



# Code of Conduct

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# Dear team and business partners of weba

The almost 40 years of the history of weba group is characterized by continuity and a strong entrepreneurial spirit. Today we are among the leading developing and producing companies for complex stamping and forming tools in the automotive industry. We have a clear ambition to strengthen and further expand this position. Thus, we need to handle the business-associated risks in an adequate manner by using our entrepreneurial abilities.

Our entrepreneurial action, the lawful and responsible behavior of our corporate management as well as of our leadership team and every single employee determinate the future success of our company. This aspiration is not limited to our home market in Austria, but extends to all global markets where we are either represented by our subsidiaries or otherwise economically active.

The weba group is fully aware of its role in the society and its responsibility towards customers, suppliers and employees. Therefore, our company is committed to clear principles of responsible and value-oriented business management. Of course, we expect the same commitment from our business partners.

**Responsibility, visioneering, passion, uniqueness and solutions** are our shared values. They represent an integral part of our corporate culture. These values form the foundation for a cooperative and productive working environment as well as for the continued and successful development of weba. They guide us in our cooperation with each other and are the basis of our daily activities.

This Code of Conduct represents the summary of principals and the balance of our entrepreneurial actions with internal and external provisions. In particular, the provisions described in this Code of Conduct include laws, regulations, guidelines, agreements, and other voluntary commitments. The Code of Conduct also serves the purpose to encourage our employees to assume personal responsibility for their professional activities by providing orientation. Furthermore, it specifies the objectives and principles for the entrepreneurial actions of weba.

The principles stipulated in our Code of Conduct also reflect our understanding of values. All locations of weba must apply these standards consistently. Compliance with the principles described in the Code of Conduct protects the weba as well as each employee from avoidable risks. Moreover, it reinforces our positive image with customers and other business partners.

Hannes Feuerhuber  
CEO

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# INTRODUCTION



**We obey the laws and regulations and act in compliance with the rules established in this Code of Conduct.**

We put all our trust in the lawful and responsible actions of our employees. The Code of Conduct summarizes the most important rules of behavior with regard to economic, environmental and social aspects. As an employee of one of the companies of the weba group, you need to familiarize yourself with the provisions of this Code of Conduct. They provide you with the necessary orientation and are a reliable basis for proper behavior in your working environment. Existing specific regulations may already cover some of the principles defined in the Code of Conduct. Also more detailed explanations on the key aspects of the Code of Conduct may be prepared or may partially already exist. In this respect, the Code of Conduct plays a comprehensive and explanatory role and does not replace these specific regulations. Particularly, if stricter requirements are stipulated in these regulations, they shall be given priority.

This Code of Conduct shall also serve as a guideline for our business partners how to balance the entrepreneurial actions with internal and external regulations. For any purchasing decision weba has to take, we will also consider whether such business partner ensures compliance with this Code of Conduct or its own behavior guidelines, which needs to be at least of equivalent value.

This Code of Conduct applies to all employees of the weba group on a uniform basis, regardless of whether the company has its place of business in Austria or abroad. Foreign subsidiaries and their employees must consider special national conditions when implementing the Code of Conduct. This Code of Conduct is the basis for all additional operational regulations, which may also take into account special conditions of the particular market or country. It covers the professional interests of the company.

The Chief Executive Officer of weba Werkzeugbau Betriebs GmbH may provide generally applicable instructions to clarify the principles stipulated in this Code of Conduct. In no case shall this Code of Conduct establish any title or claim of a third party against weba, its employees or representatives. The contracts concluded with weba and the governing law govern the legal relationship to third parties exclusively.

The term “employee” also includes - if not explicitly otherwise stated - managers and other executives.

# HUMAN RIGHTS AND SOCIAL STANDARDS

## **Mutual respect and equal opportunities**

We are committed to mutual appreciation and respectful interaction with each other, our business partners and other stakeholders. Respecting the personal rights of our fellow human beings is a matter of fundamental principle for us. Under no circumstances will we tolerate any form of discrimination, harassment or insult. In addition to our corporate values, this Code of Conduct serves us as a guideline, decision support and instruction for responsible behavior in business environment. We take commitment to obey the provisions described in this Code of Conduct. All employees must know the applicable legal regulations and the internal rules of behavior and act accordingly. We expect the same commitment from our business partners.

