

**RADEL & HAHN HOLDING GESMBH
CODE OF CONDUCT (EN Version)
01.01.2019**

Introduction

Reliability, honesty, respect and trust are the key values of Radel & Hahn which are also presented in our Vision. We are committed to respect and meet the expectations of all parties interested or involved and conduct business in a responsible and sustainable way.

We put great emphasis in providing high standard work conditions and ensuring a professional development of our employees and partnerships. Therefore we focus on working with the most-advanced technologies ensuring high quality products and services for our clients and a long-term employment.

The fulfillment of our values and regulations according with the law are the foundation for our suppliers and employees. To ensure that involved parties know their duties - our high standards, ethical principals and values have to be defined. We therefore established a Code of Conduct to ensure that the requirements and expectations are met.

Purpose of the Code of Conduct is it to

- promote a cooperative workplace and prevent conflicts of interest
- promote efficient and high quality work
- support to make right decisions based on our values and within the regulations of the law
- protect users and contribute to human dignity

Our goal is it to achieve beneficial supplier relationship built on common values. Our code defines the behaviour we expect from our partners and employees and applies to all parties involved especially suppliers and employees of Radel & Hahn.

The Code of Conduct is based on the Universal Declaration of Human Rights, the Convention for Civil and Political Rights, the Convention for Economic, Social and Cultural Rights, the eight Core Conventions of the International Labour Organisation (ILO) and if relevant other applicable UN and ILO conventions. The Code establishes a set of minimum standards and applies the principle that businesses have a responsibility to respect human rights, i.e. that they must avoid infringing on the rights of individuals and therefore exercise appropriate due diligence.

It is an additional written document that may not replace a natural human common sense.

No.		English
2.		
3.		
3.1.	Company details	Name: Radel&Hahn Holding GesmbH <ul style="list-style-type: none"> o Head office: AT- Wiener Strasse 22, 7210 Mattersburg o Phone number: +43 26 26 62744 o E-Mail: office@radel-hahn.at o Website: www.radel-hahn.com o Establishment: 1972
3.2.	Government of the Company Organisation	Radel&Hahn Holding is a passive non-financial entity with the main activity to support, observe and develop the subsidiaries. The operating companies plan, manufacture, install and service complete building technologies - heating, air ventilation and cooling technology systems. <ul style="list-style-type: none"> o Member's meeting is the supreme body of the company. The competence of the Member's meeting includes handling issues related to the company's course. o Supervisory board supervises the company's general course taking account of the interest of all stakeholders. o Auditor verifies the accounts of the company, assists the Supervisory board and the Member's meeting. o Trade union protects the interest of the union members. The members of the Trade union are the employees. o Compliance Officer is responsible for the effective implementation of the code of conduct. The Compliance Officer has the competence to adjust phrases of the code of conduct, identify risks regarding compliance, prescribe, implement methods for observation and if not respected to take measurements against breaches of the code of conduct.
4.		The Code of Conduct applies to all employees and suppliers of Radel & Hahn starting with 01.01.2018. The presented Code of Conduct was update 01.01.2019 in respect to the annual audits and reports.
5.		
5.1.	Compliances with the law, integrity	All our suppliers and employees are required to do their duties in full compliance with the laws and the internal company policies and values. Our suppliers are required to comply with all applicable laws and meeting the set high standards of our Supplier Code of conduct. Regulations in conflict with legal requirement do not take precedence over legal requirements.
5.2.	Duties, responsibility, innovation	All parties involved perform their duties to the best of their knowledge and may develop their professional skills and abilities to the extend needed. They are responsible for their activities and decisions and to accomplish their duties in an outstanding manner. We are open to acquire new knowledge and share knowledge among the company. We support each other to fulfil tasks, even if they are not directly in our scope of work.
5.5.	Confidentiality and data protection	We manage the confidential data whether it is relating to Radel & Hahn or our stakeholders carefully and take all necessary measure to protect it from being disclosed to any person who does not need or have right to that information in the course of their work. Our Privacy Policy describes the practices how we process the data, including collection, use, processing, transfer, storage or disclosure based on 2016/679 EU (GDPR). We respect the right to the protection of personal data and the right to the integrity in connection with processing of personal data.
5.6.	Reporting misconduct	Radel & Hahn believes that a strong ethical culture depends on creating an environment in which the employees are not afraid to report misconduct including suspected illegal or unethical conduct. We are committed to examine all reports and to take the necessary steps. Our employees and suppliers are also obligated to report all suspected or known misconduct. must be reported to the named compliance-officer and to the executive of the company. Involved parties have the possibility to addressee violations, complaints or suggestions anonym.
5.7.	No retaliation	Radel & Hahn does not tolerate any form of retaliation against employees for making good faith report of suspected or known misconduct or unethical behaviour. We expected the same behaviour from our suppliers. "Good faith report" is a report made with an honest and reasonable belief that the misconduct may have occurred.
5.8.	Auditing	Radel & Hahn reserves the right to monitor each supplier's compliance with our supplier Code of conduct. Our suppliers are obligated to collaborate with us by providing relevant information as requested. Furthermore we oblique our suppliers to evaluate their suppliers to ensure the compliance with our Supplier Code of conduct and if necessary by auditing the sub-suppliers if requested by Radel & Hahn. Any form of non-compliance must be rectified in an acceptable and timely manner at no additional cost. The breach of the Supplier Code of conduct may affect negatively the business relationship with Radel & Hahn including the possibility of termination of contract.

