

CODE OF CONDUCT

The Code of Conduct of GABRIEL-CHEMIE is based on the company's origin, vision, mission statement, set of values and management principles. These were defined in the 2020 Vision business strategy.

ORIGIN

Josef Houska founded our company in 1950 as a family business. The second generation now manages the business.

Over the past 70 years, our development was continuously marked by growth. Through the decades, we have been challenged and strengthened by events such as the German Wirtschaftswunder, the oil crisis of the 1970s, the subsequent boom in consumption and plastics, the 2008 global financial crisis and most recently the current recycling trend. A clear vision and a high degree of innovation have shaped us into a successful company.

The family's third generation is ready to take over and will further drive and positively develop the company and lead us into a new, changed world, in which sustainability stands above all actions.

VISION 2020

Since our foundation by Josef Houska in 1950, we have stood and continue to stand for independence, profitability, sustainable growth and balanced social and ecological action.

MISSION STATEMENT

As a family-run business with the associated values and a strong position in the competitive environment, we sustainably develop new business areas and position ourselves through innovative strength and service quality. Our branches in strategically important European markets as well as the planned expansion of our overseas presence form the basis for further healthy growth of our entire group.

SMART PLASTICS

Our world is changing at an ever-increasing pace. Consumers are thinking and acting more sustainably and environmentally consciously than ever before. Our innovative spirit will be our driving force to ensure our future continues to be marked with success. We handle recyclable material plastic with great responsibility, research alternative raw materials, develop concepts to increase service life and we improve our energy efficiency for the benefit of the environment.

CORE VALUES

CUSTOMER

All our efforts serve to satisfy our customers.

INNOVATION

We develop new solutions for our customers by means of expertise, experience and creativity.

PERFORMANCE

We are committed to focusing on performance and remunerate accordingly.

COSTS

All thoughts and actions are guided by considering the costs and we handle company property with care.

QUALITY

Constant improvement allows us to continuously increase our quality.

LEARNING

We are committed to lifelong learning.

SUCCESS

All of us contribute to the company's success.

EXPERTISE

The personal and technical expertise of our staff forms the foundation of our success.

PRINCIPLES

Trust, openness, loyalty, honesty, reliability, respect and punctuality are the basis of our cooperation.

ENVIRONMENT

We are committed to treating the environment and nature with as much care as possible.

MANAGEMENT PRINCIPLES

We are committed to implementing our strategy with all our strength, to living by these values and ensuring that they are observed.

We are committed to self-reflection with regard to our own leadership behaviour.

We promote the strengths of our colleagues and employees and support them in rendering excellent work.

We transfer responsibility and ensure that it is perceived and serves the achievement of objectives.

We promote teamwork between the divisions and across hierarchies. We prefer personal contact in our daily work.

We are responsible for the safety of our employees.

CODE OF CONDUCT

As a globally active company, GABRIEL-CHEMIE is aware of its social, societal and environmental responsibility and is committed to it. The Code of Conduct is based on our values and lays out guidelines for ethical conduct within GABRIEL-CHEMIE as well as for all subsidiaries and representatives.

If legal regulations are stricter than the Code of Conduct, these must of course be followed.

HANDLING CUSTOMERS AND BUSINESS PARTNERS

We strive to make the relationship with our customers, business partners and suppliers as beneficial and productive as possible for both sides. In our business transactions, we expect our partners to comply with applicable laws and regulations and to act in accordance with basic

ethical principles that do not conflict with our corporate principles. Our general conduct guidelines for suppliers and their subcontractors can be retrieved online from the supplier portal.

DEALING WITH AUTHORITIES AND GOVERNMENT REPRESENTATIVES

In all business actions and decisions, we strictly follow the applicable laws and regulations. All employees are requested to inform themselves comprehensively about the laws, rules and regulations that apply to their respective areas of responsibility or, in case of doubt, to contact their supervisor. When dealing with government representatives and official bodies, it is a matter of course to refrain from any action that could unlawfully influence their decision-making.

BAN ON CORRUPTION AND BRIBERY

According to Austrian law, all forms of corruption, misappropriation and embezzlement must be prohibited, not practiced and not tolerated. Even where there is no or only an inadequate legal system, no attempt may therefore be made, either at home or abroad, to unlawfully influence others in business transactions by exchanging gifts or offering or granting other advantages. The same applies to the improper acceptance of benefits (except for business meals).

DEALING WITH THE PUBLIC

We support social activities and organisations wherever possible. However, we do not offer support to political parties or finance organisations and groups affiliated with them. Further information is provided in the GABRIEL-CHEMIE Sponsoring and Donation Guidelines.

