



**SEIBERSDORF LABOR GMBH**

# CODE OF CONDUCT

Version 1.0

June 2014

# 1 PRINCIPLES

Under the Seibersdorf Labor GmbH Code of Conduct all company employees must display the utmost integrity in all activities, both in business dealings with customers, suppliers and other partners and within the company with colleagues and line managers.

Faultless conduct forms the basis of our reputation and therefore also our commercial success. Seibersdorf Labor GmbH makes every effort to be a reliable partner and takes its corporate responsibility very seriously. Our Code of Conduct represents the principles on which all of our business relationships are based.

It should be seen as a set of guidelines for our employees. It provides guidance in a concise and clear format and supports the team so that they may carry out their work independently on behalf of the company. Compliance with the principles of the Code of Conduct forms the basis for legally, morally and ethically faultless conduct in all business situations.

## 1.1 Compliance with the Law and Rules and Regulations

All Seibersdorf Labor GmbH employees must, without exception, comply with the law and rules and regulations in their company-related activities. They must ensure strict compliance with applicable laws and other applicable national and international regulations as well as relevant internal company guidelines and rules.

Our company observes applicable legislation on human rights, labor law, protection of employees, protection of minors and the ban on forced and child labor, as well as competition and anti-trust law, the ban on corruption, and obligations regarding data protection.

Compliance with the law and rules and regulations also includes fiscal law and other official regulations. We ensure that all due taxes, duties and social security contributions, etc. are paid on time and comply with the principles of proper book-keeping and accounting. Furthermore, we also obtain the necessary regulatory approvals for all of our activities, e.g., for all import and export business. Seibersdorf Labor GmbH also expects its counterparts to comply with such laws and rules and regulations in all business relationships.

It is a company requirement that all of our employees familiarize themselves with the legislation applicable to their specific area of work by consulting the relevant documents from Quality Management, and the company supports them in this with an extensive system of appointed officers. In the event of any uncertainties, the relevant line managers and/or competent professionals are available to offer advice. Our employees also receive regular internal training on legal regulations, guidelines and rules.

## 1.2 Respect, Diversity and Integrity

For Seibersdorf Labor GmbH, human rights, as laid down in the Charter of the United Nations and the European Convention on Human Rights, are fundamental values which must be taken into account and upheld in all company activities. We attach the utmost importance to human dignity, human rights including general personal rights and the right to privacy.

All employees must show mutual respect, recognition, appreciation and tolerance of each other, irrespective of gender, age, ethnic, national or social background, religion, ideology, sexual orientation, language, disability, political views and social or economic circumstances. Our company does not tolerate any form of discrimination and considers diversity amongst individual employees to be an asset. Diversity in our company is actively encouraged since the varied backgrounds of our employees increase creativity and mutual understanding, especially in terms of our international relationships.

This mutual respect also means that employees must refrain from any form of sexual harassment, such as inappropriate comments, gestures, advances or contact. Since it may be interpreted by someone else as sexual harassment, regardless of the intention in each case, employees are expected to refrain from such conduct at all times. The aforementioned principles apply both within the company and with regard to all external partners and we also expect our partners to comply with these principles in turn.

## 1.3 Social, Environmental and Economic Responsibility

Seibersdorf Labor GmbH is a socially, environmentally and economically responsible global company which is committed to sustainability and the protection of people and the environment.

### Social responsibility

Seibersdorf Labor GmbH is a company whose activities are based on the extensive expertise of its team. Our results and success are founded on the commitment, skills and cooperation of all of our employees. The company strives to create a working environment which guarantees optimum development of individuals' potential. Our company also supports employee work/life balance with flexible working time models and flextime to accommodate a range of different circumstances, and enables employees to reconcile their family and career by providing various additional services (e.g., our childcare offers).

Compliance with regulations on the protection of minors and the rejection of child and forced labor also form part of our indispensable basic principles. Seibersdorf Labor GmbH takes social responsibility very seriously, providing apprenticeships and internships as well as contracting for undergraduate and postgraduate students.

Seibersdorf Labor GmbH also expects its customers, suppliers and partners to show the same awareness toward social responsibility.

### Environmental responsibility

Sustainability and environmental management are the essential building blocks of environmental responsibility at our company. Seibersdorf Labor GmbH ensures compliance with legal environmental protection standards and strives to minimize environmental impacts and to continually improve the company's environmental protection measures.

We aim to procure and use any resources required to provide our products and services in a responsible manner and to use energy, water and raw materials sparingly. Environmental responsibility also encompasses proper environmentally-friendly waste disposal, waste separation and delivery of waste to the various recycling or recovery channels.

### Economic responsibility

The economical, appropriate, sustainable and frugal use of the means and resources that we obtain form the essential building blocks of our company's economic responsibility.