## **Protection of the human rights**

We comply with the prohibition of discrimination stipulated in the European Convention on Human Rights and the EU Charter of Fundamental Rights. This means, in particular, that we do not discriminate any employee or other persons based on gender, ethnic and social origin, sexual orientation, skin color, culture, religion, ideology, political views, physical constitution, age or state of health etc.

The respect for human rights and the compliance with all labor law regulations are an inevitable principle of our management philosophy. We disapprove of any form of child, forced or compulsory labor, as well as from any form of modern slavery and human trafficking. We strictly observe the country-specific regulations for a minimum age for employment.

## **Compliance with the labor regulations**

We stand for fair working conditions and pay our employees in accordance with the provisions of the collective agreement and in conformity with the standards of the labor markets, in which we operate. We calculate the remuneration of our employees by observing the minimum wages and the overtime regulations in accordance with the respective national laws. The same applies to the working hours and social security benefits. Our employees conclude their employment agreements on a voluntary basis and have the right to terminate these subject to the observance of a reasonable period of notice. At all our locations, we promote a culture of equal opportunities and treat individuals with the same professional and personal qualifications equally, with regard to recruitment, conditions of employment, further education possibilities as well as personnel development.



## Freedom of association and collective negotiations

We respect the right to freedom of association and collective bargaining. In doing so, we also abide by the specific national legal frameworks. It is an essential part of our management philosophy to cooperate closely and trustfully with the internal and external representation of employees. Our employees are able to communicate openly with management about working conditions without fearing negative consequences.

## Occupational safety and health protection

As an employer, we consider the occupational safety as one of our most important tasks. In order to minimize the risk of accidents, occupational diseases and other possible negative effects, the company's internal safety guideline applies, in addition to the applicable legal provisions of the occupational safety and health act, as well the regulations of accident prevention and other applicable safety standards.

Our management team is obliged to instruct their employees in detail, about the occupational health and safety. Every employee is obliged to adhere to these regulations and to report potential risks and any violations to the responsible contact person. The occupational health and safety standards apply at all weba locations. We also expect our suppliers, service providers and other business partners to comply with the applicable occupational health and safety laws and to demand the same from their subcontractors.



**”**  
**We follow the provisions of labor law and respect the human rights.**

# COMPLIANCE WITH LAWS AND LEGISLATION



**We follow the applicable laws, regulations and our contractual obligations.**

We are committed to comply with all legal regulations and to manage our business based on our corporate values.

Without exception, we operate in conformity with the national and international laws and regulations as well as with our contractual obligations.

For a successful cooperation, it is mandatory that the principles described in this Code of Conduct and the applicable laws and regulations are strictly obeyed within the entire supply chain of weba.

## **Anti-bribery and anti-corruption initiative**

We do not tolerate any corruption in the form of unlawful privileges of any kind. We expect the same commitment to combat bribery and corruption from our suppliers, service providers and other partners.

We shall not grant any benefits to the officials of authorities and public, even if they are of low economic value. These officials must preserve their independence. This does not affect an appropriate catering during meetings and conferences, to the extent permitted under the relevant laws.

## **Presents and Catering**

Personal gifts, invitations, benefits, or other advantages as “a contributions in the course of maintaining the business relationship” may be presented to public enterprises, or companies that are wholly or partially owned by the state, as well as other business partners within the private sector, provided that this does not violate any criminal laws and other regulations or that the value of the benefit is not unreasonably high. The giving of benefits must be made transparently since otherwise an impression of bribery or granting of advantages may be created.

It is especially prohibited to settle payments to employees or representatives of domestic or foreign enterprises, as well as to any persons closely associated with them, in return for the granting of benefits.

Gifts must always be shipped to the business address - we do not send any gifts to the private address. We do not accept any unduly granted benefits and we must reject any manner of bribe. We can accept personal favors, such as gifts (but no money) or invitations for maintaining the business relationship with our suppliers, service providers and other partners, but only if these favors are appropriate within the scope and the situation. In any situation of doubt, will check with our management in advance.

## Charity and Sponsorship

As a corporation, we are aware of our responsibility towards the society, therefore we sponsor and support regional goals and developments. We make financial and material donations, that means donations on a voluntary basis without a consideration or grant sponsorship funds, this means donations on a basis of a contractually agreed consideration for non-profit and charity purposes such as education, research, science, art, culture, sport or social matters. We always grant sponsorship or donations transparently and in accordance with the applicable laws, the local provisions and the internal anti-corruption regulations. We make sure that no donations or other contributions are granted to the representatives of public bodies and political parties or organizations.

