



CODE OF CONDUCT

A strong foundation for future growth

world of **wienerberger**





wienerberger

CODE OF CONDUCT

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*Message from our Managing Board,
the Supervisory Board, and the Works Council*



Introduction and purpose

Dear Colleagues, dear Business Partners,

wienerberger is perceived as an excellent, trust-worthy company. We share the vision of shaping the future with strong values – with trust, respect, passion and creativity as our driving forces we aim to advocate for people, our planet and solutions that make life easy and comfortable. The wienerberger Code of Conduct represents a binding guideline and sets out how each and every one of us should behave in our day-to-day business, acting in accordance with our guidelines. The wienerberger Code of Conduct therefore applies to the entire Wienerberger Group and to all our subsidiaries.

The principles laid down in the Code of Conduct are to ensure that we share a common understanding, demonstrate good judgement, and maintain high standards of ethics and integrity in our dealings with all our stakeholders. We expect the same behavior from our business partners, such as suppliers, contractors, and customers.

The wienerberger Managing Board, the Supervisory Board, and the Works Council fully support the ideas and guidelines of the Code of Conduct. We expect all employees and business partners to familiarize themselves with our binding Code and comply with each of its principles.





Chairman
Supervisory Board
Wienerberger AG



Chairman of the
Group Works Council
Wienerberger AG

We will continue to inform all our employees about the contents of the wienerberger Code of Conduct on an ongoing basis and also communicate its principles via various communication tools and through specific training. We would like to encourage all our employees and business partners to report potential violations or breaches of our Code of Conduct! Please report any reasonable suspicion of illegal activities or violations immediately as a witness. If you have any concerns or questions about how to proceed in a specific situation, we encourage you to raise them immediately at any time. We offer all employees several options for reporting, raising questions, or expressing their concerns either in writing or orally. Of course, you may also contact your supervisor at any time. If this is deemed inappropriate, you may make a report through an external, neutral whistleblowing service to communicate your concerns or questions.

If you so wish, you can submit your report anonymously. The whistleblowing service is operated by our external partner SeeHearSpeakUp. You can communicate with this service in your native language by phone, by e-mail, or via a web-based reporting service in all countries where

wienerberger operates. In addition, the wienerberger Whistleblowing Committee is available to you at any time. The Committee comprises wienerberger experts from Corporate Legal Services, Internal Audit, Corporate HR, and Corporate Secretary. All reports will be thoroughly investigated and treated confidentially (to the extent permitted by law) and in accordance with applicable legal requirements.

Our Code of Conduct clearly states that any misconduct will not be tolerated and that appropriate steps will be taken or sanctions imposed in the event of wrongdoing. wienerberger will not tolerate any discrimination or reprisal against anyone who raises concerns, asks questions, or reports suspected misconduct. We invite you to follow this path together with us and thus contribute toward upholding our corporate values and ensuring that wienerberger continues to be perceived as an excellent and trustworthy company.

Thank you very much!

Heimo Scheuch
CEO Wienerberger AG

Gerhard Hanke
CFO Wienerberger AG

Solveig Menard-Galli
COO East Wienerberger AG

Harald Schwarzmayr
COO West Wienerberger AG

Peter Steiner
Chairman of the
Supervisory Board

Gerhard Seban
Chairman of the
Group Works Council



Strong values to shape the future

wienerberger's success story is more than 200 years old. Since the beginning, we have committed ourselves to improving people's quality of life by producing first-class, innovative and ecological solutions, and to developing solutions for tomorrow which can be integrated into a recycling and/or reusable system, so that future generations have the same opportunities as we have today.

We want to shape the future together, with **respect, trust, passion** and **creativity**, and we want to make our contribution – on every continent, in every country, at every site, and across all fields of activity.

Trust
is the basis of
successful
human relations.

Trust grounds us

Trust is the basis wienerberger is built on. We encourage and support each other, and we believe in each other. This solidarity makes us stronger and motivates us in our daily work. Our trust in our skills and in our future ensures that we can manage even the biggest challenges.



Respect:
Show appreciation,
take on responsibility –
for humans and for
the environment.

Respect unites us

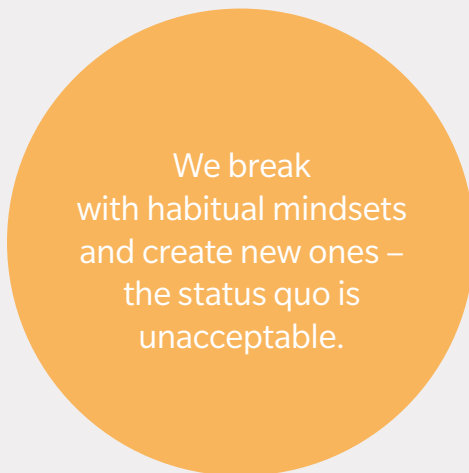
To us at wienerberger, respect means showing appreciation and taking on responsibility – for humans and for the environment. wienerberger respects and appreciates diversity. This enables all employees to authentically participate, and to give their best while feeling accepted and included.



Passion is the
engine which drives
our innovative power,
our growth, and our
development as
an international
organization.

Passion drives us

Passion is the engine which drives our innovative power, our growth, and our development as an international organization. We strive for exploiting our full potential, we are motivated in all our actions, and we think positively. We are committed and pursue our visions and goals in order to contribute significantly to overall success.



We break
with habitual mindsets
and create new ones –
the status quo is
unacceptable.

Creativity brings us to life

Creativity is a core resource for wienerberger, which determines our work. It opens up new perspectives and pushes us to find innovative solutions, and hence to contribute to a more sustainable way of life. With the courage to change things for the better, we leave well-trodden paths and look for new ways to shape the world of tomorrow.



Scope of application and use of this Code of Conduct

Who does it apply to?

wienerberger and its subsidiaries (hereinafter jointly "wienerberger") are committed to high standards of integrity and sustainability and have zero tolerance for unethical business behavior, such as bribery and corruption. We expect all our business partners (e.g. suppliers, dealers, agents) to adhere to similarly high standards and to conduct their business ethically.

This Code of Conduct (in short "Code") is a mandatory policy for all our employees, sub-contractors, and representatives of joint ventures in which wienerberger holds at least a 50% interest.

It has been drawn up to ensure the highest standards of integrity and business ethics. In addition, the Code must be brought to the attention of all our business partners.

All employees must complete mandatory online Code of Conduct training and sign off on it. These training sessions will be repeated on a yearly basis. All employees are expected to complete the Annual Certification confirming both that they are familiar with the Code of Conduct and have been informed of the action they should take if they become aware of any deviation from the principles set out in the Code.



How to use it?

The Code is not simply a list of procedures that must be followed at all times; it also requires employees to assess situations and take responsibility for their actions. We trust in your ability to make the right judgments, informed by the principles outlined in this Code. Please feel free to ask questions if you have any doubts and speak up if you feel that anything is wrong. Managers have the responsibility to not only comply with the Code, but also to foster a culture that reflects our principles. Managers should be particularly familiar with the Code and any additional policies, lead by example, and encourage compliance by others.

