

CODE OF CONDUCT

Revision	Date	Change Description
001	25.3.2024	New document

INTRODUCTION

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The Code of Conduct applies to all employees of RIEDL Group and defines the fundamental principles of conduct, on which the operation and performance of RIEDL Group are based.

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Dear colleagues!

The corporate culture that we all develop together is essential for the operation of the company in relations with customers, suppliers and society. Everything we do affects the company's reputation in society.

This Code of Conduct defines the values and basic rules of ethical business conduct in RIEDL Group, which we respect, live by, encourage and expect. Our values and beliefs support our long-term goal of continuously improving the culture of our day-to-day business performance.

Our work is not only aimed at the satisfaction and needs of customers and business partners, providing the best possible products, effective communication and the correct flow of information, helping our colleagues or creating a positive working environment. The main guideline should be that we do everyday things “right”, which means that we respect ourselves, rules and laws, behave honorably and are polite and respectful to all colleagues, customers and business partners.

With this code I remind you, how important professional and business-oriented behavior is. Mutual relationship and the success we experience have a strong influence on our satisfaction and casualness in the workplace contributes to better results.

The code defines the expectations of every employee in RIEDL Group and at the same time expresses the standards we expect in our relationship with our other stakeholders, therefore it also provides instructions and guidelines for the daily conduct and operations of the RIEDL Group.

Thank you for your support and cooperation.

Tomaž RIEDL,
CEO and owner



► CODE INTRODUCTION

Code of conduct (hereinafter: Code) for employees of RIEDL PRECISION d.o.o., RIEDL INVEST d.o.o. and RIEDL AEROSPACE d.o.o. (hereinafter: RIEDL Group), clearly describes the basic principles, rules and responsibilities for all employees in RIEDL Group and at the same time expresses the essential values and standards that we must follow in our daily practice. It defines standards of conduct and behavior within RIEDL Group, as well as towards its business partners and other stakeholders.

The purpose of the Code is to unite us in a common understanding of ethics and behavior, related rights and obligations. It is the duty of every employee to become familiar with the Code, to act according to it and to be responsible for their ethical conduct. The Code must be observed and respected. The spreading of its principles must be encouraged among our colleagues, because only in this way can we contribute to the creation of a positive working environment.



Am I doing it right?

Q: What should I do if this Code and the law conflict?

A: You must always obey the law. The Code will usually be stricter than required by law, in which case you will comply with the Code.

► COMMITMENT TO THE CODE

The Code is one of the most important regulations of RIEDL Group and is also an integral part of our employment contract.

Any intentional or negligent violation or omission of duties and responsibilities in accordance with the provisions of this code may lead to a serious violation of the work obligations of an individual employee and to the imposition of possible measures to eliminate the consequences of inappropriate behavior in accordance with applicable legislation, the collective agreement and internal acts.

Serious violations may lead to disciplinary procedures, termination of employment and may even result in compensation or criminal liability.

If you have any questions in relation to this document, believe that any of the provisions of the Code are contrary to applicable law, or require advice, please contact the QM or CEO.

► WORK IN ACCORDANCE WITH THE COMPANY'S VALUES

We believe that our values are more than just words and are crucial to our way we work and daily business.




► RESPONSIBILITIES OF EMPLOYEES

In RIEDL Group, all employees:

- Are a model of good ethical behavior, respectful and professional communication and conduct business in accordance with all laws, rules and good practice.
- Use the company's assets economically and in accordance with our powers and prevent damage, destruction, loss or alienation.
- Are open and accessible, perform our work with quality, conscientiousness and on time.
- Take care of the top quality of our products, order and cleanliness in our workplace and environment protection
- Respect the people in our work environment, defend diversity and ensure fair, equal and respectful treatment of each individual.

**WE SAY WHAT WE MEAN AND
DO WHAT WE SAY**



► NO TOLERANCE

While this code gives guidance for certain situations, there are areas where we have a zero-tolerance policy:

- Unsafe, illegal or unethical work practices
- Violence and aggression.
- Discrimination, bullying, harassment or any form of bad behavior.
- Defamation and intentional damage to the reputation and good name of an individual.
- Bribery and corruption.
- Dissemination of confidential business information to unauthorized persons.

► MISCONDUCT REPORTING

It is the obligation of every employee, who is aware of harmful behavior or violations in the work environment by a colleague, customers or third parties, to report such behavior.