## Fair competition & compliance with the Antitrust and the Competition Act

As an internationally active company, we adhere to the principles of fair and free competition and respect the relevant competition and antitrust laws in all countries where the weba has its place of business.

Under no circumstances will we engage in any anti-competitive or unethical trading practices. We shall not enter into any hidden agreements with the competitors regarding sales pricing, customer base, delivery terms, supply areas, development or product strategies etc. However, this is to be distinguished from the alliances with competitors in other fields, e.g. the development of new products for which the overall positive economic impact potentially outweighs the restraints on competition. Whether such alliances are acceptable shall be assessed on a case-by-case basis. We do not boycott customers or competitors by illegal obligations, business rejections etc.



## **Compliance with the tax, customs and foreign trade laws**

As an internationally active company, we observe all tax law regulations domestically and abroad. The same applies to all applicable foreign trade and customs regulations, sanctions, embargo or other laws and regulations, that are governed by the import, export or domestic trade of goods, services, technologies software or capital movements.

Transactions or business dealings with persons or companies who are on sanction lists are strictly prohibited.

## **Product conformity and safety**

Our products and services as well as our development and production processes correspond to the state of the art and meet the applicable customer and standard requirements as well as the applicable legal and governmental regulations in terms of safety, reliability and quality.

Our suppliers, service providers and other business partners are also obliged to implement appropriate measures in their development and production that ensure that their product and service deliveries comply with the law and industry standards. In particular, the implemented measures shall minimize the risk of fake parts or materials being introduced into our supply chain.

## **Avoiding of conflicts of interest**

We always make our business decision on a profound basis and according to the principle of relevance in the best interest of the company. Our personal relationships or interests do not influence our business activities. We do not use our business activities to gain private benefits.

Any case where our business decision conflicts with our private interests or other economic activities must be disclosed transparently and resolved in accordance with the law and the applicable guidelines.

## **Secondary employment**

As employees of weba, we do not engage in work for third parties during our working hours. Secondary employment of any kind must be disclosed to the executive management of the respective company of weba. The same applies if an employee operates a company or holds shares in a company engaged in whole or in part in competition or in a business relationship with weba.

Furthermore, prior to the acceptance of a secondary employment, a supervisory or management position in another organization, a consent must be obtained from the executive management of the respective company of weba. We also obtain such an approval in the event that weba is planning to do business with companies in which we, one of our relatives or another person closely associated with us is engaged or holds shares.

## Ethical, safe and responsible procurement

The selection of our suppliers and service providers is made on the basis of fair and comprehensible criteria. The employees must observe our internal procurement guidelines and processes. We refrain from assigning the business partner of the company for private purposes.

We also expect our suppliers, subcontractors, service providers and other business partners to adhere to the applicable laws as well as to the quality and environmental guidelines, which are published on our website, and in which our requirements relating to the ethical and sustainable corporate management are described.

During our procurement process, we will not consider suppliers who are known to violate the principles of our Code of Conduct and our Supplier Guidelines.

As it concerns the procurement and the extraction of raw materials, including conflict minerals, any illegal or ethically reprehensible procurement channels must be strictly avoided. Furthermore, the applicable environmental regulations must be observed.

For chemical substances that are subject to registration, evaluation and approval due to the EC Regulation No. 1907/2006 of the European Parliament and the European Council, the supplier must ensure that the information on the registration status is complete and up-to-date in his profile on the supplier portal.

## Protection of intellectual property

For the sustainability of our corporation, it is essential to handle the property of weba and of our business partners with reasonable care, highest responsibility and in compliance with the data protection guideline.

Both tangible objects and intangible assets, such as business information, know-how, commercial or industrial property rights, trade secrets, inventions and patents etc. are considered as property.

We only use material and immaterial property of the company in accordance with the law and for company purposes. Any unauthorized use, modification, processing, transfer, destruction or disclosure of company property will lead to serious consequences under labor, civil and criminal law.

Our IT systems and the provided stationary as well as portable IT equipment shall be used for the protection of our data and of the data of our business partners, according to the guideline of the IT security. Any unlawful, fraudulent, malicious or harassing activity is strictly prohibited.

All employees must observe the internal IT security policy without exception. We expect an equivalent protection of intellectual property and data from our suppliers and service providers.

# INFORMATION AND DATA SECURITY

## Careful communication and public appearance

Information is one of the most important assets of weba. The processing, communication and securing quality of data is a key factor in maintaining successful business activity.