Why use it?

wienerberger is perceived as an excellent, trustworthy company to do business with. Our principles ensure that we show common sense and good judgement and adhere to high standards of ethics and integrity in all our dealings with stakeholders.

Our principles are not intended as an exhaustive list, but they address the essential areas. This Code provides an overview of how we work together, and builds upon our shared values.

Applicable laws and regulations as well as group guidelines and policies must be strictly adhered to. The commitment to comply with all national and international legal standards is a fundamental principle of the Wienerberger Group. The term "compliance" encompasses all instruments and measures designed to ensure that a company and its employees act in conformity with the law in respect of all legal provisions that specifically apply to the company.

What if you have a concern to report?

If you have a concern or detect a violation or breach of the wienerberger Code of Conduct, we encourage you to raise the issue at any time. In most cases, you can discuss it directly with your supervisor(s) or colleague(s) in HR. If this seems inappropriate, you can contact the wienerberger Whistleblowing Committee directly or make an anonymous report through the external whistleblowing service SeeHearSpeakUp.

The wienerberger Whistleblowing Committee comprises experts from Corporate Legal Services, Internal Audit, Corporate HR, and Corporate Secretary. The wienerberger Whistleblowing Committee thoroughly examines every report and treats it confidentially. Your identity will thus be protected to the extent permitted by law.

For matters that pose a risk to the interests of wienerberger or others, we would also like to refer to the wienerberger Whistleblowing Policy. While individual circumstances may vary, our Whistleblowing Policy ensures that all reported incidents are handled in a fair manner. Details on reporting, whistleblower protection, and wienerberger support are also described in our Whistleblowing Policy.

wienerberger does not tolerate any discrimination or reprisal against individuals who raise concerns, ask questions, or report suspected misconduct in good faith. All reports will be thoroughly investigated and treated confidentially (to the extent permitted by law) and in accordance with applicable legal requirements.

Sanctions in the event of misconduct

If, after an investigation of the information received the employee or business partner is found to be in breach or misconduct, this is likely to have serious consequences under employment legislation and/or further contractual consequences, depending on the severity of misconduct.



SeeHearSpeakUp



See something? Hear something? Speak up!

Are you aware of any illegal, unethical, or inappropriate behavior in your workplace?
Please report the matter in one of the following confidential ways:

- › Call the whistleblowing number of your country (toll-free)
- › Email to report@seehearspeakup.co.uk
- › Report online via seehearspeakup.co.uk/wienerberger

SeeHearSpeakUp is an external and independent whistleblowing service that allows you to report concerns anonymously – 24/7 and 365 days a year!

Austria	00800 9687 4357
Belgium	00800 9687 4357
Bosnia and Herzegovina	0800 83062
Bulgaria	00800 9687 4357
Canada	011 800 9687 4357
Croatia	0800 988 945
Czech Republik	00800 9687 4357
Denmark	00800 9687 4357
Estonia	8000 100718
Finland	990 800 9687 4357
France	00800 9687 4357
Germany	00800 9687 4357
Hungary	00800 9687 4357
India	000 800 1008 921
Ireland	00800 9687 4357
Italy	00800 9687 4357
Latvia	00800 9687 4357
Lithuania	880 030 165
Netherlands	00800 9687 4357
North Mazedonia	0800 80482
Norway	800 62 804
Poland	00800 9687 4357
Romania	0800 896 530
Serbia	0800 300 192
Slovakia	0800 606945
Slovenia	00800 9687 4357
Sweden	00800 9687 4357
Turkey	0800 6214 646
United Kingdom	0800 988 6818
United States	1 877 492 6399



Whistleblowing Service

SeeHearSpeakUp

What is the Whistleblowing Service?

wienerberger relies on the SeeHearSpeakUp service, an external and independent global whistleblowing service, which enables all employees to report matters immediately. SeeHearSpeakUp ensures that employees and business partners, such as customers, suppliers, or contractors, can report their concerns confidentially.

The SeeHearSpeakUp whistleblowing service is designed to help you report suspected misconduct in our company safely and through appropriate channels, and to ensure that your concerns are taken seriously without reprisal.

The SeeHearSpeakUp service assists the wienerberger Whistleblowing Committee in investigating any suspected illegal, unethical, or inappropriate conduct that has been detected, as well as suspected compliance policy violations, and in handling the complaint cases.

Speak up when something is wrong!

It is our responsibility to promote a corporate culture that reflects these principles. We conduct internal and external audits to review the effectiveness of our rules and guidelines and to initiate further improvements where necessary.

wienerberger therefore encourages all employees and business partners to report any potential compliance violation or suspected breach of our Code of Conduct! Speak up if something is wrong and report justified suspicions without delay.

Anonymity and discretion

The possibility of using the service anonymously and in full confidentiality is a key feature of the whistleblowing service. If important to you, your identity will be kept confidential during the investigation and not disclosed to superiors, third parties, or the persons referred to in your report. Your identity will be permanently protected and not disclosed at any time during the ongoing process. All reports will be thoroughly investigated and treated confidentially (to the extent permitted by law) and in accordance with applicable legal requirements. However, you can also reveal your identity when using the whistleblowing service. This will support the investigation process and enhance its efficiency.

What happens to your report?

Each report is verified by the wienerberger Whistleblowing Committee, which then takes the appropriate steps to investigate the event reported. The Whistleblowing Committee will ensure that all reports are investigated for possible violations. All inquiries and reports are treated confidentially in accordance with legal requirements, the wienerberger Code of Conduct, as well as further guidelines and policies, regardless of whether they are submitted by telephone, by email, or via the web-based reporting service of SeeHearSpeak-Up.

How do I submit a report?

There are three different ways to submit concerns and issues to SeeHearSpeakUp:

- › **Via a web-based reporting system**
seehearspeakup.co.uk/wienerberger
- › **By email to the following address**
report@seehearspeakup.co.uk
- › **Call the whistleblowing number of your country (toll-free)**



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EMPLOYEE AND EMPLOYER BEHAVIOR



WHAT IF ...

I see a colleague working without the correct Personal Protective Equipment (PPE)?

Approach the individual (if safe to do so) and explain the safety concern identified. Find out if the individual is aware of the local rules and seek line management assistance where needed.

I cannot find information about a specific Health and Safety topic?

Health & Safety information can be located in multiple ways, including weComm, Safety Portals, Notice Boards, or via your local H&S Advisor/Specialist.

I have an accident on site. What should I do?

wienerberger requires that ALL accidents are reported regardless of how severe they are. Accidents must be reported to site management at the earliest opportunity to prevent reoccurrence.

Local accident reporting procedures should be followed to ensure compliance with national standards and to classify accidents correctly (e.g., lost time accident, medical intervention, minor, etc.).

I see a hazardous situation in a production area. What should I do?

