

Code of Conduct for Suppliers and Subcontractors (Issue October 2025)

Haslinger Stahlbau GmbH
Villacher Straße 20
9560 Feldkirchen
AUSTRIA
T: + 43 (0) 4276 / 2651 – 0
E: office@haslinger.co.at
www.haslinger.co.at

1. Introduction

HASLINGER STAHLBAU GmbH commits to the **highest standards** in ethics, integrity, sustainability, and legal compliance.

We expect our suppliers¹ to share these values and to implement them diligently in their business practices, also passing them on within their supply chain (own suppliers and subcontractors).

This Code of Conduct establishes binding minimum standards for all suppliers and aligns with the principles of the UN Global Compact, international labor standards of the ILO, as well as established environmental and compliance standards.

Suppliers undertake to comply with all applicable laws, including relevant regulations of the European Union, directives, and guidelines.

2. Ethical Behavior and Legal Compliance Conditions

2.1 Lawfulness and Fair Competition

Our business partners commit to strict adherence to all national and international laws. These include, in particular:

Anti-corruption:

Suppliers actively oppose any criminal or unethical influence on decisions by HASLINGER STAHLBAU or other entities and take measures against bribery within their own organization.

They must ensure their employees are regularly trained on compliance and anti-corruption prevention, and establish a confidential reporting mechanism for violations.

Fair competition:

Suppliers adhere to fair competition rules and do not participate in illegal anti-competitive agreements.

They ensure employees are informed about prohibited conduct through internal controls, training, or information sessions.

Export Controls and Economic Sanctions:

Suppliers are obligated to comply with applicable export control regulations, customs laws, and economic sanctions in the course of their business activities.

Intellectual Property and Plagiarism:

The intellectual property rights and trade secrets of HASLINGER STAHLBAU and third parties must be respected. Suppliers must not use, produce, or distribute plagiarized or protected products without proper authorization.

Artificial Intelligence (AI)

If suppliers use AI applications, HASLINGER STAHLBAU expects these to be used responsibly, transparently, and in compliance with applicable data protection and security regulations.

Prevention of illegal employment and undeclared work:

Suppliers comply with relevant employment laws and effectively combat illegal employment practices. All employment contracts must meet legal requirements and be documented in writing.

Suppliers are responsible for ensuring their subcontractors and temporary staffing agencies act lawfully.

Money laundering and terrorism financing:

It must be ensured that all financial transactions originate from legitimate sources.

2.2 Transparency and Information Obligations

Our business partners are obliged to disclose relevant information, particularly:

Reporting on internal control mechanisms:

Suppliers must implement appropriate measures to ensure compliance with this Code.

Data protection and information security:

Confidential information of employees, customers, and business partners must be protected according to applicable data protection laws.

Conflicts of Interest:

We expect our suppliers to handle conflict of interest responsibly. Such conflicts should be avoided or – if they arise – disclosed openly and at an early stage.

3. Human Rights and Working Conditions

3.1 Respect for Fundamental Employee Rights

Suppliers respect the health, safety, and personal rights of their employees and commit to principles of respectful, fair, non-discriminatory treatment. They employ and compensate staff based on fair and lawful contracts adhering to international minimum labor standards.

Suppliers agree to promote diversity, equality, and inclusion at the workplace.

Harassment, discrimination, or inappropriate behavior are not tolerated. Employees should be informed about these principles through clear internal policies and training.

A confidential grievance mechanism must be provided for employees and business partners to report violations.

¹ In the interest of readability, the term "suppliers" is used uniformly hereafter.
This designation also covers subcontractors.

Suppliers commit to ethically responsible recruitment. All hiring processes must be transparent, voluntary, and free from improper incentives. Recruitment through employment agencies must be carried out strictly in accordance with applicable regulations.

3.2 General Human Rights Principles

Suppliers must fully respect universal human rights, including:

Prohibition of child labor and forced labor:

No employment of minors below the legally defined minimum age (per ILO Conventions 138 & 182). Any form of forced or involuntary work - including human trafficking or modern slavery - is prohibited.

Equal treatment & anti-discrimination:

Employees must not face discrimination based on gender, ethnicity, religion, disability, sexual orientation, or other personal characteristics.

Protection of minorities & indigenous peoples:

Cultural rights and land use rights must be respected.

3.3 Working Conditions & Compensation

Suppliers must ensure appropriate working conditions that meet these standards:

Working hours:

Comply with legal regulations regarding working hours, rest periods, and overtime.

Fair wages:

Wages should at least meet legal minimum wages or collective bargaining agreements providing a decent standard of living.

Occupational health & safety:

Work environments should be safe; accident prevention measures should be implemented; regular safety training is required.

