

# Anton Paar Group

## Business Code of Conduct



The **Anton Paar Group Business Code of Conduct** serves as a binding guideline for all employees and managers of the Anton Paar Group. The current version of this document can be accessed at any time on the website or the intranet.

### Management statement

The Anton Paar Group offers its employees interesting, long-term, and secure jobs in which they can develop their talents and abilities. We want to be a reliable, competent, and pleasant partner for our customers and business partners. Not only do we want to live up to their expectations, but we also want to positively surprise them with our actual performance and behavior. We feel responsible for society and contribute to the common good. Solidarity and subsidiarity represent important cornerstones for our actions.

Graz, November 25, 2024

A handwritten signature in black ink, reading "Dr. Friedrich Santner". The signature is fluid and cursive, with a large, stylized "D" at the beginning.

Friedrich Santner  
Chairman of the Management Board of Anton Paar Group AG

## **Our responsibility for a future worth living**

The Anton Paar Group stands for innovation and integrity and is committed to acting responsibly in all areas at all times. The **Anton Paar Group Business Code of Conduct** ("Code of Conduct for Employees") is the statement of our basic understanding of compliance with legal regulations and our principles for ensuring transparent and morally responsible business conduct. Our Code of Conduct is a binding guideline for all our employees.

Every employee must be aware that violations of the law and unlawful or non-conformant behavior can have far-reaching consequences and may even be relevant under criminal law.

Our Business Code of Conduct underlines our ambition to be a leader not only in technological terms, but also in our ecological, ethical and social commitment. The following principles, in addition to compliance with legal requirements, are the foundation on which we build our business relationships in order to create a future worth living together.

The Business Code of Conduct was created based on international conventions such as the Universal Declaration of Human Rights (UDHR), the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the UN Guiding Principles on Business and Human Rights (UNGPR) and the International Labour Organization's (ILO) international labor standards.

## **Our responsibility towards whistleblowers | Anton Paar Whistleblowing System**

Our Code of Conduct cannot cover all situations in our daily activities and actions. The principles described below are to be applied reasonably and adapted to the situation and local customs – but always within the legal framework. If deviations or irregularities with regard to applicable legal or contractual requirements and our principles come to light, these can be reported anonymously at any time via the [Anton Paar Whistleblowing System](#). Every report is carefully and consistently investigated. We protect the interests of whistleblowers, not only by having set up this secure reporting system, but also by promising to treat incoming reports confidentially and to protect whistleblowers acting in good faith against any disadvantages resulting from a report.

# **1 The Anton Paar Group takes responsibility**

## **... towards society in the context of business success.**

In 2003, the ownership structure changed and the Anton Paar Group AG was donated to the charitable Santner Foundation, which is the ultimate owner of all Anton Paar companies. The deed of foundation expressly stipulates that the donated assets cannot be sold: As a research-intensive company, we are actively helping to shape a future worth living.

A part of the annual profit of the Anton Paar Group AG is distributed to the foundation. The foundation itself exclusively supports charitable projects in research in the field of natural sciences and technology, as well as projects that serve to prevent and wean people off addiction.

The Anton Paar Group does not finance any political activities or parties.

Additionally, each individual company in the Anton Paar Group has the option of using part of the profit generated in the respective financial year for social purposes. These social purposes are either related to the purpose of the foundation or to another social cause.

**... by always complying with the applicable legal requirements.**

Our employees are committed to full compliance with the applicable laws. Knowledge of and compliance with the law is the responsibility of each subsidiary. Legal Services at the Anton Paar headquarters also provides support with questions in this regard.

External inquiries can be submitted directly to Legal Services ([legal@anton-paar.com](mailto:legal@anton-paar.com)). Internal inquiries on legal issues are answered using a ticketing system.

**... for protecting sensitive data and confidential company information at all times.**

The protection of personal data is a topic that is relevant for all activities of the company. The Anton Paar Group implements the legal requirements for the protection of the personal data of customers, interested parties, employees, applicants and business partners with unerring care and ensures compliance with them on an ongoing basis. In order to anchor this awareness among our employees, for example, regular training courses are held. In addition, relevant information on data protection and cyber security is distributed via internal channels and questions can also be put directly to the data protection officers ([dsgvo@anton-paar.com](mailto:dsgvo@anton-paar.com)) if required.

**... for the protection of human rights.**

We fully observe and respect universal human rights. Our commitment includes respect for the fundamental freedoms and dignity of our employees and other stakeholders who are or may be affected in any way by our business activities. We promote anti-discrimination, well-being and equality in the working environment. The rights of each individual are respected and safe working conditions are ensured.

**... for preventing all forms of child labor, forced labor, compulsory labor, slavery and activities related to human trafficking.**

Any form of child labor, forced labor, compulsory labor, slavery or activities related to human trafficking will not be tolerated within our own operations or in our upstream or downstream value chain.

We comply with applicable labor laws. All employees do their work of their own free will and can also terminate their employment at any time – in compliance with legal requirements. As young talents, our apprentices and interns are under special protection (e.g., minimum age, working hours, breaks, age-appropriate assignment of tasks and activities) and are also integrated into fixed work processes as full team members.