Everyone in our organization has a shared responsibility for safety. Regardless of your position, we expect all employees to take action if they see hazardous situations or have safety concerns. You should do what you can to rectify the situation and then report the problem so that a permanent solution can be found. For example, if you see a hose blocking a walkway, move it to the side and then report it to workers in the area. Don't just walk by – a hazardous situation is an accident waiting to happen.

I don't feel safe

STOP! ... report your safety concern to line management.

Reference: Health & Safety Policy; available on our website www.wienerberger.com



What we expect from our employees

Before you act, always ask yourself:

- ✓ Is this in line with wienerberger's values and principles?
- ✓ Would I feel comfortable if I had to explain my behavior?
- ✓ Would I or my supervisors be happy if it appeared on the news?

If you answer "no" to any of these questions, do not act and seek advice and guidance.

OCCUPATIONAL HEALTH & SAFETY

wienerberger considers the health, safety, and wellbeing of our employees and stakeholders to be the most important aspect within the organization. We are committed to providing a safe and healthy working environment. We recognize that high standards of health and safety require a continuous management focus, supported by both financial and physical resources.

Our way of working is always to put safety first, then quality, then productivity. We recognize that all sustainable businesses have good safety systems in place. Maintaining a safe working environment is one of our key company values. Safety helps us achieve high productivity and efficiency.

We are all responsible for safety. Our wienerberger Health and Safety Policy reflects the duty of our senior management to lead by example and their commitment to managing and reducing risk to the lowest practicable levels.

All employees, contractors, and third parties representing our organization are expected to follow the wienerberger Health & Safety Policy and to abide by our local Health & Safety rules.

wienerberger will deploy and maintain an effective Health & Safety Management System ensuring that the following critical safety standards are implemented:

ACCIDENT PREVENTION

We are convinced that all accidents are preventable. All employees have a responsibility to identify hazardous situations and take action to prevent accidents. Injury to any of our workers is unacceptable and preventable.

HOUSEKEEPING & 5S

We know that good housekeeping and 5S (Sort, Set in Order, Shine, Standardize, and Sustain) are crucial for the prevention of accidents. We take pride in our workplace by keeping it orderly and clean.

WORKING SAFELY

We insist that working responsibly is a condition of employment. We are all responsible for safety. We will not compromise our employees' safety and we always expect our employees to work in a safe manner.

BEHAVIOR

We build our safety culture by example. We know that the culture of an organization is influenced most strongly by its leaders. We are aware that our behavior will be copied by others and set high standards.

MAJOR RISKS

We recognize the need to manage risks which can cause life-changing injuries or result in death. All businesses are required to demonstrate proper management of the major risks and reduce them as far as reasonably practicable.



FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We ensure fair working conditions for all wienerberger employees.

We strongly believe in fostering an environment where every employee feels valued and respected. Our human resource management is based on the fundamental Conventions of the International Labour Organization. This includes ensuring that employees have the ability to freely express their thoughts, concerns, and ideas without fear of retaliation or discrimination.

Our commitment to treating employees fairly and without bias regardless of personal beliefs also extends

to recognizing and respecting freedom of association and the employee right to form groups or join any organization which shares the same beliefs or interests. However, we strongly commit to treating all employees equally, whether they are members of any employee association or not. Our suppliers and business partners are also expected to respect and follow these principles.



CHECKLIST

- ✓ Speak up and contact the local HR or Legal Department if you or your colleagues feel you are being treated unfairly.
- ✓ Speak up if you become aware of any restriction to the freedom of association.

Fair compensation

Our employees are a key factor for our success and development. Therefore, we strive to create fair working conditions, pay adequate and gender equal remuneration, avoid excessive working hours and enable flexible solutions to achieve a better work-life balance.

Employees will receive wages/salary and benefits for a normal working week at an amount that safeguards their livelihood, at a level that is comparable with similar jobs in the relevant trade or sector of industry in the region in which the work is performed. Employees will not be paid less than the minimum legal and/or standard rates. Under no circumstances will deductions be made from an employee's wage or salary without his or her explicit consent, unless such deductions (e.g., due to absence from work, recovery of unearned employment benefits) are permissible under national law.

FAIRNESS, DIVERSITY, AND INCLUSION

We are committed to providing equal opportunities to all our employees.

Diversity & equal opportunity

We are convinced that diverse teams deliver a better performance and therefore contribute to our company's success. The principles of wienerberger ensure equal rights and opportunities for all employees – from recruitment processes and training to career progression – regardless of age, gender, cultural background, religion, origin or other characteristics. We do not tolerate any kind of discrimination or harassment.



CHECKLIST

- ✓ Treat others with respect and dignity.
- ✓ Treat everyone fairly without regard to job title or level.
- ✓ Do not bully or discriminate and do not tolerate harassment, discrimination, or any other form of disrespect to others.
- ✓ If you see a colleague being bullied or experience disrespectful behavior towards yourself, speak to a supervisor.



Employee communication and dialogue

A culture of open communication, consistent engagement with our employees, and a motivating working environment are part of our corporate culture. Trust, respect, passion and creativity are the values we regard as particularly important in our relationship with and among our employees. We expect our managers to create an open and dynamic corporate culture among employees.



CHECKLIST

- ✓ Communicate in an open and constructive manner.
- ✓ Give and seek feedback proactively and respectfully.
- ✓ Speak to your supervisors about any concerns and find solutions together.



WHAT IF ...

My supervisor pressures me to work hours that exceed the legally permissible limits. What should I do?

We do not tolerate behavior that puts our employees under pressure to break the law and work to an extent that could be unhealthy. Please speak up and share your concerns with HR or the Legal Department.

One of my co-workers is making insulting, sexist remarks to one of our female co-workers. Should I say something?

Yes. If you feel comfortable doing so, ask your colleague to stop. If you prefer, you can talk to your supervisor or report the incident via our whistleblowing service SeeHearSpeakUp. Remember, we do not tolerate disrespectful behavior or harassment, and nor do we tolerate retaliation against any employee who reports a concern in good faith.

PROTECTION OF COMPANY ASSETS, INFORMATION, AND REPUTATION

All wienerberger employees are responsible for protecting company assets and information from loss, theft, or misuse.

Our physical and intellectual assets, and information and communication technologies are strategic resources. We expect our employees to see it as being in their own interest to protect our assets and the good reputation of the company.

Protection of wienerberger’s physical assets

Physical and electronic assets such as production facilities and equipment, materials, mobile devices, computers, and software, are provided by wienerberger. This is company property and every employee is personally responsible for carefully handling these assets. In section "2.3 Privacy, data protection regulation and cyber security" you will find further guidance on how to protect your IT equipment and data.

Damage to production facilities, equipment and materials must be reported to your supervisor. Damage, loss and theft of hardware must be reported immediately to your local IT department or whoever is responsible for IT. At the same time, a police report must be filed, and confirmation of the report must be submitted to IT.