Report can be submitted in one of the following ways:

- via an online form on the website;
- to the e-mail address for applications: prijava.krsitev@riedl.si;
- anonymously in a drawer in the info corner

Information about the trustee and deputy trustee is listed in the internal act Pravilnik o zaščiti prijaviteljev and published on the company's website and notice board.

Who to talk to?

If an employee is not sure about the potentially harmful, illegal or unethical nature of individual conduct, he/she can contact the trustees of RIEDL Group directly.

RIEDL Group guarantees that all reports will be treated as confidential. The identity of those who report harmful behavior in good faith will be protected, as well of those to whom allegations of harmful behavior refer in accordance with the Act on the Protection of Whistleblowers (Uradni list RS, št.16/23). Retaliation against the applicant is not permitted.

! Am I doing it right?

Q: I am concerned that I may be punished or treated differently if I report a co-worker's misconduct.

A: If you suspect a violation, always report it without fear of potential retaliation. Any misconduct due to your report will be investigated and appropriate action will be taken.

If you are faced with a difficult decision, ask yourself the following questions to determine the steps to take:

1. What is the problem? Why does this situation concern me? Do I really not know what to do or do I just not have the will to do what I really think should be done?
2. Who else will be affected by my decision? What are the potential consequences of my decision for the CEO, my manager, colleagues, customers, suppliers?
3. How will I feel after making such a decision? Can I openly and in good conscience share my decision with family, friends and colleagues?
4. Can I provide an explanation for my decision, if necessary?
5. How would I feel if someone else made the same decision and it affected me?
6. How is the problem regulated in the Code, internal rules and laws?

► RESPONSIBLE PARTNERSHIP WITH CUSTOMERS AND SUPPLIERS

In RIEDL Group we are responsible to our customers, stakeholders and business partners. It is about understanding the needs of customers and the associated risks for them and for RIEDL Group. We carefully and responsibly build partnerships with everyone with whom we enter into business relations.

We must respect and strive for the long-term trust of employees, customers, business partners and society as a whole. RIEDL Group's operations must be comprehensive, consistent with the promises made, transparent and positive.

Each of us can contribute to the pursuit of these goals with our contribution in our daily actions and activities.

► HUMAN RIGHTS

In RIEDL Group, we are committed to respecting the human rights of all interest groups and we ask them to respect others.

These rights include, but are not limited to:

- Right to human dignity.
- Right to life.
- Right to freedom.
- Right to access the highest possible standard of health care.
- Right to fair and favorable working conditions.
- Right to fair wages and a decent life.
- Right to an adequate standard of living.
- Prohibition of any form of forced or compulsory labor.
- Prohibition of child labor.
- Prohibition of discrimination.
- Right to free expression of opinion.

Respect for human rights includes, among others, compliance with corporate rules, relevant laws and regulations, cooperation with interest groups and contributing to the general well-being of the community and society in which we operate.