We adhere to the internal guideline of a careful and consistent communication. As a matter of principle, we communicate with our employees, colleagues, customers, suppliers and other stakeholders clearly and respectfully.

We respect the right to freedom of expression, and we are aware that we can also be perceived as representatives of weba in our private environment. Therefore, we always make sure to preserve the company's reputation and ensure that our private expression of opinion does not correlate with our respective function at weba.

The external communication (Public Relations or PR), this means the publication, transfer or exchange of information and news with the media, industry experts, other companies or the public etc. in any available channels (online, print media, TV, radio, social media, interviews, speeches etc.) is only reserved to the authorized public and media department, after the release by the management of weba.

## Confidentiality, data protection and information security

### Confidentiality

We protect the sensitive data of our customers and other business partners, as well as any information about business transactions, from any form of unauthorized access. We maintain secrecy with respect to all confidential matters, documents, and information—particularly regarding the technical details of products and processes - both for the duration of the employment agreement as well as upon the termination thereof. We do not disclose such information to any third parties, unless we are obliged to disclosure by the law, court or administrative order. In this case, third parties include our relatives or individuals closely associated with us, but also the employees of weba who are not authorized to receive the confidential information.

### Data protection

We understand the protection of data as a personal right. Therefore, we always handle the personal data with a particular care. We collect, use, store and process personal data only in compliance with the legal requirements.

## Informational security

Our business activities are highly dependent on the availability and functionality of the IT systems. The security and the integrity of all information and data are therefore of fundamental importance for us.

We protect the sensitive data and information of our employees, customers, suppliers and other business partners from any unauthorized access or misuse. For this purpose, various security measures and protection concepts that correspond to the latest state of the art are implemented in our IT systems. Copying of software and installing of private software on the computer hardware are strictly prohibited.

It is prohibited to use the IT systems and the equipment for unlawful, fraudulent, immoral or harassing purposes and activities. In particular, it is strictly forbidden to search for, download or distribute data and information with racist, pornographic, anti-constitutional, violent or propaganda content etc.

We only use the IT systems, information and data in accordance with the specifications of IT security, considering all relevant data protection regulations and the internal IT security guidelines.

Already during the recruitment phase, our management will inform their employees about this internal safety guideline and its compliance requirements.

Our suppliers, service providers and business partners are also obliged to maintain confidentiality and to comply with all data protection regulations and laws.

## Transparent accounting and proper financial reporting

The credibility of our company is based on the correctness of our financial reports, in connection with which we also strictly comply with the respective regulations for proper financial reporting and work together with external auditing units and authorities.

Our employees, who collect, maintain or transmit accounting or financial data in the course of their job should ensure the accuracy and truthfulness of the financial records, data, information and books. We refuse to bypass controls through any incorrect or misleading data collection or bookings.

**”  
We comply with  
the data protection  
regulations and  
handle any  
information  
responsibly.**

# ENVIRONMENTAL PROTECTION AND SUSTAINABILITY



**We ensure the compliance with environmental laws and act sustainable.**

## **Sustainable environmental and climate protection**

Sustainable environmental and climate protection is highly important corporate goal at all our locations. We take environmental concerns proactively into account during our manufacture and avoid any negative influences on the environment as far as possible by using suitable production processes. Energy saving and emission reduction are the focus

of both the development and the production. weba is certified according to the environmental management system DIN EN ISO 14001.

As it concerns the environmental protection and energy management, the employees and suppliers of weba must comply with the laws and regulations of the country in which they operate. We use natural resources appropriately and sparingly during the production of our products. In our business routine, we obey the applicable laws and the policies of company on the conservation of natural resources, the energy use and the waste management.

Equally, we expect all our suppliers to commit themselves to the environmental protection in form of an implemented environmental management system. This should promote a greater environmental responsibility, reduce the risk of environmentally harmful accidents, help to reduce the emissions, guarantee the conservation of resources and ensure the identification and safe handling of environmentally hazardous substances. The manufacturing processes and the products or services supplied must comply with the applicable legal and official laws and regulations for protection of the environment. The supplier should also implement suitable recycling and disposal concepts for its products.





# FIELD OF APPLICATION AND CONTACT

## Field of application

We aspire to behave respectfully and fairly towards our employees and our business partners and to conduct our global business in compliance with the applicable laws and regulations.

