



Viper Tube Systems Code of Conduct

Supplier Code of Conduct

Corporate Philosophy

Viper Tube Systems is committed to sustainable development by reconciling ecological, social and economic aspects. We must be able to make our profits without damaging the environment or society. The sustainability of our actions has become a criterion of our quality.

We want to make the world a little better each day. On the one hand, we want to satisfy our customers' needs, but also make profits so that we all have meaningful work and we can therefore further develop ourselves and our company.

In order to achieve this goal, we need to have all interested parties, including employees, customers, neighbours, officials, suppliers (in short, all individuals with whom we have contact) on board with us. The impact of our actions on the environment and society should not be negative.

Viper Tube Systems is committed to carrying out all business activities safely and efficiently. We do everything we can so that Viper Tube Systems is and remains an economical and healthy company. The wellbeing of all those involved, the wellbeing of the environment, the sustainable regard for our environment and mutual respect and trust are at the forefront of our daily work.

“PRINCIPLES” – Corporate policy

valid from 2 November 2020



We need good employees

- Technical ability – honesty – team skills – ethical conduct
- **KNOW – CAN – WANT**
- Only those who respect our principles can work with us

QUAM

Managing Quality - the Environment - Occupational safety in one system



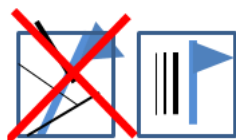
QUALITY ... has priority

- QUALITY – the fulfilment of the set requirements
- Everyone knows what quality means in their product and how to achieve this
- Everyone is THEMSELVES responsible for the quality produced by them
- **You have a good feeling boarding a plane that has a tube made by YOU installed!**



Economic and sustainable thinking and action

- Everyone must do their part to contribute towards continuous improvement (including corporate environmental protection)
- Avoiding mistakes/rubbish – reducing waste is part of our daily work
- **“Get it right from the start”**



Order/cleanliness/environment/safety

- YOUR workplace is YOUR showcase
- Careful handling of raw materials/chemicals/energy
- Work according to the system, improve our QUAM system; grievances are to be recorded
- Everyone knows **“How am I personally contributing to the collective success?”**



Satisfied business partners and employees

- **The customer comes back to us, not to the product**
- We respect our colleagues, interested parties and our customers (internal and external) and their skills and property (material and intellectual)



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In order to achieve our corporate goals, the following topics will be covered:



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Fundamental and human rights

We undertake and require our suppliers to respect, protect and support human rights in line with international law.

Treatment of employees and business partners/interested parties:

The treatment of our business partners must be characterised by fairness. We expect fair treatment of each another and we expect respect in relation to the rights and privacy of others. As a company, we foster long-term business relationships. We always approach our employees and business partners with respect, tolerance and understanding. We also expect the same in return from others.

Discrimination/Non-discrimination

We undertake and require our suppliers to treat our/their employees equally, regardless of their skin colour, nationality, race, social or national background, sexual orientation, disability, political or religious belief, membership of a trade union or their age or gender.

Our employees and those of our suppliers are employed based on their ability to complete the work and not based on their personal beliefs.

There must be a workplace environment in which every employee is treated fairly and equally and can freely develop and continue to learn/grow.

Harassment/humane treatment

All employees must be treated with respect. We undertake and require our suppliers to ensure a workplace that is free of harassment of any kind (such as psychological hardship or sexual/personal harassment). Every employee must be respected as an individual. There may not be any punishment or other forms of physical or psychological assault, sexual harassment etc. or the threat of such treatment.

Forced labour/human trafficking/child labour

We do not tolerate forced labour, human trafficking and strictly oppose child labour. Prison, slave or forced labour may not be used when manufacturing our products. The rights of adolescent employees are to be protected. We also require our suppliers throughout the entire supply chain to do the same. Our suppliers must adhere to all local legislation on labour law even in relation to minors (no child labour).

Working hours and remuneration/financial responsibility

We undertake and require our suppliers to ensure appropriate and punctual remuneration of employees, and payment of suppliers, as well as to comply with the maximum working hours specified by law in the respective country. Precise records must be maintained in accordance with the legal requirements.



Environmental protection

Sustainability is a fundamental value of Viper Tube Systems. The company strives to offer its customers sustainable products. Therefore, it is important to also think and act in this way throughout the entire value chain so that negative impacts on our environment can be reduced. We undertake and require our suppliers to take responsibility for the environment.

- We would like to refer to the following aspects for the environmental topics:
 - Preferably certification in accordance with ISO14001 or similar
 - Greenhouse gas emissions, energy efficiency and renewable energies
 - Water quality and consumption
 - Air quality
 - Sustainable resource management and waste reduction
 - Responsible chemicals management
- Safe handling and safe transport, storage, recycling or reuse of waste and waste water must be ensured. All activities, which could have a negative influence on the environment or on people when released or used, must be tested beforehand. Moreover, systems must be used that prevent unintended leaks of substances etc. or reduce the impacts.
- Renewable energies must preferably be used and projects launched to use energy efficiently and minimise greenhouse gases/air emissions.
- All natural resources are to be used responsibly. Negative impacts on the environment or on people should be reduced or prevented altogether. Water, air and soil are our most valuable raw materials. Water consumption must be minimised and the contamination (even by possible accidents) of water, air and soil must be ruled out.
- When acquiring raw materials, the duty of due diligence must be observed.-Only work with smelters and refiners who are certified as conflict-free and who observe their environmental requirements during the development process for the product or the service taking into account each production stage.
- Any chemicals used must be stored in accordance with the guidelines. Safety data sheets must be available and freely accessible to all employees. Prior to the purchase of chemicals, it must be ensured that there are no substances hazardous to health included. If this is still the case, it must be clearly labelled and the corresponding protective equipment also provided to the person in question.



