



**HS TIMBER  
GROUP**



# CODE OF CONDUCT

SEPTEMBER  
2023

## Code of Conduct: Foreword

**Clearly formulated rules are a component of good coexistence. Rules provide protection from unforeseen consequences, whether legal, economic, or social in nature, and are therefore cornerstones of sustainable development. However, it is not just about complying with laws, but also about mutual respectful interaction within the company, as well as with our business partners and stakeholders.**

This clear commitment to integrity increases the trust our partners and society have in our company. We expect honesty and compliance with rules and laws from ourselves and our partners, as well as willingness for continuous development and improvement. This is also outlined in our guiding principles (<https://hs.at/en/responsibility/how-we-do-business/mission-statement.html>).

Wolfgang Moser  
**Executive Director – Evergreen Private Foundation**

Jürgen Bergner, Christian Frühwald, Christian Hörburger, Martin Louda  
**Management Board - HS Timber Group**

Vienna, September 2023

Teamwork is the foundation of our success – good collaboration makes us strong. This is only possible when we treat each other with respect, fairness, and integrity and when we adhere to laws and rules.

This Code of Conduct is one of the pillars of our corporate culture. Our commitment in the areas of occupational health and safety and our dedication to sustainability and the environment are already rooted in the guiding principles and specific company guidelines. Therefore, we do not specifically address these topics in this code.

Each one of you is asked to follow these rules. The Compliance Office supports you in this regard and is always open to your concerns and issues.



## SCOPE

**This Code of Conduct applies to all employees of the HS Timber Group, including all subsidiary companies of HS Timber Group GmbH.**

All our managers and employees, should be familiar with this Code of Conduct and adhere to it. Violations will be subject to disciplinary action, up to and including termination of employment.

The management decides on violations in each individual case.

Subsidiaries are required to issue stricter or more detailed regulations, if the national legislation of the respective country or other conditions require it. In any case, this code forms the basis thereof.

## RESPONSIBILITY FOR IMPLEMENTATION

**Each individual employee is responsible for complying with and implementing this Code of Conduct. Compliance with regulations by management at all levels should set a live example for the entire workforce. This Code of Conduct is considered in every business decision, and employees are supported by their superiors in terms of compliance.**

Each employee is encouraged to seek advice and support from their direct superior or, if they deem it necessary, from the responsible compliance officer or the group's Compliance Office, in order to comply with the rules set out in this code.

For this purpose, the company has also set up its own confidential reporting channel.

### CONFIDENTIAL REPORTING CHANNEL

**Group Compliance Office  
Michael Proschek-Hauptmann  
compliance@hs.at  
+43 664 88145649**

The group's Compliance Office will conduct regular training on this Code of Conduct and monitor its compliance.





## I. WE TREAT PEOPLE WITH RESPECT

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**Respectful and dignified interaction improves our working conditions.**

We treat each other with respect and fairness.

We treat people equally and without discrimination, regardless of age, disability, ethnicity, gender, marital status, national origin, religion, or sexual orientation.

Sexual harassment is not tolerated. Bullying or mobbing and any other form of physical or psychological violence are not tolerated and lead to disciplinary actions.

## II. WE ABIDE BY THE LAW

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**Compliance with laws, and their interpretation in both a literal and figurative sense, is the foundation upon which the ethical standards of HS are built.**

All employees and all managers must respect and follow the laws, rules, and regulations of municipalities, regions, and countries where we operate during their work in our company.

If internal regulations exceed the legal standard, all employees are obliged to apply these stricter regulations.

## III. WE STAND FOR FAIR COMPETITION

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**Cartel violations are illegal, harm the economy, and hinder the free market. We are committed to market principles and fair competition rules.**

We therefore compete fairly and within legal limits.

We do not make agreements with competitors, suppliers, or customers that hinder trade, such as price fixing or agreements on sales conditions, market divisions, restriction of competition, or influencing the outcome of tenders.



#### **IV. WE DO NOT TOLERATE ANY FORM OF CORRUPTION OR BRIBERY**

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**We do not offer any kind of direct or indirect benefits to officials or employees of the public sector or state-owned institutions and prefer to forego business opportunities rather than resort to bribes.**

Compliance with anti-corruption laws in every country where we operate is a top priority for our company.

Any employee who loses or is at risk of losing business opportunities due to rejecting unethical practices will be supported by the company, and especially by their direct superior in this decision.

#### **V. WE DO NOT ACCEPT OR GIVE GIFTS OF VALUE**

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**We neither receive nor give gifts with a value exceeding a low monetary amount. We don't accept anything that goes beyond appropriateness. Gifts should not be offered or accepted, if they can influence the outcome of a business transaction or if they could be perceived as influencing such a decision.**

Appropriate benchmarks regarding gift appropriateness can be agreed upon at the local level, in consultation with group management and are always based on the respective local legal requirements.