Based on our values, our goals and our corporate philosophy we have created these behavior guidelines, which are compulsory for all employees of weba. Every employee must comply with the principles stipulated in our Code of Conduct and support its observance actively. Our management team has an important role model function in following this Code of Conduct. They must ensure that their direct employees have received and understood this Code of Conduct. We also expect our suppliers, service providers and other business partners to be familiar and to comply with the guidelines described in our Code of Conduct.

## Zero tolerance policy

Our values, our goals and our corporate philosophy form the basis of these behavioral guidelines, which must be obeyed by all weba employees. Actions of individual employees that are inconsistent with the Code of Conduct may lead to disciplinary and civil consequences or even be prosecuted. As employees of weba, we are aware that violations of the Code of

Conduct can also lead to serious consequences for the company. In particular, violations of competition and antitrust laws as well as anti-corruption laws can pose a major threat to the existence of company. Therefore, we will not tolerate any misconduct in these areas. The zero tolerance policy also applies to other illegal, immoral or unsafe conduct or work practices, discrimination, bullying and any form of harassment, violence, and threats of violence, coercion or aggression. Likewise, under no circumstances will we tolerate retaliations against anyone who addresses risks and concerns or reports violations.

**”  
We ensure that  
the concerns  
and risks are  
communicated  
and discussed  
openly.**

## Whistleblower Policy

We promote an open and honest culture of communication and encourage our employees and other stakeholders to express and report any legal or ethical concerns without fear of retaliation.

Regardless of how concerns are raised, all reports will be taken seriously. The report will be promptly reviewed by the relevant team. Based on the review findings, a course of action will be determined in accordance with applicable laws and defined behavioral guidelines. During internal investigations, we expect full cooperation and truthful statements from every individual involved. All individuals engaged in the investigation are required to maintain confidentiality.

**weba prohibits any form of retaliation against individuals who, in good faith and with sincere motives, report concerns or potential violations of behavioral guidelines, laws, or other policies, ask questions, or participate in internal investigations. This applies regardless of whether the reported case is substantiated or not. We also do not tolerate any efforts to discourage or prevent an individual from reporting concerns or asking questions.**

However, we also emphasize that the retaliation policy should not prevent weba from making legitima-

te personnel decisions that do not have a retaliatory nature. This policy should not be abused or misused. Dishonest reports, false statements, etc., may result in disciplinary action, up to and including termination of employment.

You can make reports related to human rights and environmental risks, as well as violations of applicable law and internal policies related to the business activities of weba Werkzeugbau Betriebs GmbH through the reporting channels listed below.

### Primary Reporting Channel and Reporting Process:

The primary reporting channel for making reports is the whistleblower system of our parent company, Mubea.

The system can be accessed at:  
<https://mubea.integrityline.com>

When making a report in the whistleblower system, please select the correct subsidiary "weba Werkzeugbau Betriebs GmbH.

Alternatively, you can also contact our Whistleblower Officer, Ms. Tanja Burghuber, with your report:

Phone: +43 7252 72807-1004

Email: wb23@weba.at

You can also submit reports in person or by postal mail.

At the beginning of the reporting process, but no later than 7 days after submission, you will receive confirmation of the receipt of your report. Within a maximum of 30 days from submission, you will receive information on how your report will be handled.

For all reports, it is preferable to use the primary reporting platform mentioned above. If the report concerns the Whistleblower Officer herself, please address it to the parent company, Muhr und Bender KG, in the whistleblower system.

### **External Reporting Channels:**

For very specific reporting topics, we would like to draw your attention to the following Austrian external reporting channels (according to §15 (1) and (2) HSchG):

#### General Authority

- Federal Office for the Prevention of Corruption and Anti-Corruption (BAK)

#### Special Authorities

- Audit Oversight Authority pursuant to § 66 (1) and 2 of the Audit Oversight Act
- Accounting Authority pursuant to § 52 e (1), (2), and (4) of the Accounting Act 2014
- Federal Competition Authority pursuant to § 11b (6) of the Competition Act, BGBl. I Nr. 62/2001
- Financial Market Authority pursuant to the legal acts listed in § 2 of the Financial Market Authority Act, BGBl. I Nr. 97/2001, listed legal act
- Money Laundering Reporting Office pursuant to § 4 (2) Z 1 and 2 of the Federal Criminal Police Office Act
- Notarial Chambers pursuant to § 154 (4) of the Notarial Code
- Bar Associations pursuant to § 20a of the Disciplinary Statute for Lawyers and Trainee Lawyers
- Chamber of Tax Consultants and Certified Accountants pursuant to § 100 (1) and (2)

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