



# CODE OF CONDUCT OF LINMAG GMBH



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COMPLIANCE GUIDELINE

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## PREAMBLE

LINMAG sets high standards for itself and its employees and it is our top priority to be a reliable, fair and predictable partner for customers, suppliers and our other business partners.

The stable growth and the consistently good development in recent years offer us many opportunities, but also present us with enormous challenges.

In order to meet the high demands and successfully manage the challenges, we have developed Compliance Guidelines and a Code of Conduct.

It is now written down what has been a matter of course for us since the company was founded: Compliance with ethical standards, social responsibility, fair competition, sustainability and law-abiding business activities.

The above-mentioned Guidelines and the Code of Conduct are intended to reflect LINMAG's corporate philosophy, values and principles: a cooperation based on mutual trust and fairness - both towards our customers, suppliers and other business partners as well as towards our employees.

LINMAG is fully committed to the Guidelines and the Code and the standards, values and responsibilities contained therein and sets a good example.

Steyrermühl (Austria), April 2022

Ing. Mag. Günter Holleis  
Management of LINMAG GmbH



## ABOUT LINMAG

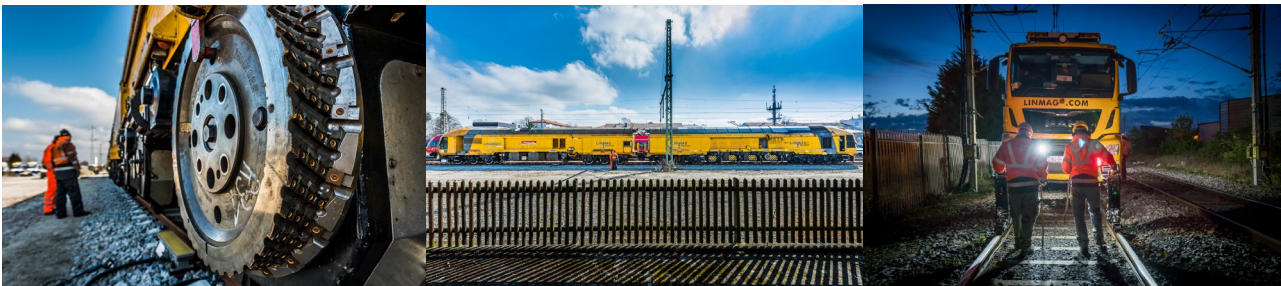
LINMAG was founded in 2012 and has its roots in the former division „Rail Service“ of its sister company Linsinger Maschinenbau Gesellschaft m.b.H.. Today LINMAG is a reliable rail maintenance service partner for many leading international infrastructure companies. By forward-looking investments and constantly developing our service offer, we convince our customers with immaculately reprofiled rails and offer individual rail maintenance solutions.

The development of the company relates to basic values such as credibility, competence, employee and product safety, professional ethics standards and pro-ecological activities.

We build our customers' trust in our products and services on the basis of quality, safety and environmental policy.

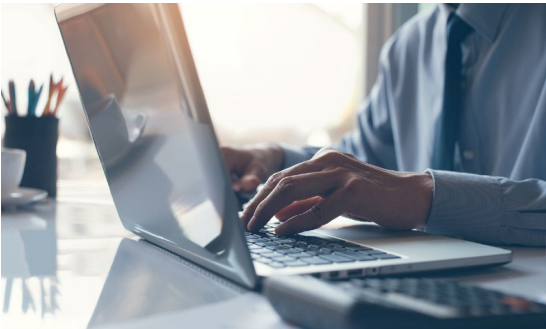
Our quality, safety and environmental management system is compatible with:

- EN ISO 9001:2015 EN 15085-2:2008
- EN ISO 14001:2015
- Framework directives on the protection of workers (89/391/EEC)
- Employee Protection Act (ASCHG)



# COMPLIANCE GUIDELINES AND CODE OF CONDUCT (CCC)

This CCC is based on our corporate policy and contains all applicable guidelines and principles for conduct in accordance with values and laws as well as rules for ethically and legally impeccable conduct. The CCC is a conglomerate of values and behavioural guidelines that have to be applied in different environments and contexts, depending on the respective situation.



## A. SCOPE

This CCC must be observed in the interest of LINMAG and in the interest of each individual employee. Compliance with the CCC is intended to strengthen LINMAG's reputation and thus our competitiveness. This CCC applies to all LINMAG employees (employees, workers, leased staff, etc.) regardless of their position in the company and also to all who act on behalf of or for LINMAG. It is important that LINMAG's business partners also comply with the law and the CCC. Leaders shall set a positive example. Instructions from superiors contradicting the CCC are not binding and cannot be used as justification for misconduct.

## B. GENDER-NEUTRAL FORMULATION

For reasons of readability, the simultaneous use of male and female language forms is avoided. In the interests of equal treatment, all designations of persons generally apply to both genders.



## C. LAWS AND GUIDELINES

Observing all regulations and laws is a top priority for LINMAG. The applicable laws and other external and internal regulations must be strictly followed in all business activities and decisions. All employees are required to obtain comprehensive information on the laws, other regulations and internal regulations applicable to their respective areas of responsibility and, in cases of doubt, to seek advice from the relevant departments of LINMAG.



## **1. SOCIAL RESPONSIBILITY**

### **a) Alcohol and drug abuse**

Alcohol and drugs influence a person's behaviour and ability to work. The health of our employees is very important to us. Therefore, it is generally forbidden for our employees to consume alcohol, drugs or other intoxicants during working hours.

### **b) Sexual harassment**

LINMAG does not tolerate sexual harassment in any form and under any circumstances. Violations will be subject to discipline or other appropriate management action.