CHECKLIST

- ✓ Do not allow external persons to access our company devices.
- ✓ Handle all our equipment and resources with care and protect them from theft.

References:

- EUG-00-IT End User Guideline
- EUG-01-IT End User Guideline/General IT Guideline; both available on our wienerberger intranet weComm

Protection of wienerberger’s intellectual property rights

The marketing and sales success of the wienerberger Group is largely dependent on the fact that the intellectual property rights used by Group companies are adequately protected against interference or theft by third parties. In addition, the public image of wienerberger depends to a large extent on the integrity of the industrial property rights protected for wienerberger (or a subsidiary). The unlawful use of such industrial property rights can lead to confusion, loss of sales and revenues, financial liability, and reputational damage.

Obtain appropriate legal advice at an early stage in any situation where intellectual property rights may be at issue, or patents and design or protection for patents, designs or registered trademarks is required. If you have any doubts or questions, please contact Corporate Legal Services or your local management.



CHECKLIST

- ✓ Protect wienerberger’s intellectual property, including the use of brand names, trade secrets, business plans, engineering ideas, databases, customer lists, copyrights, and patents. By doing so, you help wienerberger to protect this asset and to maintain our competitive advantage.

Reference: Guidelines for Industrial Property Rights; available on our wienerberger intranet weComm

Handling of corporate and third-party confidential information

Many employees will gain access to important information from the company or third parties, such as business partners. This information must be kept confidential. If you receive such information, it must not be disclosed, unless you are entitled to share such information with a particular third party for business reasons. In such case, a Confidentiality Agreement or a Non-Disclosure Agreement is frequently used.

Confidential information within the company (e.g., employee data) may only be handled by the responsible persons and in accordance with the data privacy laws (see page 22).



DEFINITION

Non-Disclosure Agreement (NDA)

is frequently used in situations involving third parties when there will be a flow of confidential information. Confidentiality agreements are often used at the outset of commercial negotiations to protect parties wishing to share confidential information (intellectual property, pricing, financial information, etc.) in furtherance of a particular transaction or project. As this agreement is designed to be pro-discloser, it expressly excludes representations and warranties relating to the confidential information. It includes a comprehensive indemnity from the recipient in relation to breaches of confidentiality and misuse of information.



CHECKLIST

- ✓ Do not share confidential information unless there is a legitimate reason for doing so.
- ✓ Protect information belonging to others, such as our business partners.
- ✓ Ensure you have an NDA in place when your work with third parties involves sensitive information.
- ✓ Do not accept information offered by competitors that may be confidential. If you are not sure, ask if this information is confidential and how it was obtained.
- ✓ Protect corporate information: Workrelated documents and data carriers must only be accessible to authorized persons. Mobile data carriers in particular (e.g., USB sticks, CD-ROMs or DVDs) must be protected against unauthorized access.
- ✓ Take special care when working from mobile workspaces (home office).
- ✓ Store and transport protected documents and data carriers securely (e.g., in a locked environment). Data on mobile data carriers (USB sticks, etc.) is usually not encrypted and is therefore easily accessible to anyone. Even data from deleted and/or formatted USB sticks and hard drives can be reconstructed with very little technical effort.
- ✓ Hand over hard drives and USB sticks that are no longer needed to the IT department for professional disposal – if in doubt, forward only new, unused USB sticks to external partners.

Reference: EUG-02- IT End User Guideline – Data Storage Guideline; available on our wienerberger intranet weComm



WHAT IF ...

While I am on the train on my way to a client meeting, my manager calls me to discuss an urgent matter about a business partner. She asks me to send her some information immediately. How do I react?

We not only protect our own confidential information such as business targets, but also our business partners' information. Thus, make sure that you do not use any client name, brand name, or personal information in public spaces and be mindful of your surroundings. Let your manager know that you are currently in a public place. Only work on your laptop in a public space if you are sure that nobody can see your data or steal your devices.

Professional communication and communication contacts on the Internet

Each user is personally responsible for his or her private and professional communication and communication contacts on the Internet. The company management and IT have selected relevant technical security measures (such as spam filters and antivirus programs). However, technical measures alone are insufficient to provide adequate protection against all types of risks.

As our employee, please remember that all activities that may put wienerberger at risk and/or damage its reputation must be avoided at all costs. Please observe the following guidelines when using the Internet, especially if you are active in social media networks.

- › **Be authentic, friendly, and respectful.**
- › **Pay attention to your privacy settings.**
- › **Bear in mind that the Web does not forget!**
- › **Observe all applicable legal requirements.**
- › **Act responsibly and protect our brands.**
- › **Speak only for yourself.**
- › **When in doubt ask!**



CHECKLIST

- ✓ Do not access, view, save, or forward Internet sites and/or Internet platforms with racist, sexist, (child) pornographic, discriminatory content, or content that glorifies violence or intolerance.
- ✓ Do not access, view, and save Internet sites that require payments to be made if they are not necessary for work activities.
- ✓ Do not download copyright protected works, software, and files from the Internet (e.g., music, videos, images, texts, etc.).
- ✓ Be aware of possible manipulations of electronic identity when using e-mail (see page 23, phishing).
- ✓ Do not send private e-mails through the company account if they raise or could raise suspicion that they concern company matters (e.g. private purchases, etc.).
- ✓ Never answer spam mails or send or save e-mails that contain joke programs and similar items because they could contain computer viruses.

References:

- *EUG-03-End User Guidelines – Internet Email Guidelines*
- *Social Media Guidelines;*
both available on our wienerberger intranet weComm





BUSINESS BEHAVIOR



WHAT IF ...

While visiting a supplier's headquarters, I heard rumors of human rights violations such as forced labor. I am not sure if the rumors are true, how should I react?

Speak up! As we do not tolerate any form of human rights violations and discrimination, take the rumors seriously and report them to the Legal Department. An expert team will further assess the situation.



HUMAN RIGHTS

We are committed to respecting and protecting human rights in all our business activities.

With the signing of the Social Charter in 2001, we committed ourselves to creating Group-wide employment and working conditions that meet national legal provisions or collective bargaining agreements as a minimum standard. Thus, wienerberger complies with the recommendations of the International Labor Organization (ILO, a specialized agency of the United Nations). Within our sphere of influence, we guarantee the protection of fundamental human rights. It therefore goes without saying that wienerberger tolerates neither child labor nor forced labor, nor any form of discrimination. The Monitoring Committee, which is comprised of an equal number of representatives of wienerberger and the European Employees' Council, monitors compliance with this agreement.

We expect our suppliers to share our commitment to uphold human rights to the same standard as we do. We also assess the observance of ecological and social standards including human rights by our suppliers. We explicitly communicate these standards in our Group-wide "Supplier Code of Conduct". To verify the compliance of our direct suppliers with the Supplier Code of Conduct, we reserve the right to audit and inspect our

suppliers' operations and facilities upon reasonable notice, with or without the support of a third party.