Freedom of association & participation:

Employees have the right to join trade unions and participate in collective bargaining.

4. Environmental Protection & Climate Action

Suppliers shall comply with applicable environmental laws and minimize environmental impacts.

They commit to continuous improvement in environmental performance - reducing emissions, energy/water consumption, waste management.

Suppliers are encouraged to reuse materials wherever possible, promote recycling processes, and integrate circular economy models into their production processes.

Suppliers shall promote sustainable production processes such as increased use of renewable energy sources, energy-efficient technologies, and resource-conserving materials.

Suppliers are expected to contribute toward CO₂ reduction targets along their supply chain by documenting environmental measures/targets regularly for progress tracking.

Chemicals are used only to a limited extent in the production processes of HASLINGER STAHLBAU. If suppliers work with hazardous substances (e.g. in coatings or auxiliary materials), we expect safe and legally compliant handling in accordance with applicable regulations.

HASLINGER STAHLBAU is committed to treating all living beings with respect. Animal welfare is not relevant to the steel construction supply chain, as no animal-base materials are used and animals are not part of our supply or production processes.

HASLINGER STAHLBAU values the careful use of land and resources by its suppliers. Activities that impact biodiversity or lead to deforestation should be avoided or carried out responsibly.

If processes have the potential to negatively impact soil quality, careful and damage-preventing handling must be ensured.

Suppliers should implement measures to reduce noise emissions in sensitive areas and comply with local noise protection regulations.

5. Expectations Regarding Standards Transmission

HASLINGER STAHLBAU expects its Tier-1-suppliers to pass on the standards described in this Code to their own suppliers and subcontractors wherever possible and to promote compliance within the scope of their influence.

Compliance with this Code is reviewed periodically, if necessary (for example, by requesting valid certificates, self-assessments upon request, and audits when required).

Tier-1-suppliers are also encouraged to establish processes to identify and effectively minimize sustainability risks in their own supply chains at an early stage.

6. Responsible Raw Material Procurement

Partners must ensure that raw material sourcing adheres to sustainable ethical standards:

Obligation to sustainable procurement policies:

Suppliers must establish their own sustainable procurement policy.

Participate in recognized sustainability initiatives:

HASLINGER STAHLBAU favors suppliers actively involved in such programs.

7. Violations & Consequences

7.1 Whistleblower Protection Act (HSchG) Reporting obligation in case of violations:

All employees of HASLINGER STAHLBAU are encouraged to report violations via traditional channels (phone, fax), anonymous letters or email (hschg@haslinger.co.at). This whistleblower system is also available to our suppliers if they suspect violations.

Suppliers are also obliged to report violations related to their relationship with HASLINGER STAHLBAU or misconduct by their employees without fear of repercussions via a secure anonymous mechanism reviewed by an independent body; confidentiality is guaranteed.

Violations of the code must be reportable without fear of consequences. A secure, anonymous reporting mechanism must be provided, and all reports must be handled confidentially and reviewed by an independent body. Suppliers should regularly inform their employees about this mechanism and encourage them to report violations anonymously.

Suppliers are obliged to actively investigate suspected cases and cooperate fully with HASLINGER STAHLBAU in doing so.

7.2 Consequences for Violations:

Adherence to this Code is fundamental for our business relationships; if there is credible suspicion of violation by a supplier - depending on severity - corrective actions may be

required within an appropriate timeframe to prevent future breaches effectively.

If a supplier fails to adequately fulfill their obligation to investigate and cooperate in suspected cases, or if repeated or serious violations of the code of conduct occur, HASLINGER STAHLBAU may terminate the business relationship with the affected supplier with immediate effect based on existing contractual or legal rights. In the event of a violation of the code of conduct, HASLINGER STAHLBAU reserves the right to take further legal action, including claims for damages.

Random audits remain reserved.

8. Updating the Code

HASLINGER STAHLBAU may update this Code periodically from time to time and will make the current version available on its website (haslinger.co.at).

In the context of existing business relationships, significant changes will be actively communicated to the affected suppliers. Suppliers are expected to accept and implement such changes.

HASLINGER STAHLBAU reserves the right to conduct random checks to verify compliance with updated requirements.

Confirmation by Supplier/Subcontractor:

1. We hereby confirm that we have received the Code of Conduct and undertake beyond our contractual obligations with HASLINGER STAHLBAU GmbH to adhere to its principles.
2. We also undertake that these principles will be observed within our supply chain.
3. We agree that this declaration is governed by Austrian law (excluding conflict-of-law rules).

Place / Date

Company Stamp

Signature Supplier / Subcontractor

Name (in print), Position