



**Our Code of Conduct**  
for all persons  
working for and with Fronius



We act

in line with  
our values.

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Version 01/04-2024

Compliance

Specified in Controlled Document for this PDF:

CCI\_CC\_Fronius\_Code of Conduct\_General, Version 4 (04/2024)

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# 1 Values that last for generations

Our core corporate values of Community, Innovation, Creativity, Sustainability, Quality Awareness and Cost

Effectiveness guide us and are at the centre of our daily activities. Legally compliant and ethical behaviour in business decisions is both a top priority for us and part of our success. We cut no corners when it comes to law and ethics and define clear principles in business life.

With this Code of Conduct, we all commit ourselves to responsible and correct behaviour and thus offer a universally valid point of reference for professional decisions in accordance with our values and principles.

Our employees are an essential part of the company's success. They are the reason for the trust placed in us and our reputation. In addition to this Code of Conduct, our "Fronius Compliance Policy" serves as a guideline and basis for compliant decisions and behaviour in everyday working life: It contains binding rules and offers concrete case studies.

We also expect our business partners to act in accordance with our Fronius values, applicable laws and ethical standards. Therefore, we have summarised our principles for working together with integrity and responsibility in a special "Code of Conduct for our Fronius Business Partners".

When interpreting the rules of the Code of Conduct, everyone should be guided by their own judgement and critically examine whether a specific course of action is ethically or morally questionable or could give rise to criticism. As part of our Fronius values, this also includes politeness, common sense, and appropriateness. If you have any questions or uncertainties, our managers and our Legal Compliance Team are always available to provide advice and support.

We thank you for your commitment and dedication to our values. Together we will continue to build the success of Fronius.

**This is who we are. We are Fronius.**

## 2 To Whom this Code of Conduct applies

In this Code of Conduct, we have summarised binding rules and we expect everyone who works for and with Fronius to comply with them.

Therefore, this includes all employees, regardless of the type of employment (salaried employees, workers, apprentices, interns, leasing personnel) and position in the company. In this context, our managers have a special function as role models.

Acting responsibly and with integrity at all times is in the interests of us all. We strictly reject any abuse of one's own position for personal gain or the toleration of behaviour that is not in line with this Code of Conduct.

We also expect our business partners to behave in accordance with this code, in compliance with the law and with integrity across our entire value chain.

In individual countries in which we operate, stricter rules may apply than those included in the standard set-out herein. In such a case, the stricter regulations must always be applied.

**All persons working for Fronius are obliged to comply with applicable laws and our internal principles and policies.**

### 3 Legally Compliant and With Integrity

Fronius takes responsibility for the impact of decisions and activities on society, the economy, and the environment. Honesty and integrity form the basis of our actions.

The integrity of each and every individual is essential in order to maintain the trust of our business partners and other stakeholders.

Therefore, we are fully committed to complying with the applicable laws and our internal rules.

This forms the basis for all business activities and decisions.

We use a legal register to ensure that the key standards for Fronius are both known and that appropriate processes and measures are actually implemented.

In addition, each and every individual is required to inform themselves about innovations and regulations applicable in their own area

It is a matter of course for us that all persons acting on behalf of Fronius comply with applicable laws and internal rules.

## 4 People at the Centre

For us as a family business, people are at the centre of everything we do. **Community and teamwork** are core values at Fronius and key success factors for our organisation. Every person is unique and valuable and has the right to be treated with respect and dignity. Our corporate culture is characterised by tolerance and appreciation. This strengthens the community feeling and loyalty to our company.

**We condemn any form of discrimination, bullying or sexual harassment.** At Fronius, we see diversity as an opportunity and promote the different perspectives, experiences, and competences of our employees. We treat everyone equally, regardless of gender, age, origin, religion, sexual identity or different mental or physical characteristics or abilities. We are considerate of our employees with special needs.

**The health and safety** of our employees is particularly important to us. That is why the highest safety standards apply in all our operating facilities. All occupational safety regulations must be complied with at all times.

We see ourselves as a fair employer. Fronius attaches great importance to **respect for human rights** and its **commitment to the UN Human Rights Charter and the ILO core** labour standards. We are committed to ensuring appropriate and safe working conditions, paying appropriate wages, respecting freedom of association and the right to collective bargaining. Unfair, exploitative, and abusive labour practices as well as child and forced labour are prohibited both within our organisation and across our supply chain and are unacceptable to Fronius.

**We treat each other with respect and appreciation and promote a safe and healthy working environment.**



## 5 Against Corruption and Money Laundering

We reject all forms of corruption and do not tolerate bribery. Giving or accepting gifts of any kind that are linked to obligations or expectations is alien to us and will not be accepted.