Compliance with the principles contained in the wienerberger Supplier Code of Conduct is a criterion that wienerberger takes into consideration in its supplier selection process. Whenever non-compliance is identified, wienerberger may work with the supplier to develop and implement a corrective action plan to improve the situation.



CHECKLIST

- ✓ Speak up and report the existence of illegal workers, child labor, or other inadequate working conditions that come to your knowledge be it at wienerberger premises or our suppliers' plants.

References:

- *wienerberger Social Charter*
- *Supplier Code of Conduct*
both available on our website
www.wienerberger.com

PRODUCT SAFETY AND QUALITY

We create permanent value by providing safe, durable, and innovative products and system solutions.

Creating long-lasting value with durable and innovative building and infrastructure solutions: this principle forms the basis of wienerberger's product development.

We continuously work on improving our products and system solutions to make a positive contribution to the environment (see page 32) and at the same time, we strive to contribute to people's quality of life by providing innovative and durable products and system solutions that will meet building and infrastructure requirements now and in the future. Our quality management system ensures that the quality of our systems, processes and products is continuously monitored and improved.

We always act to meet wienerberger's high product quality and safety standards and constantly strive to improve the quality of our products and services. We also expect our suppliers to meet these quality and safety standards.



CHECKLIST

- ✓ Insist on product quality and safety and follow our quality-control procedures.
- ✓ If you become aware of a customer complaint or a quality or safety issue, report it immediately to your supervisor.

PRIVACY, DATA PROTECTION REGULATION, AND CYBER SECURITY

The protection of privacy and personal data is extremely important to us and is taken very seriously in all our business activities/relationships.

wienerberger respects all relevant international and national data protection laws that protect the personal data of its customers, employees, and business partners. Collecting information is allowed only to the extent necessary for the performance of business processes.

Employees are responsible for adhering to these measures and must always act to prevent risks from any number of sources, e.g., by using strong passwords, keeping programs and systems up-to-date, and not working around access controls.

To ensure data integrity, system availability, confidentiality, and accountability all employees must be informed about the rules and regulations for the use of IT systems and other physical assets.

Protection of personal data



CHECKLIST

- ✓ Handle personal data carefully in accordance with national data protection regulations.
- ✓ Protect personal data and in case of doubt consult your supervisor and/or the local Legal Department, or your local Information Security Manager.

We treat any form of personal data – whether employee, customer or business partner data – confidentially and in accordance with data protection regulations. Failure to do so may lead to disciplinary sanctions.

In order to maintain the high quality of data protection, an international team of data protection coordinators operates at wienerberger and in the country organizations. Together with external specialists, a quality standard for data protection was developed and successfully implemented throughout the Group. Regular internal controls are performed to review and optimize the quality standards and the data protection measures already implemented. These controls cover all business areas, country organizations, and partner companies that process data on our behalf.



DEFINITION

Personal data

is any information that could be used to identify a natural person, either directly or indirectly, such as a name, employee ID, e-mail address, or phone number.

Cyber security

Cyber security incidents can be disruptive and may cause damage to individuals, clients, or our business. In order to mitigate cyber risks, we regularly back up data, secure devices and networks, encrypt important information, and enforce regular password changes and password safety.



CHECKLIST

- ✓ Protect your equipment and your computer with strong password(s) and do not write them down.
- ✓ Do not install unauthorized software, applications, hardware, or storage devices on our computer.
- ✓ Log off the running applications and the operating system or manually lock the computer (WIN+L), whenever you leave your workplace – even if only for a brief period.
- ✓ Clearly label all mobile data carriers with sensitive data where possible.
- ✓ Data carriers containing sensitive data should only be transported in person, by courier, by registered letter, or by equivalent services in a sealed container. These data carriers may only be forwarded in return for a receipt.
- ✓ Sensitive data may only be transferred online in an encrypted form (e.g. via https://, in our wienerberger Box, or as a password protected file).
- ✓ Report any kind of security issue that occurs to the responsible IT staff, the local Information Security Manager, or the central Information Security Team.

Reference: IT End User Guidelines; all available on our wienerberger intranet weComm



DEFINITION

Phishing

The term "phishing" is a combination of "password" and "fishing". Phishing refers to the attempt to steal confidential data from Internet users (e.g., for online banking, auction platforms, or online shops). In addition to phishing mails, there is also a form of criminal phone fraud known as "voice phishing".

In most cases, you will receive an e-mail in which you will be asked under a misleading pretext to visit your bank's homepage, for example, and enter your account details there. The e-mail usually contains an Internet link. If you click on it, you will be directed to a page that looks deceptively similar to the actual bank page but is in fact operated by criminals. The criminals hope that you will enter your bank details so they can access your account and make illegal payments from it. These fake websites usually disappear after a few hours or days, but in the meantime, a great deal of financial damage can be done.

Clues to help you spot a phishing e-mail:

- › **Playing on your emotions:** They often promise a financial reward or threaten negative consequences, often with a fast-approaching deadline.
- › **Bad grammar:** Poorly constructed sentences, spelling mistakes, and an unusual tone are all signs that an e-mail is not from whom you think it is.
- › **Embedded links:** Place your cursor on the link without clicking and check the web address that appears before you click it.
- › **Unknown senders:** Check the sender's name and host (often, names are copied well but @xxx.com is a random address).
- › **Suspicious attachments:** Do not open them and take particular care with file types .exe, .zip, .docm, .bat, and .xlsm.
- › **Getting personal:** Genuine companies will not ask for personal details such as bank details or passwords.
- › **Payment diversion fraud:** If an e-mail or website invites you to reroute company payments, or to set up unexpected new payments, always double check.

If you receive a suspicious e-mail forward it to fraudattempt@wienerberger.com



WHAT IF ...

A former business partner asks me for a list of contact persons in different departments to discuss future business ideas. Can I share this information with her?

It depends: Do not send any contact details without the written consent of the individuals concerned. Make sure you only share business-related contact details and no private e-mail addresses or phone numbers. When in doubt, check with your supervisor/manager or consult the Legal Department.

I have received an e-mail from a well-known bank informing me that I have a message. To retrieve the message, I should follow a link. It seems strange to me that the bank has contacted me directly by e-mail. What should I do?

Banks do not send e-mails with links to their websites or with a request to disclose or change access data! If you receive such e-mails, please forward them immediately to fraudattempt@wienerberger.com.

Please do not open any attachments or click on any links if you receive e-mails from unknown senders concerning orders or deliveries that you never placed or are not expecting. This includes invoices for services or goods that you have not ordered or commissioned. Never trust attachments that require macros to be activated when you open them.

Never respond to e-mails that ask you to send confidential information by e-mail or to provide it on a website.

SELECTION AND FAIR TREATMENT OF SUPPLIERS AND CUSTOMERS

We pursue fair and long-term business relationships with our suppliers and customers.

