

CODE OF CONDUCT
BUSINESS PARTNERS

HPW Metallwerk GmbH



1. INTRODUCTION AND PURPOSE

When conducting international business activities, it is essential to observe fundamental principles of lawful and ethical behaviour. Compliance with all applicable laws and regulations as well as the protection of human rights are of central importance to HPW Metallwerk GmbH.

The same commitment is expected from our business partners, including suppliers, service providers, intermediaries, consultants, and all other contractual partners.

This Code of Conduct establishes the standards and expectations for business partners to ensure that their business practices align with the values of HPW Metallwerk GmbH and fully comply with applicable legal requirements.

2. COMPLIANCE AND RESPONSIBLE CORPORATE GOVERNANCE

Compliance with Laws

The business partners commit to comply with all applicable national laws and international regulations.

Fair Competition and Antitrust Law

The business partners commit to ensuring fair, transparent, and lawful market behaviour.

The business partners further commit to comply with all applicable national and international competition and antitrust laws, to refrain from practices that could restrict or distort competition, and not to enter into agreements, arrangements, or concerted practices with competitors or other third parties that influence or determine competitive behaviour. This includes, in particular, price fixing, market or customer allocation, bid rigging, and other behaviours that violate antitrust provisions.

Corruption / Bribery / Acceptance of gifts

HPW Metallwerk GmbH strictly rejects any form of corruption, bribery, or undue influence. The business partners commit neither directly nor indirectly to offer, promise, or grant gifts, personal advantages, or other benefits to employees of HPW Metallwerk GmbH or their related persons that are suitable to influence decisions or create the impression of such influence. Gifts and invitations of low value that are within the scope of usual business practices are permissible.

Money Laundering

The business partners commit to comply with all applicable laws on combating money laundering and not to participate in transactions or business dealings involving funds or assets from criminal activities.

Data Protection and Information Security

The protection of personal data is of highest priority for HPW Metallwerk GmbH. The business partners commit to process all personal data in accordance with applicable data protection laws and to take appropriate organizational and technical measures to prevent unauthorized access, misuse, or loss of data.

Confidentiality

The business partners commit to treat all confidential information made available to them in the course of the business relationship or otherwise obtained – including business and trade secrets, technical data, internal processes, customer and supplier information, as well as strategic plans – with the utmost care.

The business partners commit to use confidential information exclusively for the contractually agreed purposes, not to disclose it directly or indirectly to third parties, and to take appropriate measures to protect it from unauthorized access, loss, or misuse.

Intellectual Property

Inventions, technical developments, and company-specific know-how are important resources for HPW Metallwerk GmbH. The business partners commit to comply with applicable laws on the protection of intellectual property, including patents, trademarks, and copyrights, to respect the intellectual property rights of third parties, and to avoid infringements of protective rights.

Trade Controls and Sanctions

Business Partners undertake to comply with all applicable trade control and sanctions regulations in every jurisdiction in which they operate.

3. SOCIAL RESPONSIBILITY

Respect for Human Rights

Business Partners hereby undertake to fully respect and comply with internationally recognized human rights standards. They shall specifically ensure that no form of human trafficking, modern slavery, child labor, forced or compulsory labor, or wage dumping is committed in their operations or supply chains.

Business Partners further undertake to establish and maintain appropriate procedures to identify, prevent, and mitigate adverse human rights impacts in their operations and supply chains. In the event of violations, they commit to implementing remedial measures.

Equal Opportunity and Non-Discrimination

Business Partners undertake to refrain from any form of discrimination or harassment. In particular, they undertake to prohibit sexual harassment, inappropriate gestures, comments, or physical advances.

Business Partners further undertake to promote equal opportunity and ensure that no disadvantage occurs on the basis of gender, race, ethnic origin, religion or belief, age, sexual orientation, disability, or other protected characteristics.

Working Conditions

Business Partners undertake to ensure fair, safe, and legally compliant working conditions for all employees, in particular to pay fair remuneration that meets or exceeds applicable legal requirements and to provide a humane working environment that complies with statutory occupational health and safety regulations.

Business Partners undertake to fully respect employees' right to freedom of association, including the right to form or join trade unions or employee representative bodies, as well as the right to collective bargaining, without fear of retaliation, discrimination, or other adverse consequences.

Health and Safety

Business Partners undertake to create and maintain safe and healthy working conditions and to comply with all applicable occupational health and safety laws. They further undertake to take proactive measures to prevent occupational accidents, injuries, and diseases.

4. ENVIRONMENT AND SUSTAINABILITY

Business Partners undertake to comply with all relevant environmental laws, regulations, and internationally recognized standards. They further undertake to avoid environmental risks, minimize environmental impacts, use resources efficiently, and contribute to environmental protection and climate stability.

5. HUMAN RIGHTS IN THE SUPPLY CHAIN AND SUPPLY CHAIN MANAGEMENT

Business Partners undertake to fully respect internationally recognized human rights and to ensure that this obligation is observed in all areas of their business activities. This obligation includes, in particular:

- **Respect for human rights** - The Business Partner and all third parties associated with it, including suppliers, are expected to respect internationally recognized human rights.
- **Risk management** - Implementation of appropriate measures to identify, prevent, and remedy risks associated with human rights violations.
- **Supply chain responsibility** – Communication of the principles of this Code of Conduct to suppliers and subcontractors, contractual requiring of such parties to adhere to equivalent standards, and regular monitoring and enforcement of compliance within the supply chain.

6. COMPLIANCE WITH REGULATIONS AND AUDITS

HPW Metallwerk GmbH reserves the right to verify compliance with these obligations through appropriate measures, including audits and reporting. Such reviews or audits may be conducted, upon written notice, either by HPW Metallwerk GmbH itself or by third parties commissioned by it.

Business Partners undertake to provide all requested information and documents for inspection. In addition, reasonable access shall be granted to executives, officers, and employees of HPW Metallwerk GmbH or the commissioned third parties to conduct discussions or interviews, insofar as this is necessary for the performance of the review.

In the event of a violation of these obligations, HPW Metallwerk GmbH reserves the right to take appropriate measures. These measures may include, depending on the severity of the violation, the suspension or termination of the business relationship.

Linz, September 2025