

Compliance Guidelines

Polymer Competence Center Leoben GmbH

Sauraugasse 1, 8700 Leoben

+43 3842 42962-0

office@pccl.at

Code of Conduct

Dear Readership,

Polymer Competence Center Leoben GmbH (PCCL) is the leading center for collaborative research in polymer technology and polymer science in Austria. In collaboration with businesses and universities, we carry out R&D on innovative polymer solutions in a broad and diverse range of applications, including automotive, aerospace, packaging and solar energy.

As a reliable partner, we feel responsible also for how we interact with our corporate partners, scientific partners, suppliers, staff members and other business partners. This is the reason why we have drawn up a Code of Conduct to help our staff take on responsibility for their business activities. This Code of Conduct forms the basis for ensuring morally, ethically and legally irreproachable conduct by all our staff members. Our staff is a key factor in our success as an organization and plays a major role in the trust others place in us. This is why it is all the more important for us to set out clear principles and rules to govern ethical and moral conduct in business. This Code of Conduct is a cornerstone in our efforts in this area. By walking the talk, each one of our staff members is to act as an ambassador of our corporate culture.

POLYMER COMPETENCE CENTER LEOBEN GMBH

CEO

01. Introduction and objectives

Given its international orientation, Polymer Competence Center Leoben GmbH is faced with a diverse set of social, political and legal framework conditions it has to pay tribute to. Noncompliance with these conditions may result in considerable financial disadvantages for the organization and may cause the reputation of PCCL to suffer long-term damage. This Code of Conduct forms the basis for all of PCCL's business activities and decisions, ensuring morally, ethically and legally irreproachable conduct by all of its staff members.

Whenever staff members fail to comply with statutory provisions, in-house policies, rules and instructions or provisions of this Code of Conduct, they must expect disciplinary consequences. In addition, non-compliance may also have consequences under criminal and civil law, such as claims for recourse and damages not only for the individual employee but above all for the company.

02. Scope of application

This Code of Conduct applies to all staff members of PCCL. Newly hired staff members shall undertake to comply with the Code of Conduct in an individual agreement. All staff members are expected to comply with the rules set out in the Compliance Guidelines. It may be the case that applicable national law imposes stricter standards than the ones set out in this Policy. In such an event, these stricter standards shall apply.

03. Responsibility for implementation

Each individual staff member is responsible for complying with and implementing the Code of Conduct. PCCL's management has to make sure to act as a role model for others when it comes to implementing the Code of Conduct. It also has to provide instructions to its staff members on how to apply the Code of Conduct, monitor compliance and, where necessary, offer training, with support from the respective PCCL units. In interpreting the rules set out in the Code of Conduct, staff members are called upon to rely on their common sense and to critically review whether, with due consideration of reasonable ethical and moral standards, a specific course of action might give cause for complaints. In doing so, country-specific standards and practices shall be considered. Where there are statutory regulations on a particular issue, there is no discretion to deviate from them. In cases of doubt or if there are questions, all staff members may ask a direct supervisor for advice and assistance with decision-making. In addition, the responsible compliance office of PCCL should always be contacted. In cases of disputes or questions on interpretation, the PCCL Compliance Department shall, alongside PCCL's

management, act as supreme body for internal investigations and give binding interpretations of the Code of Conduct.

Compliance office:

PCCL Legal Department

Jörg Sölkner

Greta Pomberger

04. Compliance with laws and other external and internal regulations

The applicable laws and any other rules and regulations, be they external or internal, must be strictly adhered to in all business activities and decisions. All staff members are called upon to obtain full information on any laws, other rules and internal policies and regulations applicable to their sphere of responsibility and, if in doubt, to contact the competent bodies.

Standardized research (e.g., concerning the image, credit rating, political connections, ongoing proceedings, etc.) is conducted on potential (business) partners upon approval of a requested project, and the results of this research are documented in writing and communicated to the project managers within the company.

05. Corruption / bribery / gifts

It is strictly prohibited for all staff members to offer or accept, both directly and indirectly, any advantages¹ if their purpose is to influence business transactions in an inadmissible manner or also even if they might give the impression of doing so. The only exceptions are low-value gifts and hospitality within the scope of local business practices / business practices in the respective country. Any and all other gifts have to be refused or returned, and the supervisor has to be notified thereof. Under no circumstances shall it be admissible to offer or accept cash or non-cash benefits. The laws and usage of the respective country have to be considered in any event. Furthermore, no advantages are to be offered or granted to the own superiors. The PCCL provides equal opportunities for all employees. In case of doubt, advantages are to be refused in a friendly but firm manner. In the course of documenting and monitoring compliance with compliance regulations, each employee must keep a "list of benefits" and submit it to his/her superior once a year. Employees receive detailed instructions on how to keep these benefit lists during the compliance training, which can be accessed continuously via e-learning. The benefit lists must be kept for a period of three years for reasons of proof.

¹ Benefits may include gifts, invitations, shopping facilities at non-standard conditions, interest-free loans, etc.