Since the foundation of wienerberger back in 1819 our mission has been to improve people's quality of life by providing outstanding, sustainable building material and infrastructure solutions. Within the framework of our business relationships, we ensure that our suppliers also comply with quality, social, and ecological standards. We evaluate suppliers based on sustainability

and risk ratings in conjunction with their financial terms and conditions. We do so by using an internal data platform (Supplier Relationship Management Tool), containing information on the financial terms and conditions of all wienerberger suppliers and the ratings of suppliers' sustainability performance by EcoVadis.

Screening of suppliers and customers against international sanctions lists

wienerberger's suppliers and customers are registered in our SAP system and are screened monthly via an interactive data platform against international sanctions lists (published by the UN (United Nations), the EU and the Office of Foreign Asset Control (OFAC) of the US Department of the Treasury). This screening is performed centrally by a sanctions management software, which runs checks of all customer and supplier master data in the SAP system. Each "match" is transmitted to the local management in charge of assessment and follow-up. The local decision whether to continue doing business with the supplier or customer concerned must be communicated to the Whistleblowing Committee for further coordination. All decisions taken in this context are documented in the sanctions management software.



CHECKLIST

- ✓ Raise awareness of environmental topics among our suppliers and customers.
- ✓ Aim for respectful, long-term, and transparent relationships with all our business partners.

PROHIBITION OF CORRUPTION & BRIBERY AND CONDUCT WITH PUBLIC AUTHORITIES

We promote high standards of integrity and ethics in all wienerberger's activities and in accordance with all applicable laws and regulations on corruption, bribery, prohibited business practices, and extortion.

wienerberger is committed to the principle of free and fair competition, which includes a firm stance against any form of corruption. We always pursue the target of zero incidents of corruption and expect all our employees to act accordingly.

In building good business relationships, we rely on our corporate values. However, situations might arise in which one party wishes to show its appreciation through gifts or hospitality. This is fine as long as such gifts are within reasonable limits and considered generally acceptable.

Offering, giving, or receiving bribes is never good business practice and causes enormous harm to society. Therefore, wienerberger does not tolerate any bribery by anyone acting on behalf of our company. Bribery can also be encountered in more subtle forms, such as the provision of travel facilities, charitable donations or so-called facilitating payments to third parties. If you suspect that a bribe has been given, you must report it immediately. Remember, all forms of bribery are illegal!

Think critically and use your common sense as you implement wienerberger's "Anti-Trust Compliance Policy" and the "Guidelines on How to Deal with Personal Benefits".



CHECKLIST

How can I ensure I do not violate any of those guidelines and laws?

Before accepting gifts from active business partners or third parties, check:

- ✓ What motive might the donor have for offering this gift?
- ✓ Could accepting the gift leave behind any negative impressions on third parties?
- ✓ Does accepting the gift place any obligation or constraint on you on behalf of wienerberger?
- ✓ Is the acceptance of the gift within our guidelines?
- ✓ Moreover, evaluate the frequency of gifts from a business partner. Gifts should be infrequent.

Employees with direct responsibility for purchasing decisions are subject to additional obligations. These employees are only permitted to accept inexpensive promotional giveaways and beverages and meals served within the framework of business meetings.

If you have any doubts or are uncertain as to whether a gift from a business partner is acceptable and within reasonable limits always consult the Whistleblowing Committee.

The same principles apply to any gifts you may wish to make to business partners or third parties.

References:

- *Antitrust Compliance Policy;* available on our wienerberger intranet weComm
- *Guidelines on How to Deal with Personal Benefits;* available on our wienerberger intranet weComm and our website www.wienerberger.com



DEFINITION

Bribery

A bribe is the offering, promising, giving, accepting, or soliciting of money, a gift, or other advantage as an inducement or reward for doing something that is illegal, unethical, improper, or a breach of trust. A bribe or improper payment can be paid or received directly or indirectly (i.e., via a third party such as a contractor or a family member). It can be for the benefit of someone other than the person who is being improperly influenced. Moreover, no money or other consideration needs to change hands: even if the bribe is ultimately not paid, but only offered, it remains bribery. Furthermore, bribes are not limited to money, they can also take the form of special privileges, personal favors, benefits, and services (for example, in some countries providing free personal accounting services to a government official and his or her family or helping arrange a loan from a bank for an employee of a state-owned entity at an interest rate that is not publicly available) could be considered a bribe.

Facilitation payments

Facilitating/facilitation payments (also known as "speed payments" or "grease payments") are payments of little monetary value provided (in cash or kind) to government officials to encourage them or influence them to perform – or speed up the performance of – a routine, non-discretionary transaction or service that they are obligated to perform (such as expediting the issuance of a license, visa, or permit for which the applicant has met all requirements and is entitled to by law).



WHAT IF ...

An active business partner offers me his tickets to a sports event. He is unable to attend, so I could take my children to the event. Am I allowed to accept the gift?

No. In general, gifts of tickets to sports or other events offered by business partners are only appropriate and acceptable if the donor himself/herself is present at the event.

A prospective future business partner is inviting me to the Olympic games. As this year's games are not within my local area, the business partner is offering to cover my travel expenses to the event location. I am not sure if this is still within our guidelines. What should I do?

Ask yourself some questions: Are the expenses for this gift still within a reasonable limit? For example: The maximum cost per event and person must not exceed EUR 100 for it to be acceptable. Moreover, consider whether acceptance of this gift would impose any obligations or put pressure on you with regard to future business deals. In case of doubt, please always contact and consult the Legal Department.

To discuss and celebrate the successful interim results of a project, I am considering inviting my business partner to a local soccer game. The price of the tickets does not exceed EUR 100. My business partner also holds an important position ("political representative") in a local political party. Am I allowed to invite her or him to the event?

No. Making gifts to political representatives or political parties is not permitted under any circumstances.

After a business meeting I gave the business partner a notebook, pen, and coffee-to-go cup. All items bear the wienerberger logo. Have I behaved in accordance with our policies?

Yes. Advertising giveaways bearing our company logo are generally permissible and appropriate. Other permissible business gifts are articles of daily use, such as writing implements and office accessories; food and beverages especially if consumed within the framework of a business function, and tickets or events with a net value of less than EUR 100.

References:

- *wienerberger's policy on business gifts: Guidelines How to Deal with Personal Benefits • Donation Guidelines*; both available on our wienerberger intranet weComm
- *Code of Conduct for Lobbying Activities*; available on our website www.wienerberger.com



CONFLICT OF INTERESTS

We are all required to make business decisions in the best interest of wienerberger, not on the basis of our own personal interests.

A conflict of interest can arise when our personal interests may unduly affect a decision we have to make on behalf of wienerberger or in circumstances when it appears that our decision could compromise our ability to conduct business objectively and fairly. This semblance of conflict must be avoided by clearly notifying your supervisor if you believe you may have a personal conflict of interest. Furthermore, you should be aware of circumstances in which others might get the impression that there is a conflict of interest! In case of doubt, it is in your own interest to disclose such relationships or activities. Transparency often removes any misleading perception of improper activity.

