

THÖNI GROUP

Guideline to prevent
discrimination, violence
and (sexual) harassment

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.

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

The management board commits itself to this guideline and expects the same from all interested parties.

The Management of Thöni Holding GmbH

Telfs, October 2024



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1. SCOPE

This guideline applies equally to the members of the supervisory board, members of management and members of staff of the Thöni group. Included are temporary employees, trainees and contract workers. The guideline is meant to promote and solidify a common understanding for the way we communicate with one another, in an external and internal context, and set out our expectations to our interested parties.

The Thöni compliance code (www.thoeni.com / Downloads) is an integral part of this guideline.

2. DEFINITION OF TERMS

Discrimination: Every unjustified disadvantage or unjustified preference of a person based on characteristics such as gender, race, age, religion, disability, illness, sexual orientation, political affiliation, involvement in the employee representation etc., application of law (for example the right to strike) or ethnic origin.

Sexual harassment: All unwanted sexual advances, requests for sexual favours and other verbal or physical behavioural patterns of a sexual nature, which create a hostile, intimidating or offensive working environment.

Examples of sexual harassment:

- Verbal harassment: Inappropriate comments about the appearance, insinuating jokes or remarks.
- Physical harassment: Unwanted touching, hugging.
- Visual harassment: Showing or sending of insinuating pictures, videos or illustrations, whether in physical or digital form.
- Non-verbal harassment: Obscene gestures, whistling.

3. RULES OF CONDUCT

- All persons are obligated to demonstrate respectful and inclusive behaviour.
- Discriminating or harassing actions are not tolerated and can lead to disciplinary measures.
- Every employee has the right to work in an environment that is free of discrimination and sexual harassment.

4. THE ROLE OF MANAGERS



- Managers have special responsibilities to set an example for respectful conduct and to foster a culture of inclusion and respect.
- They must ensure that all employees are aware of this guideline and understand how they can report discrimination, violence and (sexual) harassment.
- Managers are obliged to take all reports of discrimination, violence and (sexual) harassment seriously and to immediately take appropriate measures.
- They should organise and take part in regular training courses and awareness-raising measures for their team.

5. THE ROLE OF COLLEAGUES



- Colleagues should be respectful and supportive towards each other and promote a work environment free from discrimination, violence and (sexual) harassment.
- They should pay attention and interfere if they observe discriminating, violent or harassing behaviour and, if necessary, report it.
- Colleagues should support the persons concerned and help them to find the right contact person.
- It is important for colleagues to ensure mutual awareness and that this guideline is adhered to.

6. THE ROLE OF THE PERSONS CONCERNED



- Persons concerned should be aware that they have the right to work in a safe and respectful work environment.
- They should report incidents of discrimination, violence or (sexual) harassment without delay to allow for a quick and appropriate response and to ensure adequate protection.
- Persons concerned can speak with their line manager or directly with the management board, to receive support and advice.
- It is important that persons concerned collect and document all relevant information and evidence to prove the incident.
- Persons concerned should not be afraid to enlist the support from colleagues, confidants or external advisory services.

7. THE ROLE OF WITNESSES

- Witnesses should be aware of their responsibility not to tolerate discrimination, violence and (sexual) harassment.
- They should report incidents which they observe without delay, even if they are not directly involved themselves.
- Witnesses should support persons concerned and help to report the incident.
- It is important that witnesses document all relevant information and observations to prove the incident.
- Witnesses should be willing to cooperate with the investigations and make truthful statements.

8. REPORTING PROCEDURE

- Employees who experience or observe discrimination, violence or (sexual) harassment, should report this immediately to their line manager or the management board.
- This report can also be made anonymously via the Thöni APP / Services / iWhistle- our compliance tool (whistleblower system).
- External interested parties can also use iWhistle on the Thöni homepage (www.thoeni.com) to report such observations without delay.
- All reports, including the documentation on follow-ups, measures etc. are treated as strictly confidential and are thoroughly investigated. Protecting victims has the highest priority