

**Lenzing**

Innovative by nature



*Global*  
**Code of Business  
Conduct**

[www.lenzing.com](http://www.lenzing.com)

# Preface from the Managing Board

Dear Colleagues,

We see ourselves as sustainability champions, carefully balancing the environmental, social and economic aspects of doing business and never tiring of continuing to drive the transformation of the global textile and nonwovens industries from linear to circular. Our sustainable actions stem from a deep sense of responsibility towards our planet and people, and a desire to act in a way so that future generations can be proud of us.

An essential part of this responsibility lies in the fact that we, as Lenzing employees, comply with laws and guidelines without exception. The trust of customers and partners in our company and our products is a valuable asset that must be preserved.

This Code goes far beyond compliance with the law. It sets a clear framework for how we want to work together on a daily basis. As the Lenzing Managing Board, we are committed to an open and always honest work culture and try to exemplify this every day. That is why it is important to us that this Code is also formulated as concretely and practicably as possible, and provides real assistance in our daily work. It shows the high standards we set ourselves and offers room for individual decisions in order to be able to act quickly and decisively, and at the same time responsibly, in the respective local environment. This Code, therefore, translates our corporate values into practical instructions for action.

Our Code of Conduct shapes our corporate culture. As the Managing Board, we attach great importance to compliance with the Lenzing Global Code of Business Conduct. In doing so, each and every one of us is called upon: let's act consistently and in accordance with our rules.

**We thank you very much for your support!**

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# Our mission and our corporate values

Our corporate values are linked to our strategic focus on improving environmental performance along the value chain. We contribute to society by clearly linking our strategy to the Sustainable Development Goals (SDGs)\*.

Our mission defines who we are and what we aspire to. It shapes our strategy and provides us with a template for decision-making.

## Who we are

- Lenzing stands for the ecologically responsible production of specialty fibers from sustainable or recycled materials.
- The Lenzing Group's innovative product and technology solutions make it a partner and leader in the world market for textile and nonwoven production, and a driver of numerous new developments.
- Lenzing aspires to use and process all resources efficiently, and offers solutions for the realignment of the textile and nonwoven industry towards a circular economy.



\* The member states of the United Nations have set 17 goals for global sustainable development with the 2030 Agenda.

# Our mission and our corporate values

## Our mission

As a global company operating in the field of sustainable solutions, Lenzing turns CO<sub>2</sub> and sunlight into highly functional, emotional and aesthetic products to give people all around the world a natural choice.

We create value with innovative, eco-friendly and high quality products and services. We work on the basis of sustainable principles and create value for all stakeholders. We improve our own ecological footprint, and those of our partners, along the length of the value-added chain. We create growth and learning opportunities for our highly engaged employees.

## International Global Standards

The United Nations Global Compact (GC)\* is one of the world's most important initiatives for responsible corporate governance. As a member, we are committed to upholding human rights, respecting the rights of employees and their representatives, protecting the environment, enabling fair competition and combating corruption. The principles of the UN Global Compact are incorporated into our strategy and thus also into our corporate culture. We publish regularly information from all countries in which we operate about our effort to implement these principles.

As another internationally recognized method for our monitoring and reporting, we prepare our sustainability reports in accordance with the guidelines of the Global Reporting Initiative (GRI)\*\*.

\* More than 19,000 companies and organizations from civil society, politics and academia in over 170 countries are members of the UN Global Compact.

\*\* The GRI guidelines provide standards for corporate sustainability reporting and thus allow comparability on achieved targets.

# About the Code of Conduct

The way we do business is as important as the business we do. This Code of Business Conduct (“Code”) shows how we base our activities and decisions on our mission and our corporate values, and it supports us in doing business the right way.

The Code creates a framework with ethical standards within which we all operate. It also provides us with firm guidelines and directives for individual themes and areas, which require particular attention, such as corruption prevention, money laundering and counter-terrorism, compliance with human rights, occupational health and safety standards, and the protection of whistleblowers. They serve to protect the individual and the company.

Local customs and specifics in our businesses require additional, in-depth rules and guidelines. These rules and guidelines are compulsory for all of us.

