

Wienerberger Supplier Code of Conduct

Wienerberger AG and its subsidiaries (hereinafter jointly “Wienerberger”) are committed to high standards of integrity and sustainability and have a zero tolerance when it comes to unethical business behavior, such as bribery and corruption. We expect all of our suppliers to adhere to similar standards and to conduct their business ethically.

As a supplier, you will use best endeavors to ensure compliance with all applicable laws and regulations, the requirements set out in this Wienerberger Supplier Code of Conduct and your contractual obligations to us.

Although the Supplier Code of Conduct only applies to Wienerberger’s direct suppliers, Wienerberger encourages the supplier to invite its own suppliers to comply with its terms. Wienerberger will also look favorable to those suppliers that sign this Code of Conduct, submits their own Code of Conduct and actively shows management of its’ supplier base in this area.

Human rights

Wienerberger needs its suppliers to support and respect the protection of internationally proclaimed human rights and make sure that they are not complicit in human rights abuses to any internal or external stakeholder.

Labor

Wienerberger expects the supplier to comply, as a minimum, with all applicable local laws and regulations related to labor and employment including, but not limited to, minimum wage, maximum hours of work, days of rest, compensation, freedom of association, right to organize and collective bargaining.

The supplier is expected to treat all employees fairly, ethically, respectfully and with dignity. The supplier must protect its employees from harassment and victimization in the workplace, including all forms of sexual, physical and psychological abuse.

In particular, you as a supplier will;

- Refrain from employment discrimination based on gender, age, nationality, religion, ethnicity, disability, union membership, sexual orientation or political affiliation
- Respect the rights of employees to freely associate and bargain collectively
- Not tolerate or use child labor in any stage of your activities
- Not use any forced labor or involuntary prison labor and allow all employees the choice to leave their employment freely upon reasonable notice

- Ensure that working hours, including overtime, do not exceed applicable legal limits
- Compensate employees fairly and follow local wage regulations and/or collective agreements

Health and Safety

Wienerberger provides a safe and healthy workplace to its employees. Wienerberger expects that the occupational health and safety of employees is a priority for the supplier through-out all significant aspects of its activities.

Wienerberger conducts its operations in a sustainable way and in compliance with environmental laws and regulations. Wienerberger expects that environmental protection is a priority for the supplier in all significant aspects of its activities.

As a minimum, the supplier must comply with all applicable health and safety laws, regulations and standards. The supplier shall take appropriate action, such as policies, standards, procedures, contingency measures and management systems, in order to prevent occupational illnesses and work-related accidents and to provide a safe and healthy workplace to its employees.

In particular, you as a supplier will

- Formally appoint a competent person to manage health, safety and environmental programs and improvements
- Establish appropriate organizational structures and procedures for the effective management of health, safety and environmental risks
- Ensure that all employees are sufficiently aware of these risks and appropriately trained on the implementation of control measures

Environment

The supplier should support a precautionary approach to environmental challenges and undertake initiatives to promote a greater environmental responsibility e.g. energy efficiency, climate protection, biodiversity, responsible use of water. The supplier shall also strive to reduce the impacts of its activities and products on the environment and work towards a total lifecycle view in product design, while maintaining its competitiveness.

As a minimum, the supplier must comply with all applicable Environmental laws, regulations and standards.

In particular, you as a supplier will

- Formally appoint a competent person to manage environmental programs and improvements

- Policies and procedures in place for the avoidance of local and accidental pollution
- Establish appropriate organizational structures and procedures for the effective management of environmental risks

Ensure that all employees are sufficiently aware of these risks and appropriately trained on the implementation of control measures

Material Compliance

At Wienerberger we are determined to comply with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and “conflict minerals”. Therefore, suppliers shall ensure that the goods provided to Wienerberger are in compliance with the requirements covered under the scope of all applicable regulations on local and international level.

In particular, you as a supplier will

- implement a policy regarding “conflict minerals” and exercise due diligence to investigate the source of these minerals, and
- respond in a timely manner to Wienerberger’s requests for evidence of your compliance with these requirements.

Anti-Corruption and Business Ethics

Wienerberger promotes integrity and ethics in all aspects of its activities and expects the supplier to comply with all applicable laws and regulations on corruption, bribery, prohibited business practices and extortion. Furthermore, the supplier must never make or approve an illegal payment to anyone under any circumstances.

Additionally, Wienerberger expects from its suppliers that they will

- adhere to anti-trust and other competition laws,
- protect all confidential information provided by Wienerberger and our respective business partners,
- respect intellectual property of others, including Wienerberger and
- adhere to local and international trade regulations.

Governance

In order to ensure and demonstrate compliance, with the Wienerberger Supplier Code of Conduct, the supplier shall keep record of all relevant documentation. Furthermore, provide supporting documentation to Wienerberger upon request.

To verify your compliance, we reserve the right to audit and inspect your operations and facilities upon reasonable notice, with or without support of a third party.

Compliance with the principles contained in the Supplier Code of Conduct is a criterion that is taken into consideration in Wienerberger’s supplier selection process. Whenever a

situation of non-compliance is identified, Wienerberger may work with the supplier to develop and implement a corrective action plan to improve the situation.

General Data Protection Regulations (GDPR)

The protection of privacy and personal data is an important matter we pay attention to in all our business relations. We respect the confidentiality of personal data and always act in accordance with the provisions of data protection law and this Privacy Policy.

Suppliers, who collect and process personal data shall ensure compliance with GDPR and any other applicable EU Directive regarding data privacy too. Only the necessary information required to perform their duties must be collected. The supplier shall have robust policies and procedures in place to be able to demonstrate its commitment to the Directives.

Supplier Responsibility

If any ethical or legal compliance issues arise that are likely to cause a breach of this Supplier Code of Conduct, the supplier is obliged to bring them forward.