

CODE OF CONDUCT AND ETHICS

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Sauber[®]macher

CODE OF
CONDUCT
AND ETHICS



**A robust
basis for
future
growth.**

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**We are Saubermacher –
responsible and fair!**

What we stand for

Foreword

Dear Saubermacher colleagues!

For many decades, Saubermacher has stood for success: founded as a regional family business, the company grew rapidly to become an international, innovative and reliable disposal and recycling partner for business, industry, public clients and private households with an outstanding reputation extending beyond the borders of Austria.

We are confident that our success is down to our excellent customer orientation and our strong foundation of values and awareness of our responsibilities. And, most importantly, its our Saubermacher colleagues who make Saubermacher the company that it is with their everyday commitment – a company that takes responsibility for people, for the environment, for society and for the future. No ifs, no buts.

We make sure that our corporate values and basic principles of responsibility underlie every single corporate activity. Our vision, mission, strategy and our values, such as respect, fair cooperation, social commitment, innovative spirit, sustainability and reliability form the binding guide rails that support our decisions and our actions.

This Code of Conduct and Ethics represents the bridge between our value-focused corporate culture and our claim to legal compliance. As a framework, it reflects what is important to us and outlines the most important rules of conduct for our everyday activities. It applies to all contact with customers, business partners, suppliers, competitors and public officials. At Saubermacher, we all undertake to comply with the Code of

Conduct and Ethics as well as the guidelines and regulations that elaborate upon it. Each and every one of us is responsible for ensuring that Saubermacher stays true to its values and basic principles.

As a Board, we are committed to this Code of Conduct and Ethics and undertake to ensure that the conditions that are needed for our joint understanding of compliance with the law and values are in place. ■



Georg Ketzler
CFO, Saubermacher



Ralf Mittermayr
CEO, Saubermacher



Andreas Opelt
COO, Saubermacher

Our Code of Conduct and Ethics

As a central framework, our Code of Conduct and Ethics is the binding basis for all further guidelines and regulations that ensure responsible and ethically correct behaviour by and at Saubermacher.

The Code of Conduct and Ethics:

- + sets standards for responsible, lawful and honest business activity
- + reminds us of the values and principles that we must take into consideration in our decisions and actions
- + acts as a first orientation for our conduct in our everyday work

It is complemented by additional internal specialist guidelines and regulations. These are rooted in the basic principles and the individual sections of the Code of Conduct and Ethics and outline more detailed behavioural practices as well as questions and answers for everyday work. The objective of our Code of

Conduct and Ethics and additional guidelines and regulations is for all Saubermacher colleagues to act in a way that is legally compliant and to stay true to our ethical principles. Our Code of Conduct and Ethics applies to our Group as a



Each and every one of us is obligated to comply with the rules that apply within the Group at all times and wherever we are located.

whole and includes all Saubermacher colleagues, managers, managing directors and members of the Executive Board and Supervisory Board in all companies directly or indirectly managed or operated by Saubermacher or under the controlling influence of Saubermacher. In other words: each and every

one of us is obligated to comply with the rules that apply within the Group at all times and wherever we are located, irrespective of our role or company site, in whichever country we may be. Our managers have a particularly important role to play: as role models, they have a duty to prevent behaviour that goes against the rules and to ensure proper conduct. By practising exemplary conduct themselves, they can encourage colleagues to do the same and support them in their implementation.

Our Code of Conduct and Ethics is checked at regular intervals to ensure that it continues to comply with current requirements, including in the event of changes to national and international legislation. Changes will be decided by the company management. ■

Our values Our culture

Our basic principles and values are the beating heart of our corporate culture and form the basis for our compliance objectives.

1 We comply with laws, regulations and values.

6 We set new standards in the circular economy.

We ensure equal treatment. **2**

We act responsibly with a view to leaving our children and grandchildren an environment worth living in. **7**

We take responsibility for people, for the environment and for the company. **3**

8 We support one another and practise maximum possible customer orientation.

We protect the climate, take social responsibility and manage the company for the future. **4**

We commit to free and fair competition. **9**

We recover recycled raw materials from waste and preserve natural resources. **5**

We act responsibly with our assets and protect data and information.