► BRIBERY AND CORRUPTION

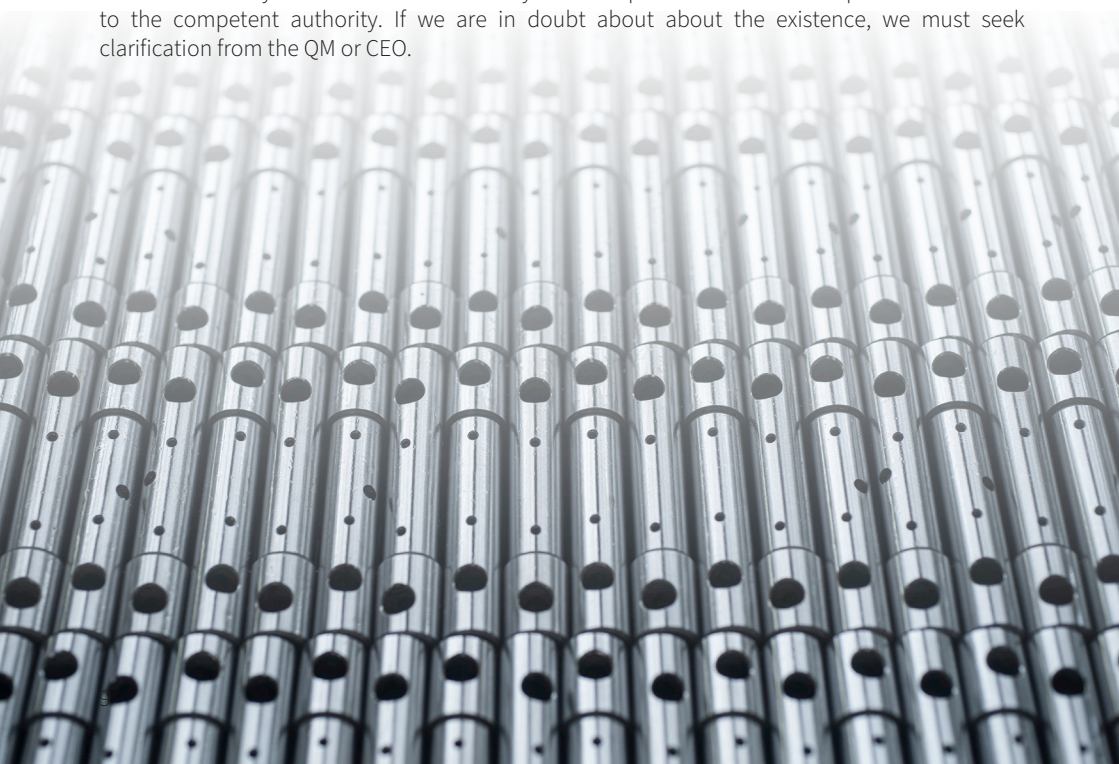
When someone offers us some benefit in order to influence our conduct or behavior, he is thereby offering us a bribe. When someone wants to take advantage of his position to gain a benefit for himself, he is acting corruptly. RIEDL Group employees must not accept or give bribes. We must not be involved in or enable corruption in any form, at any level. We must ensure that our actions and our behavior do not give the impression of bribery or corruption.

► GIFTS AND HOSPITALITY

In RIEDL Group, we are aware that certain gifts of small value can be part of establishing or maintaining a business relationship, but in the case of receiving such gifts or similar displays of hospitality, they must not in any way influence the adoption of our business decisions.

► CONFLICT OF INTERESTS

A conflict of interest occurs when employees are involved in personal activities or relationships that may prevent our ability to fully act in the interest of RIEDL Group. In general, conflicts of interest must be avoided, but if a conflict is unavoidable, it must be managed in such a way that RIEDL Group does not suffer any damage. Employees are expected to be aware of potential conflicts that may arise in the course of daily business performance and to report such conflicts to the competent authority. If we are in doubt about the existence, we must seek clarification from the QM or CEO.



INTEGRITY IS DOING THE RIGHT THING EVEN WHEN NO ONE IS WATCHING

C.S.Lewis



We act responsibly in accordance with our authorities

Everyone in RIEDL Group is, at all levels of working, committed to the highest standards of moral integrity and ethical conduct, which not only benefits RIEDL Group, but also our colleagues, customers, business partners and the wider community.

Only ethical, careful and responsible business performance that comply with this Code is a guarantee for the long-term strengthening of trust in RIEDL Group, which is the key to its reputation and long-term business success.

Regardless of the occasion, all employees of RIEDL Group follow complete openness, honesty and integrity in everything we do.

▶ DATA PROTECTION / CONFIDENTIAL INFORMATION

In RIEDL Group we ensure the highest standards of care in the management of business data and other confidential information. Only in this way we can guarantee the discretion of business relations with our business partners, as well as with employees, which are based on long-term trust.

Each employee is responsible and takes care of the protection of all confidential data and information received. They may only be used internally, for business purposes, and may not be disclosed to outsiders, unless this is permitted in accordance with regulations or internal rules.

In our work, we are particularly committed to protecting confidential information relating to customers; zero tolerance applies to all events resulting in the leakage or transmission of such information to unauthorized persons.

Employees of RIEDL Group must not exploit or disclose business secrets that are defined in the companies of RIEDL Group and were entrusted to the employee or he/she was aware of them in another way. Business secrets are also considered to be information for which it is obvious that significant damage would arise if an unauthorized person found out about them.

