

# Anton Paar

## Business Code of Conduct



### Management Statement

The purpose of the Anton Paar Group is to provide employees with 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.

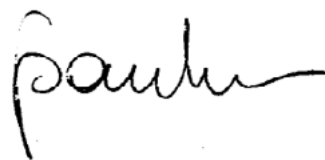
Graz, 06.03.2024



From right to left: Jakob Santner, Friedrich Santner, Dominik Santner



Jakob Santner, CTO



Friedrich Santner, CEO



Dominik Santner, COO

## Business Code of Conduct

The purpose of the Anton Paar Business Code of Conduct (behavioral code) is to demonstrate the company's basic understanding of compliance with legal provisions as well as transparent and ethical business conduct. For the effective implementation of compliance, not just business processes and corporate regulations are required, but so is a deeply rooted awareness and self-understanding on the part of all employees. The Anton Paar Business Code of Conduct is a binding guideline of conduct for all employees of the Anton Paar Group.

Every employee must be aware that violations of the law as well as unlawful or non-conformant behavior can have far-reaching consequences for Anton Paar as well as for them as individuals, which, in the worst case, can result in fines or even imprisonment.

A code of conduct can never cover all situations that an Anton Paar employee might face. The principles described below are to be applied with good sense and according to the local customs appropriate for the situation (but, nevertheless, always compliant with the law). If deviations from the behavioral rules are noted, the compliance office is available at any time: **[whistle.anton-paar.com](mailto:whistle.anton-paar.com)**

## 1 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 Anton Paar. Responsible and professional action in every job-related situation is self-evident for all of us.

### **... appreciative of the diversity and the value-creating, cooperative workplace environment**

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

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

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, bullying, or violence at work or in work-related situations. Employees are encouraged to report violations to the neutral compliance office: **[whistle.anton-paar.com](mailto:whistle.anton-paar.com)**

### **... aware of safety**

With regard to safety in the workplace, we have a clear goal: avoidance of damage or impairment to health. We all respect laws on workplace safety.

### **... mentally alert, with no alcohol or drugs**

Alcohol and drugs, and the effects they have, are incompatible with the working world of Anton Paar. Managers have a responsibility, in the event of misuse, to provide assistance and initiate a response.

## 2 With our customers, the marketplace, and our competition, we are ...

### **... one step ahead in terms of product quality and safety**

With the quality and high safety standards of our measuring instruments and services, we can make sure that our customers enjoy the highest level of quality. Compliance with the standards, laws, and regulations related to our instruments and markets is an integral part of our business processes. Since 1994, Anton Paar has successfully maintained a quality management system according to ISO 9001.

### **... a fair competitor**

Anton Paar stands for fair competition. We advocate and abide by the law since well-functioning, fair, and open markets ensure that our business success is based on the highest quality and performance.

### **... incorruptible and determinedly opposed to undue gifts and hospitality**

Our understanding of fairness and lawfulness leaves no room for bribery, fraud, or corruption. It is neither permitted to make any such offer to a partner in this regard, nor to approve it, nor to make or accept improper payments or compensations in whatever form or amount. Exceptions to this are usual business meals, such as lunches or small gifts from business partners, for example, customary gifts made in good taste before national/religious holidays or on personal occasions. Deviations from this regulation must always be reported to the direct superior or the neutral compliance office:  
**[whistle.anton-paar.com](mailto:whistle.anton-paar.com)**

### **... 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. They may result in high fines and a loss of business.

### **... consistent in our relationships with suppliers, service providers, and third parties**

We deal fairly with our business partners. We conduct ourselves honestly and transparently when drawing up contracts, setting prices, and invoicing. If we have to purchase individual components, we do so with qualified suppliers or service providers whose performance and quality we regularly monitor and control.

### 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 and controlling 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 and deliberate deception or misrepresentation of facts or information are unacceptable to Anton Paar. If an irregularity nevertheless occurs, it must be reported immediately to the direct superior or the neutral compliance office at **whistle.anton-paar.com**

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

Any kind of secondary employment must always be reported to the company through the management. A direct or indirect participation of any kind with customers, suppliers, or competition is not desirable. However, Anton Paar is prepared to examine individual cases in order to be able to clarify and, if necessary, 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 to ensure that all of this is protected against any damage, loss, or theft.

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

Anton Paar respects and never violates the intellectual property rights of others. Likewise, the employees are aware of their obligation not to divulge Anton Paar's intellectual property or internal confidential company information to third parties whether intentionally or unintentionally.

#### **... responsible in using the means of communication provided by the company**

In order to facilitate business transactions efficiently and successfully, Anton Paar provides comprehensive and modern means of communication. These include: e-mail, telephone and cell phones, chat systems, internet, intranet, and other IT resources needed for external and internal communication.

#### **... alert with regard to implementing company processes and procedures as well as the associated documentation and recording obligations**

Anton Paar, as a global player, needs 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 it is also necessary because the company must comply with a high number of laws, regulations, standards, and requirements. Every staff member is aware of, and committed to, the processes, procedures, and regulations that apply to exercising their tasks, as well as the documentation and retention obligations of information media that apply in and for the company. This fundamental idea is 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 regard to official/public institutions, applicable laws, and the general public, Anton Paar always behaves ...

### **... responsibly to preserve resources and the environment**

For an innovative, modern company like ours, sustainability and environmental protection are integral components of our day-to-day activities and the actions of all employees. The applicable environmental, energy, and resource conservation regulations must be respected and fully applied in every country where Anton Paar operates a subsidiary. At its sites in Austria and Germany, Anton Paar operates a certified environmental and energy management system in accordance with ISO 14001 and ISO 50001.

### **... with a view to the common good in the context of business success**

The assets of the Anton Paar GmbH were irrevocably gifted to the Charitable Santner Foundation in 2003. The deed of donation expressly stipulates that the donated assets cannot be sold. The biggest portion of the profits after tax are reinvested into the company – in line with the function of the foundation. A part is distributed to the foundation, which uses it to promote science for the common good and research in the areas of the natural sciences and technology as well as the prevention of drug and other dependencies, and support for withdrawal from drugs and other addictions.

Additionally, each company in the Anton Paar Group can steer up to 5 % of the previous year's profit (max. €50,000) into social causes. These must be aligned with the objectives of the Charitable Santner Foundation. Alternatively, each company can offer financial support for a personal, social-cause commitment on the part of an employee. The directors of each company report the specifics of such use at the Annual Shareholder Meetings.

### **... compliantly and acknowledges applicable law**

The employees of Anton Paar are committed to comprehensive compliance with the applicable laws, regulations, and practices of their corporate subsidiary. Knowledge of and compliance with the law is the responsibility of each subsidiary along with their local legal advisors. The Anton Paar corporate headquarters' Legal Services team can provide support in case of ambiguity or questions in this context.

[legal@anton-paar.com](mailto:legal@anton-paar.com) (external requests)

<https://jira.anton-paar.com/servicedesk/customer/portal/17> (internal requests)

### **... correctly with regard to data protection**

The protection of personal data is a topic that is relevant for all activities of the company. Anton Paar implements with unerring care the legal requirements and regulations for the protection of the personal data of customers, interested parties, employees, applicants, and business partners. We constantly monitor data protection compliance. For any questions, Anton Paar headquarters is available at: [dsgvo@anton-paar.com](mailto:dsgvo@anton-paar.com)