Lenzing has committed itself to every single aspect of sustainability. Therefore, this Code presents our rules for conduct, arranged as follows:

**People** is about our social and cultural responsibility to our own employees, to those of our business partners along the whole value chain and the positive contributions to local communities.

**Planet** is about our commitment to reducing negative impacts by keeping within planetary boundaries and creating positive impacts through innovation of sustainable processes, products and solutions.

**Profit** is about our economic success, as this allows us to pursue our social and ecological responsibility in the long term.

The section “Adhering to our Code of Conduct” provides information on how we can all participate in ensuring adherence to our Code and what we can do if we notice or suspect a breach.



# About the Code of Conduct

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The company requires all employees, above all supervisors, leaders and managers, to display integrity.

## **Supervisors, leaders and managers are required**

- to foster a culture of openness adherence to the rules and ethical action.
- to create an environment in which employees can raise questions and voice concerns.
- to prevent any retaliation against employees who voice concerns.

Supervisors must also make sure that employees are familiar with, understand and abide by our guidelines, rules and this Code.

**We are all required** to familiarize ourselves with the rules, to actively participate in training, to ask for advice in a timely fashion when needed, to be attentive and to speak openly when we see room for improvements.

Our principles do not end at the company's front door. We expect lawful and ethical behaviour from our business partners along the value chain as well.

## NOTE:

"We" refers to all employees including apprentices, interns, supervisors, managers, directors, board members, agents and all others who work for or in the name of the Lenzing Group.

„Company“ refers to the entire Lenzing company and all subsidiaries and elements of the Lenzing Group in which the Lenzing AG has a controlling influence.

# About our responsibility





# About our responsibility

## Here at Lenzing we know that we are a part of society.

We create products from the renewable resource wood. As an innovative pioneer we are a partner in the global textile and nonwoven products market and drive numerous technological developments.

Together with our customers and partners we work on solutions to bring greater value with our products.

We think about social, economic, ecological and cultural aspects and consider these in our business dealings and decision-making.

We are active in a number of initiatives, networks and associations relevant to our industry. We value the dialogue within these groups, the controversial discussions and the opportunity to change perspectives, develop new ideas and drive innovation.



# About our responsibility

**At Lenzing we see laws as crucial pillars of global economic prosperity.**

## **Company leadership**

All topics related to the environment, social issues and good corporate governance (ESG – Environment, Social and Governance) are an important element of the Lenzing strategy, and of our short-term, mid-term and long-term planning.

In this we are aware that our integrity, good reputation and profitability depend on the individual actions of our upper management, leaders, employees and business partners who act in our name.

We want to increase the long-term value of our company by contributing with our corporate culture of ethical dealing to the cultivation of a sustainable future for society.

To fulfill the requirements of our corporate due diligence we monitor adherence to laws, human rights principles, applicable environmental and climate standards not only with ourselves, but also with our suppliers and within our supply chains.

We have management systems for all material topics and have clearly defined roles and responsibilities starting from the Managing Board.

## **Dialogue with politics and society**

We use many different opportunities for a decent, constructive dialogue with experts, institutes, government bodies and NGOs. We want to accompany the political discourse and contribute when it comes to measuring the impact of decisions made today on the future, for example when it comes to reorganizing our business field and industries that we supply as a circular industry. We voice our opinions and stick to the facts.

As a globally active company we obey all laws, regulations and comparable guidelines in the countries in which we operate. We respect cultural traditions to the extent in which they conform to local laws.

## **Respecting human rights**

Compliance with human rights is essential and non-negotiable for us. We look to internationally accepted foundational principles and rights when it comes to work as per the International Labor Organization (ILO).

# About our responsibility

## **Collaboration with business partners along the supply chain**

We want to keep a very close eye on the risk of human rights violations as well as the disregard of environmental obligations both at our own sites and within the entire supply chain. Therefore we pursue the thorough compliance with legal standards.

In a transparent selection process, we clarify at an early stage that potential business partners meet the high requirements. With the Lenzing Global Supplier Code of Conduct, we commit our partners to ensure that their organization is structured to comply with the high standards for sustainability and ethical behavior.

If we determine that a supplier has violated the Code, Lenzing will request / support the supplier to take corrective action. If possible corrective actions are not implemented, Lenzing may suspend, or respectively terminate the business relationship.