#### **VI. WE HANDLE OUR FINANCES ETHICALLY AND ACCURATELY**

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**Tax evasion is illegal and harms public finances. Therefore, we are very careful in handling our finances and our taxes.**

We ensure that our money is spent appropriately; our financial records are complete and accurate and are audited.

Employees must not, in any way, attempt to influence the independent audit of financial records.

Similarly, they must never forge company records or accounts. This is the basis for accurate finances and, thus, a proper tax assessment.

#### **VII. WE COMBAT FRAUD**

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**Fraud unlawfully restricts the financial capability of the company or a third party and can lead to severe civil and criminal, as well as financial and other penalties against individuals and the company. We fight against it.**

This regulation obliges the management of each company of the HS Timber Group to carry out appropriate checks to ensure that fraud is effectively prevented.





## VIII. WE AVOID CONFLICTS OF INTEREST

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**A conflict of interest can negatively affect the company's performance and reputation.**

Employees and members of management therefore carefully separate their own personal interests from those of the company and disclose them to their superiors. This applies to conflicts of interest both within and outside the company.

## IX. WE SUPPORT THE LOCAL COMMUNITY AND CHARITABLE ORGANIZATIONS

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**Supporting the local community and charitable organizations is part of our understanding of responsible entrepreneurship.**

We have a structured decision-making process and transparently communicate every contribution made in this area, to exclude any connection with corrupt practices.

## X. WE VOICE OUR CONCERNS TRANSPARENTLY AND PUBLICLY

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**The Public Affairs Management strictly adheres to all regulatory frameworks.**

The main part of our Public Affairs activity involves constructive cooperation with industry associations. Any direct contact beyond this with decision-makers and authorities must be documented internally.



## XI. WE PROTECT OUR PHYSICAL ASSETS AND INTELLECTUAL PROPERTY

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**All employees are responsible for protecting our company's assets and ensure that physical and intellectual property, as well as financial assets, are not damaged, stolen, misused, or wasted and that confidential information is handled carefully.**

All types of confidential information must be protected from unauthorized disclosure, and this is also sanctioned internally.

Conversations and calls about company-related topics in public spaces (especially in public transport) must be avoided.

Details on the protection of digital assets are regulated in a separate IT guideline.

## XII. WE HANDLE PERSONAL DATA WITH CARE

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**Personal data is handled with care by HS and processed exclusively within the framework of the applicable regulations. The core processes of the General Data Protection Regulation (GDPR) are familiar and understandable to everyone who deals with personal data.**

Our company fully commits to implementing the GDPR principles of the EU regarding privacy protection. A separate data protection policy, as well as procedures and processes have been established to achieve this.



## REPORTING CONCERNS

**We want to ensure an open and transparent communication in the company. All employees are therefore encouraged to report, if they become aware of a violation of this code of conduct! The first point of contact for reporting is the direct supervisor. However, you can also turn to local management and/or local compliance officers or the group's Compliance Office.**

For the management of confidential hints, we have set up a confidential reporting channel at group level (compliance@hs.at). All information directed to this channel is handled in a structured process. We guarantee identity protection by means of confidentiality and discretion. A separate internal guideline regulates the precise investigation process.

In principle, all employees, but especially the management, who are confronted with reported content, are obligated to protect the identity of the whistleblowers. This also applies to the dissemination of information based on which the identity of whistleblowers can be directly or indirectly derived, including anonymous tips. Therefore, the dissemination of such tips or underlying information, apart from forwarding to the Group Compliance Office, is prohibited! Only in exceptional cases may the identity of the whistleblowers be disclosed (e.g., in the context of official investigations). However, the whistleblowers are informed in advance by the Group Compliance Office in this situation.

Reports are documented in accordance with our confidentiality obligations and are not kept longer than necessary and appropriate.

HSTG is committed to not only limiting the legally guaranteed whistleblower protection to the legal matters covered by Directive 2019/1937/EU (Directive 2019/1937/EU on the protection of persons reporting breaches of Union law), but to extend and guarantee it in relation to all violations of laws, contractual obligations, or internal regulations, such as this Code of Conduct. Because compliance with rules is essential to us, and we want to use the whistleblower channel as an effective compliance management tool, we voluntarily go beyond the legally guaranteed minimum standard.

Violations reported by external interest groups are primarily investigated by the Group's Compliance Office.

All incoming reports are to be carefully checked. The Group's Compliance Office must be informed about each case and reports annually in the sustainability report on the implementation of the whistleblower system.