10

responsible enterprise practised by Saubermacher.*
These basic principles guide our actions and represent the future-focused,

*Explained in further detail in the sections that follow.



**In our opinion,
respect also means
helping one another.**

02

Appreciative cooperation

Respect

As part of our Saubermacher values, we stand for appreciative and respectful cooperation between individuals. The conduct of Saubermacher colleagues and managers, both between themselves and in respect of customers, business partners, investors and third parties, is characterised by mutual respect throughout the company and in all countries and regions.

For us, respect also means helping one another. Which is why the 'Helping Hands' initiative for Saubermacher colleagues was established in 2011 as a means of providing moral and economic support during times of personal and family emergency.

Respect also means abiding by the law. We undertake to comply with the laws of the countries and regions in which we operate.

Responsibility

We take responsibility for people, for the environment and for the company. We create added value for customers and society and operate as a reliable and fair employer. We protect the climate and manage the company for the future. As part of this, we take social and environmental measures to support sustainable development.

Team spirit

The comprehensive expertise and sustainable commitment of Saubermacher colleagues are important features of our company and decisive to our success. We support continued professional and personal development and appreciate a pioneering spirit and resourcefulness, as new and courageous ideas are what strengthen our innovativeness. Together, we achieve our goals.

Corporate communication

We communicate with respect and integrity. We conduct discussions at all levels in a way that is fair and open. We respect different opinions and engage with one another constructively. We are aware that each and every one of us acts as an ambassador for our company. With this in mind, we keep

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Each and every one of us acts as an ambassador for our company.

to the communication rules in direct dialogue with our customers, suppliers, business partners and the public and ensure that our conduct is always appreciative. This applies in particular in our professional and private use of social media. ■

03

Responsible management

Human rights

We respect the dignity and human rights of Saubermacher colleagues and others who are affected by our activities. We comply with the Universal Declaration of Human Rights (UN) and the European Convention on Human Rights and Basic Freedoms and are committed to the Declaration of the International Labour Organization concerning basic principles and rights at work. We do not tolerate forced or child labour of any kind.

Diversity

We see our diversity as one of our particular strengths. In our everyday work, we create an environment in which the diversity of Saubermacher colleagues is appreciated, in which everyone is accepted and is able to give their best every single day.

Non-discrimination

We promote cohesion and fairness and never discriminate on the basis of skin colour, nationality, religion, gender, age, sexual orientation, disability, origin, social background, trade union membership, political opinions or other potentially discriminatory attributions. We do not tolerate harassment in the workplace, whether sexual, physical or psychological in nature, such as bullying.

Equal treatment

We practise solidarity and are committed to equal treatment and equal opportunity. Appointments, promotions, awards and the offering of development opportunities are based on individual skills and performance, ethical behaviour and adherence to our values.

Skills development

We support professional and personal training and continued education in order to prepare Saubermacher colleagues for current and future company requirements. In addition to training, our Saubermacher Academy also offers long-term development programmes.

Health and safety

We look out for our own health and safety and those of others. Our everyday objective is to keep our workplace free of accidents and injuries. With this in mind, we are committed to minimising the risks that Saubermacher colleagues are exposed to in their everyday work by taking appropriate measures to prevent accidents and harm to health. We keep to the health and safety rules, provide safe

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We act responsibly with a view to leaving our children and grandchildren an environment worth living in.

and reliable equipment and offer training. Our working conditions are designed to meet needs and undergo constant improvement. We expect Saubermacher colleagues at every level to always create and maintain a forward-focused safety culture and to observe all applicable legal boundary conditions for health protection, workplace ergonomics and occupational health safety.

Sustainability

Sustainability is an indispensable part of our strategy and encompasses environmental, social and governance. We act responsibly with a view to leaving our children and grandchildren an environment worth living in, and respect the UN Sustainable Development Goals (SDG). As part of our Zero Waste vision, we improve resource efficiency and support a truly circular economy. ■



For an
environment
worth living in.

A high-angle, close-up photograph of several business professionals in a meeting. Their hands are stacked together in a circle, symbolizing teamwork and collaboration. The individuals are wearing professional attire, including dark blue suits and light-colored blouses. The background is a blurred, light-colored surface, possibly a conference table or floor. The overall tone is professional and positive.