5.9.	Anti-corruption and anti-bribery	We are committed to conduct business with a high level of integrity and we do not tolerate any form of bribery or corruption including embezzlement, money laundering, kickbacks, extortion, fraud, nepotism (family) or cronyism (friends).
5.10.	Hospitality and gifts	We do not request, accept, offer, authorize or provide hospitality or gifts that may improperly influence - or create the appearance of improperly influencing - our business decisions, or decisions by our customers or others with whom we work. Each Radel & Hahn Unit has established a hospitality and gifts policy that outlines acceptable circumstances and monetary limits for hospitality and gifts.
5.11.	Fair competition	We believe that fair competition benefits Radel & Hahn, our stakeholders and society as it promotes efficiency and innovation that are the basis of a well-functioning market economy. We are committed to fair competition and do not tolerate any violation of antitrust laws, competition laws or related regulations.
5.12.	Employee discipline	Any form of violence including acts of abuse, harassment, sexual harassment, physically or emotionally detrimental behaviour must not be used. Financial penalty or compensation can be imposed if these are allowed by the national law or the collective agreement. In addition the personal accountability must be unequivocally proved. Allowance in connection with the production value or the performance is not allowed. The maximum amount of the allowance is limited to the extent that the net salary covers the living cost and it cannot be less than the national minimum wage.
6.		
6.1.	Commitment, reliability, loyalty	Any form of customer agreements have to be clear and transparent. Any additional agreement has to be presentable. We are operation on a vendor relationship based strategy. We evaluate our suppliers constantly and select them based on a competitive wide range of factors such as price, quality, reliability and service.
6.2.	Cooperation, computability, motivation,	To meet our common purpose and values we are eager to maintain a cooperative surrounding and aim for a respectful, objective and service-oriented communication among our teams as well as an open-mindset regarding knowledge and collective problem-solving of conflicts.
6.3.	General requirements	All employees are obligated to be mentally and physically fit for work and to remain fit while on duty. While on duty, they may not be under the influence of alcohol or any drugs that impair their ability to perform their work safely and efficiently. They are required to comply the working hours regulations.
		Every employee is required to handle the property and assets of the company with due care and to protect the property that are in use. They are also expected to contribute to the good reputation of our company by displaying good conduct. All our employees must be well-mannered and considerate.
		They are obligated to do their duties in full compliance with the health and safety regulations and with other internal regulations.
		The employees must endeavour to keep their knowledge affecting their work updated. They must be able to follow the changes and to put it into practice. They are also expected to acquire the recent professional knowledge and to develop their skills and abilities.
		They are required to avoid personal remarks, abusive words, false accusation and slander. Show respect for others' right.
		Their outward appearance and dress must be appropriate and clean avoiding extremes. They are expected to keep order with a view to protecting their colleagues' health and safety and to preserving the living environment.