Business decisions at Seibersdorf Labor GmbH are made exclusively based on comprehensible, factual and economic arguments.

Seibersdorf Labor GmbH employs a results-focused approach and uses synergies wherever possible. Long-term, strategic thinking enables us to improve the company's performance potential and secure it from an economic perspective.

Seibersdorf Labor GmbH is committed to fair and impartial competition and makes decisions based on criteria made available in advance and in compliance with legal provisions and standards. Orders are placed based on the best and lowest bidder principle, employing an appropriate performance/price ratio.

## 1.4 Health, Safety and Security

Seibersdorf Labor GmbH operates in many highly sensitive areas of life and business within modern society. We support our clients with knowledge and technology and ensure that products and services meet current health and safety, environmental and quality guidelines. Our company is also an active service provider in the field of employee protection. Our experts sit on international committees helping to continually develop health, safety and security standards in terms of plant and occupational safety.

As a matter of course we also pay careful attention within our own company to ensure that the working environment is free from danger and hazards. We ensure strict compliance with the laws and regulations on health and safety in the workplace and conduct regular checks to that end. As such, we have in place an extensive network of appointed officers in our quality management system.

Our site has a medical service to safeguard the occupational health of our employees. It conducts the examinations required by law and also provides all new team members with the opportunity to undergo a medical examination on joining the company. All of our business areas have a number of first aiders. There is also a Red Cross unit and a company fire department at our premises.

## 2 BUSINESS CONDUCT

### 2.1 Competition

Transparent, fair conduct in the marketplace is in everyone's interest. In order for us to maintain our own image as a reliable and responsible partner, Seibersdorf Labor GmbH employees are obliged to comply with rules on fair competition and firmly stand up against any illegal attempts to influence the market or restrict free competition and any breaches of competition and antitrust law.

This includes the principle that the interests of the company must be kept strictly separate from the personal interests of employees involved in all business matters. In particular, Seibersdorf Labor GmbH stipulates that the following guidelines must be observed in terms of conduct with regard to corporate competition:

- Agreements with competitors on market behavior, e.g., agreements on prices, capacity, market sharing or boycotts with regard to third parties, are forbidden
- Unfair commercial practices, such as exerting direct or indirect pressure over customers, suppliers or other partners, are forbidden
- Exchanging information with competitors, for example about prices, conditions, capacity, costs or similar confidential data, is forbidden
- Industrial espionage is forbidden
- Distributing information which is known to be incorrect (e.g., via competitors) is forbidden

All of these guidelines also apply in full to work carried out in and on national or international associations, committees, lobby groups and similar bodies.

### 2.2 Corruption and the Acceptance of Benefits

Seibersdorf Labor GmbH employees are obliged to firmly stand up against any form of corruption, bribery and acceptance of benefits. They are strictly forbidden from directly or indirectly accepting or offering money, non-monetary benefits (e.g., invitations) or other benefits (e.g., purchasing opportunities with special conditions) in order to influence business processes (e.g., in connection with the award and/or preparation and handling of contracts and the acquisition and execution of projects). Any activities or statements that could cast doubt over this approach are forbidden.

Seibersdorf Labor GmbH employees must make it clear to third parties that they cannot be influenced or corrupted by personal advantages and that they do not intend to influence or corrupt others. In the case of doubt, our employees must also refuse to accept and/or must return low-value tokens of appreciation and also politely but firmly turn down hospitality and/or insist on splitting the bill in the case of business meals. Seibersdorf Labor GmbH employees may make allowances for local, country-specific customs, e.g., in terms of hospitality, after giving them careful consideration.

Our company also has clear internal rules on donations and sponsorship. Seibersdorf Labor GmbH does not make donations to political parties, individuals, profit-oriented organizations or groups whose aims are at odds with our company principles under any circumstances. All sponsorship is carried out transparently by means of a written contract and exclusively for business purposes, ensuring that there is an appropriate relationship between the service provided and the service received in return.

Seibersdorf Labor GmbH also expects its counterpart in each case to clearly refrain from corruption and bribery and any such related behavior.

### 2.3 Conflicts of Interest

As part of their work, Seibersdorf Labor GmbH employees may find that their economic or other personal interests conflict with the interests of the company.

In order to minimize the risk of such conflicts of interest, all company employees are obliged to report any existing or potential conflict of interest to their line manager or other relevant focal point when it arises and/or is foreseeable. Conflicts of interest may arise on account of the following circumstances, inter alia:

- Secondary employment
- Involvement of a team member in the company of a customer, supplier or partner or a rival company of Seibersdorf Labor GmbH
- Involvement of a relative or other person with close connections to an employee in any of the examples mentioned above
- Relative or other person with close connections to an employee who is authorized to make a decision or able to influence a decision as a representative of the opposite party in commercial transactions

Where appropriate, Seibersdorf Labor GmbH will find suitable measures in cooperation with the individual(s) concerned in order to avoid or rectify conflicts of interest for all those involved.