► PROTECTION AND RATIONAL USE OF ASSETS AND RESOURCES

With the goal of long-term success, each of us is obliged to take care of and respect all assets of RIEDL Group, including material assets, technological equipment, intellectual property in financial assets, protect them from damage and misuse or abuse and use them only for the purposes of working, unless it is otherwise approved.

Employees are obliged to use materials, tools, measuring devices and other resources used at work in a reasonable manner, and in general to protect the property of all member companies of RIEDL Group.

We must comply with the applicable software license agreements and intellectual property rights for published materials. When using information technologies, it is necessary to take into account the applicable legislation in the Republic of Slovenia and the company's internal acts. Only software and applications approved by the employer may be installed on computers, telephones and other devices owned by RIEDL Group. As users, we are obliged to adequately protect computer access passwords and to immediately report the occurrence of unwanted events. Programs must not be started on the workstation (computer) if we do not know their meaning or if we do not need them to perform work and tasks at the workplace, even if the programs are not disabled.

When using the company's systems, we must not access or transmit material that may offend colleagues, adversely affect the Company's reputation, or contain anything prohibited by law. Harmful and prohibited content must not be viewed online (gambling, drugs, terrorism, pornography, child pornography, causing or participating in racial, religious and other intolerance, etc.). Use of private personal computers with installed pirated or unlicensed software is prohibited within RIEDL company/network. Online services may be used exclusively for the performance of work and tasks related to work processes in RIEDL group.

If the illegal behavior of the employee causes any property damage and RIEDL Group is obliged to compensate the damage to a third party, RIEDL Group has the right to demand reimbursement of the damage or the entire amount paid to the third party from the employee.

Guidelines:

- We use company resources responsibly and appropriately.
- Equipment such as laptops, phones and other devices are never left in public or dangerous places. We keep passwords safe.
- We ensure that all sensitive, confidential and personal information we manage remains secure.

► COMMUNICATION AMONG EMPLOYEES

Open communication and cooperation form the basis of our work. We operate according to the system of first listening, thinking carefully and then speaking. Our words are trustworthy and we are clear about what we can and cannot do. We actively seek and value feedback that we share openly.

For the benefit of RIEDL group we share knowledge with each other, learn from each other and help each other. We are simple and understandable in our communication.

► COMMUNICATION OUTSIDE RIEDL GROUP

Communication with the public must be professional and consistent with the values and policies of RIEDL Group.

Employees of RIEDL Group are obliged to comply with internal rules regarding public speaking and public expression of opinions that could have an impact on the reputation of the RIEDL Group.

Outside RIEDL Group we do not talk about matters for which we are not authorized. We do not comment on or about RIEDL Group to the media, on social networks or other public forums without special permission.

We always communicate in a way that protects or improves the reputation of RIEDL Group.



► RESPECT FOR PRIVACY

! Am I doing it right?

Q: Can I use my work computer for personal use?

A: Work computer can be used for reasonable and limited personal purposes as long as they are lawful and do not interfere with your work.

Electronic communication systems such as e-mail, intranet, internet and voice mail are used by employees primarily for the business of RIEDL Group

Internet access, e-mail, fax, telephone and copying systems of RIEDL Group may be used by employees for random or occasional personal use, as long as it does not affect work efficiency and does not disturb others.

RIEDL Group does not exercise control over employees and does not access private data and content of employees, and does not check search history and electronic correspondence without a valid reason. Nevertheless, employees understand that RIEDL Group, where legally permitted, has the right to access and review all communications, records and information created at the workplace or with company resources without prior notice or permission. For safety reasons backup copies of the entire contents of work computers are also carried out. Therefore, when using the systems of RIEDL Group, employees cannot expect confidentiality or privacy, except where this is guaranteed by applicable legislation. If we do not wish to expose personal information to potential access and review as described above, we do not use company systems for personal purposes, and we do not store documents of a private nature on work computers.

Upon termination of the employment relationship, the employee shall immediately hand over all electronic and other equipment to the employer, including the work computer, telephone and all the assets, used at work. The electronic mailbox of the former employee is deactivated.

The departing employee will not have the opportunity to save private documents from the work e-mail box and from the computer to another data medium. The purpose is to avoid the risk that the employee would also delete important work-related data (especially data, representing the company's intellectual property and business secrets) or unlawfully forward it to third parties.

