



THE PAYER WAY OF DOING BUSINESS
CODE OF BUSINESS CONDUCT





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BINDING

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Scope: all employees of PAYER Group.

Approved by: PAYER Group Board

PAYER Group was founded in 1946 in Austria. We count leading brands worldwide among our customers. We develop and manufacture products for the following business areas within the group: healthcare & medical, home, beauty, and personal care. Over the course of 75 years, we have acquired skills and technological expertise in design, development, prototyping, industrialization, tooling, plastic injection molding, metal processing, and assemblage.

The headquarters of the PAYER Group is in St. Bartholomä. Over the past few years, our technology and innovation center has increasingly specialized in manufacturing products used in medical technology (i. e. surgery, respiration, and diagnostics). Alongside our headquarters, we produce at sites in Hungary, China, and Malaysia to optimally supply our customers worldwide. With 1,100 employees, we operate our production facilities to the highest quality standards. It allows us to not only master customer challenges and realize requirements, but also to seize visionary ideas and successfully develop innovative product solutions on our own - from concept to series production.

Our core values form the basis of our company and inspire our day-to-day operations. The world may change, but our values remain. PAYER's core values and principles, to which we are dedicated globally, guide us in our everyday operations. The PAYER Code of Business Conduct (here referred to as the "Code") specifies PAYER's values and supports their further implementation by establishing a set of non-negotiable, minimum standards of conduct in key areas.

The Code does not cover every conceivable situation, but describes the standard to which all activities are measured. Employees must seek guidance if unsure of the correct course of action in a particular situation. It is everyone's direct responsibility to "do the right thing" which cannot be delegated. Employees should always consider the following simple principle: behave ethically and in an upright, legally abiding manner!

Throughout these guidelines, "employees" refers to all PAYER employees, including managers, and to all PAYER company representatives.

Reitereg, 01/07/2022

CEO PAYER Group



Introduction

Due to its international operations, the PAYER Group is subject to many social, political, and legal conditions. Violations of these general conditions, especially those against the jurisdiction of a foreign country, can cause considerable financial disadvantages for the company and cause lasting damage to the reputation of the Group. This Code of Conduct constitutes the groundwork for all business activities and decisions of the PAYER Group. It is the foundation for ethically and lawfully conduct. Each employee will be subject to disciplinary consequences in case of a violation of statutory provisions, internal guidelines, regulations, and directives, or of any other legal provisions of this Code of Conduct.

Compliance with the Code

We will consult the Code, comply with its provisions and seek guidance when in doubt.

Each employee is responsible for ensuring full compliance with all provisions of this Code and, if necessary, seeking guidance or advice from a manager or the Human Resources Department. "Doing the right thing" and upholding the integrity is the personal responsibility of all employees. It cannot be delegated. When in doubt, employees should always be led by the basic principles stated in the introduction of this Code. Any breach of this Code may result in disciplinary action up as far as dismissal and, if warranted, legal proceedings or criminal prosecution.

Compliance with Laws, Regulations and Directives

We always abide by the law.

Both PAYER and its employees are law-bound. All applicable laws and external and internal company regulations must be strictly adhered to in all business activities and decisions. All employees are requested to inform themselves about the laws, regulations, internal guidelines, and rules applicable to their respective areas of responsibility. In case of doubt, they should contact their manager or the Human Resources Department.

Human Rights, Respect and Integrity

We consider human rights to be fundamental values.

Based on the UN Charter and the European Convention on Human Rights, human rights are considered fundamental values that must be respected and considered by all employees. PAYER Group's corporate culture recognizes and welcomes that every human being is unique, valuable, and respected for their abilities. PAYER strictly prohibits any form of human trafficking and modern slavery, as well as child and forced labor. It does not tolerate any form of discrimination in any form whatsoever. The latter also applies to sexual harassment in any form, for example, through obvious advances, demeaning comments, jokes, foul language, suggestive gestures, or the display of relevant visual material in the company's business and production facilities. Such conduct can be classified as harassment, even if not intentional. These principles also apply to conduct towards external partners.



Discrimination

We encourage diversity and respect the dignity of our colleagues.

At PAYER, we respect the personal dignity, privacy, and rights of all our employees. We are committed to ensuring a workplace free of discrimination. Therefore, employees shall not discriminate against others because of their origin, nationality, religion, ethnicity, gender, age, or sexual orientation, nor shall they verbally or physically harass other employees based on any of the above or on any other circumstance. Any employee who feels that their workplace does not comply with the principles previously stated is encouraged to bring their concerns to the attention of the Human Resources Department.

Privacy Policy

We protect the personal data of employees, customers, suppliers and other business partners.

PAYER Group entities process personal data of employees, customers, suppliers, and other business partners within the scope of their business operations. We take the protection of personal data very seriously. Any processing of personal data (e.g., collection, use, disclosure, publication, and storage) is only allowed in compliance with the applicable legal provisions and the PAYER Data Protection Guidelines. All employees are required to handle personal data carefully and conscientiously. Click on the following link for detailed information on the subject of data protection: <https://www.payergroup.com/privacy-policy>

Conflict of Interest

As a matter of principle, we act in the interests of PAYER.

A conflict of interest occurs when an employee's interests or the interests of a third party interfere with those of PAYER. It may be difficult for employees to protect PAYER's interests in such a situation. Whenever possible, employees should avoid conflicts of interest. If a conflict of interest arises, or if an employee finds himself/herself confronted with a situation that may involve or lead to a conflict of interest, the employee shall inform the manager and/or the Human Resources Department to find a solution that is appropriate to the situation, fair and transparent.