## 3 HANDLING OF INFORMATION

### 3.1 Confidentiality and Non-disclosure

As part of its extensive accreditations and certifications, Seibersdorf Labor GmbH must give special consideration to confidentiality and non-disclosure. All employees are obliged to conduct themselves appropriately with regard to all commercial information which they come across as part of their professional work, irrespective of the actual source of the information. In this context, information is understood to mean project, company and/or group-related data of any kind (in particular research and development and know-how) but also concerning the company's strategies, targets and investments.

An appropriate declaration of commitment forms part of the employment contract. When employees join Seibersdorf Labor GmbH they must also sign a non-disclosure agreement.

The company is also bound by a range of confidentiality agreements to protect and handle confidential information belonging to its customers, suppliers and partners, which it comes across as part of its business relationships, in a responsible manner. Where information needs to be disclosed for business purposes, Seibersdorf Labor GmbH ensures that extreme care is taken to keep the group of individuals involved as small as possible.

The protection of information (data or know-how) is a top priority for Seibersdorf Labor GmbH, irrespective of the existence of registered industrial property rights or other intellectual property rights. This also applies in particular to know-how and intellectual property rights and hence the sphere of ownership of customers, suppliers and partners. Seibersdorf Labor GmbH requires its counterparts to take the same cautious approach to confidentiality and non-disclosure and actively requests corresponding declarations of commitment.

In addition to their confidentiality and non-disclosure obligations, Seibersdorf Labor GmbH employees are also expressly forbidden from personally benefiting from information which they obtain as part of their professional work and from using that information for the interests of third parties.

### 3.2 Data Security

Seibersdorf Labor GmbH employees are obliged to protect company-related documents of all kinds (texts, drawings, plans, images, etc.) from being accessed by unauthorized third parties, whether hardcopies (originals or copies) or electronic files. When using IT systems, suitable security measures are taken (e.g., passwords, licensed software, technology released exclusively for internal use) in order to ensure that the saved data is protected. Our company's IT maintains high security standards using state-of-the-art technology. All documents in electronic file format are stored on the company's central server for safekeeping.

Should documents (hardcopies or electronic files) be taken off company premises for business purposes (e.g., for meetings), all necessary measures are taken to ensure that unauthorized individuals cannot access the documents and that the data (e.g., personal data) cannot be lost or stolen.

### 3.3 Data Protection

Seibersdorf Labor GmbH is wholeheartedly committed to complying with the Data Protection Act (DSG 2000 in its current applicable format). Work with and disclosure of personal data, both within the company and in cooperation with external parties, is permitted solely within the confines of the law. Personal data is only ever obtained, processed and used for clearly defined purposes and solely where necessary in relation to those purposes. Any data obtained is stored securely and transferred exclusively in accordance with the necessary precautionary measures (e.g., when it needs to be sent out).

Our data applications are transparent for all parties concerned, and their rights (right to information and right of objection, as well as the right to block or delete the data) are protected. Our respect for individuals' privacy requires us to handle personal data conscientiously. The right to informational self-determination is protected under all circumstances, both in terms of our partners and our own team.

Appropriate security measures have been implemented as part of our quality management procedure to prevent any misuse of data.

### **3.4 Communications**

Seibersdorf Labor GmbH works closely with customers, suppliers and other partners. Trust and professionalism play an essential role in this. Swift, comprehensive and open communication is of utmost importance here. Our employees react quickly to queries and information from customers, suppliers and other partners either by providing them with an immediate response or by confirming receipt and processing it at a later date or forwarding it to the relevant person(s). Our team also keeps customers, suppliers and partners informed in long-term projects with regular status updates. They immediately report any delays, whether foreseeable or not.

### **3.5 IT Usage**

When using IT, all of our employees strive to minimize risks by complying with the company's internal IT guidelines and security regulations. All IT devices must be appropriately stored and password-protected. Only essential data should be carried on business trips. Personal passwords are not disclosed to other team members or third parties. In the event that an employee stands in for another employee, clear rules are followed and documented. In the event that company data or data belonging to a partner is lost or stolen, line managers or other responsible persons are immediately informed, who subsequently take further measures (e.g., blocking passwords, informing the partner concerned, etc.).

## 4 QUALITY

The quality of our work is assured by an array of accreditations and certifications that are subject to ongoing, strict monitoring by national and international agencies. The key element in terms of quality assurance within the company is the extensive set of rules in place for our quality management system. It covers and regulates all major work process and procedures.

