes corporate lobbying. In such a case, Hueck Folien complies with all obligations concerning conduct and registration that result from the statutory provisions (lobbying law). The Compliance Officer is responsible for registration and compliance with the conduct obligations.

Hueck Folien does not agree performance-related fees with employees who are corporate lobbyists or with external lobbyists if their activity leads to the possibility of concluding a contractual agreement with public authorities. Annual bonuses based on other employee achievements are, however, permissible. Corporate lobbyists always disclose to the public authority that they are acting on behalf of Hueck Folien and comply with the other statutory obligations when pursuing their lobbying activities. Offering personal benefits in discussions with politicians or public officials is never permitted.

4.13 Compliance with the regulations concerning money laundering and the financing of terrorism

Concealing the illegal origin of revenue from specific criminal activities (= money laundering) is prohibited and is liable to imprisonment for at least 6 months and up to 5 years pursuant to Sec. 165 of the Criminal Code. Activities that provide financial support to terrorist organisations for specific criminal acts are subject to imprisonment for at least one year and up to 10 years pursuant to Sec. 278d of the Criminal Code. Any suspicion of money laundering or the financing of terrorism



shall be reported to the competent authority, failing which Hueck Folien may be liable to a fine of up to EUR 30,000.

Hueck Folien employees must identify customers if a transaction exceeding EUR 15,000 is carried out and there is no ongoing business relationship. In the case of legal persons, in addition to identification (determination of the identity of the beneficial owner), the power of representation and the identity of the representative must also be determined. The information about the identity of the customer and all documents and records concerning business relationships must be kept for at least five years. Bank transfers shall always state the recipient of the payment.

Accordingly, if new business relationships are entered into with trading partners, the identity of the business partner must be checked. If this check is not possible, the transaction shall initially be suspended and the Compliance Officer shall be informed so that he/she can arrange for the identity of the business partner to be checked before conclusion of the transaction.

As soon as there is any suspicion of money laundering or the financing of terrorism, the Compliance Officer must be informed. There are grounds for suspicion if for instance the type of transaction is implausible or the execution of the transaction is unusual (e.g. offshore company; transfers from abroad with unusual bank details).

5. Implementation

5.1 Responsibility awareness and training

The business principles communicated in the Code of Conduct and more extensive instructions for action in specific fields are communicated to the staff by means of training courses. The employees receive training in the areas of relevance to them according to their fields of activity. A new employee joining the company is given brief training by the security officer as part of the instructions in property security. Extensive training courses for employees with external contact, managerial staff and members of the works council are offered each year and attended by the relevant employees regularly at two-year intervals. Separate courses take place if there are particular changes or new features.

The training courses are conducted by the Compliance Officer or external consultants. The training courses are compulsory for members of staff.



These training courses are intended to strengthen the employees' responsibility awareness and to ensure knowledge of the business principles and standards of conduct within the enterprise.

This Code of Conduct is accessible to all Hueck Folien employees and stakeholders on the Hueck Folien website (www.hueck-folien.com). In addition, all guidelines, training documents, service instructions, authorisation forms and other forms are available to staff members on the intranet.

5.2 Notification obligations

5.2.1 Immediate notification if there are grounds for suspicion / Whistleblower system

It may happen that Hueck Folien employees become aware of or suspect infringements of the provisions of the Code of Conduct, other internal guidelines and rules or statutory regulations. Such misconduct can lead to serious negative consequences for Hueck Folien's business activity and/or reputation, and for this reason is not to be tolerated.

Accordingly, each member of staff is expected to report such misconduct or grounds for suspicion. In addition, each report presents an opportunity to improve the compliance system and helps to avoid further critical situations. Turning a blind eye constitutes a form of contribution to unethical conduct.

If an employee is not certain what to do in a particular situation, his/her first point of contact is, in principle, his/her immediate superior. In addition, employees can also contact another trusted employee, the works council members or the Compliance Officer.

In addition, Hueck Folien has set up an internet-based **whistleblower system** at <https://www.hueck-folien.com/hinweisgebersystem>. Thus, Hueck Folien offers its employees and business partners the opportunity to report infringements against specific areas of EU law (see also Sec. 3 of the Act on the Protection of Whistleblowers [*"3 HSchG"*]) as well as infringements against the company's own Code of Conduct around the clock, and, consequently, contribute to commercial success in harmony with social, legal, entrepreneurial, and ecological responsibility.

Hueck Folien has also set up an internal reporting office (Whistleblower contact point: Human Resources Management) and appointed a deputy contact point (Head of Quality Management). The Whistleblower contact point will receive and check the reports. Receipt of reports will be acknowledged within seven calendar days at the latest.



