



# CODE OF CONDUCT

for suppliers to Kotányi GmbH

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WORKING TOGETHER FOR A BETTER FUTURE.



## DEAR BUSINESS PARTNERS,

our world is changing rapidly – economically, technologically and socially. Amidst this change, we at Kotányi are particularly committed not only to supplying high-quality products, but also to acting responsibly, ethically and sustainably. Integrity, fairness and mutual trust are values that guide our daily actions and which we also wish to uphold in our collaboration with you, our partners.

Only by working together can we meet the high expectations of consumers, customers, authorities, and society – going well beyond mere compliance with legal requirements. With this Code of Conduct, we aim to establish a clear framework that defines our shared values and expectations. It is intended to provide guidance on how we can work together as equals and with mutual respect throughout our entire supply chain. This Code of Conduct is more than an agree-

ment – it is a commitment to responsibility, to values and to a shared future in which success, quality and ethics go hand in hand.

We invite you to join us on this journey, in the knowledge that acting responsibly is not only the foundation of long-term partnerships, but also makes a difference for people, society and the environment.

Thank you for your support, your trust and your commitment to responsibility.

Kind regards,

Erwin Kotányi  
Managing Director



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## INTRODUCTION – RESPONSIBILITY AND OBJECTIVES

Sustainable and responsible conduct is a core element of Kotányi's corporate values. Together with our partners, we assume responsibility for people, society and the environment.

This Code of Conduct for Suppliers is based on internationally recognised frameworks – including the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights (UNGPs), the core labour standards of the International Labour Organisation (ILO) and the UN Global Compact.

It sets out our expectations for fair, ethical and sustainable conduct throughout the entire supply chain. Our shared goal is to create conditions that ensure dignity, safety and equal opportunities, whilst at the same time protecting the environment and conserving resources.

The Code is addressed to all business partners who supply goods or services to Kotányi. By accepting it, our partners undertake to actively implement the contents of this document within their own organisations, to communicate them to their employees, and to embed them in their cooperation with sub-contractors and upstream suppliers.

# 1. TREATMENT OF EMPLOYEES

## 1.1 LABOUR AND SOCIAL STANDARDS

Kotányi expects its business partners to comply unconditionally with the core labour standards of the International Labour Organisation (ILO). These include the prohibition of forced labour, discrimination and child labour, as well as the right to freedom of association.

Wages, working hours and social benefits must meet at least the statutory and industry-specific standards. Fair remuneration, written employment contracts and compliance with maximum working hours are a matter of course for us.

Remuneration must comply at a minimum with applicable legal requirements and the prevailing standards of the respective region. Wages and benefits must be clearly defined and paid in full, regularly, and on time. The objective is for remuneration, unless otherwise required by law, to provide a decent standard of living and cover basic living costs.

Deductions for benefits in kind may only be made in reasonable proportion to their actual value. Statutory and social benefits, as well as legally mandated allowances such as overtime pay, insurance benefits, and paid leave, must be granted in full.

All employees must be informed in a transparent and comprehensible manner about the composition of their remuneration. Employment contracts must be drawn up in writing and handed over to the employees. As a general rule, employees must not be required to bear the costs of work equipment.

The following also applies to working hours: the maximum working hours and break regulations permitted by law must be observed.

## 1.2 RESPECTFUL TREATMENT AND PROTECTION AGAINST ABUSE

We consider it essential that our business partners ensure that all employees are treated with dignity, respect and fairness.

Any form of inappropriate, abusive or degrading treatment is strictly prohibited. This includes, amongst other things, sexual harassment, corporal punishment, psychological or physical coercion, and verbal abuse. Even the threat of such behaviour is unacceptable.

A respectful and safe workplace is a fundamental prerequisite for a trusting working relationship.



### 1.3 DIVERSITY AND EQUAL OPPORTUNITIES

We value cultural diversity, different perspectives and individual life paths. Discrimination in any form – for whatever reason – has no place here. Kotányi expects its business partners to consistently prevent any form of discrimination. No one may be disadvantaged or excluded, either directly or indirectly.

This applies in particular with regard to age, gender, sexual orientation, pregnancy or parenthood, disability, ethnic origin, skin colour, nationality, religion or belief, political opinion, social background or marital status.

Kotányi stands for a corporate culture that values diversity and actively promotes equal opportunities – in training as well as in personal and professional development. We expect the same from our partners throughout the supply chain.