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Health and safety of employees

We undertake and require our suppliers to take responsibility for the health and safety of our/their employees. We understand this to mean:

- Preventing accidents or injuries by means of evaluating and using personal protective equipment
- Ensuring a safe, ergonomic and clean work environment which corresponds to the legally applicable rules. All machinery and workplaces must be evaluated in terms of their ergonomics and any possible sources of hazard (even psychological stresses) present must be evaluated and measures taken to remove them. All rooms must be fitted with emergency exits and comply with fire protection guidelines.
- Each employee must be given access to:
 - Drinking water, at least to mobile water supply
 - First-aid boxes
 - Well-lit, ventilated and heated work area
 - Adequate medical service
 - Clean recreation rooms such as: lounge, break room etc.
 - Personal protective equipment provided by the employer
- The necessary requirements for a healthy business environment and safe workplace must be fulfilled where each employee can express their personality and further develop (also including further qualifications).
- Right of association/freedom of association: Employers may not prevent the founding of a works council, but rather they are required to support the employees in doing so in an organisational manner. Collective negotiations are to be conducted in accordance with legal provisions.
- Responsibilities and channels of communication must be clearly defined in order to be able to respond quickly in the event of dangerous situations and accidents and to thereby prevent the worst case scenario.
- Continuous improvement of business environmental protection must be encouraged in order to prevent/reduce environmental impacts (soil and water contamination, exhaust gas etc.) and therefore also the health impacts.
- The health and environmental awareness of all employees must be promoted through training in order to influence their behaviour and reduce negative influences on health or on the environment.





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Business ethics | Ethical action | Corporate ethics

Fair labour practices (combating fraud and corruption, transparency, ethical conduct):

We undertake and require our suppliers to commit to responsible corporate management. We also expect our business partners to take strict action against corruption and fraud and to not tolerate this in any way. Our business partners may not tolerate any type of corruption, bribery, corruptibility or other unlawful granting or accepting of benefits (for example accepting benefits such as gifts or for example using counterfeit parts). Our business partners must adhere to all applicable antitrust laws. Fair treatment and competition is the basis for any business. All business dealings should be handled honestly and in an ethically acceptable manner.



Handling of information and data protection/security:

We respect our colleagues, interested parties, suppliers and our customers (internally and externally) as well as their skills and their property (material and intellectual). We undertake and require our suppliers to openly and completely exchange work-related information and knowledge. Personal data should be treated in a highly-sensitive manner and protected to prevent misuse. Information or data on business partners should be used only within the body responsible and also protected against misuse in this case. To ensure this, all individuals in the company must play a part.

Conflicts of interest

We undertake and require our suppliers to avoid situations where their own interest conflicts with other companies. Business decisions may not be characterised or made based on private interests. Potential conflicts should be identified as early as possible and measures also taken to remedy them.

Export controls and economic sanctions

Exports/imports must be processed in accordance with the current legal requirements or internationally-imposed bans or economic sanctions. Long-term supplier declarations/original certificates must be issued upon request.

Expressing concerns/complaints process

We undertake and require our suppliers to give our/their employees the opportunity to at any time report concerns or possible unlawful activities in the workplace. Such reports must be treated as confidential. The management must follow up on these reports and introduce adequate measures. It is expected that employees reporting grievances are treated fairly at all times in spite of their report.

Internal and external complaints management and business ethics are governed by our Guideline FO2207.



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Supplier relationships – monitoring and obligation to provide proof

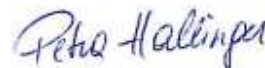
This Code of Conduct and these Sustainability Guidelines are applicable to us and all our suppliers and to all areas of our business.

We expect our suppliers to inform their subcontractors and suppliers about all the principles and requirements described here and to also take these principles into account when selecting subcontractors and suppliers. The standards described here for human rights, working conditions, prevention of corruption and environmental protection must be adhered to within the context of fulfilling your contractual obligations.

The supplier must disclose to us, accurately and in detail when requested as part of a self-assessment, all necessary information for an initial evaluation. The supplier must also provide further information that demonstrates compliance with the guideline. We will check that this guideline has been implemented. The supplier must inform us about any events that violate the principles of this guideline.

All employees/suppliers/customers etc, are required to be guided by this Code of Conduct and therefore implement the Sustainability Guideline. Only by doing so can we, as a company, continuously build sustainable momentum and therefore also shape the world so it is a little better and more liveable each day for all of us.

Bischofshofen, 12/12/2020

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