



# **CODE OF ETHICS AND CONDUCT**



PROLICHT and all those associated with Prolicht are committed to upholding and respecting internationally recognized human rights.

In all our business processes within the company, but also with our business partners, all business practices must be 100 percent compliant with the United Nations Guiding Principles on Economic and Human Rights (UNGP).

The principles described in the Code of Conduct and Ethics serve as guidance for our employees and those persons who have business contact with us in order to act in conformity and to reduce any risks to humans and nature to a minimum.

## OUR VALUES

Our values guide our actions because they reflect what we believe in. The contents of the following contents can be applied to all divisions of the company but also to the cooperation with customers, partners and suppliers in the environment of the company ROLICHT.

Within our business processes, we manage to live our values and demand them from our business partners. In this creative space we can guarantee that the preservation and respect of internationally recognized (human) rights, the observance of regulations, directives but also the values of PROLICHT

the utmost care is taken to protect people and nature and to all our socially sustainable efforts.

## ‘P’ FOR PRIVACY

### WE PAY ATTENTION TO DATA PROTECTION

We are committed to protecting personal data in accordance with the guidelines of the GDPR. We are committed to treating personal data with the utmost care and use it only for legitimate business purposes, in compliance with all laws and regulations.

We respect the individual’s right to freedom of speech and expression, yet it is our policy to protect all safety-relevant information about PROLICHT, its partners, customers and suppliers and not to publish it. In principle, only a few authorized persons (e.g. marketing, CEO) are allowed to communicate on behalf of our company via social media (Facebook, Instagram, etc.). Every person who is active in social media must act according to the principles of PROLICHT and be aware that published data is accessible to everyone and must not damage PROLICHT’s reputation.

In addition, we commit our business partners to the careful handling of sensitive company data by signing the PROLICHT CONFIDENTIALITY AGREEMENT.

## ‘R’ FOR RESPECT

### WE RESPECT EACH OTHER

It is very important for us to never lose sight of the principle of respect. We treat each other with respect and dignity, are polite and friendly to each other, consider each other and accept the opinions of all, because with these essential and simple tools we can maintain and increase our daily cooperation.

## **‘O’ FOR ORGANISATION**

### **WE PAY ATTENTION TO THE COMPANY**

We expect all our employees and business partners to handle confidential and proprietary data with particular care and discretion (e.g. financial results, projects, new products, contracts, changes in business strategy, etc.). Any unauthorized use and any resulting commercial damage will be investigated by PROLICHT, in accordance with current law. We always act in the interests of the company, therefore appropriate measures are taken in the event of any fraudulent activity.

## **‘L’ FOR LOYALTY**

### **WE PLACE GREAT VALUE ON LOYALTY AND TAKE ACTION AGAINST BRIBERY AND TAKING ADVANTAGE**

PROLICHT supports all activities that serve a transparent, honest and fair competition on the world market. We are therefore strictly opposed to any form of bribery or other illegal payments. We refuse to take any action that could illegally give us an advantage over other competitors. Guest gifts or free copies that have a low value and are commercially available are allowed. In addition, it is strictly prohibited gifts, payments, material benefits, etc. which could give rise to suspicion of being considered as an attempt to bribe, accept or offer.

We therefore conduct our day-to-day activities with fairness and in compliance with all applicable internal and external regulations. We are not corrupt and we do not bribe.

## **‘I’ FOR INNOVATION**

### **WE ARE DRIVEN BY INNOVATION**

Our way of working must always be future-oriented, as innovation is the basis for economic as well as personal growth. With this approach, we are well prepared to react quickly to changes or even to be ahead of time.

Innovation permeates all areas of our work. This applies both in the area of our product management as well as in the construction of unique process structures. Not to be forgotten are our employees. Their innovative strength is also a decisive part of our entrepreneurial success.