06. Respect and integrity

Human rights are regarded as fundamental values to which everyone is entitled unconditionally and which must be respected and observed. Human rights, as set out in the UN Charter and the European Convention on Human Rights, are deemed fundamental values that have to be respected and observed by management and all staff members. The principles we adhere to are mutual respect, honesty and integrity. All staff members should feel free to voice their opinions, ask questions, point out irregularities and express concern without affecting their employment relationship. It is a cornerstone of PCCL's corporate culture to recognise and welcome the fact that every human being is unique and valuable and has to be paid respect for his or her individual abilities. PCCL therefore shall not tolerate any kind of discrimination in whatever form. All forms of sexualized behavior, corporal punishment, duress, mobbing and any related verbal abuse or insults shall be forbidden.

These principles shall also apply in interactions with external partners. In carrying out the tasks assigned to them, staff members shall exhibit commitment and loyalty and uphold PCCL's usual standards. Such tasks shall be carried out based on the principles of efficiency, effectiveness, economy, transparency and respect of public interests.

With respect to research activities, the PCCL staff members shall be bound by the international rules of good scientific practice, which excludes plagiarism, deception or forgery in respect of research results.

07. Diversity and Gender Equality

The Polymer Competence Center attaches great importance to gender equality and the interstructural integration and promotion of individuals. All employees should have the same opportunities. Running a diverse and inclusive company means supporting all employees (with their gender identities, their origin, with disabilities or similar) in a way that is suitable for them. This applies at all organizational levels. As a result, we have a 50 % rate of women in the company, and we are pleased to have colleagues of different nationalities working together. One of the main concerns of PCCL is to work in a gender-oriented way. Another important option for all employees is to contact the PCCL Gender Equality & Diversity Coordinator for all questions relating to gender issues. One of the aims is to ensure that gender inequalities can be eliminated or prevented in advance by preventive and interventional measures. Discriminatory structures or incidents are not

tolerated in PCCL. Furthermore, all work processes in the course of the research projects are designed in a way that promotes equal opportunities.

08. Use of company information / confidentiality

Confidential information of any kind which is obtained in the course of professional activities, which also includes information outside one's own field of activity, shall not be used in pursuing one's own interest nor be disclosed in the interest of third parties. It has to be ensured that company information of any kind (documents, excerpts, files, drawings, plans, printouts, etc., including any reproductions thereof on paper as well as electronic or other data media) is always stored safely and securely. Where such information must be transported outside the company for business reasons, it has to be protected so it can neither be viewed nor accessed by third parties. Any and all business and trade secrets as well as topics that are relevant for the company, including, without limitation, research and development activities, shall be subject to strict confidentiality. Where external partners (e.g. corporate partners and scientific partners) are involved, pertinent non-disclosure agreements shall be concluded in consultation with the competent Legal Department. Information from which business and trade secrets can be derived shall be subject to the same level of confidentiality and shall be made accessible only to those staff members who need to know within the scope of their work activities. Such information must be stored safely and securely at all times. The same applies to information the confidentiality of which is in the interest of the contracting parties of PCCL, in particular in cases where a non-disclosure agreement was concluded for such purpose. The confidentiality obligation continues to exist without limitations also after a staff member's employment contract has ended. In addition, the relevant confidentiality provisions in the respective employment agreements or similar agreements shall apply as well. In case of doubt, employees are not required to share any information before consulting the Legal Department or the management in this regard.

09. Duty of loyalty („Treuepflicht“)

Employees do not only have a work obligation, but also a loyalty obligation (duty to protect others' interests), which requires them to take account of the employer's business interests appropriately. Employees must respect the interests of the company and, in particular, avoid doing anything that could damage the company's area of business, its organization and its opportunities. Employees must warn the employer of impending damage and contribute to its elimination. In addition, employees may not run an independent business without the employer's approval, nor may they carry out

commercial transactions in the employer's area of business for their own account or for the account of others.

10. Data protection

The protection of the personal data of our employees and all contractual partners is not only a legal obligation for us, but also a declared concern of PCCL. The Legal Department of the PCCL is responsible for the coordination of all data protection measures and the training of employees in accordance with the relevant regulations. Every employee must implement these data protection measures and act in accordance with the data protection laws. With this in mind, PCCL has, for example, drawn up a data protection checklist that can be accessed via the internal e-learning platform. PCCL also trains all employees once a year in how to act in accordance with data protection regulations. Awareness of data protection in everyday working life should be created in the staff. The responsible departments therefore ensure compliance with all organizational and technical measures (TOM) in day-to-day business.

11. Corporate Communications

Any and all verbal and written communications and press releases affecting the interests of PCCL shall be made exclusively via the managing directors or the person in charge of communications. This refers to both conventional and digital communications. The disclosure of personal data, both inside and outside the company, shall be admissible only within the scope of the applicable statutory provisions. In case of doubt, especially in view of PCCL's internal data protection regulations (see e.g.: "Checklist", training courses), consultation with the Legal Department is required. Employees must refrain from making statements about the company or even partners (especially on social media and the Internet) that may damage the company's reputation or credit. This also applies after termination of employment. The PCCL responds to such statements without exception with legal action.

