

THÖNI GROUP

ANTI-CORRUPTION GUIDELINE

thöni[®]

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MESSAGE FROM THE MANAGEMENT

As a family business we take great pride in flexibility, reliability and continuity and we set high standards for the quality of our products and services. Social, ecological and economic responsibility motivates our everyday action as well as our strategic decisions and requires highest levels of integrity and professionalism.

We commit to respect ethical and moral values as they are firmly anchored in our compliance code. In addition, this anti-corruption guideline constitutes our commitment to fight against corruption and to promote integrity, transparency and responsible behaviour.

Therefore, clear values apply within the Thöni Group to encourage respectful interactions with integrity towards all our industry partners as well as in terms of observing normative, national and international regulations in commercial transactions.

The success and the future of the Thöni group rely on the confidence and dedication of each and every one of us!

The management is committed to this anti-corruption guideline and expects your support to successfully implement it on a daily basis.

The Management of Thöni Holding GmbH

Telfs, October 2024



KR Ing. Helmut Thöni




Dipl. Ing. Anton Mederle



Dr. Thomas Bock

1. SCOPE



This anti-corruption guideline applies equally to the members of the supervisory board, members of management and members of staff of the Thöni Group.

As a company we are committed to avoiding all forms of corruption, bribery and unethical behaviour. This includes:

- Integrity within all business activities
- Transparent communication and documentation
- Responsible conduct of all employees

The rules set in this anti-corruption guideline must be considered in addition to the compliance code of the Thöni Group. The uniform compliance with the principles specified in the compliance code and in this anti-corruption guideline is essential. The members of the supervisory board, the members of management and the members of staff of the Thöni group are equally, within the scope of their respective functions, responsible to ensure compliance.

2. OBSERVING NATIONAL AND INTERNATIONAL LAWS, STANDARDS AND GUIDELINES



The organisation agrees to comply with all relevant laws and provisions relating to corruption and bribery. This includes national and international laws. In addition, we are committed to complying with the provisions set by international organisations such as UNO, Transparency International and the World Bank.

3. WORKING WITH INTERMEDIARIES



Collaboration with intermediaries (e.g. representatives, agents, advisers etc.) is admissible only if they operate in a transparent manner and in accordance with legal provisions. Prior to any collaboration, reasonable checks must be carried out to ensure that this person does not engage in corrupt practices. This anti-corruption guideline as well as the Thöni compliance code applies to intermediaries, who will be informed of those by their internal contacts.

4. COMBATING MONEY LAUNDERING



In addition to the topics specified in the compliance code all members of staff are trained to recognise signs of money laundering and to report suspicious activities via the whistleblower tool. Transactions must be monitored and verified to ensure their legitimacy.

5. HANDLING OF CASH PAYMENTS



Cash payments are to be avoided to guarantee transparency and traceability. Only small expenses can be made in cash and must be recorded accordingly.

6. GRANTING AND RECEIVING OF BENEFITS



Granting and accepting of gifts and/or benefits, which exceed the amount customary in that particular place or country, is strictly forbidden. Detailed specifications can be found in the Thöni compliance code. Donations to charities, associations, schools or universities must be approved by the management board and recorded.

7. DEALING WITH STATE INSTITUTIONS AND POLITICS



All interactions with state institutions, political parties and their implementing organisations must be transparent and in accordance with existing law. Bribery or undue benefits are strictly prohibited. Any invitations or presents for public officials must be submitted for approval prior to being offered. Employees must disclose if they are active within political parties or their implementing organisations.

8. AVOIDING CONFLICTS OF INTEREST



Employees must report potential conflicts of interest immediately. It must be ensured that personal interests do not influence any business decisions. Regular training courses to identify and deal with conflicts of interests are being offered.

9. SELECTION CRITERIA FOR SUPPLIERS AND CONTRACTORS



When selecting suppliers and contractors, transparent criteria must be applied. The verification of business practices and the integrity of potential partners is obligatory. The supply chain is subject to a risk assessment, which looks at, amongst others, but not limited to, country and industry risks, employee attitudes and historic misconduct.

10. EDUCATION AND TRAINING



Regular training on topics such as corruption, compliance, bribery and money laundering are compulsory for all employees. These training courses should raise awareness for corrupt behaviour and impart knowledge on legal requirements and company policy.

11. RECORD KEEPING REQUIREMENTS AND MONITORING OF TRANSACTIONS



All financial transactions must be recorded in detail and it must be reviewed whether they are lawful. Regular internal audits are conducted to ensure that these guidelines are being adhered to.

12. INTERNAL CONTROL



An effective internal control system (IKS - internes Kontrollsystem, internal control system) is crucial to prevent corruption and to guarantee the integrity of our financial and operative processes. This includes approval processes, verifications and regular reporting. The dual-control principle applies to approvals, implementations and monitoring of transactions. Access to sensitive information and systems is covered in the information security guideline.

13. CLEAN ACCOUNTING



Accounting is in line with national and international legal requirements and is processed via the ERP system. All financial transactions are to be documented transparently, completely and in a timely manner and in accordance with generally accepted accounting principles. All accounting records are to be kept in accordance with legal requirements for a defined period of time.

14. REPORTING AND WHISTLE-BLOWING PROTECTION



Cases of corruption which occurred will be reported in the annual sustainability report. Employees and business partners are encouraged to report infringements of this policy. Anonymous reporting options are offered and whistle-blowers are protected from retaliation measures. The relevant process can be found in the Thöni compliance code.

15. REVIEWING THE REQUIREMENTS OF THIS GUIDELINE



The requirements of this guideline are reviewed regularly and amended if necessary. In addition, there is an annual risk assessment on the topics of corruption, bribery and blackmail. Measures that result from the risk assessment are implemented in a timely manner and reviewed with regards to their effectiveness. The Thöni Compliance Agent is responsible for any further development of the program to combat corruption, bribery and blackmail and is also the contact for all questions that may occur in this regard.