## **‘C’ FOR CLIMATE PROTECTION**

### **WE PAY ATTENTION TO A SUSTAINABLE USE OF NATURE**

„We all share one planet and are one humanity, there is no escaping this reality“.

In the words of Wangari Maathai, the first African woman to be awarded the Nobel Peace Prize, we see it as our duty to protect our common planet and thus our future. As a company, with all our colleagues and business partners, we constantly strive to think and act in the interests of our environment. Our actions include the reduction of energy consumption, the expansion of renewable energies, the reduction of all types of waste, the expansion of recycling measures, the reduction of CO2 emissions, the expansion of electric mobility, the protection of biodiversity, water and wildlife. All our measures can be found in the PROLICHT Environmental Report 2021-20222, and are our contribution to the Protecting our environment.

## **‘H’ FOR HUMANITY**

### **WE TAKE ACTIONS TO PROTECT OUR FELLOW HUMAN BEINGS**

Each and every one of our employees is close to our hearts and is part of the PROLICHT family.

Together, we are able to achieve great things, which is due to our enormous know-how, but also to the team spirit of our unique colleagues. Only together can we achieve our corporate goals and grow sustainably. Therefore it is very important to PROLICHT to promote and protect the potential of its employees.

## **‘T’ FOR TRANSPARENCY**

### **WE STAND FOR MAXIMUM TRANSPARENCY, FIGHT FOR HONESTY AND AVOID CONFLICTS OF INTEREST**

“Transparency” is firmly anchored in our communication policy. This is lived inwardly as well as outwardly. Figures, data and facts are the basis of clear, comprehensible and truthful communication. It is the basis for unambiguous decisions, but also for a harmonious and balanced working atmosphere. We are taking a further step towards transparency with the publication of our sustainability efforts on our homepage. The sustainability strategy, the environmental statement, the report on labour and human rights, the PROLICHT statement of principles are just some of the documents that we as a company would like to share with the public in order to motivate more sustainability beyond our sphere of influence.

This is to prevent employees, partners or ourselves from getting into conflicts of interest, i.e. we want to prevent people from having to choose between the duties and requirements of their position and their own private interests. It is our goal to systematically prevent dishonesty in small and large (fraud, corruption, violation of laws, etc.) and to strengthen honesty - we stand for honest and loyal cooperation with all our stakeholders and competitors.

## **ADDRESSEES OF THE CODE OF ETHICS**

The Code of Ethics is addressed to all those involved in PROLICHT’s business processes. The Code of Ethics serves both us and our business partners as a guide in the context of our sustainable cooperation.

By adhering to the Code, we also adhere to and strengthen the values of PROLICHT.

Thus, we commit ourselves to act according to these values, to respect them, to implement them, and thereby try to be an example to others in the responsible handling of people and nature.

Within the company, we are constantly striving to build up a clear picture of the contents of the Code of Ethics and to steer our joint actions in the appropriate direction. We therefore expect our colleagues to deal appropriately with employees and business partners. In the event of wilful violations, employees are made aware of the misconduct in personal discussions with the departmental managers, and to keep the values of PROLICHT high at all times in order to counteract further misconduct. This is supported by a variety of documentation and guidelines that allow transparent review and verifiability of these values. We also expect our partners to comply with our ethical principles and reserve the right to respond in the event of non-compliance in an adequate framework and with appropriate measures.

## „SUSTAINABLE DEVELOPMENT GOALS (UN)“

PROLICHT has also agreed to base its Code of Ethics on the 17 Sustainable Development Goals of the United Nations. We want to contribute to achieving these objectives of the UN. The Code of Ethics contributes to the following objectives:  
PROLICHTs his contribution:



### SAFETY AND SECURITY

PROLICHT supports the SDG goal as part of its Code of Ethics



Objective 3: Health and well-being

The health and well-being of our employees is paramount. Therefore, we do not only follow the legal regulations and guidelines, but also continuously evaluate the workplace at our headquarters in Neu-Götzens, with the support of external experts. These audits include:

- Workplace safety
- Personal protective equipment (PPE)
- §82b examination (plant and installation permits)
- Training of employees and managers

With these activities, we follow the preventive approach to prevent accidents at work. In the interests of the protection and safety of our employees, we pay particular attention to the following:

- Working and rest periods
- Healthy and safe working environment
- Prevention of illegal and dangerous behaviour
- No tolerance of alcohol and/ or drug abuse
- Clear instructions for protective measures

In detail, the measures are covered in the “PROLICHT SUSTAINABILITY GOALS 2030”, but also in the document “REPORT ON LABOUR AND HUMAN RIGHTS”.

## HUMAN DIGNITY

PROLICHT supports the SDG goal as part of its Code of Ethics



Objective 5: Gender equality



Goal 8: Decent work and economic growth



Objective 10: Reducing inequality

We can only be successful in the long term if the impact of our business activities is in harmony with people and the environment. For this reason, PROLICHT has a clear and unambiguous claim to respect all internationally valid human rights. This principle is not only internal to the company - a predetermined path for all our employees, but also a criterion for the selection of our business partners. We expect them to comply with the applicable laws, directives, norms and regulations of the human rights conventions.

In the interests of human dignity, we pay particular attention to the following:

- Fairness
- Protection against discrimination
- Mutual respect
- Elimination of social inequalities between women and men of all kinds
- No coercion
- No bullying/no harassment
- No participation in any illegal acts

Here our Code of Ethics refers to the “DECLARATION OF PRINCIPLES ON RESPECT FOR HUMAN RIGHTS”

## ENVIRONMENTAL PROTECTION

At PROLICHT, both the legal and official requirements are strictly adhered to, and further measures are regularly developed and implemented in order to keep the negative effects on our environment to a minimum. Here, PROLICHT focuses on packages of measures that meet the SDG goals SDG 7

Affordable and Clean Energy, SDG 12

Sustainable Consumption and Production and SDG 13 Climate Action. Rather than the product itself, our actions as a company with regard to energy, waste and emissions should support the achievement of these goals.



Objective 7: Affordable and clean energy



Goal 12: Sustainable Consumption and Production



Objective 13: Action on climate change

In the interests of environmental protection, we pay particular attention to the following:

- Reduction of energy consumption or expansion of renewable energies
  - Reduction of waste generation at the HQ -Improvement of the CO2 balance
  - Definition and tracking of key figures & derivation of programs and initiatives in the field of the environment
  - Establishment and expansion of the IMS area of responsibility & awareness and training of Environmentally relevant topics within PROLICHT
  - Professional disposal of our products at the customer's premises
  - Establishment of an energy management system according to ISO 50001
- This issue is discussed in detail in the document "ENVIRONMENTAL DECLARATION PROLICHT".

## DISSEMINATION CODE OF ETHICS

The Code of Ethics can be downloaded from the PROLICHT homepage under the link below.

<https://prolicht.at/de/social-responsibility/>

## WHISTLEBLOWER PROCEDURE

Whistleblowing provides an opportunity to report this if addressees do not comply with the Code of Ethics or if we are at risk of non-compliance by addressees. This also ensures that the values of our Code of Ethics are upheld. "Whistleblowers" should be given the opportunity to report malpractice in the company. PROLICHT is obliged to comply with the obligation of confidentiality with regard to these reports. The identity of the person giving the information shall not be disclosed to anyone other than the authorised persons without their express consent. Details on the PROLICHT whistleblower procedure can be requested from the Human Resource team.

Under the chapter "CONTACT PARTNERS AT PROLICHT" there are several ways of accessing the internal whistleblower procedures.

The subject of "Whistleblowing" is further explored in the document "WHISTLEBLOWER PROLICHT" and can also be read in detail there.

## **CONTACT PERSON AT PROLICHT**

Your contacts for questions about the PROLICHT Code of Ethics are:

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