If you are invited to act as a director, consultant or member of the management for an external organization, first check whether such an engagement is permitted under the terms of your employment contract and whether it might affect your work at wienerberger and then contact your HR department.



WHAT IF ...

Our current contractor's employees repeatedly breach our health & safety as well as environmental rules. Moreover, the contractor cannot meet wienerberger's quality standards. I am aware of this issue and responsible for awarding contracts to this company. However, this is my uncle's company and he urgently needs this contract. In that case, is it okay if I decide not to report the quality issues?

Your decision making should not be influenced by your personal relationship with the contractor. We are all required to make business decisions in the best interest of wienerberger, not on the basis of our own personal interests.



CHECKLIST

- ✓ Take a step back and judge the situation from a third person's perspective.
- ✓ Avoid any activity outside the Company as well as financial interests and associations that could possibly lead to, or merely appear to create, a conflict of interests.
- ✓ If you are not sure whether a situation represents a conflict of interest, contact the Whistleblowing Committee.

PROHIBITION OF MISUSE OF INSIDE INFORMATION

We are aware of market-sensitive inside information and do not violate legal and regulatory requirements.

As employees and managers, information concerning our company or our business partners might come to our knowledge that is not, or yet not, publicly available. This knowledge makes us "insiders". Material information that is not in the public domain, also called "inside information" or "capital-market-related information" must be treated confidentially and in accordance with national and international law. "Inside information" could substantially impact an investor's decision to buy or sell a security, influence stock markets, and the price of companies.

Our Capital Market-Compliance-Directive is based upon the provisions of Austrian Law and the EU Market-Abuse Regulation (MAR). The directive is a preventive measure aimed at insider trading and the unlawful disclosure of insider information.



CHECKLIST

- ✓ Do not engage in insider dealings.
- ✓ Do not give recommendations to participate in insider dealings or induce third parties to participate in insider dealings.
- ✓ Do not disclose inside information unlawfully (dissemination).
- ✓ If you are not sure if a piece of information is considered "inside" and material, consult Corporate Secretary.

Reference: wienerberger Capital Market-Compliance-Directive; available on our wienerberger intranet weComm

A compliance officer and deputy have been appointed to monitor compliance. Furthermore, regular training sessions on Issuer Compliance are held for the top management of wienerberger.



WHAT IF ...

During a meeting with our managers and business partners I gain knowledge of a merger that is possibly about to happen but is not yet in the public domain. The merger might affect my best friend's stock trading business. Am I allowed to let him know?

No. This is material inside information, or "capital-market-related information" and you are legally prohibited to share this information ("insider dealing"). The law also prohibits you from buying or selling stock based on this material inside information.



DEFINITION

Inside Information

Inside information means information of a precise nature ("information" includes facts as well as observations, value judgements, expressions of opinion, or even rumors), which is directly or indirectly related to wienerberger (or other issuers) or its financial instruments ("financial instruments" include shares or similar securities, bonds or derivatives). Inside information has not been made public and therefore has not yet come to the knowledge of an indeterminate number of persons and has not yet been made available to the public (i.e. "secret" or "confidential" information), and the disclosure of this "inside information" has the potential to significantly influence the price of the financial instruments and the related derivative financial instruments, because a knowledgeable investor would be likely to take account of such information when making his/her investment decisions (pursuant to Art. 7 (1) of the Market Abuse Directive).

FAIR COMPETITION

We are committed to free and fair competition.

The Group's Anti-Trust Compliance Policy provides guidance on sensitive issues of competition law and is to be strictly observed by all employees. Among other topics, the policy sets out strict rules regarding contacts with competitors in respect of market activities, in particular:

- > exchange of information
- > pricing and delivery terms
- > possible forms of cooperation



CHECKLIST

- ✓ Do not participate in illegal and unfair activities such as price fixing, bid-rigging, etc. This would not only lead to a violation of antitrust law, but also to unfair competition in free markets.

Reference: Group Policy on Compliance with Antitrust Law; available on our wienerberger intranet weComm



WHAT IF ...

At a party I met an old school friend who is working for a competitor. He complained about the professional challenges in the segment due to increasing production costs. He therefore suggested that both our companies increase prices for a certain product by 2%. As we both have higher production costs and it would allow us to make profits at the end of the day, am I allowed to implement this in our company?

No. Agreements between competitors on prices, planned price increases, or other terms and conditions violate anti-trust law and are therefore prohibited. The suggestion must be rejected.

As regards contacts with customers, distributors, and suppliers, strict rules apply in particular to

- > determination of re-sale prices or other re-sale restrictions
- > exclusivity arrangements

All country organizations of wienerberger are obliged to hold regular training sessions as required by the Anti-Trust Compliance Program.



TRANSPARENCY AND ACCOUNTABILITY IN COMMUNICATION AND REPORTING (INCLUDING REPORT VERIFICATION)

We are accurate and truthful in all our dealings and in every form of communication.

wienerberger complies with all applicable accounting, record keeping, and financial and non-financial reporting requirements. This is important to fulfill our role as a responsible corporate citizen and provides the necessary basis for transparency and accountability towards our stakeholders, appropriate tax payments, and the recognition of early warning signs of money laundering.



DEFINITION

Money laundering

Money laundering is the movement of cash or other assets generated from illegal activities through legitimate financial institutions or businesses so as to conceal the source of the funds or make it appear that the source of funds is, in fact, legitimate. A closely related issue is the channeling of funds to support illegal activities (for example, terrorism). Money laundering is a global problem. Money laundering is not just about cash and other monetary instruments; neither is it a problem restricted to conventional deposit taking and lending institutions and activities. Money launderers have greatly diversified their operations across financial services sectors and, increasingly, target non-financial services businesses.



CHECKLIST

- ✓ Be honest, accurate, and complete in any recording – no matter if you are preparing a financial statement, simply completing our time sheet, or complying with disclosure requirements.
- ✓ In all of your activities, be attentive and investigate any irregularities. When in doubt, always consult your supervisor or the Internal Audit Department.

Reference: Internal Audit Function Guideline; available on our wienerberger intranet weComm

Our employees should prepare all documents with the utmost care and comply with internal verification procedures. Keeping accurate records and ensuring that files and documents are all kept up to date is of the utmost importance.

To systematically assess compliance with all principles, policies, and laws, the Internal Audit Department covers with its assessment all functions, systems, and areas. Internal Audit has unrestricted access to all information and personnel in the area of activity subject to the internal audit procedures employed.





RESPONSIBLE CORPORATE CITIZENSHIP

ENVIRONMENT

We strive for environmentally friendly production and for environmentally friendly and safe products and solutions.

We see it as our mission to conduct business in an environmentally responsible manner. We strive to not only comply with all applicable environmental laws but go beyond regulations and standards to ensure wienerberger's sustainable development. We therefore pursue clear objectives to add ecological value to our business by supporting the decarbonization of buildings and infrastructure throughout their entire life cycles, contributing to climate change adaptation with our products and solutions, the creation of a circular economy as well as the protection of biodiversity and natural resources.

