

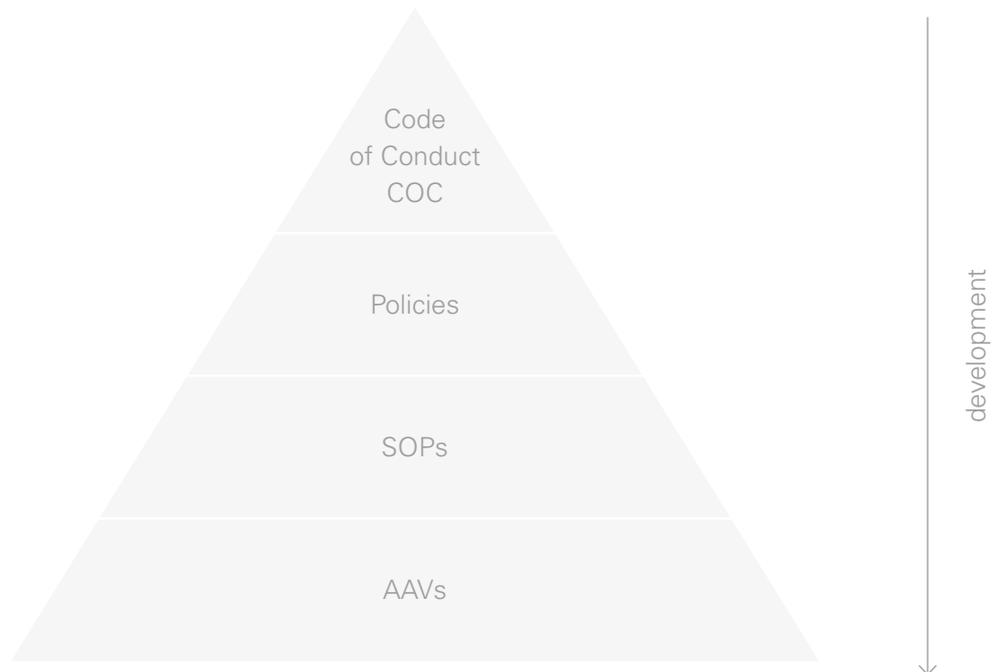
Gebro Principles  
Code of Conduct (CoC)



# Quality Pyramid

In August 2012 Gebro has established a Code of Conduct (Verhaltenskodex (CoC)) representing the applicable company philosophy and describing the top of the quality pyramid:

## Quality pyramid



Based on this Code of Conduct several basic Policies as a framework for different working areas are compiled based on international standards.

These Policies are the basis for SOPs (Standard Operating Procedures) and AAVs (Allgemeine Arbeitsvorschriften – general working procedures to describe detailed working processes).

The Code of Conduct (2012) itself consists of

- a) the long-term mission statement (1975)
- b) Gebros values diamond
- c) the objectives of the ethical standards

Gebro has developed the Code of Conduct (Verhaltenskodex (CoC)) 2012 in more details with regard to

- Labour Rights
- Health and Safety
- Environment
- Anti-Bribery and Fair Competition
- Data Privacy

by the following Gebro Principles:

# Gebro Principles for Labour Rights, Health-Safety-Environment and other Ethical areas

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## 1 Labour Rights

Gebro shall be committed to uphold the human rights of workers and to treat them with dignity and respect. The labour elements include:

### 1.1 Freely Chosen Employment

Gebro shall not use forced, bonded or involuntary prison labour.

**Management Systems:** the responsible manager of HR ensures that the ages of workers at each Gebro site, including temporary workers, are monitored and that, where necessary, there are adequate policies and procedures in place.

### 1.2 Child Labour and Young Workers

Gebro shall not use child labour. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment and the age established for completing compulsory education.

**Management Systems:** the responsible manager of HR ensures that the ages of workers at each site, including agency or temporary workers, are monitored and that, where necessary, there are adequate policies and procedures in place.

### 1.3 Non-Discrimination

Gebro shall provide a workplace free of harassment and discrimination. Discrimination for reasons such as race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status is not tolerated.

**Management Systems:** the responsible manager of HR ensures that discrimination is prevented and that all workers know to whom they can report incidences of discrimination. Where necessary, adequate policies and procedures are in place.

### 1.4 Fair Treatment

Gebro shall provide a workplace free of and with no threat of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.

### 1.5 Wages, Benefits and Working Hours

Gebro shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits.

Gebro shall communicate in a timely manner with workers regarding the basis upon which they will be paid. Gebro is also expected to communicate with the worker whether overtime is required.

**Management Systems:** the responsible manager of HR ensures that a system is in place to monitor the hours and wages paid to all staff onsite, and complete hours and payroll records are kept for all workers onsite at all times.

### **1.6 Freedom of Association**

Open communication and direct engagement with workers to resolve workplace issues are encouraged.