### 1.4 HEALTH AND SAFETY

Our partners ensure safe, hygienic and health-promoting working conditions. Appropriate measures for occupational health and safety, as well as accident prevention, must be implemented and regularly reviewed.

All workplaces, machinery, facilities and processes must comply with applicable legal regulations and safety standards. Fundamental human rights must be upheld at all times and in all areas of the company.

Fire safety measures, emergency plans and evacuation procedures must be in place and effectively implemented.

Particular consideration must be given to the protection of underaged workers, pregnant women and vulnerable groups.

Minors must under no circumstances be exposed to dangerous, harmful or unsafe conditions. Their physical and mental development must be given special protection.



Suppliers are also obliged to provide their employees with regular training on health and safety measures. Cleanliness, order and hygiene in the workplace must be ensured, as must, where accommodation is provided, decent living conditions in accordance with the same standards.

To ensure the consistent implementation of these requirements, a responsible person from management should be appointed to monitor compliance with, and the continuous development of, measures to ensure occupational safety and health protection.

## **1.5 FREEDOM OF ASSOCIATION AND EXPRESSION**

Employees have the unrestricted right to assemble, join trade unions or establish employee representative bodies within the framework of applicable laws. They also have the right to participate in collective bargaining to address concerns regarding working conditions, remuneration or other relevant issues.

Discrimination, intimidation or other forms of reprisal arising from the exercise of these rights are in no way acceptable and will not be tolerated by Kotányi.

Respect for employees' fundamental democratic rights is an essential foundation for responsible cooperation.



## 1.6 DISCIPLINARY MEASURES

Respectful treatment also includes fair and legally compliant handling in the event of disciplinary measures. Such measures may only be taken in accordance with national law and internationally recognised human rights.

Disproportionate or degrading disciplinary measures, such as the withholding of wages, social benefits or personal documents (e.g. identity cards), as well as prohibitions on leaving the workplace, are not permitted.

Furthermore, the right of both contracting parties to terminate the contract must be fully respected within the framework of statutory provisions.

## 1.7 CHILD LABOUR AND THE PROTECTION OF MINORS

Child labour is prohibited without exception. The minimum age for employment must correspond to the age at which compulsory schooling ends, but must under no circumstances be below 15 years (or 14 years, if permitted under national law in accordance with ILO Convention 138).

Furthermore, all national regulations and international standards regarding the protection of minors must be complied with. Young people must not be entrusted with dangerous tasks or exposed to working conditions that are harmful to their health, unsafe or involve night work.



## 2. BUSINESS CONDUCT

### 2.1 FAIRNESS AND ACTIVE PARTNERSHIP

For us, genuine partnership means more than just business cooperation – it is based on trust, mutual respect and a sincere desire to achieve more together.

We see our business partners not merely as part of the supply chain, but as valuable co-creators of a responsible and sustainable future.

We believe in success through transparency, open communication and fair conditions. Only by acting as equals and sharing our responsibilities can we grow together and bring about meaningful change for people, markets and the environment.

### 2.2 LAW AND COMPETITION

Compliance with all applicable laws is non-negotiable for us and our partners. Agreements that contravene antitrust law, market manipulation or breaches of competition law are prohibited. Contracts must never conflict with legal requirements.

### 2.3 INTEGRITY AND ANTI-CORRUPTION

Bribery, the granting of favours or corrupt behaviour – of any kind – will not be tolerated. Promotional gifts, gifts of symbolic value, as well as invitations to occasional business meals customary in the local area or other benefits, may only be offered within socially acceptable limits and of modest value. However, Kotányi employees must not accept monetary gifts.

Kotányi rejects any form of bribery and corruption, as well as any unethical conduct in business dealings. Any suspicion of attempted bribery must be reported to Kotányi management or the Kotányi Compliance Officer and may lead to the termination of the business relationship.



## 2.4 DEALING WITH PUBLIC AUTHORITIES

Kotányi and its partners treat representatives of public authorities with respect and integrity. Influence must not be bought through payments, favours or invitations.

## 2.5 COMPLIANCE WITH LEGAL REQUIREMENTS

Kotányi operates in numerous countries and consistently aligns its actions with the applicable laws and legal frameworks in each jurisdiction.

We also expect our business partners to be fully aware of and comply with all relevant legal provisions, regulations and official requirements that are relevant to our cooperation.

Contractual agreements, whether written or verbal, must never conflict with applicable law. In the event of any discrepancies, the legal requirements always take precedence.