DEALING WITH COMPETITORS

We believe in transparent and fair competition and follow all competition rules that apply. All employees are expected to comply with the principles of fair competition and all relevant regulations. When meeting or coming into contact with competitors, employees must refrain from discussing confidential matters such as prices and sales conditions, costs, production capacities, stock levels or similar confidential information concerning the shared competitive market. In particular, all legal requirements of cartel laws must be complied with.

DEALING WITH STAFF

Our managers follow the seven management principles of GABRIEL CHEMIE. In addition, we respect all people regardless of their age and gender, constitution, nationality, ethnicity, religion and sexual orientation. We respect their dignity, their rights and their privacy. We cultivate diversity among our employees in terms of education, experience and age, cultural background and gender. We do not tolerate discrimination or harassment of our staff. We do not tolerate discussions in secret about shortcomings or misconduct of colleagues. If there are reasonable grounds for suspicion, a supervisor or HR needs to be involved.

CONFLICTS OF INTEREST

All employees of our company must ensure that their own interests do not conflict with their obligations at GABRIEL-CHEMIE or with those that GABRIEL-CHEMIE has towards its business partners. In the general interest and in order to maintain the company's good reputation, corruption must be prevented in all regards. This applies to both receiving and offering advantages and benefits. Low-value considerations that are customary in the region or country are excluded from this, as are expenses associated with an actual business purpose and that are part of a socially and legally adequate framework. Employees must not misuse their position in the company to gain advantages for themselves or others that correspond to improper monetary value.

OBSERVING MISCONDUCT

In the event that an employee discovers violations of the Code of Conduct or other legally questionable actions, they must promptly report these to their supervisor or the HR Department. They will then investigate any violations of the Code while ensuring confidentiality. Employees who report any detected improper behaviour will never be subject to negative consequences of any kind.

HEALTH AND SAFETY AT WORK

We promote the health and safety of our employees by creating a healthy, safe and modern working environment. The prescribed standards for safety and health at work are observed and checked. Any impairment to the work performance stemming from alcohol or drug use is strictly forbidden.

PRODUCT SAFETY

We manufacture high quality products that are safe to use as intended. Products are completely and properly labelled and communicated.

CONSERVATION OF RESOURCES

To the extent possible, we strive to use natural resources as efficiently as our options allow. Our goal is to achieve the best possible balance between economy, ecology and social responsibility and run efficient production facilities that are safe for employees, the neighbouring community and the environment. We continue to optimise our business processes in order to reduce the consumption of resources.

COMMUNICATION ABOUT THE COMPANY

Gabriel-Chemie respects the right to free expression. In certain situations, however, each employee may also be perceived as a representative of GABRIEL-CHEMIE in the private sphere. All employees are thus required to maintain the company's good reputation through their conduct and public behaviour. When expressing opinions privately, care must be taken not to connect one's own position within the company or the company itself with the private statement.

Employees who privately use Social Media platforms are aware that, as employees of GABRIEL-CHEMIE, they have a direct or indirect influence on the company's reputation in the public eye - to the extent this is perceivable. If online activities are carried out as a private person and not as part of the work for Gabriel-Chemie, the employee must make it clear that the content is a personal expression of opinion and does not represent the company.

We always strive to do justice to our social responsibility as a reliable and recognised part of society. We are committed to open communication and rely on constructive cooperation with representatives of all media sectors. All verbal and written statements such as press releases, for example, about GABRIEL-CHEMIE are exclusively published via the communications department or the Board.

INFORMATION/ DATA PROTECTION

Company and business secrets of our company, our business partners or our customers are subject to confidentiality and may not be disclosed to unauthorised third parties. All our employees are required to protect information that is not public and to comply with the specifications of the Data Protection Act. We only store and handle personal data of customers,

business partners and employees in accordance with the applicable General Data Protection Regulation.

HANDLING OF COMPANY PROPERTY

Employees are required to treat all company property such as facilities, operational rooms, equipment, tools, vehicles, consumables etc. with care and exclusively for company purposes. Company vehicles are exempt from this, as users may also use their vehicles outside the company.

IMPLEMENTATION AND REVIEW

The HR Department is responsible for implementing this Code of Conduct. The company's managers support this process. The employees are informed about the Code of Conduct in the course of the GC Academy.

New hires are provided with the current Code of Conduct when starting their employment. The current version of the Code of Conduct is always available on the GABRIEL-CHEMIE intranet.

FINAL COMMENTS

The Code of Conduct is neither an explicit nor a concluding contract of employment. It does not change the employment relationship unilaterally by a wilful act or mutually by contract. GABRIEL-CHEMIE reserves the right to supplement, amend or revoke the Code of Conduct at any time and for any reason.

The Code of Conduct was fashioned in German and English. Should there be any contradictions between the language versions, the German version shall prevail.