The whistleblowers' reports will be processed within an IT-based closed system accessible exclusively by the Whistleblower contact point, thus ruling out any inspection by unauthorised third parties.

In order to permit further enquiries and to facilitate clarification, we would like employees and business partners to identify themselves when reporting suspicion. However, anonymous reports will also be accepted. The whistleblowers' identity is protected.

5.2.2 Protection of persons who report grounds for suspicion

In order to encourage open and trusting communication, Hueck Folien hereby confirms that employees who report that they have identified or have grounds for suspecting infringements of laws, the Code of Conduct or other internal guidelines and rules will under no circumstances incur negative consequences of any kind.

This applies equally to other people who make available important information to clarify such misconduct. We guarantee that all reports received will be treated confidentially and examined very carefully and objectively.

Making false accusations although they are known to be incorrect is not tolerated. The attention of employees and business partners of Hueck Folien is explicitly drawn to the fact that any knowingly false reports may be subject to prosecution under criminal law and will be punished by the district government with a fine of up to EUR 20,000.00, and in case of repeated offences up to EUR 40.000.00 (see Sec. 24 of the Act on the Protection of Whistleblowers). Hueck Folien therefore reserves the right to take measures against employees and business partners who knowingly make false accusations.

5.3 In the event of questions or improvement suggestions

5.3.1 Questions

If you are confronted with questions or situations for which neither the Code of Conduct nor internal guidelines and rules provide precise instructions for actions, you should ask the following questions:

- Is the proposed action legal/illegal or does it infringe applicable law? Are you being expected to do something that in your opinion might be wrong?
- Is the situation transparent and verifiable?



- Would I act in this way in the presence of my superior, the Hueck Folien management and my work colleagues?
- Would I be unpleasantly affected if my actions were reported in the media?

If you still have doubts about the correct procedure after considering these questions, please contact your superior or the Compliance Officer.

5.3.2 Improvement suggestions

Every employee is at liberty to submit suggestions for improvements to the Compliance Officer. Hueck Folien welcomes this commitment by its employees.

5.4 Consequences in the event of infringements

5.4.1 Infringements by staff members

Compliance infringements can have serious consequences for the individual employee and for the entire enterprise. An infringement of this Code of Conduct or internal conduct guidelines is by no means a trivial offence, but instead is to be regarded as serious misconduct.

Hueck Folien can and, in the event of gross or repeated infringements of the provisions of the Code of Conduct, other internal guidelines and rules and statutory regulations, will commence measures appropriate to the specific situation, such as issuing a warning or a caution, terminating the employment or notifying the authorities (criminal law prosecution).

5.4.2 Infringements by business partners and third parties

Should Hueck Folien become aware that one of its business partners is infringing these provisions, the relevant business partner will be requested to terminate such conduct. If this does not happen within a reasonable period, the Hueck Folien management reserves the right to commence corresponding steps, such as to terminate the business relationship.



6. SCHEDULE

Provisions of the Austrian Penal Code (StGB) regarding property crimes

(as of October 2023)

Criminal damage to property (§ 125)

Anyone who destroys, damages, disfigures or renders unusable another person's property shall be liable to a term of imprisonment of up to six months or a fine of up to 360 daily rates.

Data corruption (§ 126a)

(1) Anyone who causes harm to another person by altering, deleting or otherwise rendering unusable or suppressing automated data that was processed, transmitted or made available to them, over which they are not or not solely entitled to dispose, shall be liable to a term of imprisonment of up to six months or a fine of up to 360 daily rates.

(2) Anyone who causes damage to data in excess of EUR 5,000 by committing this act shall be liable to a term of imprisonment of up to two years.

[...]

Theft (§ 127)

Anyone who takes away another person's movable property with the intention of unlawfully enriching himself/herself or a third party by appropriating it shall be liable to a term of imprisonment of up to six months or a fine of up to 360 daily rates.

Embezzlement (§ 133)

(1) Anyone who **appropriates for himself/herself or a third party a good that has been entrusted to him/her with the intention of thereby unlawfully enriching himself/herself or the third party** shall be liable to a term of imprisonment of up to six months or a fine of up to 360 daily rates.

(2) Anyone who embezzles a good with a value exceeding EUR 5,000 shall be liable to a term of imprisonment of up to three years; anyone who embezzles a good with a value exceeding EUR 300,000 shall be liable to a term of imprisonment of between one and ten years.