## **Tax and customs regulations and global trade restraints**

Lenzing makes timely and accurate tax statements. The company does not use aggressive or illegal tax-avoidance tricks. Our proactive customs and foreign trade management aims to ensure a high level of supply stability. We are aware that global trade is subject to continuous changes. Current foreign trade regulations and restraints have an effect on our business data. We see ourselves as citizens of the world. So it's natural for us to support politically motivated sanctions in our daily business by complying at all times with currently applicable sanctions.

## **Preventing money laundering and financing of terrorism**

Lenzing supports national and international initiatives, which aim to fight money laundering and the financing of terrorism by carefully applying money laundering-specific requirements and integrating these into our business processes.

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## Social & cultural responsibility

### At Lenzing we treat all people with great respect and actively benefit society.

It is our employees who bring new ideas, who implement them on a daily basis and who respond to our customers' needs with excellent service. We work to foster an environment that makes Lenzing a great place to work.

#### The company is committed to

- fostering a positive environment for collaboration and team building.
- creating growth and learning opportunities for our highly engaged employees.
- creating an inclusive work environment where all employees can contribute fully, regardless of their backgrounds.
- offering a safe and healthy work environment for employees and applying the relevant safety and health laws.
- engaging in the implementation of equality and diversity in remuneration practices.
- paying all employees at least a living wage, appropriately, fully and in a timely manner, and paying for overtime in at least the relevant local requirements.
- adhering to all local labor laws specifically regarding minimum age, as well as to the laws forbidding child labor.
- ensuring that the work of all employees is voluntary at all times.
- processing personal data only on a legal basis and for the purposes transparently outlined upfront.
- protecting the processing of personal data by appropriate technical and organizational measures to ensure that the rights of the data subjects are fully respected.
- guaranteeing employees' rights to form or join organizations or associations like labor unions and other work-related organizations, in accordance with applicable local laws.
- taking measures to keep social standards with our suppliers and within our supply chains.
- engaging actively in society for the benefit of all.

## Efficient, trust-based cooperation

Good cooperation gives us the energy to aim for outstanding performance and the best possible results. Our mutual respect is the prerequisite for the exchange of different ideas and views, enabling an inspiring and motivated work environment for all of us. We learn from experience and insights as well as from mistakes we have made.

## Respect

Every employee contributes with their individual behavior to a cooperative approach which is characterized by mutual respect and tolerance. Harassment of any kind violates the worth of the person. We therefore categorically reject any and all behavior which can lead to hostility, aggression or degradation against our colleagues, business partners or customers.

## The individual's privacy

In our world data can be swiftly assessed and made use of. We protect the data because it is a fundamental right – for example, login data, telephone and birthday lists, photos and videos, bank data or job applicants' details. We safeguard the personal data entrusted to us by only using it for the specific and permitted purpose, and by respecting the data owner's rights.

We gather personal data where possible directly from the individual and are transparent in how we use it.



## What does this mean for us?

**We treat each other with respect.**

**When working together we actively look for different ideas, views and approaches, we listen and we seek to learn from others.**

**We are open for criticism and see it as a dialogue for improvement.**

**We directly and honestly identify mistakes.**

**We respect the rights of others when dealing with their personal data and we reject everything which is in opposition to this.**

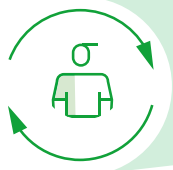
**We protect personal data from any potential abuse by adhering to predefined security standards and applying appropriate technical and organizational measures.**

## Inclusion, diversity and equal opportunities

As a global company Lenzing profits from the diversity of its employees who greet each other every day with respect and who learn to grow in team work with new views and approaches.

Equal opportunities can only be achieved at Lenzing when nobody is excluded. This is why we do not tolerate any discrimination based on, for example:

- gender
- age
- political views
- origin, skin color, nationality, ethnicity
- religion and world view
- social background
- sexual orientation and identity
- family responsibilities (including pregnancy)
- disabilities
- sensitive medical conditions



### What does this mean for us?

**If we see that an employee is being discriminated against or harassed, we step in to put a stop to this behavior.**



## **Working age, child labor, forced and compulsory labor**

The work of all employees is at all times voluntary. That is, employees begin employment voluntarily and are free to terminate employment at any time.

