

Code of Conduct

SIMACEK Facility Management Group

Version 1.1

SIMACEK

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SIMACEK

Code of Conduct

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1 Introduction

Our Code of Conduct ('the code' for short) forms the basis for all commercial actions and decisions within the group and should provide a moral, ethical and legal compass for all individuals acting on behalf of SIMACEK Facility Management Group.

The code does not dictate how we should behave in any given situation – rather, each individual should be in a position to make a rational, carefully considered decision about how to handle situations as and when they arise.

If you have any questions about how to use the code or are unsure of the direct or indirect consequences of a business activity on our ethical goals, please contact your line manager or our legal team.

2 Our principles and our approach

SIMACEK Facility Management Group is a business operating in the field of facility management. We see ourselves as a professional partner, dedicated to delivering top-quality service and sustainability.

We work in accordance with the following principles:

- Responsibility and accountability
- Transparency
- Ethical behaviour
- Safeguarding the interests of stakeholders
- Observing the rule of law
- Observing international standards of behaviour
- Observing human rights

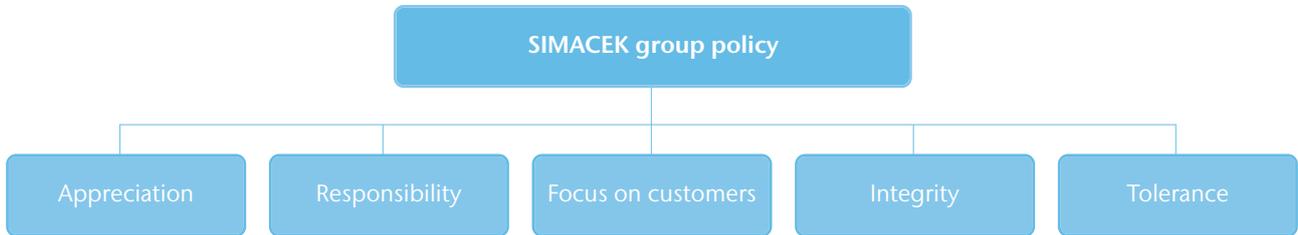
Our group policy is based on an integrated approach encompassing the following seven key areas:

- Organizational management
- Employee welfare
- Employment practices
- Environmental considerations
- Fair business practices
- Consumer requirements
- Focus on integration and developing together (society)

Through our integrated management system, we ensure that these organizational principles are adhered to both internally and externally.

3 Our values

Our group policy is the foundation for a sustainable company management. The following five values underpin all of our business activities:



Appreciation

means treating each other with respect, based on open communications and recognition of good performance.

Responsibility

means acting independently and using all resources sustainably.

Our focus on customers

means responding flexibly to customer needs and using innovative solutions to develop a mutually beneficial partnership.

Integrity

means consciously living our values, keeping our promises and demonstrating our reliability and fairness.

Tolerance

means accepting different opinions and reaping the benefits of working with a diverse range of people.

These values and principles apply to our CEOs, as well as all our managers, employees and partners.

3.1 Target audience

The terms of our Code of Conduct apply to all employees across SIMACEK Facility Management Group, and all staff must adhere to them. This includes staff in Austria and abroad, as well as those at indirectly or directly controlled SIMACEK affiliated companies and holdings. Furthermore, all third parties (partner, suppliers, etc.) carrying out business at the request of and/or on behalf of SIMACEK Facility Management Group must also comply with the terms of the code.

3.2 Compliance with the code

Making a company more successful and profitable does not in any way justify an infringement of national or international laws, or this code. We refuse and will not engage in any business activities that may be in breach of the law.

3.3 Local laws and the SIMACEK Facility Management Group standard

We respect the laws, statutory provisions and regulations of the countries in which we operate. We do our best to comply with the very highest standards when undertaking our business activities. In case that where local laws or regulations differ from the SIMACEK Facility Management Group Code of Conduct, we shall enforce the stricter, wider-reaching rule.

3.4 Responsibility

Ultimate responsibility for ensuring group-wide, consistent implementation of the code lies with the CEOs of SIMACEK Facility Management Group and the CEOs and managers of affiliates and holdings. Managers are responsible for ensuring application of and compliance with the code within their team. The CEOs and all managers must lead by example.

3.5 Obligation to report non-compliance (ombudsman)

Should an employee become aware of an infringement of our code, they must report it immediately to the relevant ombudsman, their superior or company management. All reports are investigated carefully and in full, and handled confidentially. We ensure that reports of non-compliance made in good faith do not have any repercussions for an individual's work or career.

3.6 Sanctions for infringement of the code

Our Code of Conduct forms a part of all our employment contracts. Infringements of the terms of this code or of other internal guidelines or legal regulations are not tolerated and shall be penalised within the framework of the law. Furthermore, misdemeanours of this sort may have additional consequences under criminal, employment or civil law. In the worst case scenario, in addition to consequences under employment law, this may lead to a fine and/or imprisonment. Deliberate, objectionable misconduct will be punished in accordance with the law and without any regard to the position of the individual within the company. Should a verifiable infringement of the code cause damages or disturbances, or result in demonstrable damage to the company, the individual responsible will be required to provide compensation.

4 Core areas of the code

We see ourselves as an organization that is constantly learning. We live our values and, in doing so, develop innovative solutions for our customers and partners. We are attentive to environmental concerns and are aware of our social responsibility.