Seibersdorf Labor GmbH employees carry great responsibility as the quality and reliability of our work has a direct impact on people, the environment and other companies. In our day-to-day operations, we therefore work in line with our core values of being knowledge-driven, quality-driven and customer-driven.

These core values describe our own image and form the basis of our actions: we are committed to achieving the highest level of knowledge, quality and customer service as a partner for the economy and society. In order to live up to these high standards, we adhere to the following quality principles:

- We strive to understand our clients' current and future requirements and to meet their needs and exceed their expectations wherever possible.
- Our senior managers create and maintain an internal environment in which our employees can apply themselves and their skills to benefit the company and ensure that the company's targets are achieved.
- We help the company to achieve its targets efficiently by systematically establishing, understanding, conducting and driving interdependent processes.
- The constant improvement of the company's overall performance represents one of our permanent goals.
- Key decisions are based on the analysis of data and information.

Health, employment and environmental protection form an integral part of our QM system.

All internal processes are continuously measured, analyzed and improved, right down to individual operating instructions. There are appointed officers for all company-specific issues, designated process managers for all processes and documentation is accessible via our intranet. This means that all employees can access the entire set of rules for our QM system at any time.

Our quality management is ISO 9001 certified in its current format.

Seibersdorf Labor GmbH has also been awarded the following certifications:

- Accredited testing center No. 312 as per EN ISO/IEC 17025
- Authorized calibration laboratory No. 554
- Accredited calibration center No. 612 (ÖKD-13)
- and numerous other certificates

With regard to the work for the above-mentioned testing center, calibration laboratory and calibration center, the employees involved are not provided with any instructions or direction. As such, management has no influence whatsoever over the content of the test and monitoring reports or evaluations.

## 5 ETHICS IN RESEARCH AND DEVELOPMENT

One of Seibersdorf Labor GmbH's core activities is research and development for a) maintaining the quality standards of our range of services and b) tailor-made solutions for our clients and partners. We are therefore committed to the highest standards in terms of research ethics. As such, our collective agreement contains a section entitled "ethics agreement".

The "Singapore Statement on Research Integrity" forms the basis of this. The principles and responsibilities set out in it represent international efforts to develop unified policies, guidelines and codes of conduct.

Honesty in all aspects of research, accountability in the conduct of research, professional courtesy and fairness in working with others, and good stewardship of research on behalf of others are the principles behind good scientific practice.

All Seibersdorf Labor GmbH employees who work in research and development must comply with the principles of the "Singapore Statement", which, in particular, cover the following important points amongst others:

- Integrity: We take responsibility for the trustworthiness of our research.
- Research methods: We employ appropriate research methods, base conclusions on critical analysis of the evidence and report findings and interpretations fully and objectively.
- Research records: We keep clear, accurate records of all research in ways that will allow verification and replication of our work by others.
- Authorship: We take responsibility for our contributions to all publications, reports and other representations of our research.
- Reporting irresponsible research practices: We report to the appropriate authorities (Austrian Agency for Research Integrity – ÖAWI) any suspected research misconduct, including fabrication, falsification or plagiarism.
- Societal considerations: We recognize that we have an ethical obligation to weigh societal benefits against risks inherent in our work.

## 6 OUR EXPECTATIONS OF OUR PARTNERS

Seibersdorf Labor GmbH is committed to adhering to the various points contained in this Code of Conduct in order to ensure corporate governance in accordance with the law, giving consideration to the ethical, moral, environmental and economic obligations of modern entrepreneurship. We also expect all of our customers, suppliers and other partners to behave in the same way.

They must abide by the following and other basic principles when working with Seibersdorf Labor GmbH:

- Compliance with the law and rules and regulations
- Rejection of corruption
- Fair competition
- Respect for human rights
- Ban on forced and child labor
- Safeguarding of health and employment protection
- Data protection and security
- Confidentiality and non-disclosure
- Environmental protection and sustainability

## 7 SUPPORT

This Code of Conduct provides an overview of our guidelines for proper business conduct. However, it may not always be sufficient for specific, individual cases. Seibersdorf Labor GmbH employees must therefore always contact their line manager or management for support if they have any questions, problems or doubts.

Examining controversial or ambiguous cases by discussing them and exchanging experiences helps us to constantly improve our underlying internal guidelines.

## Contact

**Seibersdorf Labor GmbH**

A-2444 Seibersdorf

[www.seibersdorf-laboratories.at](http://www.seibersdorf-laboratories.at)

Fax: +43 (0) 50550 2502

**Dr. Martina Schwaiger**

Managing Director

+43 (0) 50550 2501

[martina.schwaiger@seibersdorf-laboratories.at](mailto:martina.schwaiger@seibersdorf-laboratories.at)