

Compliance Rules (Code of Conduct) of



ZDENKO DWORAK GMBH

Upright and responsible behavior is a fundamental and indispensable element of our corporate culture. It is not only important to us **that** we achieve our business goals, but also **how** we achieve them.

Goals

We attach great value to maintaining a working atmosphere characterized by mutual trust. Our employees are an essential factor in our corporate success as well as a significant source of the trust placed in our company. We therefore consider it important to define clear policies and principles regarding ethics and morals in our business activities.

We pass criticism on a factual, never on a personal basis, since only constructive exchange between different standpoints can ultimately lead to an optimal solution.

Business Relations with Our Customers

The way we act vis-à-vis our customers has a lasting influence on the way our company is perceived. For this reason, we take the utmost care to observe all legal regulations and **treat our customers with respect and esteem**.

Orders are obtained in a **fair process** through the quality and pricing of the services we provide, and never by offering, promising or granting public servants or decision makers in commercial enterprises unfair benefits or advantages.

Business Relations with Our Competitors

We do not disseminate untrue information about our competitors, nor do we attempt to gain a competitive advantage through unfair means. We do not participate in any price-fixing schemes or other unfair arrangements, as such actions would violate our principles of morality and integrity.

We take no part in any arrangements stipulating the submission of sham offers, pledge adherence to the principles of fair competition and business practice, and strive to satisfy through our quality and the continuous improvement of our services.

Business Relations with Our Suppliers

We maintain **trustful and fair business relations** with our suppliers, and expect the same from them in return.

Our business decisions have our company's best interests in mind and are not influenced by offers or promises of unfair advantages by our suppliers. Should any unfair advantages be offered, promised or granted to us, we shall inform our management immediately so that those unfair advantages can be unequivocally refused.

Granting of Benefits (Gifts and Invitations)

The exchange between business partners of small tokens of appreciation that possess negligible or no monetary value is considered common business practice.

It is **strictly forbidden for all our employees to offer or accept any benefits** that have an improper influence on business transaction, or that could be interpreted as having such an influence. Not affected by this rule are exclusively such gifts that possess negligible value, as well as business entertainment within ordinary convention.

The following internal rules apply to all our employees:

-) Any benefit must be granted or accepted in a fully transparent fashion, i.e. it must be recognizable and verifiable to outsiders.
-) Benefits may not be granted or accepted as recompense for unfair advantages.
-) Gifts of money or equivalent values are categorically forbidden.

Compliance with Corruption Legislation Regarding Public Service

With the stricter regulations and extended scope stipulated by the new Austrian anti-corruption legislation, our management and all employees are urged to avoid even the slightest semblance of dishonesty and obliqueness. In particular, our guidelines forbid the offering and granting of monetary or material values to any employees of the public sector.

The term “public sector” includes not only the immediate public services and administration, but also all employees of enterprises and institutions operated by or closely affiliated with the state, e.g. employees of Vienna International Airport, ORF, ÖBB, Österreichische Post AG, chambers and universities.

The so-called “feeding” of public sector employees is considered illegal even if it does not occur in direct connection with an official or business transaction. The attempt to make a public service employee generally well-disposed towards oneself or one’s employer is sufficient to constitute an offense. The only possible exception is negligibility in terms of actual value of the gifts.

Not only the acceptance, but also the offering of such benefits or gifts can be punishable.

Handling of Company Property

We handle all company property made available to us with care and prudence. Private use of company property is allowed only if stipulated by appropriate regulations and explicitly authorized by management.

Handling of Information

Confidential information of any kind that we obtain in the course of our professional activity – including information outside of our respective field of expertise – may neither be used to further our personal interests nor made accessible to unauthorized persons.

We are aware of the sensitivity of the personal data of customers, co-workers and suppliers we are entrusted with, and will protect them through careful handling and absolute discretion vis-à-vis third parties.

This obligation of discretion continues without restrictions even after termination of our employment contracts.

Data Security

We protect company-related and personal data against unauthorized access with all technical and organizational means available to us.

Financial Integrity

Within our commercial activity, we ensure that the business records we create are complete and correct, that they truthfully describe every business transaction and expense, and that they are created in compliance with the applicable legal specifications.

Reporting Misconduct

Compliance is mandatory for all employees. In the case of violation of any legal prescriptions, rules or directives, or of the stipulations of this Code of Conduct, employees face disciplinary measures up to and including dismissal.

Any employee who witnesses or becomes aware of such misconduct is obligated to report it to his or her superior or to senior management immediately. All such reports will be thoroughly investigated and treated with confidentiality.

Treatment of Equality

We are committed to the equality of opportunity. Therefore, employees and applicants may not be discriminated against on account of their ethnic origin, faith or religion, skin color, age, nationality, gender, sexual orientation or existing disability.

Training and Personal Development

We strive to support the long-term employment and personal development of our employees through training programs.

Although the respective requirements are determined by the department heads and company management, a high degree of personal initiative by the employees is likewise expected.

Internal and external training and professional development programs are perceived as an investment into our employees and include the expectation of aslo generating benefits for the company.

Next review: January 2023