Our code sets down parameters for how we behave in the following areas:

- 4.1 Company management and sustainable management
- 4.2 Employees and employment practices
- 4.3 Bribery and corruption
- 4.4 Conflicts of interest
- 4.5 Interacting with customers and business partners
- 4.6 Dealing with information

4.1 Company management and sustainable management

As a traditionally minded, family-owned company our sense of responsibility spans generations. We consider decisions carefully and in accordance with the principles of fair, honest business. Our business activities surpass the requirements of existing laws and regulations and aim to generate more benefits and value added for our company, society and the environment. We take responsibility for our independent actions and sustainable approach to using resources. We also view protecting the environment as a key responsibility for everyone, including future generations.

We consider sustainability to mean balanced management that considers economic goals, environmental resources and our values equally.

In our corporate culture, we commonly talk about an unflinching reliability. By this we mean that verbal agreements must be honoured and that we are true to our word. We lead by example and help our employees to behave in an honest, upright way.

Our complaints management system stands out for its prompt, straightforward approach to dealing with complaints.

4.2 Employees and employment practices

Our employees respect the business environment and privacy of their colleagues and of our customers and our partners. Violations of confidentiality result in immediate action and are not tolerated.

We expect our employees to go about their tasks independently. All decisions should take our Code of Conduct into consideration.

We create a climate in which everyone feels appreciated and has the possibility to grow and develop on a personal as well as a professional level. This benefits the company and leads to satisfied staff members who enjoy their work. The implementation of a sustainable human resource management enabled us to continuously support our staff members' professional endeavours and efforts. Another goal we support is compatibility of profession and private life by offering flexible solutions to facilitate reaching a balance between family and work.

We provide constructive feedback and criticism. We know from experience that discussing various perspectives and opinions leads to the best solution for all concerned. Once a decision is made, it should be supported by everyone and implemented consistently.

We do not tolerate any form of discrimination or harassment on the basis of nationality, culture, religion, ethnicity, gender, sexual orientation, age or disability. The recruitment, promotion and evaluation of staff are all based on performance-based criteria and skills.

We have an active equality policy and regard it as the foundation for a customer-driven service provider.

4.3 Bribery, extortion and corruption

Corruption is defined as the abuse of power for personal gain or benefit. We do not tolerate any form of bribery, extortion or corruption. We want to avoid giving the impression that we can be influenced in our business decisions through personal gain or extortion. This is based on legal regulations and international recommendations. The receipt or provision of cash gifts is completely forbidden, while all other gifts and invitations are subject to strict internal rules and anti-corruption law (in accordance with the current version), and/or equivalent laws of other countries in which the group's affiliate companies operate. Accordingly, only low-value local and customary gifts, presents and invitations (to dinners, events) up to a maximum of 100 euros may be accepted.

If there is any uncertainty about whether you are permitted to accept a gift, invitation to a business dinner or to a supplier event, contact your manager or email the compliance team/manager at compliance@simacek.at.

4.4 Conflicts of interest

In the course of day-to-day business, it may happen that the personal, financial or political interests of our employees come into conflict with those of the group. Employees are therefore required to act with the utmost transparency in all matters related to this topic.

Employees are asked to identify potential conflicts of interest or situations involving bias and actively counteract them. Additionally, all employees must report any conflicts of interest immediately and independently to their direct superior.

Conflicts of interests involving multiple roles (e.g. on supervisory boards or committees with companies outside the group) are only permitted with the prior approval of group management. Furthermore, employees must inform their direct superior of any instances where close relatives hold roles at business partners (customers, suppliers, competitors).

4.5 Interacting with customers and business partners

As a service provider, we act in a customer-driven way. We engage in dialogue with our customers to find the best solutions and develop a mutually beneficial relationship.

Our goal is to form long-term partnerships with our customers based on trust, respect, mutual appreciation and fairness. Decisions are therefore made with this in mind, and not only to boost profits in the short term. The same principles apply to our relationships with suppliers, and to all other partners who form part of our supply chain. We view all our business partners as equals, offering them a unfailing reliability and expect the same in return.

When it comes to competing on the free market, we consider behaving fairly towards competitors to be extremely important. This is why we adhere to the principles of fair competition. Our company aims to impress through quality and performance. Any infringements of legal constraints or of competition or antitrust laws are strictly forbidden.

4.6 Information management

4.6.1 Information security

We have developed and implemented a risk-adjusted and economically appropriate information security concept. This concept sets out our company's long-term, mandatory, security-related goals, strategies, responsibilities and methods. We categorize all information in terms of confidentiality, availability and data protection (DSG 2000), calculate potential damage across various categories and, using threshold values, allocate corresponding protection categories as well as the resulting measures.

By ensuring our employees handle data reliably, particularly in terms of the confidentiality, accuracy and timeliness of information, we minimize liability and financial risks and ensure the continuity of our business processes. Our active approach towards information security increases the public's and stakeholders' trust in our company, and helps us to continuously improve our reputation on the market. Within the scope of an ongoing improvement process, we analyze information security as part of our integrated management systems.

4.6.2 General discretion

Each employee is obliged to protect confidential data, as well as information subject to the law on data protection (DSG 2000), against unauthorized access, and to refrain from using it for their own personal gain. This excludes information that is in the public domain. This obligation to maintain discretion applies to all company and trade secrets, as well as all investments, and remains valid following conclusion of an employment relationship. It also applies among work colleagues. Passing on such information to colleagues who do not directly require it for their work represents an infringement of this obligation. It is strictly forbidden for employees to collect, process, use or pass on any personal information without prior authorization. Where confidential company information must be shared with external partners (e.g. consultants), the relevant individuals must sign a confidentiality agreement.

The Executive Board



Ursula Simacek
CEO



Rudolf Payer
CFO

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