**Together,
we achieve
our goals.**

04

Fair business activities

Fair competition

We are committed to free and fair competition and reject measures that could impede competition. More specifically, we never participate in agreements and do not agree, whether formally or informally, with our competitors to

- + fix prices and conditions
- + limit what we offer or restrict production
- + divide customers or markets
- + manipulate tender offers
- + collectively boycott customers or suppliers

We do not exchange sensitive information with our competitors and act with caution when participating in trade association and other industry meetings at which our competitors are also present.

Anti-corruption, gifts and invitations

We do not engage in corruption and never pay or demand bribes, irrespective of local customs or the party with whom we are dealing.

We may only give or accept gifts, invitations and other benefits if they

- + are appropriate
- + are consistent with the socially accepted framework and business customs
- + are only occasional
- + are of low value
- + are not intended to unlawfully influence current or future business decisions or give the appearance of doing so.

Appropriate and of low value means gifts such as pens, calendars, notepads, pumpkin seed oil, honey, etc. Equally appropriate invitations to business lunches, dinners and events are an integral part of business life. When offering or accepting invitations, it is important to remember how this might appear from

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We are committed to the highest standards of integrity and ethics.

the outside as well as complying with our own value limits. We do not tolerate the offering,

The trust of our customers and business partners is a key factor for success.



promising, giving, demanding or accepting of cash, vouchers or other means of financial investment. We are additionally cautious when dealing with officials, so as to avoid any appearance of corruption.

Donations and sponsorship

Donations are voluntary in nature with no expectation of reciprocity. Donations are distinct from sponsorship. Sponsorship is a contribution in the form of finance, material resources or services. It involves a return of monetary value, typically in the form of advertising and promotion.

We never make donations, charitable contributions or investments in society, or engage in sponsorship in order to conceal corruption or obtain an improper business advantage. In the event of donations, charitable

contributions, sponsorship or investment in society, we ensure that relevant circumstances and potential connections are verified carefully and kept transparent. We refrain from all political donations, i.e. donations to political parties, to organisations that are associated with political parties and to campaigning groups. Where reciprocity is expected, we document it in contracts and, if applicable, monitor the lawful use of the funds we provide.

Money laundering and funding of terrorism

We undertake to comply with all applicable laws and regulations to fight money laundering and the funding of terrorism. We ensure that we know who our business partners are and take measures to protect ourselves against unlawful transactions.

Conflicts of interest

We always act in the best interests of our company and endeavour to prevent actual or alleged conflicts of interest. We are aware of the fact that even the appearance of a conflict of interest could be harmful. We are transparent about all conflicts of interest, document them and take appropriate measures to prevent conflicts of interests from arising. A conflict of interest may arise if personal interests, activities or relationships of a Saubermacher colleague are not consistent with the interests of the company or gives the appearance that the decisions or actions of Saubermacher colleagues are no longer being taken or exercised independently and objectively.

Close personal relationships with Saubermacher colleagues, customers, business partners (e.g. family relationships,



romantic relationships), secondary employment or interests in other companies (capital shares, investments) in particular could give rise to a conflict of interest.

Secondary employment may not only be inconsistent with our company obligations, but may also lead to significant conflicts of interest for Saubermacher colleagues, customers or suppliers. We report any form of secondary employment before commencing that employment and refrain from secondary employment unless express approval has been granted.

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We practise maximum customer focus and strive to meet and even exceed the expectations of our customers.