		Perform their duties to the best of their knowledge. Show respect for others and enhance the mutual trust. They are supposed to display self-control avoiding unnecessary violence and hot-tempered behaviour. They are expected to not get their colleagues and managers into an awkward situation.
7.		
	a)	while on duty they must endeavour to maintain the cooperative working relation, to take into account others' and the company's interest, to look for common solution to the issues and to avoid the conflicts;
	b)	they are expected to show respect and esteem for each other, to maintain the good labour relations;
	c)	They are expected to resolve their problems connected with their work or conduct in a timely and appropriate manner. If it is needed ask their manager's help to reach common solution;
	d)	do not claim privileges or benefits, these offers must be refused;
	e)	They are supposed to take account of protecting one another's good reputation. The false accusation against a colleague must be rejected;
	f)	They are expected to take the responsibility for making bad decision and to do their best to find the best solution. They are supposed to respond to the rightful criticism given by their colleagues and managers in an appropriate manner;
	g)	Endeavour to collaborate with each other. They are expected to promote the adaptation of the new employees;
	h)	they are expected to comply the agreements between each other;
	i)	they are expected to ensure the necessary information in a timely and appropriate manner;
	j)	They are expected to do their best to meet the common purpose and to perform their duties more effective. Eliminate the unnecessary competition or rivalry between each other. Put their focus on the cooperation with one another.
8.		
	a)	facing difficulties while on duty they are supposed to rely on their managers' experience by requesting their assistance or advice;
	b)	during the discussion they are expected to be genuine and clear;
	c)	they are expected to contribute the success of the discussion by doing the best of their knowledge;
	d)	While monitoring the work the managers and auditors must be fully informed.
9.		
		Principles of the performance evaluation
	a)	The monitoring, the incentive and the rewards must be consistent, realistic and fair. The performance evaluation must be objective. The goal of the evaluation is to promote the development and the effective work. It must be reported in person;
	b)	The managers are required to use consistent assessment system. The evaluation must focus on the work and not on the person.
10.		
	a)	we do not tolerate any form of discrimination such as race (including colour, descent, national or ethnic origin); family responsibilities; political or religious conviction,
	b)	we are expected to support the new colleague by providing all information to the extent necessary for the performance of his duties that promote the his integration;
	c)	we are expected to help the new employee to become acquainted with his duties and the working process
	d)	the employment must be terminated in a peaceful way;
	e)	We endeavour to maintain good relations with our employees after retirement in such a way that does not undermine the interest of the company.
11.		
		For the purpose of the Code of Conduct the leader/manager is that person who – doing his duty – manages other employees' work regardless exercising employer's right.
		The leader/manager is authorized to exercise control over another, to make decision on the working process. He has more significant influence over the company.
		Our leaders/managers endeavour to collaborate with their colleagues and to build and maintain good relations with them. They are required to be full compliance with the laws and the internal regulations. They are also expected to develop their skills and abilities thus contributing to meet our purposes.
		Since the leader/manager has power to control another he must apply higher standards.