Business Opportunities

We are committed to promoting PAYER's business.

Employees must not compete with the Group. They may also not take advantage of business opportunities that arise for them or in connection with their work unless the company has previously expressly denied its interest in these opportunities. Also, if the company does not take advantage of a business opportunity, the employee may pursue it in their interest only if it is clear beyond doubt that this action will not result in direct or indirect competition for the Group.



Fair Competition

We believe in the importance of fair and free competition.

Transparent and fair conduct in the marketplace sustainably safeguards the interests of both individual companies and employees and the competitiveness of the PAYER Group as a whole. PAYER is prepared to compete successfully with other businesses while always complying with the applicable antitrust laws and the laws on competition and fair business conduct. Therefore, all employees abide by the following regulations at all times:

- Business policies and prices are set independently and are never formally or informally agreed upon with competitors or other independent parties, either directly or indirectly.
- Customers, territories and product markets are never shared between PAYER and competitors, but are always the result of fair competition.
- Customers and suppliers are treated fairly.

Restricting free competition, and violating competition and antitrust regulations is not in line with the corporate philosophy or culture and the self-image of PAYER Group.

Sensitive Information

We value and protect our company's confidential information and we respect the confidential information of others.

Any information that has not or has not yet been made public is confidential. It includes trade secrets, business plans, manufacturing and production ideas and designs, manuals, blueprints, databases, records, remuneration information, and unpublished financial or other data. Employees may not disclose or allow the disclosure of confidential information unless required or authorized by law or by their manager. This obligation continues even after termination of employment with PAYER. Employees must also do everything in their power to avoid inadvertent disclosure by taking special care in storing and transmitting confidential information.

Fraud, Protection of Company Assets and Accounting

We insist on honesty and respect the company's assets and property.

Employees must not engage in fraudulent or other unlawful activities. This is especially true for actions relating to PAYER's or a third party's property, assets, financial reporting, or accounting. Non-compliance may result not only in disciplinary action but also in criminal prosecution. The financial records of PAYER constitute our basis for managing the business and meeting obligations to various stakeholders. Therefore, all financial records must be accurate and comply with PAYER's Accounting Standards.

PAYER employees will treat PAYER property with care. They shall use it only for its intended purpose. All employees protect PAYER's property from loss, damage, misuse, theft, fraud, embezzlement, and destruction. Such obligations apply to tangible and intangible assets, including knowledge, confidential or proprietary information, and information systems.



Bribery and Corruption

We denounce any form of bribery and corruption.

Employees must never, directly or through third parties, offer or promise personal or improper financial or other benefits to establish or maintain a business relationship or other advantages with a third party (whether public or private). Likewise, employees must not accept such benefits in exchange for preferential treatment from third parties. Additionally, employees must refrain from any activity or conduct that could create the appearance of such behavior or attempted behavior.

Employees must understand that offering or giving improper benefits to influence a decision by the recipient, even if the recipient is not a government official, may result in disciplinary action and criminal prosecution. A disproportionate advantage may be anything of value to the recipient, including employment or consulting contracts for the benefit of closely related individuals.

Gifts, Hospitality and Invitations

We base our business and competitive standing on quality and competence.

The receipt of favors shall not influence employees. Likewise, employees are not allowed to influence others through any favors. They must accept only customary hospitality and token gifts appropriate to the circumstances. They are not allowed to accept or offer gifts, hospitality, or invitations if these could give the impression of trying to influence the respective business relationship inappropriately. When assessing a situation concerning the above criteria, employees will follow the internal policy in effect in their market. If there is no such policy, they shall apply the most restrictive local practice to avoid any appearance of improper behavior. When in doubt, the employee shall seek the advice of the direct supervisor or the Human Resources or Legal Department.

Neither an employee nor a third party may accept gifts of the following types or offer them to third parties, regardless of the value of the gift:

- Money
- Loans
- Commissions
- Other forms of money

Donations and Sponsoring

We recognize our social responsibility.

PAYER is committed to exercising its social responsibility in several ways. PAYER entities can make monetary and in-kind donations primarily to support humanitarian and social projects, cultural and scientific institutions, and education. Apart from that, PAYER sponsors selected cultural projects and regional sports events. Gifts and give-aways for employees are also primarily sourced regionally to support local businesses. PAYER makes no donations or other financial contributions to politicians, political parties, party-affiliated organizations, or organizations that do not exclusively pursue social causes.



Workplace Safety

We see the safety and health of employees as core values.

The safety and health of its employees are a top priority for PAYER. Permanent improvements to the working environment, and various prevention and health measures, are the foundation of the PAYER Group's Health & Safety corporate culture. Every employee is required to encourage safety and health in their working environment. They are required to comply with the safety standards, occupational health and safety guidelines, and regulations. It also applies to companies and their employees acting on behalf of PAYER.

Protecting the Environment and the Climate

We see environmental protection and climate protection as a key task.

At PAYER Group, sustainable production processes, responsible use of resources and application of the best possible technologies are an inherent part of the corporate philosophy and business operations. This premise is also our claim to long-term quality leadership in products and services. The entire production chain aims to use resources - especially raw materials and energy - as sparingly as possible and minimizing the environmental impact of processes and products.