Anticorruption provisions of the Austrian Penal Code (StGB)

(as of October 2023)

Breach of trust (§ 153)

(1) Anyone who **knowingly abuses his/her authority to dispose of another person's assets or to obligate another person, and thereby causes financial harm to that person**, shall be liable to a term of imprisonment of up to six months or a fine of up to 360 daily rates.

(2) A person abuses his/her authority if he/she violates, in a manner that cannot be justified, rules that serve to protect the assets of the person economically entitled thereto.

(3) Anyone who causes damage in excess of EUR 5,000 by committing this act shall be liable to a term of imprisonment of up to three years; anyone who causes damage in excess of EUR 300,000 shall be liable to a term of imprisonment of between one and ten years.

Acceptance of gifts by persons in positions of power (§ 153a)

Anyone who, in the exercise of the authority granted to him/her by law, official order or legal transaction to dispose of another person's assets or to obligate another person, **has accepted a not merely insignificant pecuniary advantage and wrongfully fails to remit it**, shall be liable to a term of imprisonment of up to one year or a fine of up to 720 daily rates.

Anti-competitive agreements in award procedures (§ 168b)

(1) Anyone who, in **an award procedure, submits an application for participation, places a bid or conducts negotiations** that are based on **an unlawful agreement** aimed at inducing the contracting authority to accept a particular bid shall be liable to a term of imprisonment of up to three years.

(2) A person shall not be punished pursuant to para. 1 if he/she voluntarily prevents the contracting authority from accepting the bid or from providing his/her service. If the bid is not accepted or the contracting authority does not provide its service without any contribution from the perpetrator, the perpetrator shall be exempt from punishment if he/she voluntarily and earnestly endeavours to prevent the acceptance of the bid or the provision of the service.



Corruption (§ 304)

(1) A public official or arbitrator who, for the wrongful performance or omission of an official act, demands, accepts or has promised to him/her a benefit for himself/herself or a third party shall be liable to a term of imprisonment of up to three years. The same shall apply to a person who, as an expert appointed by a court or another authority for a specific proceeding, demands, accepts or has promised to him/her a benefit for himself/herself or a third party in exchange for submitting an incorrect finding or expert opinion.

Acceptance of benefits (§ 305)

(1a) The same shall apply to a person who, as a candidate for an office, in the event that he/she would become a public official in the future, demands, accepts or has promised to him/her a benefit for the wrongful performance or omission of an official act in that capacity for himself/herself or a third party. The perpetrator who demands a benefit or has one promised to him/her shall only be punishable under this paragraph if he/she has actually attained the position of public official.

(2) Anyone who commits the act with respect to a benefit value exceeding EUR 3,000.00 shall be liable to a term of imprisonment of between six months and five years; anyone who commits the act with respect to a benefit value exceeding EUR 50,000.00 shall be liable to a term of imprisonment of between one and ten years. [...]

(1) A public official or arbitrator who, for the proper performance or omission of an official act, demands a benefit for himself/herself or a third party, or accepts an undue benefit (para. 4) or has one promised to him/her, shall be liable to a term of imprisonment of up to two years.

(2) (Note: repealed by Federal Law Gazette I No. 61/2012)

(3) Anyone who commits the act with respect to a benefit value exceeding EUR 3,000.00 shall be liable to a term of imprisonment of up to three years; anyone who commits the act with respect to a benefit value exceeding EUR 50,000.00 shall be liable to a term of imprisonment of between six months and five years.

(4) The following shall not constitute undue benefits:

1. Benefits whose acceptance is permitted by law, or which are granted in the context of events in which participation is officially or objectively justified,
2. Benefits for charitable purposes (§ 35 BAO) over the use of which the public official or arbitrator does not exercise any determining influence, as well as
3. In the absence of permissive norms within the meaning of item 1, tokens of appreciation of low value that are customary locally or in the country, unless the act is committed on a commercial basis.[...]



Acceptance of benefits for the purpose of exerting influence (§ 306)

(1) A public official or arbitrator who, in cases other than those covered by §§ 304 and 305, with the intention of allowing himself/herself to be influenced in his/her activities as a public official thereby, demands a benefit for himself/herself or a third party, or accepts an undue benefit (§ 305 para. 4) or has one promised to him/her, shall be liable to a term of imprisonment of up to two years.

(2) Anyone who commits the act with respect to a benefit value exceeding EUR 3,000.00 shall be liable to a term of imprisonment of up to three years; anyone who commits the act with respect to a benefit value exceeding EUR 50,000.00 shall be liable to a term of imprisonment of between six months and five years. If the value of the benefit exceeds EUR 300,000, the perpetrator shall be liable to a term of imprisonment of between one and ten years.