▶ WORKPLACE SAFETY

RIEDL Group strives to provide our employees with a safe and healthy working environment, meet all requirements in the field of occupational health and safety, and are committed to continuous training and improvement of healthy and safe workplaces and conditions. It is the duty of every employee to take care of and respect the regulations on safety and hygiene at work and to avoid actions that would endanger the health or safety of anyone.

To ensure safety and health at the workplace, we cooperate with an external contractor, with the help of which we regularly update the Safety Statement with risk assessment and perform occupational safety and fire safety training. Appropriate work equipment is available to all employees, first aid equipment is available at appropriate locations and qualified persons are available to provide first aid.

! Am I doing it right?

- Make sure you know which employees are qualified to provide first aid.
- Be aware of the work you are doing and the hazards involved with that.
- Watch out for your own safety and the safety of your colleagues.
- Report any accident, injury, poor health or dangerous condition so that appropriate action can be taken.
- Make sure you are properly qualified for the job you are doing you perform.
- Familiarize yourself with the type and location of fire extinguishers exits and evacuation procedures.

If you have health and safety concerns, please contact your superior or the QM department.



**IF IT'S NOT SAFE,
DON'T DO IT**

▶ DIVERSITY, EQUALITY AND INCLUSION

In RIEDL Group we promote a diverse, inclusive and equal working environment. Every employee is expected to treat everyone with whom they come in contact with dignity, courtesy and respect.

We treat our colleagues, customers and business partners fairly. We hire, reward and promote our employees according to their abilities and skills.

Gender, race, color, ethnic and national origin, marital status, family circumstances, age, disability, sexual orientation, political or religious beliefs are not relevant to work performance.

! Am I doing it right?

Q: The head of the department is becoming increasingly hostile towards a colleague of another nationality. The atmosphere in the team deteriorates, and other colleagues also follow the behavior of your leader.
What to do?

A: Express your concern to the CEO.

▶ HARASSMENT

Every RIEDL Group employee has the right to work in a safe environment without discrimination, intimidation or harassment.

We strictly oppose any disrespectful behavior and prohibit sexually oriented emails or text messages, unwelcome gestures or physical contact, as well as offensive or demeaning comments about personal characteristics.

What is harassment?

Harassment is any unwanted behavior or conduct related to any personal circumstance, with the effect or intent of harming a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment

! Am I doing it right?

Q: Is harassment only physical?

A: No. Harassment can also be verbal or non-verbal. Words and gestures can be just as offensive as physical actions. Jokes, obscene gestures, sarcastic remarks, suggestive or offensive sounds or racial comments can be considered harassment and can create a hostile work environment.

If you feel that you are a victim of any type of harassment, violence or bullying:

- Write down what happened (date, time, place, situation, witnesses) and save any evidence of misconduct (eg materials, written communication).
- Make it clear to the assaulting person that such behavior is unacceptable and must stop. Remind him/her that RIEDL Group strictly opposes any form of harassment and that inappropriate behavior is sanctioned.
- If the harasser does not stop his/her inappropriate behavior, immediately report the situation according to the procedure for reporting violations in accordance with the internal act Pravilnik o zaščiti prijaviteljev, as it constitutes a violation of the Code.

▶ DRUGS AND ALCOHOL

In order to ensure a healthy and safe work and working environment, working under the influence of alcohol, drugs and other illegal substances is strictly prohibited and is sanctioned in the RIEDL Group by termination of employment.

If an employee notices that someone is under the influence of alcohol or drugs at work, you are obliged to immediately remove them from the work process and inform the competent persons.

▶ HEALTHYWORKINGENVIRONMENT

We promote health and encourage employees to lead a healthy lifestyle through free sports activities and the daily access to fresh fruit at the workplace.



► ENVIRONMENTAL RESPONSIBILITY

RIEDL Group has established environmental management standards according to ISO 14001: 2015 and operates in accordance with applicable environmental laws and regulations. Whenever possible, we use environmentally friendly technologies, products and services with the aim of optimizing the use of natural resources, energy and water and reduction of negative impacts on air, water and groundwater, soil and climate.

Our environmental impact is relatively small, but we all still have a responsibility to take care of it.

Am I doing it right?

Q: What can I do to help the environment?

A: Be aware of the environmental impact you have. Think about recycling options, reducing the amount of paper you print every day, rationalizing all work consumables, carpooling on the way to and from work, as well as for meetings outside the company.

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