Customers, suppliers, Saubermacher colleagues and business partners

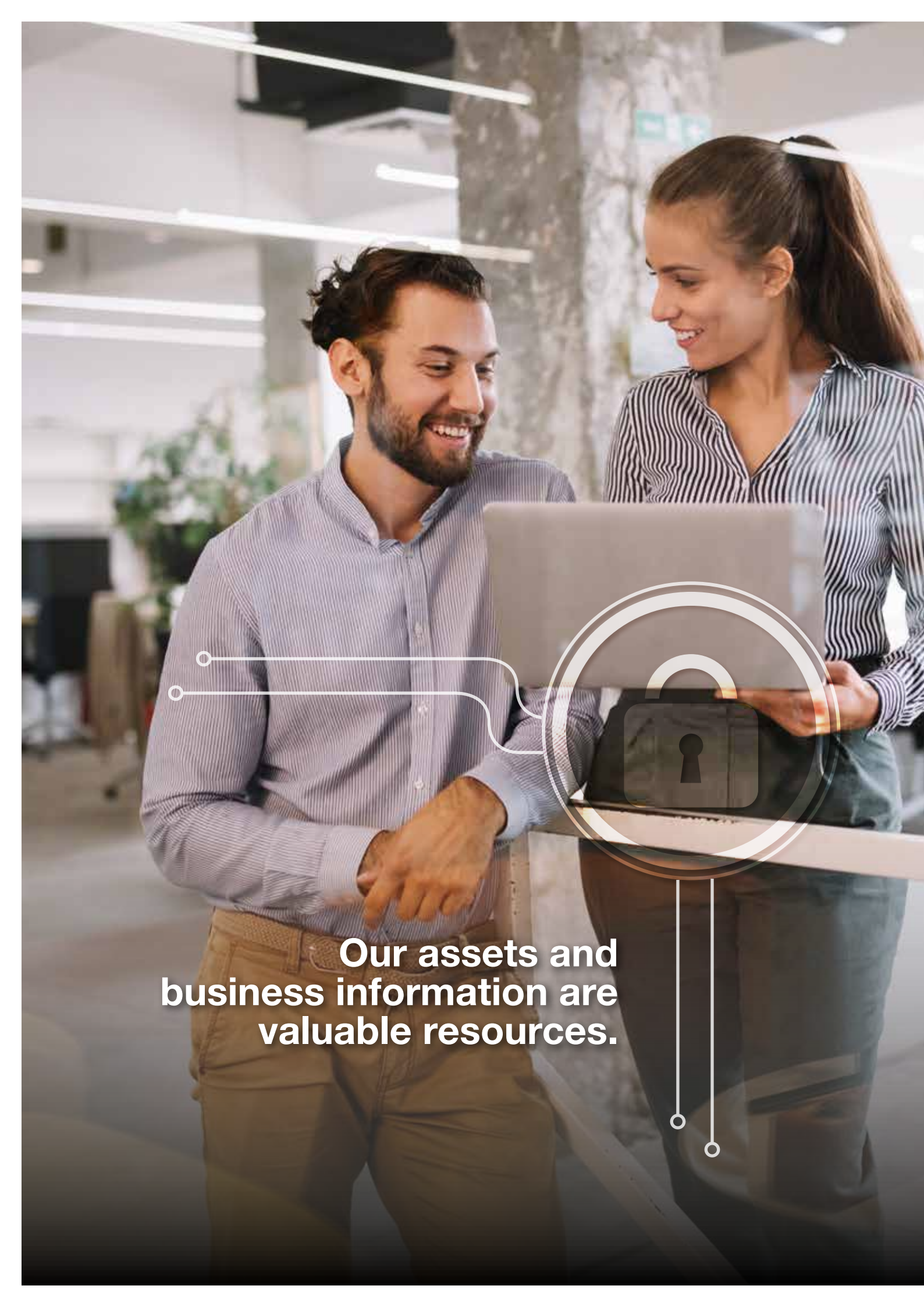
We practise maximum customer focus and strive to meet and even exceed the expectations of our customers.

We make sure that we know who our business partners are (suppliers, Saubermacher colleagues, partners) and get to know them through careful scrutiny.

We engage in dialogue with our business partners and expect them to apply the same principles of responsible, ethical and environmental conduct to their actions as we do. This helps us to safeguard our own reliability and that of our business partners. With this in mind, we also have a Code of Conduct for business partners, of which we make them aware beforehand.

Accounting and reporting

We undertake to ensure that all business transactions are reported in our accounting promptly, accurately and in full in accordance with established procedures and applicable accounting regulations. Documents and reports must contain the requisite information and be retained in accordance with the applicable laws. ■



**Our assets and
business information are
valuable resources.**

05

Careful handling of company assets, data and information

Protecting our assets, data and information

We understand that our assets, business information and intellectual property are valuable assets. We use physical assets, information and systems responsibly and carefully and take appropriate measures to protect our assets.