Even the mere appearance of improper or dubious behaviour should be counteracted accordingly. Any granting or acceptance of benefits is therefore prohibited if it could give the impression of undue influence on business activities.

Our actions are always orientated towards the interests of Fronius. We take our decisions impartially, led by business interests and objectively and do not allow ourselves to be influenced by personal interests or relationships.

However, in everyday working life, we may find ourselves in situations in which our personal or economic interests come into conflict with the interests of the company, for example in connection with secondary employment or family or friendly relationships. We disclose such conflicts of interest to our supervisors immediately and in full, without being asked to do so.

We are committed to complying with all applicable anti-money laundering regulations. No cash flows that could be associated with money laundering may be accepted. In case of doubt, a careful check must be carried out.

We reject corrupt behaviour and money laundering. We act objectively and do not allow ourselves to be unduly influenced. We disclose conflicts of interest immediately.

## 6 Careful treatment of property and data

Confidential information of any kind, such as financial data, contracts, correspondence or technical data obtained in the course of professional activities, is intended exclusively for internal use and for the fulfilment of professional tasks. Its use for the pursuit of personal interests or disclosure to external third parties without authorisation is prohibited.

We always store **company information** securely and protect it from access by unauthorised persons. We also protect the (intellectual) property of Fronius and ensure that unauthorised third parties do not gain access to this exclusive knowledge.

We use **company resources** carefully and sparingly.

The obligation to maintain confidentiality shall continue to apply even after the termination of the employment relationship. We respect the intellectual property of others. Any unauthorised use of third-party intellectual property will not be tolerated.

We handle the personal data entrusted **to us with the utmost sensitivity** and only process it in a lawful manner. We are taking appropriate measures to achieve this.

We attach great importance to **transparent communication and truthful reporting** and disclose relevant information properly, correctly, completely, and in good time. When preparing records and reports, we ensure that the information is not manipulated or misleading.

**Strictest confidentiality must be maintained with regard to all company and business secrets as well as with regard to topics relevant for the company. We handle data and information with care.**

## 7 Fair in Competition

Through our transparent, fair and professional behaviour on the market, we not only safeguard our interests in the long term, but also help our company to remain competitive and successful in the long term. We therefore expect the applicable national, European and international rules on **competition and antitrust law** to be complied with.

We are aware of the responsibility that comes with being a technological leader and do not abuse this position.

We do not engage in any activities that would restrict competition, such as in particular the allocation of markets or customers or the fixing of prices. In particular, we do not discuss internal matters with our competitors or share information that could influence market behaviour. This includes discussions about prices and sales conditions, costs and calculations, stock lists and capacities, production plans, strategic information of all kinds, as well as confidential or proprietary information.

We never deliberately provide misleading or false information regarding our products and services. We make our purchasing decisions exclusively on the basis of objective criteria.

**We respect fair competition and do not take any actions that could distort the market. We do not exchange sensitive information, such as prices or cost calculations, with competitors.**

## 8 Picky Regarding Partnerships

We are convinced that long-term business relationships are based on trust. We are also aware of our responsibility across the entire value chain. **Therefore, we select our business partners carefully and obtain sufficient information in order to check their integrity and reliability.**

We take measures to ensure that existing sanctions, embargoes or legal regulations on **export control** or money laundering are not violated when working with third parties.

We ensure that remuneration is only paid for services actually rendered and is proportionate to the service provided. We immediately report suspicious transactions or payments internally in order for appropriate measures to be taken.

**The behaviour of our business partners also has a direct influence on the image of Fronius. That is why we select them with great care. We obtain sufficient information and verify its integrity.**

## 9 Open and Consistent

In the course of our day-to-day business, situations can arise in which we do not know how best to behave. The first points of contact in such cases are the direct supervisors or the Legal Compliance department ([compliance@fronius.com](mailto:compliance@fronius.com)).

We deal with concerns and mistakes openly and transparently – this is the only way we can improve continuously.

Violations of our Code of Conduct can have serious consequences and damage our entire company. However, each and every individual can also face sanctions and consequences.

We take any offence seriously and will take appropriate measures to clarify the facts. In addition to consequences under labour law, we also reserve the right to take criminal and civil action.

In the event of known or suspected breaches of legal or internal regulations, everyone is required to report these promptly. In addition to the reporting options listed above, it is also possible to report via the Fronius Whistleblower Reporting Channel, available on our website.

We treat all reports confidentially and investigate them carefully.

In order to promote open and trusting communication, we expressly state on this occasion that persons who submit reports in good faith should in no way fear negative consequences of any kind. This also applies to other persons who contribute important information in order to facilitate the investigation of such misconduct.

### Freely selectable reporting channels:

- Direct supervisor
- Legal Compliance
- Management
- Whistleblower reporting channel

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