### **c) Discrimination**

LINMAG rejects any form of discrimination based on age, gender, religion or belief, ethnicity, marital status, disability, culture, political opinion, sexual orientation or social affiliation. For LINMAG, every person is equal, unique and valuable and is respected for his or her individual abilities.

### **d) Bullying**

LINMAG will not tolerate bullying in any form and under any circumstances. Violations will be subject to discipline or other appropriate management action.

## **2. FAIR, RESPECTFUL AND SAFE WORKING CONDITIONS**

Our employees are our most valuable asset. That is why we strive to create a safe and attractive working environment in which trust, teamwork, taking on responsibility as well as respectful and fair interaction with one another are valued and lived.

LINMAG pays attention to fair working conditions and high occupational safety standards. We reject any form of child or forced labour.

The health of our employees and safety at work are very important to us.

LINMAG complies with the respective legal regulations on health protection, occupational safety as well as fire and environmental protection. Furthermore, we strive to continuously improve the safety and health of our employees in their working environment and to avoid hazards.

### **3. DILIGENCE IN SUPPLY CHAINS**

For the manufacture and provision of our product and service solutions, we source raw materials and goods and services worldwide and expect the highest standards of sustainability from our suppliers, both in their own companies and within their local and global supply chains. We place a special focus on the continuous improvement of working conditions, the protection of human rights and the environment, as well as fair dealings and sustainable actions within the supply chain.



### **4. ENVIRONMENTAL PROTECTION**

A responsible and sustainable approach to the environment is an important part of our corporate policy. We regard compliance with all relevant environmental protection laws, including the regulations of the countries in which LINMAG operates, as a matter of course for management, executives and each individual employee.

Both in the development of new products and in the operation of production facilities, we always ensure that all environmental impacts arising from these are kept as low as possible.

We also attach great importance to the conscientious handling of waste and contribute to the recycling of materials and products.

Each individual employee has a certain responsibility to treat natural resources with care and to contribute to the protection of the environment through his or her personal conduct.



## 5. FAIR COMPETITION

We are committed to fair competition and consider it an important component of our long-term corporate success. LINMAG complies with the applicable competition rules in all its business activities and does not participate, directly or indirectly, in business practices that violate competition law. In the interests of fair competition, we do not use unfair business practices, such as statements about products that could mislead customers, belittling competitors or inappropriate advertising.



## 6. CORRUPTION

LINMAG attaches great importance to being unswayable and independent. Therefore, we avoid circumstances that could influence our impartiality. Corruption is the abuse of entrusted power for personal benefit or advantage. The term “personal benefit” refers to benefits that personally enrich or improve a person. This includes gifts, invitations and other benefits (cash, vouchers, etc.).

LINMAG employees may therefore neither directly nor indirectly grant, promise, accept or demand advantages which are suitable to influence transactions in an unacceptable manner or even to give the appearance of such an influence. Cash or non-cash benefits (e.g. vouchers), for example, may not be accepted, offered or granted under any circumstances.

## 7. AVOIDANCE OF CONFLICTS OF INTEREST

Every employee at LINMAG is obliged to avoid conflicts between his private interests and the company interests of LINMAG. All decisions should be made in the interest of LINMAG and should not be influenced by private interests.

Conflicts of interest can arise, for example, through family or friendly relationships with a business partner or his employees or by own financial interests (e.g. by own entrepreneurial activities or investments). In addition, sideline activities can establish an economic or moral dependency relationship.



Potential conflicts of interest must be disclosed in full immediately and reported unsolicited to the respective manager.

## **8. CONFIDENTIALITY AND PROTECTION OF INTELLECTUAL PROPERTY**

The intellectual property of LINMAG includes, for example, know-how and industrial property rights, product developments, development of new technologies and results from scientific or technical research. These represent valuable assets and are the basis for our success. This information must therefore be particularly protected.

Every single employee of LINMAG is obliged to protect the intellectual property, know-how etc. of LINMAG particularly carefully by keeping this information secret and using it only for business purposes. In particular, this confidential information may not be disclosed to third parties.

Business partners of LINMAG must sign confidentiality agreements if confidential information is brought to their attention after approval by a head of department or the company management. LINMAG also protects the business secrets of all business partners, treats them with strict confidentiality and does not disclose them to unauthorised third parties.



## **9. DATA PROTECTION**

The protection of personal data is a special concern of LINMAG. We therefore process personal data of our employees and business partners exclusively on the basis of the relevant legal provisions (in particular EU GDPR, DSG (Data Protection Act), TKG (Telecommunications Act) 2003).

When collecting and processing personal data, LINMAG pays attention to lawfulness, fairness and transparency, the limitations on use, the minimisation of data, correctness, storage limitation, integrity and confidentiality.

Further information on data protection can be found in our Data Privacy Statement on our website at <http://www.linmag.com/en/dataprivacy>.



## 10. REPORTING MISCONDUCT

If employees discover specific violations of the CCC or unlawful or dubious events, these must be reported immediately to the following departments/bodies in the order listed below:

- Line manager or department manager
- HR department
- Works council
- Company management

All reports are carefully examined with due regard for confidentiality.

Employees who report misconduct will not suffer any negative consequences.

## 11. IMPLEMENTATION AND REVIEW

The HR Department is responsible for the implementation and review of the CCC. All employees are regularly informed about the content of the CCC and the applicable legal regulations.

LINMAG reserves the right to amend, change or cancel the CCC at any time and for any reason.

Our CCC can be found on our website at <http://www.linmag.com/en/download-en> and on the intranet under IMS Manual/ Guidelines and the Code of Conduct (CCC).