	11.1.	Duties:
	a)	he/she must be a model for others by demonstrating loyalty for the company
	b)	he/she is required not to abuse his power in order to obtain advantages or other benefits
	c)	He/she is obligated to comply the laws and requirements (tax laws, accounting laws, and labour laws) according to the Code of Conduct.
	11.2.	The manager is responsible for:
	a)	the work,
	b)	efficiency
	c)	ensuring the working conditions
	d)	ensuring the employee development
	11.3.	Apart from his duties the manager is responsible for
		Exercising his power including defining the duties, supervising the performance he is not allowed to violate the personality rights and to force another to do such work that endangers directly or indirectly their health and physical safety.
12.		
		Managers and supervisors must:
	a)	always use a tone that is suitable for maintaining the authority of the manager, but does not violate the dignity and self-esteem of his subordinates;
	b)	have an open, patient and understanding attitude against their colleagues in case of human problems, signals, and suggestions;
	c)	Protect their employees and the organization that he/she manages from unfounded accusations, slander; In case of accused employees, specify the possibility of defences.
	d)	Act with sufficient tact, compassion and care in resolving workplace problems and conflicts, but with determination without any delay.
13.		
		Radel & Hahn pays special attention to creating and maintaining conditions that do not endanger health and safety. We ensure this by providing protective equipment, occupational safety training and maintaining a healthy working environment. We ensure the obligations of employees covered by the occupational safety regulations and review and monitor working conditions on a regular basis.
		We care about our people and the people affected by our workplaces, and we continuously strive to develop a work environment that promotes health, safety and well-being. We aim to lead our industry in health and safety performance, with continuous, measurable improvements toward our goal of an injury-free environment. We promote and share sound personal safety and accident prevention practices with our supply chain and throughout our industry.
	13.1. Safety Regulations and personal protective equipment	All employees are required to comply with the provisions of the Occupational Safety Regulations and the knowledge acquired what they get within the framework of occupational safety trainings. All employees must do their work in way that their own and others physical integrity and health are not compromised. The intended use of the protective equipment provided for in the Occupational Safety Regulations during the work is compulsory. All employees should immediately inform their immediate supervisor of the loss of, or failure of these equipment, so that the company can provide for the replacement of these devices. In addition to the regulations contained in our Company's policies, compliance with the rules set by our partners and the use of protective equipment provided or prescribed by us is compulsory.
	13.1.2. Protection of property, assets and equipment	We safeguard and protect our assets from damage, theft, loss and misuse, as they are essential to our business. Assets are either tangible or intangible. Examples of tangible assets are raw materials, money, products, machines and equipment, computers and real estate. Examples of intangible assets are our brand, patents, trademarks, know-hows', trade secrets and copyrights.
	13.2. Health regulations	Employees should take care of their own health, and do everything according to their own decision and medical prescriptions to prevent diseases. Besides maintaining a healthy lifestyle, the employee should appear in the prescribed medical examinations and take medicines only for medical advice and consume the amount prescribed by the doctor. In case of regular use of medicament, the employee is obliged to get information from the doctor about the effects of the medicament on the body and driving. The use of any drugs and doping agents is prohibited!
	13.3. Corporate Social Responsibility & Environment protection	We are aware on our social responsibility towards the public, the environment and all parties involved. We are committed to embrace our social duty and contribute to a sustainable environment by improving the environmental performance of our operations, products and services throughout their entire life-cycle. Paying careful attention to our processes, materials, waste, water retention system, emissions, water usage, aso. All parties involved are obliged to follow the national environmental protection rules and regulations and ensure the reduction and prevention of negative environmental impacts.
		Our suppliers are obliged to ensure the following:
		- chemicals management;
		- management of hazardous waste;
		- Environmental pollution prevention.
		All our employees and suppliers are expected to improve gradually their performance in the following:
		- to limit the waste and the environmental pollutant;
		- to promote the reutilisation, recycling and recovery;
		- To use green technology.
	13.4. Conflict of interest	When acting as a representative of an employer or other party, we all are responsible for making decisions in the best interest of that employer or party without regard for personal gain. Conflicts of interest can be rooted in hospitality and entertainment, gifts, charitable contributions, political contributions, sponsorships and close personal relationships. Radel & Hahn strives to operate in a manner in which conflicts of interests are actively avoided, and we require our supply chain to do the same.
14.		
		The Process Introduction for the enforcement of the norms established by the Code of Conduct based on the applicable legal background – should be published as an annex to this Code of Conduct. The code of conduct shall be reported official to all parties involved especially addressing existing and new employees as well as our suppliers. Furthermore we establish a specific code of conduct for internal use only and a specific supplier code of conduct.