**... that our employees are offered an interesting, long-term and secure employment relationship with fair pay.**

Our employees are the key to success and job security is part of our corporate culture. We therefore want to give our employees a meaningful job in which they can contribute and develop their skills. We comply with the respective legal requirements without exception.

All benefits and other important information about the individual companies of the Anton Paar Group are presented transparently on the website.

**... that work and life are not mutually exclusive.**

As an employee-friendly company, it is particularly important that the working day can be easily reconciled with the respective life situation of the employees. For example, flexible working time models, year-round childcare in the company nursery and kindergarten (at the headquarters in Graz) and a wide range of health, sports and leisure programs are offered.

**... for enabling dialog on equal terms.**

All our employees are free to form employee representative bodies or join trade unions in accordance with local laws. In those companies with a works council installed, we value their commitment and build on trusting cooperation and fair, constructive and solution-oriented dialog. In addition, the right to freedom of expression, freedom of association, peaceful assembly and similar rights are respected without exception.

**... to conserve and protect resources and the environment for future generations.**

For an innovative, modern company like ours, resource conservation and environmental protection are integral components of our day-to-day activities and actions of all employees – in addition to the expansion of modern infrastructure for process optimization (e.g., photovoltaic systems, heat and water recovery systems, thermal refurbishment, automated building management systems, heat pumps, efficient cooling and heating systems) and the implementation of awareness-raising measures (e.g., employee training, travel allowances for the use of alternative means of transport). Great importance is placed on longevity when developing our products and we aim to minimize the amount of sample media for measurements. We strive to minimize the use of resources such as energy, water and materials and to reduce waste, air, soil and water pollution and greenhouse gas emissions.

To support these efforts a [certified management system](#) (e.g., ISO 14001, ISO 50001) is in place at some companies of the Anton Paar Group. Our environmental and energy policy serves as a guide for this.

**... for minimizing the use of hazardous substances and ensuring that they are handled safely.**

We strive to largely avoid or reduce the use of hazardous substances that could harm the health of our employees or the environment. Where there are currently no alternatives, we ensure that the legal requirements are met, personal protective equipment is worn and that the employees concerned are adequately trained. If our employees have any questions on these topics, they can contact the person responsible for occupational health and safety.

**... that required materials are sourced from reliable suppliers.**

We neither support nor tolerate the financing of armed conflicts or the violation of human rights in any form through our procurement activities. We therefore always strive to purchase responsibly sourced materials that do not contain minerals or metals from conflict and high-risk areas.

**... for strengthening and promoting the regions in which we operate.**

Regionality is deeply rooted in our corporate culture – we also strive for this in the regions and countries in which we have production sites or sales offices. We therefore procure goods and services from regional companies, wherever possible, in order to promote the region, shorten transportation routes and thus be able to react flexibly to changing needs.

**... for protecting people and business operations at all times.**

When hiring private or public security forces for our premises, we strive to ensure that the security personnel are adequately trained so that all employees and other affected parties (e.g., local residents, passers-by) are protected from violence.

**... for carefully examining transactions with our business partners.**

Our business relationships are built on integrity and trust. Nevertheless, we carefully examine every business relationship before entering into it. We do not support or tolerate money laundering or financing terrorism in the course of our business activities.

## 2 As employees, we are

**... responsible for the way we behave.**

Our behavior in the workplace and in other job-related situations, such as meetings, business trips, or events with a business background, has a direct impact on the image of our employees and that of the Anton Paar Group. Responsible and professional conduct in every work-related situation is self-evident for all of us.

**... appreciative of the diversity and the value-creating collaborative workplace environment.**

Everyone is different and that's a good thing. As an international company, we have colleagues from different cultural backgrounds with diverse experiences, skills and perspectives. We appreciate this diversity because it adds value to all employees as they work together, it impacts positively on the company as a whole, and it promotes innovation and creativity.

We strictly reject discrimination based on nationality, language, skin color, social background, religion, gender, age, physical or mental impairment/disability, sexual orientation or political views. This begins with the selection or hiring of new employees and continues with promotions, the distribution of work assignments and remuneration, where decisions are made exclusively on the basis of the respective position, qualifications and skills. In addition, as far as the activity allows, workplaces are set up and designed in such a way (e.g., accessibility) that the same opportunities are offered to everyone.

**... completely intolerant of disrespect, unequal treatment, personal threats or violence.**

Each of us should treat others with respect and should also be treated this way. In our company, there is no room for any kind of unequal or unfair treatment, personal threats, harassment, corporal punishment, mental or physical coercion, verbal abuse, bullying or violence. In addition, we respect the rights of minorities, vulnerable people and affected communities (e.g., local residents, indigenous people) and do not tolerate any activities related to unlawful evictions and deprivation of land, forests and water during acquisition and development.