(3) Anyone who merely accepts or has promised to him/her a minor benefit shall not be punishable pursuant to para. 1, unless the act is committed on a commercial basis.

Bribery (§ 307)

(1) **Anyone who offers, promises or grants a benefit to a public official or arbitrator for the wrongful performance or omission of an official act** for him/her or a third party shall be liable to a term of imprisonment of up to three years. The same shall apply to anyone who offers, promises or grants a benefit to an expert (§ 304 para. 1) for him/her or a third party in exchange for submitting an incorrect finding or expert opinion.

(1a) The same shall apply to anyone who offers, promises or grants a benefit to a candidate for an office, in the event that such person becomes a public official, for the wrongful performance or omission of an official act in that capacity for him/her or a third party. The perpetrator who offers or promises a benefit shall only be punishable under this paragraph if the candidate for an office has actually attained the position of public official.

(2) Anyone who commits the act with respect to a benefit value exceeding EUR 3,000.00 shall be liable to a term of imprisonment of between six months and five years; anyone who commits the act with respect to a benefit value exceeding EUR 50,000.00 shall be liable to a term of imprisonment of between one and ten years. If the value of the benefit exceeds EUR 300,000, the perpetrator shall be liable to a term of imprisonment of between one and fifteen years.



Granting of benefits (§ 307a)

(1) Anyone who offers, promises or grants an undue benefit (§ 305 para. 4) to a public official or arbitrator for the proper performance or omission of an official act for him/her or a third party shall be liable to a term of imprisonment of up to two years.

(2) Anyone who commits the act with respect to a benefit value exceeding EUR 3,000.00 shall be liable to a term of imprisonment of up to three years; anyone who commits the act with respect to a benefit value exceeding EUR 50,000.00 shall be liable to a term of imprisonment of between six months and five years. If the value of the benefit exceeds EUR 300,000, the perpetrator shall be liable to a term of imprisonment of between one and ten years.

[...]

Granting of benefits for the purpose of exerting influence (§ 307b)

(1) Anyone who, in cases other than those covered by §§ 307 and 307a, offers, promises or grants an undue benefit (§ 305 para. 4) to a public official or arbitrator for him/her or a third party with the intention of thereby influencing him/her in his/her activities as a public official shall be liable to a term of imprisonment of up to two years.

(2) Anyone who commits the act with respect to a benefit value exceeding EUR 3,000.00 shall be liable to a term of imprisonment of up to three years; anyone who commits the act with respect to a benefit value exceeding EUR 50,000.00 shall be liable to a term of imprisonment of between six months and five years. If the value of the benefit exceeds EUR 300,000, the perpetrator shall be liable to a term of imprisonment of between one and ten years.

Prohibited intervention (§ 308)

(1) **Anyone who, for himself/herself or a third party, demands, accepts or has promised to him/her a benefit in exchange for exerting undue influence on the decision-making process of a public official or an arbitrator** shall be liable to a term of imprisonment of up to two years.

(2) The same shall apply to anyone who **offers, promises or grants a benefit to another person in exchange for that person exerting undue influence on the decision-making process of a public official or an arbitrator.**

(3) Anyone who commits the act with respect to a benefit value exceeding EUR 3,000.00 shall be liable to a term of imprisonment of up to three years. Anyone who commits the act with respect to a benefit value exceeding EUR 50,000.00 shall be liable to a term of imprisonment of between six months and five years.

(4) Influence on the decision-making process of a public official or arbitrator shall be deemed undue if it is aimed at the wrongful performance or omission of an official act or is associated with



the offering, promising or granting of an undue benefit (§ 305 para. 4) to the public official or to a third party on his/her behalf.

(5) The perpetrator shall not be punishable under the foregoing paragraphs if the act is threatened with a more severe penalty under another provision.

Acceptance of gifts and bribery of employees or agents (§ 309)

(1) An **employee or agent of a company who, in the course of business, demands, accepts or has promised to him/her a benefit from another person for himself/herself or a third party in exchange for the wrongful performance or omission of a legal act** shall be liable to a term of imprisonment of up to two years.

(2) The same shall apply to anyone who **offers, promises or grants a benefit to an employee or agent of a company in the course of business in exchange for the wrongful performance or omission of a legal act** for him/her or a third party.

(3) Anyone who commits the act with respect to a benefit exceeding EUR 3,000.00 shall be liable to a term of imprisonment of up to three years; if the benefit exceeds EUR 50,000.00, to a term of imprisonment of between six months and five years.