We treat our business information, such as information about our customers, suppliers and business partners, confidentially and protect it from unauthorised access and manipulation. We do not use business information for personal use.

Data protection and privacy

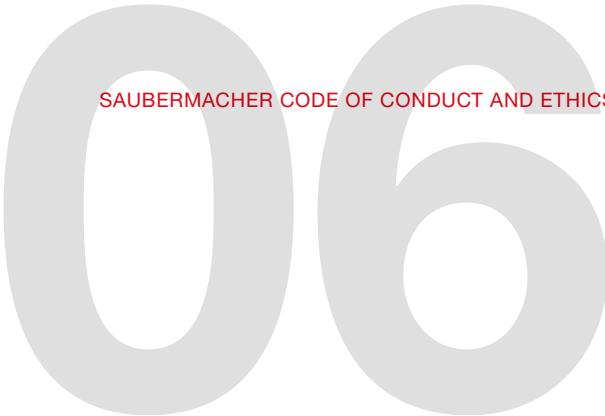
We keep to the rules on the protection of personal data and respects the rights of the individual and the rights of individuals to data privacy. We

are additionally cautious with certain categories of personal data known as 'sensitive data', such as data relating to religion, ideology, political views, racial and ethnic background, sexual orientation and health as well as medical and biometric data.

We follow the principles of the General Data Protection Regulation and data security and through our data protection management system, ensure the appropriate and lawful processing of personal data. ■

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We treat business information confidentially and protect it from unauthorised access and manipulation. We do not use information for personal use.



Effective implementation and the whistleblower system

In the event of questions or uncertainties about our Code of Conduct and Ethics, the following can be contacted as a first point of contact:

- + your manager
- + the local managerial team
- + the local compliance officer(s)
- + the chief compliance officer

They will be able to help you ensure that your actions are lawful and ethical. Our managers help to ensure that all Saubermacher colleagues are familiar with and abide by the Code of Conduct and Ethics.

We take concerns about and violations of our Code of Conduct and Ethics and our guidelines equally seriously and handle them with extreme care, irrespective of who is involved. We encourage Saubermacher colleagues to report concerns, possible misconduct and violations so that we can handle and resolve them pro-actively and

prevent future misconduct. Reports about potential or actual violations of laws, our Code of Conduct and Ethics or other guidelines can be submitted using our whistleblower system.

Situations may arise in which it is impossible or uncomfortable to raise concerns or potential violations with points of contact in person. Our whistleblower system allows reports to be submitted fully anonymously. In any event, we will handle all reports confidentially and will protect and never disclose the identity of the whistleblower.

We do not tolerate reprisals against anyone who raises a concern about conduct that they believe goes against our Code of Conduct and Ethics, our guidelines or applicable law, or who reports actual or suspected violations, even if those concerns ultimately turn out to be unfounded. We reserve the right to take steps against an

one who knowingly and deliberately submits false reports or makes false accusations.

Failure to adhere to our Code of Conduct can have serious implications for our Group, our colleagues and business partners. We do not tolerate violations of our Code of Conduct. Depending on the severity of the violation, consequences can range from disciplinary measures to dismissal and may also include civil claims for damages and criminal penalties. ■

Contact

We practise an open culture of discussion and communication in which direct dialogue is extremely important. For further information or in the event of questions about compliance, our Compliance Team would be happy to help you.

You can contact the Compliance Team by e-mailing compliance@saubermacher.at. All contact information can be found on the Saubermacher website and on the Compliance page of the Saubermacher intranet, which is accessible to Saubermacher colleagues.

The link to the Saubermacher whistleblower system can be found on the Saubermacher website and on the Saubermacher intranet. The system is confidential and secure and reports can be made individually or anonymously.

Daniela Tonweber

Group Chief Compliance Officer

T: +43 59 800 1043

E: compliance@saubermacher.at

Saubermacher Dienstleistungs AG

Hans-Roth-Straße 1 | 8073 Feldkirchen bei Graz | saubermacher.at

Scope of application:	Saubermacher Group
Valid from:	01/05/2023
Version:	2.0 (replaces version dated 01/02/2017)
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