Gebro shall respect the rights of workers, as set forth in local laws, to freely join or not join labour unions and seek representation. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

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## **2 Health and Safety**

Gebro shall comply with all applicable health and safety laws and regulations by providing a safe and healthy working environment. The health and safety elements include:

### **2.1 Risks and Process Safety**

Gebro shall have systems and programs in place to identify both occupational and external hazards. They should classify such hazards and define the risk levels appropriately, and have programs and systems in place to prevent or mitigate these risks (e.g., catastrophic releases of chemicals, fumes, dust, etc.).

### **2.2 Worker Protection**

Gebro shall have systems and processes in place to protect workers from exposure to chemical, biological and physical hazards (including physically demanding tasks) in the workplace.

### **2.3 Emergency Preparedness and Response**

Gebro shall develop and distribute emergency plans across their facilities (emergency exit plans, fire protection plans). Gebro minimizes the potential impact of any emergency by implementing suitable emergency plans and by carrying out appropriate measures (such as fire drills, evacuation exercises).

### **2.4 Hazard Information**

Gebro shall have programs and systems in place to provide workers with safety information relating to hazardous materials and education to protect them from potential hazards. Hazardous materials can include but not be limited to raw materials, products, solvents, cleaning agents, and wastes.

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## **3 Environment**

Gebro shall comply with all applicable environmental laws and regulations. This specifically includes:

### **3.1 Environmental Authorizations**

Required environmental permits, licenses, information registrations and restrictions shall be obtained, and their operational and reporting requirements followed.

### **3.2 Waste and Emissions**

Gebro shall have processes and systems in place to ensure the safe handling, movement, storage, recycling, reuse, or management of waste. Any generation and disposal of waste, emissions to air and discharges to water, with the potential to adversely impact human health or the environment shall be appropriately minimized, properly managed, controlled, and/or treated prior to release into the environment.

### 3.3 Accidental Releases

Gebro shall have processes and systems in place to prevent and mitigate accidental and diffusive spills and releases to the environment.

### 3.4 Sustainability and Efficiency of Resources

Gebro shall have processes and systems in place to optimize the use of all relevant resources sustainably, such as energy, water and materials.

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## 4 Animal Welfare

Gebro itself does not conduct any animal testing. In the event that animal testing is unavoidable in the context of studies, Gebro ensures that the commissioned institutes comply with the following guidelines.

Animals shall be treated respectfully, with pain and stress minimized. Animal testing should be performed after consideration to replace animals, reduce the numbers of animals used or refine procedures to minimize distress. Alternatives should be used wherever scientifically valid and acceptable to regulators.

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## 5 Anti-Bribery and Fair Competition

### 5.1 Anti-Bribery

Gebro shall not bribe any public official or private person and shall not accept any bribes. No intermediaries, such as agents, advisers, distributors or any other business partners, shall be used to commit acts of bribery.

Gebro shall comply with applicable laws and regulations and industry standards related to anti-corruption.

Gebro has guidelines in place that define under which circumstances, or within what limits, employees are allowed to receive gifts or favors from external companies with whom the company does business.

Gebro trains their sales forces and any other relevant employees on anti-bribery, at their own expense.

all workers are encouraged to report concerns or illegal activities in the workplace, without threat of reprisal, intimidation or harassment (CIRS).

### 5.2 Fair Competition

Gebro shall conduct their business consistent with fair and vigorous competition. They shall employ fair business practices, including accurate and truthful advertising.

Gebro shall comply with all fair competition and antitrust laws and regulations.

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## 6 Data Privacy

Gebro shall apply adequate data privacy and security protection to individuals' personal information in its processes. Gebro will operate in a manner that is consistent with applicable data protection laws in particular the EU General Data Protection Regulation (DSGVO).

**Proper Protection of Personal Information:** Gebro shall have the proper organizational structure, processes and procedures to ensure the protection of personal information against accidental, unauthorized or unlawful loss, destruction, alteration, disclosure, use or access.

**Proper Security Measures:** Gebro shall have adequate policies and procedures in place which address technical and organizational security and take reasonable steps to confirm compliance with those.

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## 7 Identification of Critical Incidents

All workers should be encouraged to report critical incidents or other concerns or illegal activities in the workplace, without threat of reprisal, intimidation or harassment. Gebro shall investigate and take corrective action if needed (CIRS).

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## 8 Management Systems

Gebro shall use management systems to facilitate continual improvement and compliance with the expectations of these principles. Elements of the management systems include:

### 8.1 Commitment and Accountability

Gebro shall demonstrate commitment to the concepts described in this document by allocating appropriate resources.

### 8.2 Legal and Customer Requirements

Gebro shall identify and comply with applicable laws, regulations, standards and relevant customer requirements.

### 8.3 Risk Management

Gebro shall have mechanisms to determine and manage risk in all areas addressed by this document.

### 8.4 Documentation

Gebro shall maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable regulations.

### 8.5 Training and Competency

Gebro shall have a training program that achieves an appropriate level of knowledge, skills and abilities in management and workers to address these expectations.

### 8.6 Continual Improvement

Gebro is expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections and management reviews.

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Approved by and on behalf of  
Gebro Holding GmbH



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Managing Partner

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