Precautionary principle

We support a precautionary approach to environmental challenges, even if some cause-and-effect relationships have not yet been fully scientifically proven, and undertake initiatives to promote greater environmental responsibility, e.g. energy efficiency, climate protection, biodiversity, responsible use of water. We strive to reduce the impacts of our activities by adopting a full life cycle perspective in product design while maintaining or even increasing our competitiveness on the market.



WHAT IF ...

I might have seen a colleague dump some hazardous waste in the regular waste container. What should I do?

Speak to your colleague and offer your help to make sure he or she knows the rules for disposing of hazardous waste. Make him or her aware of local and Group-wide environmental policies.

Minimize environmental impacts and risks

Our goal is to minimize the environmental impact and risks of our production, procurement processes, products and solutions. Responsible operation of our clay extraction sites, the best possible conservation of resources, and an increase in the percentage of secondary raw materials used are central principles of our production. Additionally, we provide environmental product declarations that are transparent about the environmental impacts of our products across their entire life cycles.

We are mindful of the risks our operations pose for the environment and minimize the use of resources where possible. We consider environmental and climate aspects to be integral parts of our innovation activities. We expect our suppliers to act in the same mindful way to protect the environment.



CHECKLIST

- ✓ Comply with all laws, policies, permits, and regulations aimed at:
 - › Protecting the environment
 - › Conserving energy, water, and natural resources
 - › Reducing the environmental impact of our operations
- ✓ Look out for environmental risks in and around the production site and ensure that they are addressed through adequate processes and systems.
- ✓ Learn more about our sustainability initiatives and raise awareness of environmental topics among our suppliers and customers.

References:

- *wienerberger Supplier Code of Conduct; available on our website www.wienerberger.com*
- *Local Environmental Guidelines and Management Systems*



COMMUNITY AND GOVERNMENTS

As a successful international company, we bear substantial social responsibility.

Involvement and protection of neighbors

Every production site is a neighbor, a local employer, a taxpayer. Good, trust-based relationships not only with neighboring residents, but also with local government authorities, associations, and citizens' initiatives are essential for a stable production environment. We therefore value the importance of direct on-site dialogue. We adapt our contacts with neighbors and local authorities to local traditions – sometimes opting for strictly formalized stakeholder committees as a framework for structured exchanges, at other times choosing a more informal setting.



CHECKLIST

- ✓ Be respectful towards people when dealing with enquiries or complaints. If you are not the responsible contact person, forward the request to the correct person to find a solution.

As regards our production processes and our extraction of clay, wienerberger has committed itself to implementing extensive health and safety measures and protecting employees as well as local residents from exposure to noise and dust.

Social commitment and charitable activities

Our charitable activities are based on clear ethical principles and follow firm compliance guidelines. We are engaged in numerous social projects and initiatives. We support disadvantaged people with donations – in particular, we offer help in those regions in which we operate. The best way to help is with our core competencies – offering building materials and infrastructure solutions as well as passing on expertise on sustainable construction.



WHAT IF ...

I want to suggest a local charity as a recipient of donations by wienerberger. What do I have to consider?

First, check if the recipient works in a suitable sector, such as the building and infrastructure sector. Remember, we focus on product donations (building materials and infrastructure solutions) and training (practitioner training).

Secondly, the donations also have to be of local relevance and it should be possible to produce the donated products locally.

Thirdly, make sure the donation does not breach any of our other compliance policies, e.g. the wienerberger Guideline "How to Deal with Personal Benefits". For example, donations to government officials or political parties are strictly prohibited.

Before you suggest a donation, make sure you are familiar with wienerberger's donation policy. You might also inform your local superior/management board or whoever is authorized to approve donations.



CHECKLIST

- ✓ Contact your local management if you want to nominate an organization for a donation or contribute to one of the projects.

References:

- *wienerberger Donation Guideline*
 - *wienerberger Guideline "How to Deal with Personal Benefits"*
- both available on our wienerberger intranet weComm



BUSINESS CONTRACT

The business contract is approved by...
Investment capital, the franchise company, or the franchise company only.
This contract is valid from... and it will terminate on...

- (1) **Representation & Warrant:**
The franchise company has taken care of the proper work and the...
The franchise company has taken care of the proper work and the...
The franchise company has taken care of the proper work and the...
- (2) **Marketing & Marketing:**
The franchise company has taken care of the proper work and the...
The franchise company has taken care of the proper work and the...
The franchise company has taken care of the proper work and the...
- (3) **Payment:**
The franchise company has taken care of the proper work and the...
The franchise company has taken care of the proper work and the...
The franchise company has taken care of the proper work and the...
- (4) **Termination:**
The franchise company has taken care of the proper work and the...
The franchise company has taken care of the proper work and the...
The franchise company has taken care of the proper work and the...





Lobbying practices and political involvement policy

To a growing extent, we have been publicly advocating the provision of affordable and social housing in Europe. Moreover, we are trying to convince policymakers of the need for state aid for renovation measures and the construction of water supply and wastewater disposal networks. The members of the Managing Board therefore regularly meet with high-ranking politicians and representatives of the public administration.

As a member of various European and national representative bodies, platforms, and technical committees, we actively contribute to the process of political opinion-shaping. We are determined to address the trends and developments in the individual markets, such as increased urbanization, and to offer decision-makers practical, sustainable and, above all, affordable solutions for the new construction and renovation of residential buildings as well as essential components of infrastructure.

The principles governing our lobbying activities have been laid down in a Code of Conduct based on the provisions of the Austrian Lobbying and Transparency Act, which applies to all boards and employees of Austrian companies in which wienerberger holds a majority interest. wienerberger is registered in the EU Transparency Register under the registration number: 82041746393-10.



CHECKLIST

- ✓ Act in a fair and professional manner, according to the highest ethical and moral standards.
- ✓ Act in accordance with the relevant, applicable legal requirements.
- ✓ Behave appropriately and do not obtain information dishonestly. Placing office-holders under undue pressure is not permitted. Do not offer or promise office-holders any illegal benefits and do not participate in any activities which have any semblance of being corrupt or illegal.
- ✓ Do not make payments or in-kind donations to political parties, institutions, or other candidates, agencies, or representatives.
- ✓ Provide only open, honest, and comprehensive information.
- ✓ Act with the utmost integrity and protect confidential information from third parties.
- ✓ Avoid any actions which may present a conflict of interest.

References:

- *Code of Conduct for Lobbying Activities*
 - *Austrian Code of Corporate Governance*
- both available on our website www.wienerberger.com

Gender-sensitive formulation

In the interest of text flow and reader-friendliness, gender-specific differentiation has been predominantly avoided in this Code of Conduct. In the interest of equal treatment, the corresponding terms apply to all genders.

LEGAL DISCLOSURE**Media owner (publisher)**

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