**... curious and eager to learn in order to be able to cope with our daily activities.**

We know a lot, but never everything. Over time, due to different circumstances, areas of responsibility can change or new opportunities within the company can open up. It is important that the potential of our employees is used and their talents are promoted. Development paths are jointly defined between the manager and the employees in annual performance reviews in order to enable targeted education and training for existing tasks or internal reorientation.

**... aware of health and safety.**

When it comes to health and safety in the workplace, we have a clear objective: to prevent and avoid injuries and accidents at all costs. Therefore, we comply with the applicable laws on occupational safety in the respective countries. Internal directives, work instructions, notices and other documents provide a guideline and address aspects such as emergency response, incident and accident reporting, the correct use of personal protective equipment, fire protection, handling of chemicals, operating machines/equipment and workplace ergonomics.

In order to anchor this awareness among our employees, regular training courses are carried out tailored to the area/position. In addition, employees are continuously informed of important preventive protective measures (e.g., intranet, notices, management information, instructions).

External persons (in particular suppliers and service providers) working on our company premises are also instructed accordingly. Legal requirements and our policies must be complied.

**... mentally alert, without alcohol or drugs.**

Intoxicating substances, such as alcohol, drugs and some medication may lead to impairment and are thus incompatible with the working world of the Anton Paar Group. Employees who have been prescribed medication by their doctor, which may cause impairment, must inform their managers. In case of misuse, managers have a responsibility to take appropriate action and to provide assistance.

### 3 With regard to the company and its stakeholders, the employees are

**... committed to proper business accounting and financial management.**

All employees involved in accounting, controlling and treasury must work carefully, precisely, and transparently. Any transaction and reporting activity must be in full compliance with the legal requirements and other rules applicable to the Anton Paar Group.

**... aware of their responsibility to never defraud nor deliberately deceive.**

Fraudulent acts, deliberate deception or misrepresentation of facts or information are unacceptable to us.

**... never involved in a conflict of interest.**

Personal or financial interests can influence business decisions. It is therefore essential to act to the best of one's knowledge and belief. Possible conflicts of interest must be communicated and disclosed to the company. Any kind of secondary employment must immediately be reported to the management. Direct or indirect participation of any kind with customers, suppliers, or competition is not desirable. Individual cases are assessed to clarify the necessity and, if applicable, the possibility to eliminate any potential conflicts of interest.

**... called upon to protect the company's property/assets.**

The careful and diligent handling of infrastructure of all kinds, equipment, warehouse stocks, and liquid or otherwise invested funds is self-evident.

**... committed to protecting intellectual property and confidential information.**

We respect and never violate the intellectual property of others. Likewise, our employees are aware of their obligation not to divulge the intellectual property of the Anton Paar Group or internal confidential information to third parties whether intentionally or negligently.

**... paying attention to company processes and procedures as well as the associated documentation and recording obligations.**

As a global player, we need clear and consistent processes, procedures and structures to ensure that business activities are successfully performed. This is indispensable, not only for the successful management of the business, but also to ensure the company complies with numerous laws, regulations, standards, and requirements. Every employee is aware of, and committed to the processes, procedures, and regulations that apply to exercising their tasks, as well as the documentation, disclosure, and retention obligations of information media that apply in and for the company. This fundamental concept forms the basis for maintaining high quality levels for our customers as well as securing and creating jobs, and making resources available for investment.

## 4 With our customers, suppliers, the marketplace, and our competition, we are

**... particularly committed to ensuring product quality and safety.**

With the quality and high safety standards of our products and services, we can ensure that our customers enjoy the highest level of quality. Compliance with the standards, laws, and regulations related to our products and markets is an integral part of our business processes.

To support these efforts, a [certified management system](#) in accordance with ISO 9001 is in place at some companies of the Anton Paar Group.

**... a fair competitor.**

We stand for free and fair competition. We advocate and abide by the (local) laws (e.g., antitrust, monopoly, competition law, ...) since well-functioning, fair, and open markets ensure our business success based on the highest quality and performance. We reject any form of anti-competitive behavior, including cartels and monopolies.

**... incorruptible and determinedly opposed to bribery, corruption or other illegal practices.**

Our understanding of fairness and lawfulness leaves no room for bribery, fraud, or corruption. It is neither permitted to make such an offer to another party, approve it, or make or accept improper payments or compensations in whatever form or amount. Corruption or other illegal practices are not tolerated.

**... strict and uncompromising, wherever export controls and trade restrictions are in force.**

Responsible employees are aware that any violations of export controls, trade restrictions, and economic sanctions are serious offenses and can entail criminal consequences.

**... consistent and fair in our business relationships.**

We deal fairly with our suppliers, service providers and third parties and conduct ourselves honestly and transparently.

If we purchase individual components, we do so from qualified suppliers or service providers whose performance and quality we regularly monitor. We regard any violation of legal requirements and our principles as a significant impairment of the contractual relationship. In the event of suspected non-compliance, we reserve the right to demand information about the relevant facts. If our requirements are demonstrably not met or if improvement measures are not implemented after a reasonable period of time, a decision will be made on the commencement or continuation of the business relationship.