All employees must meet the minimum age requirements set by local laws.

We all make sure that any form of compulsory labor, involuntary work, slavery or human trafficking is excluded from our company.

## **Donations and sponsoring**

Our economic success gives us the opportunity to help charitable organizations through donations and to support other institutions in their research and development work through providing grants. We donate on a voluntary basis, without compensation, and we adhere to local laws and applicable guidelines.

For sponsoring activities we expect a service in return, for example the prominent display of the Lenzing logo. We wish to raise our profile and positively reinforce Lenzing's public reputation. We make sure that our sponsoring is in an appropriate balance with the agreed-upon services we receive in return and is transparent. We document our donations and sponsorships, ensuring transparency.



## **What does this mean for us?**

**If we see that other people are being exploited in our own field or with business partners, then we do our best to put a stop to this.**

**If we notice violations of human rights or labor standards, it is our responsibility to point this out.**

**We act according to Lenzing's valid guidelines for donations and sponsoring. We document everything to ensure transparency – what we donated, when and to whom. Sponsoring is always determined by a contract.**





## What does this mean for us?

### Safe and healthy work environment

We are convinced that accidents are preventable, and so we see safety as one of our core values.

We all want to work safely and healthily. Our work environment should allow us to balance our private and working lives, letting them enrich each other.

Together, we ensure a safe work environment and are aware of any potential accidents.

We see our safety guidelines as a protection and so we follow them carefully. Applicable local requirements define our minimum standards. If, however, our own global safety standards demand higher standards, then we apply these.

We reject company-wide the abuse of drugs and alcohol, as these can result in unacceptable safety risks.

**We always put safety first – wherever we are working and whatever we are doing for the company. We are always careful and use safe working practices.**

**We keep our eyes open. Making a signal in time can keep others from getting hurt.**

**Safety concerns are voiced openly and we inform colleagues, supervisors and safety and security experts on-site. Injuries and “near misses” are immediately reported.**



People  
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Profit

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## Ecological responsibility

**We at Lenzing care about our planet, we think about future generations and invest in the continuous development of the circular economy and a climate neutral industry.**

We consider the environment in all our activities and business decisions, and seek to improve our own ecological footprint as well as those of our business partners throughout our value chain through forward solution.

### The company is committed to

- operate all sites around the world according to local environmental legislation.
- conduct all activities in an ecologically responsible manner.
- promote the development and use of environmentally-friendly technologies.
- consider environmental challenges with a precautionary approach.
- consistently pursue ambitious environmental goals and to continuously improve our own environmental performance.
- minimize the use and release of hazardous substances and to ensure their safe handling and disposal.
- initiate appropriate measures based on our emergency plans in the case of any adverse events and emergencies.
- take action to mitigate future damage and risks.

## Circular economy

We use the natural and renewable raw material wood and employ special production technologies wherever and whenever possible: To the utmost extent possible we use closed loop production cycles.

## Mitigating climate change

We are fully committed to the Paris agreement\* and have already set a science-based target for climate change and engage key suppliers to support our targets.

We inform ourselves about current and new measures to improve our climate targets and support them - if possible - with our personal commitment.



## What does this mean for us?

**We use renewable and recycled resources to protect the planet.**

**We deploy our innovative spirit and improve our processes to conserve resources and to recycle waste materials.**

**We think circular to prevent waste and emissions in all of our processes.**

\*At the 2015 UN Climate Change Conference in Paris, all 195 member states of the UN Framework Convention on Climate Change agreed that global warming should be limited to less than 2°C.

**Responsible sourcing**

We obtain wood and cellulose material from natural forests and plantations. We strive to the utmost extent possible that all wood derives from legal and sustainably-managed sources by using recognized certification systems, and by continuously checking the high standards of our deliveries and supplies.

We engage our key suppliers to support our climate targets.

**What does this mean for us?**

**We strictly adhere to environmental regulations and ensure our environmental monitoring and control devices function reliably.**

### Protecting resources in production

We invest in research to continuously improve our processes with the goal of protecting resources and re-using waste materials. This applies to processes like, for example, modifications to manufacturing, recovery and recycling of materials, but also to maintenance and facility processes. We use natural resources (i.e. water, energy, wood, pulp and other resources) smartly and economically.

