

# Organisationsanweisung: Compliance Guideline



OA 023c

Zugehöriger Prozess: FP01; Dokumenteneigner: AL Qualität

Ersterstellungsdatum & Autor:  
Andreas Matzig, 14.05.2020

Erstellungsdatum aktuelle Version & Autor:  
Andreas Matzig, 30.10.2021

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15.04.2022

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## Purpose of this statement

Explaining and shedding some light on the topic of modern-day slavery/circumstances of slavery like working conditions within the organization. Bringing the importance of this issue in the global supply chain to the attention of all stakeholders.

For reason of simplicity Franz Barta GmbH is referred to as – Barta - in the following text.

## Area of effectiveness

Franz Barta GmbH Wien. All Barta employees acting officially on behalf of Barta, regardless of their physical location.

## Document range

All Barta compliance related documents are in the number area "023". Kindly refer to other files of the 023 series for specific compliance topics.

## Declaration of Operations and Management Principles of Franz Barta GmbH

- Franz Barta GmbH is an experienced and stable producer of unique and top-quality products, creating long-term value for stakeholders.
- The vision of the Barta Group is to be a company respected for excellence in the things it does and built by people that are proud of it.

## Operations, management, and all other activities of the company are founded upon these firmly set values:

**RESPECT:** Our day-to-day business and decisions are driven by the respect we hold for one another and our business partners.

**COOPERATION:** Mutual communication and cooperation among individuals and within teams is the key to our success.

**EFFORT:** We make the greatest possible effort in order to become a top-quality and dependable supplier, business partner and employer.

**RESPONSIBILITY:** We recognize our responsibility toward people, society and the environment. We do the right thing. We think about the future.

**INNOVATION:** Innovation is the key to our development. Our growth is based on experience; we are open to change, opportunity, and new ideas.

**OPERATIONAL EXCELLENCE:** We strive for perfection and operational excellence. We want to keep improving – to be the best in what we do.

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## BARTA's VALUES ARE EMBODIED IN OUR COMMITMENTS

### Key Commitments and Principals

- We follow all applicable laws and regulations, including implemented management systems such as ISO, IATF and others.
- We comply with concluded contracts, agreements and obligations.
- We treat all of our Barta colleagues and stakeholders with dignity and respect.
- We are a responsible citizen; we recognize the values of corporate social responsibility.
- We strive to grow, innovate and create long term value for our stakeholders.
- We protect Barta's assets, both tangible and intangible.

### Equal Treatment

- We are committed to providing equal employment opportunities. We treat everyone fairly, and we never engage in any form of unlawful discrimination. We follow all anti-discrimination laws, and our employment decisions (such as recruiting, hiring, training, salary and promotion) are never based on discrimination against individuals on the basis of race, color, gender, age, national origin, religion, sexual orientation, gender identity, gender expression, marital status, citizenship, disability, health status or any other legally protected factor.

### Physical and Verbal Violence in the Workplace

- We are committed to providing a safe work environment. We never tolerate any form of violence, physical and verbal. "Violence" includes threats or acts of violence, intimidation against others or attempts to instill fear in others.

### Preventing Harassment

- We are committed to providing a harassment-free environment, in which we all have an opportunity to contribute our highest potential. "Harassment" as a behavior, either physical or verbal, done in person or by other means (such as harassing notes or emails), that creates an offensive, intimidating, humiliating or hostile work environment that unreasonably interferes with another person's work performance is not tolerated by any means.

### Workplace Health and Safety

- Our employees are our company's most valuable asset, and so we are committed to ensuring the highest standards of safety to protect ourselves, our colleagues and external parties who work at or visit our sites. We follow all Barta safety and security procedures, as well as applicable laws and regulations. Nothing justifies working around or ignoring any safety rule – whether an internal procedure, external regulation or law.

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## Drug and Alcohol Use

- Business at Barta is conducted in a safe and responsible manner, free from the influence of any substance that could impair or alter job performance. We never tolerate alcohol, drugs, controlled substances or medication in a way that might harm our ability to conduct business safely and successfully.

## Child Labor and Forced Labor

- We forbid the use of child labor, forced labor, or compulsory labor, in any of our facilities. An individual under the age of 15 or the underaged person without completed compulsory school attendance is considered a child. Individuals under the age of 18 years require increased job protection in the form of specially arranged working conditions.