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## GUIDELINE FOR THE AVOIDANCE OF RETALIATION

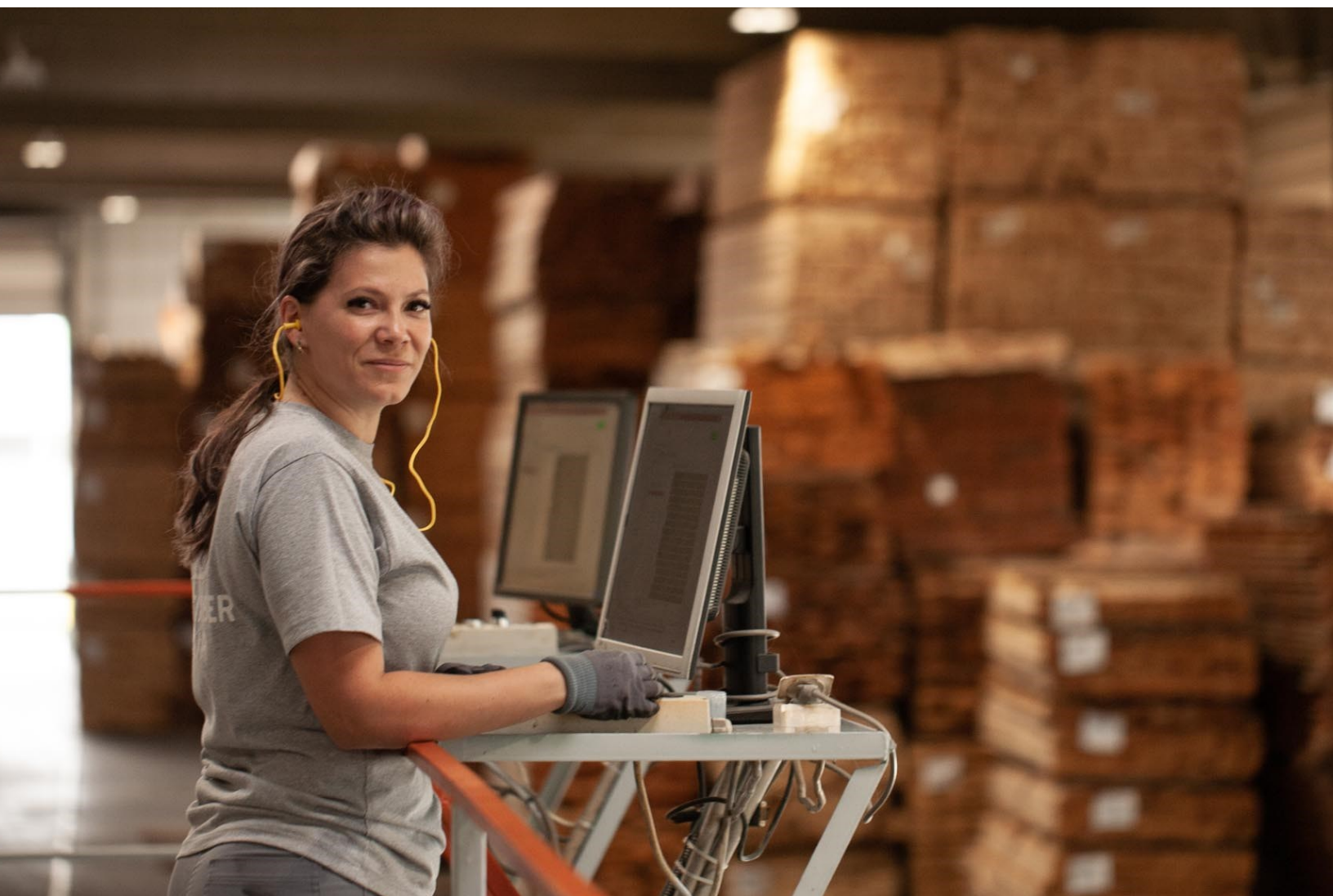
**To promote a culture of open and transparent communication, employees and managers must not demote, suspend, terminate, threaten, discriminate in any other way, or undertake any action that adversely affects employment, because an employee reports such a violation in good faith. Good faith is confirmed especially when whistleblowers had sufficient reason to believe that the information they provided was true at the time of the tip.**

Whistleblowers cannot be held liable for the procurement or access to information that was

reported, provided that the procurement and/or access do not constitute a separate criminal offense.

In general, all whistleblowers – even those outside the company (contractors, candidates, etc.) and people around them are to be protected from personal disadvantages.

However, intentional and/or blatantly false accusations can indeed be punished with disciplinary measures. This is checked on a case-by-case basis.



**Responsible for the Document:**

Michael Proschek-Hauptmann  
Chief Compliance and Sustainability Officer

T: +43 1 585 68 62 - 73

M: +43 664 88145649

michael.proschek@hs.at

[www.hs.at](http://www.hs.at)

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Favoritenstraße 7/2  
1040 Vienna  
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