### Waste and emissions

Wherever possible we prevent or reduce waste, for example by adapting our processes to enhance the efficiency of the materials used. We continuously develop our systems to ensure the safe handling, transportation and storage of waste, as well as minimizing the generation of air emissions and waste water.

All activities which have the potential to adversely impact human or environmental health are appropriately monitored, controlled, treated and managed to prevent the release of any potentially harmful substances into the environment.

These high requirements apply not only at our company sites. We do our utmost to ensure that our suppliers and their suppliers also meet them.



### What does this mean for us?

**We promptly report and investigate environmental incidents, including potential hazardous emissions into air, soil or water, and take proper and necessary measures to control/minimize the impact and reduce any potential risks.**

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## Economic & financial responsibility

**We at Lenzing understand that our long-term success as a business depends on how well we economize.**

We create value with eco-friendly, innovative and high quality products and services. As a publicly listed company, it is of critical importance for us to earn the trust of our investors, customers, employees and local community.

The only sustainable way to earn the unwavering trust of everybody we deal with is by demanding a high standard behavior and unquestionable integrity from all employees at all times.

### The company is committed to

- provide a high and consistent quality of products and services to meet and exceed the requirements and expectations of our customers.
- ensure that the products we make are environmentally sound.
- adequately consider environmental and social aspects in strategic decisions.
- implement quality standards and to continuously work to improve quality and service performance.
- fully, accurately and promptly publish financial, and non-financial reports.
- immediately prevent transactions or activities which are in conflict with applicable rules, laws or guidelines or, failing prevention, to put a stop to them.
- conduct its business solely on the basis of the quality of our products, services and people, and in this way to conduct our business activities with the highest level of integrity.
- protect the personal rights, valid laws and intellectual property of all employees and business partners.
- take measures to protect company property from loss, theft or misuse.
- continuously teach and inform employees about compliance risks.



## Responsibility for ethics in our business activities

**We want to assert ourselves in the market with our services and products.**

### Competition laws, fair competition, antitrust

This area of law is complex and can vary greatly from country to country. These laws can be known as antitrust, monopoly, competition, fair trade or price discrimination laws. They apply to all business activities, including contracts and agreements among competitors, customers, suppliers and other parties, and they regulate competition, mergers and take-overs with the goal of promoting fair and free competition.

We fundamentally reject any improper agreements with any market participants. Our behavior in the market is based on our own decisions.



### What does that mean for us?

**We are committed to making sure that the products and solutions we offer in all countries in which we are active are among the best in the market.**

**We never consult with competitors and never coordinate our activities with our competitors. This includes “non-binding” agreements or agreements we never intended to keep, or agreements made by means of non-verbal signals (nods, hand signals).**

**If we enter into cooperation with competitors to gain better market services, then we bring in the Legal & Compliance team to monitor the antitrust guidelines.**

**We never act in a way which could raise the suspicion of unfair competition or misuse of a dominant market position.**

## Anti-bribery, anti-corruption (ABC)

Corruption impedes the development of trustworthy markets and can hurt our company as well as our business partners, other market participants and society at large.

The company has defined the following principles to combat bribery and corruption (ABC Principles):

- We do not offer, promise, accept or demand bribes or facilitation payments.
- We only provide appropriate gifts or hospitality to business partners, like for instance inexpensive gifts and invitations to business dinners, only if this is in compliance with applicable laws and internal guidelines.
- We never directly or indirectly influence officials or public servants with inappropriate gifts.
- We only provide appropriate gifts for officials when this is permitted by applicable laws and internal guidelines.
- We ensure that any commission payments and/or agent fees are based on real, legitimate and documented services.
- We require all those who act for and on behalf of Lenzing to conduct their business in accordance with applicable law and with our ethical guidelines.



### What does that mean for us?

**We never provide, offer or promise illegal payments or gifts. These are gifts which are intended to influence our business partners or officials/public servants.**

**We avoid even the appearance of bribery or corruption.**

**We are transparent in dealing with gifts and invitations.**

**Conflicts of interest**

A conflict of interest arises when personal interest, activities or relationships influence our objectivity and loyalty to Lenzing.