## Wage and Hour Practices

- We follow all applicable wage and hour laws, including minimum wage, overtime and maximum hour laws. We never require an employee to violate these laws.

## Freedom of Association

- We respect every employee's right to choose to join a trade union, or to have recognized employee representation in accordance with applicable law. We do not violate these employee rights.

## Keeping Barta Information Secure

- All our employees keep confidential information about Barta secure, including any information they may come across during their work. "Confidential information" is any information that is not available to the public but has been learned as a result of one's position within Barta.

## Protection of Barta Intellectual Property

- Barta's Intellectual Property (IP) is considered as one of its most valuable assets and all employees spare a maximal effort in protecting it. IP includes copyrights, patents, utility models, trademarks, trade secrets, design rights, trade dress, logos, know how, photos / videos, individuals' names and likenesses, and other intangible industrial or commercial property.

## External Party Information

- We are committed to safeguarding the confidential information of our business stakeholders. We respect and comply with all confidentiality agreements entered with our partners. We value this cooperative relationship, and so we never share a stakeholder's confidential information with another entity.

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## External Party Intellectual Property and Commercial Rights

- We respect all external party intellectual property (IP) rights and other intangible commercial rights belonging to others. These rights include creative works, personality rights, and other ideas and inventions protected by law such as copyrights, patents, utility models, trademarks, trade secrets, and design rights, among others. We never knowingly infringe upon these rights.

## GDPR

- We comply with all applicable rules related to the General Data Protection Regulation (GDPR).

## Employee Data Privacy

- We properly manage and use all personal data that our employees, as well as prospective and former employees, entrust to us.

## Protecting the Environment

- Barta is a responsible citizen. We aim to meet or exceed all applicable environmental laws & regulations and permit conditions, and to use environmentally sound practices to ensure the protection of the environment. We look for all possible opportunities to reduce waste and emissions.

## Ensuring Product Quality and Safety

- Product quality and safety are of the utmost importance to us. Our customers choose Barta because we provide products of superior quality and value.
- We must ensure that Barta meets or exceeds all applicable legislative and regulatory requirements, including our certified standards or management systems such as ISO or IATF, related to product quality and safety. Our products and packages are safe for consumers and the environment when used as intended.

## Complying with Competition Laws

- Barta is a vigorous and fair competitor. We succeed based on the quality of our products, our operational excellence & our employees, and never using unfair business practices. We adhere to market competition laws (also referred to as "antitrust" laws).

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## Transparent Behavior

- We strictly follow all applicable anti-corruption laws and regulations, including legislation regulating foreign anti-corruption practices. We will neither engage nor tolerate any form of corruption, bribery, theft, embezzlement, or extortion.
- We never make supplier, customer or other business decisions based on any personal benefit given or offered. We do not solicit or accept bribes or kickbacks from anyone who does or seeks to do business with Barta. We never offer or give any bribes or kickbacks to any supplier, customer or other stakeholder.

Barta complies with all applicable provisions against corruption in accordance with:

- a) OECD convention of 1997 and the
- b) UN convention against corruption of 2003 (UNCAC)

## Handling Potential Conflicts of Interest

- We always act solely in the best interests of Barta. To uphold Barta's reputation, we make every effort to watch out for any situations that may create a conflict of interest, whether actual or potential.

## No illegal Financial Transactions

- We will not tolerate any use of illegal financial transactions including any payments or other benefits to individuals, companies, international organizations, or governmental bodies for the purpose of influencing the decision-making process which would violate applicable laws, internal rules and procedures. Barta is entitled to terminate any contractual relationship if it believes, in good faith, that the contractual party has violated applicable anti-corruption laws or any other regulation by its conduct.

## Boycotts and Embargoes

- We have systems and processes in place to help us comply in a responsible manner with economic sanctions and trade embargoes.

## Communication

- We strive to provide clear and accurate information to the media, external business partners, state authorities and the public. Clear and accurate communication helps us maintain and develop our relationships with the public and other external stakeholders, which in turn strengthens our corporate reputation.
- Management of the Barta Group shall provide the necessary resources required to fulfill this declaration, create conditions for all employees to understand the principles and conduct regular reviews. We expect our partners to follow these or similar guidelines; this expectation is also considered in their selection.
- The Declaration is made available on the website of Franz Barta GmbH.