## 3. ENVIRONMENT AND SUSTAINABILITY

### 3.1 ENVIRONMENTAL PROTECTION

Our environment is not a resource – it is the foundation of our existence. Suppliers are obliged to comply with all applicable environmental laws and regulations. The careful use of energy, water, soil and air is just as much a matter of course as the proper disposal of waste and hazardous substances. Environmental protection is not merely a duty, but part of a shared commitment. We want to work with suppliers who reduce environmental impact not just because they have to, but because they are convinced of the need to do so. Those who treat this foundation of our existence with care today are protecting the world of tomorrow. That is why we rely on partners who actively champion environmental and climate protection, reduce the consumption of energy and raw materials, and promote biodiversity. Every step forward counts, and we want to drive this progress together.

We require our suppliers to communicate openly and honestly at all times, to inform us in a binding manner of any environmental emergencies or incidents, and to make every effort to avoid adverse effects on the environment.

Suppliers who have implemented a recognised environmental management system and/or hold credible sustainability certification are particularly valuable partners to us. We actively prioritise them in our collaboration and, where necessary, support other suppliers in developing and implementing such systems. After all, sustainable action arises from shared commitment and mutual support.





## 4. PRODUCTS AND PROCESSING

### 4.1 PRODUCT SAFETY

Our suppliers ensure that products and raw materials supplied to our company are safe, of high quality and in compliance with all relevant legal requirements. In particular, they do not possess any properties that endanger the health of consumers.

The implementation of the strictest hygiene, safety and quality standards throughout the entire production and supply chain is a fundamental requirement.

### 4.2 PRODUCT LABELLING

All products must be labelled in accordance with the law. A transparent, comprehensible declaration that complies with the relevant legislation is essential.



## 5. COMPLIANCE AND IMPLEMENTATION

### 5.1 RESPONSIBILITY AND TRAINING

Our business partners are responsible for ensuring that this Code of Conduct is communicated, implemented and adhered to internally. All employees – particularly those in managerial roles – must be trained and made aware of its requirements.

Our suppliers undertake to cooperate actively in investigations, naturally whilst safeguarding legitimate interests and protecting trade secrets, and in compliance with applicable data protection regulations. This also applies to breaches occurring among subcontractors.

### 5.2 SUBCONTRACTORS

Subcontractors, suppliers and service providers must also be bound by these standards. Our suppliers are obliged to ensure compliance and to pass on relevant information transparently.

Furthermore, we expect our business partners to establish an internal, confidential whistleblowing system through which all employees can report potential breaches without fear of discrimination or sanctions. Only through openness and protection for whistleblowers can a responsible corporate culture be fostered.

### 5.3 REPORTING OF BREACHES AND COOPERATION IN INVESTIGATIONS

Should our business partners receive any indications of a possible serious breach of this Code of Conduct, Kotányi must be informed immediately.

Upon request, the business partner is obliged to provide a written and comprehensible statement containing relevant information on the incident, the persons involved and any potential or actual consequences (e.g. regulatory measures).





#### 5.4 AUDITS AND INSPECTIONS

Kotányi reserves the right to verify compliance with this Code of Conduct. Business partners undertake to provide transparent information on request and, where necessary, to allow on-site inspections of their own premises.

In the context of such reviews, business partners shall grant access to relevant records and documentation to the extent necessary to assess compliance with the provisions of this Code of Conduct. Kotányi may also commission independent third parties, such as auditors, to carry out these reviews.

Where subcontractors or other business partners are engaged to provide services, the business partner shall ensure that appropriate rights of inspection and access can also be granted to them.

#### 5.5 CONSEQUENCES OF BREACHES

Kotányi expects suppliers not to engage in any conduct that contravenes the principles of the Code of Conduct for Suppliers. Compliance with these requirements forms the basis of every supply agreement and is an integral part of all supplier contracts.

Any breach of the principles set out in the Code of Conduct for Suppliers shall be regarded as a material breach of the business relationship and shall entitle Kotányi to terminate a contract or business relationship without notice, subject to the setting of a reasonable period for the implementation of remedial measures.





**Kotányi GmbH**  
Johann Galler Straße 11  
A-2120 Wolkersdorf im Weinviertel  
T +43 (0) 2245 | 53 00-0  
[info@kotanyi.com](mailto:info@kotanyi.com)  
[www.kotanyi.com](http://www.kotanyi.com)