We know that there are situations in which our professional judgement could be in conflict with our personal interest.

Some examples for potential conflicts of interest:

- Personal relationships (e.g. preferential hiring of close friends or relatives)
- Engagement in activities which compete with our company's interests
- Usage of company property, information or resources for personal benefit or the benefit of others
- Outside employment that negatively influences job performance or has negative effects on the company
- Receiving personal or financial benefit from providing services to suppliers, customers or other business partners

If we find ourselves in this kind of situation, then we are open about our possible conflicts of interest by promptly informing our supervisors and coming to an agreement on how best to conduct ourselves.

**What does that mean for us?**

**We avoid activities which create or even appear to create a conflict of interests.**

**We deal with suppliers, customers and other parties in an objective, professional and fair manner.**

**We do not accept any personal payments, fees, loans or services from persons or companies as a condition for Lenzing doing business with them.**

**We do not use the company for inappropriate personal enrichment or to misuse the company's assets.**

**If we become involved in other companies or become active in the supervisory or technical boards of other companies, then we disclose this to our supervisors.**

## Responsibility to our shareholders

### Confidential information, inside knowledge, intellectual property, patents

Rights to intellectual property including patents, brands, copyright, business secrets, innovations, ideas and know-how are classified as confidential information within the company. They ensure our advantage in the market. This is why we safeguard them and never pass them on without permission, and protect them from being accessed without permission. This applies to digital, handwritten and oral information.

Our business partners can rely on our trustworthiness and our discretion when dealing with confidential information. Just like we trust them.

Information which could influence our company's share price and have not (yet) been officially published are handled with extreme confidentiality, and are not to be passed on without authorization – not even to close friends or family members.

NOTE: All information relating to the company must be viewed as confidential, as long as it is not published or in any other way legally available to the general public.

### Books and records management

Accurate business records are essential for the good management of the company as well as for maintaining and safeguarding investor confidence. Our books and records describe and reflect the nature of each transaction truly and completely.



### What does that mean for us?

**We deal carefully with information concerning all of our business concerns; for example, we only share critical business information with those individuals who absolutely need to know this information (= Need-to-know principle).**

**We follow at all times the technical and organizational security guidelines we have set up to guard business secrets.**

**We provide no information or statements in reports, recording of working hours or invoices which are not in accordance with valid local laws and guidelines.**

**Communication & media requests**

Consistent messaging is of great importance for the company. The Corporate Communications Department is responsible for commenting on inquiries and sharing information with the public, the media and other stakeholders.

Specific product inquiries will be handled by the Technical Customer Service, Product Safety or similar experts, e.g. from R&D.

NOTE: All information about Lenzing, our products and services must be presented in a correct, open and balanced manner.

**Protecting company property and assets**

With our commitment and services we create new material and conceptual value and assets every day. Our inventions and developments are a valuable part of our assets. This is why we safeguard our innovative business ideas and developments by identifying at an early stage which protective laws can be applied.

We deal carefully with Lenzing's assets. We are careful that they are not used for the wrong purpose, that they are not wasted or misused.

We are aware that each one of us contributes to the maintenance and growth of our company's value. This is why we work to protect the company's property from loss, theft or misuse.

**What does that mean for us?**

**We do not answer questions or provide statements if we are not explicitly authorized to do so. Inquiries from the media are directed to the authorized person in the company.**

**We make no questionable or doubtful statements concerning Lenzing products or services.**

**We handle devices, materials and other business assets carefully.**



### Information security, cyber resilience

Business processes are based on IT applications and the information processed and stored represents a very high value for our company. We know that inadequately protected information can threaten the existence of our company and therefore make great efforts to ensure the security and reliability of our IT systems.

We regularly evaluate our IT solutions (hardware, software, services) according to the nature and scope of the various processing operations and the associated risks in order to ensure appropriate protection at the state of technology and process design and to strengthen our cyber resilience.