12. Use of electronic media

PCCL's communication channels, such as internet, intranet, telephone and e-mail, are primarily reserved for business purposes. The private use of e-mail, internet and other electronic media is admissible in a reasonable extent, provided that such use does not adversely affect work productivity and/or – as in the case of the download of large files – the corporate IT system's performance or the security of the entire corporate IT system.

13. IT use

IT devices (PC, notebook, mobile phone, etc.) must always be stored in a suitable manner and equipped as specified by IT within the scope of technical possibilities. On business trips, staff members should only take immediately required data along with them. Personal passwords must not be disclosed to other staff members or to third parties. Clear and verifiable rules shall be put in place for substitute arrangements. Should company-related data be stolen or lost, the respective supervisor shall be notified without delay. Where electronic data are concerned, password blocking or other suitable actions shall be initiated immediately, in consultation with the competent IT department.

14. Environment, safety and health

We are committed to protecting our environment and take responsibility. The protection of the environment and the conservation of natural resources are important to us. Every employee contributes to the protection of the environment and the conservation of natural resources according to his/her possibilities through his/her behavior.

The health and safety of employees at their workplace is a high priority for PCCL. The best possible precautions against the risk of accidents are achieved by

- the technical planning of workplaces, equipment and processes
- the personal behavior in everyday working life
- regular safety training with mandatory - at least annual - participation of all PCCL employees

Every employee must pay constant attention to occupational safety and act in a safety-conscious manner. Possible work-related health and safety hazards must be reported to the supervisor.

15. Copyrights

In general, the following applies: The owner of the copyright must have agreed to the use of his work. When using the work of another person, the name of the author must not be forgotten, unless the contractual agreements contain a prohibition of naming. As a rule, the contractual agreements even expressly provide that the user is obliged to name the author. If you order pictures from a photographer, the above applies in the same way: the rights of use should be clearly defined. Private licenses (e.g. for software)

or similar may not be used commercially. The rights granted will depend on the contractual agreement.

Licenses may be granted for a fee or free of charge, for a limited or unlimited period of time, and only for certain types of exploitation. Even if a third party, e.g. an employee or the university, has the right to use the work, PCCL must still purchase this right itself before using the work.

16. Protection of personal rights

Personal rights are rights that serve to protect the individual's own personality from interventions in life and freedom. Special attention must be paid to human dignity. Personal rights are absolute rights – everyone must respect them. The various personal rights are regulated in different laws (ABGB, UrhG, DSG, EMRK, etc.). Among other things, personal rights include the right to life, health and ability to work, protection of gender self-determination and freedom, as well as the right of gender equality, the right to religious belief, the right to a name and the right to respect for privacy, but also the right to one's own picture, protection of letters, the right of honor and the right to express one's opinion. In this respect, the spectrum of possible violations of personal rights ranges from insults in the Internet, unintentional publication of photos on websites, name usurpation to so-called identity theft. Personal rights may only be restricted in cases foreseen by law.

17. Organization of responsibilities

We design processes in such a way that responsibilities are defined, transparency is created and duties of approval, co-participation, powers of representation and signatory powers are defined. Mutual trust is the basis for working relationships. Therefore, we are dedicated to an open and trusting relationship with each other. Control measures in our work processes and the comprehensible documentation of decisions are not in conflict with this principle of trust, but rather form protective mechanisms for employees and support independent actions. Compliance regarding a qualitative 4-eye principle is a standard for us.

18. Finances and sponsoring

We use the fundings we receive in accordance with their intended purpose and in an economical manner. The use of the fundings is transparent, verifiable and duly documented. Sponsoring activities are transparent and documented and are based on

an adequate exchange of services with the respective sponsoring partner. Sponsorship may not be used to circumvent the prohibition of accepting benefits or gifts. The granting of donations (cash or non-cash donations or the provision of working hours free of charge) is made exclusively within the framework of legal regulations and on the basis of any internal guidelines that may apply.

19 Compliance breaches

Each employee shall immediately notify the supervisor of any violation of the Code of Conduct or other compliance violations. With no exception, all reports are investigated and taken seriously. If the Legal Department is aware of a compliance violation, this must be reported immediately to the management. In such a case, the facts must be clarified together with the concerned persons and the compliant status must be restored. All employees must monitor not only their own compliance with the Code of Conduct. An administrative division of tasks should be useful for mutual control. Furthermore, the general principle applies that professional and private interests must be kept strictly separated. Conflicting interests must be disclosed to superiors without exception.

The PCCL has also implemented a whistleblowing platform called "BKMS® Incident Reporting", which can be accessed via the company website. Compliance violations can be reported via this platform. Whistleblowers must have reasonable grounds to believe that the facts they report are true in order to be protected from reprisals. However, if rumors or speculation are reported, there is no protection for the reporting person.