### What does that mean for us?

**We familiarize ourselves with our internal protection measures, like our corresponding directives, remain alert and take personal responsibility for the security and protection of data and IT systems in our daily work.**

**Tools cannot solve everything. We are the best firewall. We act responsibly and help keeping our company secure.**

**We immediately report security concerns or fraudulent activities (emails, calls, etc.) to the responsible Lenzing IT Security desk.**

# Adhering to our Code of Conduct



# Adhering to our Code of Conduct

## It is our joint task to work together to observe our Code of Conduct.

In every corner of our global network it is imperative that all employees comply with the legal requirements, ethical values and Code of Business Conduct.

### Think, ask!

If we're unsure how we should act or behave then we ask for advice. The relevant supervisor is the first contact for the employee. Our Compliance experts support management and employees at all times.

### Be responsible!

Nobody is above the law and ethical violations are always unacceptable. A single violation of our Code, directives or the law can cause massive damage to the company's reputation or even impact our ability to do business, and thereby put the work of many employees at risk. This is why Lenzing expects that we all contribute to the protection of the company.



### What does that mean for us?

**We know the rules and live according to them. We are familiar with the external and internal guidelines applying to our work, and we adhere to these.**

**We act according to the basics of honesty and integrity. We never violate the law, this Code or other Lenzing guidelines. We cannot be put under pressure or even forced to act against our principles.**

**We are familiar with the Code and with all requirements our role(s) bring.**

**We seek help if we are unsure or have doubts about our legal duties, or the appropriate behavior in a given situation.**

**We act with common sense. We think before we act.**



# Adhering to our Code of Conduct

## Voice concerns!

We are all required to be attentive, to look and to report any suspicion we may have that there has been a violation of our values and Code of Conduct. In this way the company can avoid mistakes at an early stage, defend against risks or manage any issues.

Everyone who makes a report is protected by corresponding processes and directives and may not be retaliated against. The only people who can fear negative consequences are those who intentionally level false accusations: they must reckon with the appropriate response.

Reports can be made in person or using our electronic system (Tell us). Compliance reports can also be made anonymously.

Contacts for advice and reports:

- Supervisors
- Group Compliance Office in Austria
- Local Compliance Office or Compliance Manager
- Responsible technical office or on-site technical expert
- “Tell us” – electronic system via internet



## What does that mean for us?

**We voice our concerns if we observe behavior which may violate the law, this Code or our guidelines.**

**We will not tolerate intimidation or retaliation against any employee making a good faith report.**

# Responsibilities

## Issuing and altering the Code

The Managing Board and the Group Compliance Officer are responsible for releasing and issuing the Code. Our Code is regularly checked to see if any changes to the law or regulations, or changes in our business activities, make any updates necessary. Any changes or alterations to the Code are authorized by the Managing Board.

## Directives, guidelines, policies and standards

This Code by no means addresses all themes related to workplace conduct. The company maintains additional directives, standards, guidelines and policies which may provide further guidance in addition to the Code, and may deal with aspects of conduct which supplement this Code.

Comprehensive information on business ethics and Compliance, additional directives, guidelines, contact persons and helpful links for our employees can be found on Lenzing-Connect.

## Disciplinary actions in case of violations of the Code/laws

All employees are encouraged to adhere to the Code, as well as policies and laws and additional guidelines and policies, while acting on behalf of the company. Negligent or even intended violations against the law, this Code or our directives and guidelines can lead to disciplinary action in compliance with applicable local laws, corporate agreements and the relevant contracts.

The company reserves the right to institute legal proceedings against any perpetrators.

**The following applies only for the USA:**

It is expressly forbidden to breach the above Code of Conduct.

Each contravention will result in the undertaking of disciplinary measures. These will accord to nationally-applicable laws, corporate agreements and contracts with employees.

The Lenzing Group reserves the right to institute penal or civil proceedings against perpetrators under observance of the applicable nationally-applicable laws.

Nothing in this document is intended, or will be interpreted, to interfere with, restrain or coerce any employee's lawful exercise of his or her rights under any nationally-applicable law, in particularly including collective bargaining agreements, including but not limited to lawfully discussing terms and conditions of employment, engaging in protected concerted activity, acting together for mutual aid or protection or otherwise lawfully exercising their rights under any nationally-applicable labor law. Any violations of the Code of Conduct shall be dealt with in accordance with the nationally applicable labor law.



[www.lenzing.com](http://www.lenzing.com)

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