

# **TUBEX**

# **Code of Conduct**



# Working together for our core values

As an employee of **TUBEX Aluminium Tubes**, you know that we all take pride in the trust, integrity, reliability and innovation that we bring to our work every day. Our people are the key to upholding these core values and to maintaining the reputation that drives our long-term relationships with our suppliers, our customers and everyone in between. We are grateful for the role that each and every one of you plays in our success.

This **Code of Conduct** sets out the principles that guide our work at TUBEX Aluminium Tubes. It reflects our awareness that business activities must be mindful of their social and environmental impact, and respectful of the rights of the individuals involved. By following this Code, we can all contribute to the success of TUBEX Aluminium Tubes and to a working environment which takes care of its people, its products and the environment.

Thank you for your support.

A handwritten signature in black ink, appearing to read 'Thierry Bitout', with a stylized, flowing script.

Thierry Bitout, CEO



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# 1. Preamble

At TUBEX Aluminium Tubes, we have decades of experience in the packaging industry and a specialised focus on producing aluminium tubes. We are steadily expanding our capacities to strengthen our market-leading position, right up to the global level.

We are passionate about new challenges and we develop innovative and sustainable solutions that shape the entire industry. Professional, committed employees are the driving force behind TUBEX Aluminium Tubes.

All of our business activities are based on trust, integrity, reliability and innovation. This provides a solid foundation on which we can build a successful future for our customers and our employees. We aim to be a responsible company that meets the highest ethical, environmental and professional standards.

With this in mind, we expect honest, legal behaviour from both ourselves and our business partners, and a willingness to engage in ongoing improvements to all activities, measures and policies.

Our Code of Conduct describes how we aspire to work at TUBEX Aluminium Tubes, and guides us in our business relationships. It helps us to build long-term relationships with customers, suppliers, authorities, business partners and colleagues. It is one of the cornerstones of our company and a crucial element of our business culture.

Our success depends on confidence, professionalism, transparency and trust. Each and every one of us has a critical role to play in building and maintaining these values.



„Our professional and committed employees are the driving force behind our company.“

## 2. Foundation

This Code of Conduct is founded on applicable legal requirements and internationally agreed standards – in particular the ten principles of the UN Global Compact, the ETI Base Code, which is founded on the conventions of the International Labour Organization

(ILO); the UN Convention against Corruption; and the Rio Declaration on Environment and Development. TUBEX managers must ensure that their employees follow this Code of Conduct, and they must act in a manner that sets a good example.

## 3. Labour and human rights

Our human rights statement seeks to earn the trust of everyone involved in our operations, and demonstrates our commitment to ethics and human rights through our words and actions. An essential element of our human rights policy concerns labour rights and working conditions. The rights of our employees and of those working for our suppliers and business partners will always be respected and we will work to ensure high labour standards. We do not support or engage in the use of child labour, forced or compulsory labour, or any activities linked to the trafficking of people.

We treat people with dignity, respect and compassion, and foster a trusting work environment that is free of harassment, intimidation and unlawful discrimination.

As a company with global reach, we promote equality in all our business units and will not accept discrimination of any kind – whether on the basis of gender, race, family status, sexual orientation, ethnicity, culture, union membership or religion. We provide equal opportunities to all of our employees.

Our **NEXT@TUBEX** programme gives our staff fair opportunities for career advancement by focusing exclusively on their skills and qualifications.

We have also implemented a fair and transparent recruiting process that reflects our commitment to tackling discrimination.

We strictly comply with legislation on health, safety and working conditions, such as fair wages, working hours and leave. We support the right of our employees to freely associate and we comply with all local and national laws governing the right of employees to select or not select workplace representatives. Employees who act as workers' representatives shall not be disadvantaged or discriminated against because of their role.

We strive to conduct ourselves with integrity and to show respect for our colleagues and everyone we encounter at work. Bullying, harassment and similar behaviour will not be tolerated.



### We reject:

- Child labour
- Forced or compulsory labour
- Unlawful discrimination or harassment of any kind
- Any activities relating to trafficking



## 4. Occupational health and safety

The well-being of our employees is paramount. We observe the statutory requirements and standards for a safe and healthy working environment, and take appropriate measures to implement these. Continually improving the working environment is the foundation of a successful and reliable health & safety culture within our company.

To ensure the effectiveness of the measures, we conduct risk analyses and monitoring. We provide all employees with ongoing training to raise their safety awareness and to build confidence and skills for dealing with security threats and preventing accidents.

Training our staff on the correct handling of dangerous goods and providing them with protective equipment are among the most important elements of our health & safety standards.

All employees are encouraged to promote health & safety in their own work environments and those of their colleagues, and to report unsafe conditions and behaviours that might otherwise lead to accidents (see point 10). Our employees must comply with statutory and internal health & safety requirements during their work. Any infringement must be reported immediately, and appropriate preventative steps must be taken.

„Continually improving the working environment is the foundation of a successful and reliable health & safety culture within our company.“



# 5. Business ethics

## Combating corruption

We do not tolerate any form of corruption in our global business operations. Corruption is banned by international conventions, national laws and our own internal guidelines. TUBEX Aluminium Tubes does not tolerate any form of bribery or extortion, among employees or business partners, or any business practices that could create the impression of improper influence. Our ethical business practices are demonstrated through transparent financial reporting.

All TUBEX Aluminium Tubes employees are prohibited from directly or indirectly demanding, accepting, offering or granting advantages in business transactions that are designed to dishonestly influence business procedures, or that create the impression of doing so.

## Exchanging gifts or entertainment

We have a zero-tolerance policy on accepting gifts or entertainment of an inappropriate value, or those that corrupt. Our employees will only give and accept small gifts as long as they do not intend to influence business decisions or create the impression of doing so. In case of doubt, employees must contact their line manager.

## Money laundering

We are committed to complying fully with all anti-money laundering laws.

## Conflicts of interest

A conflict of interest may arise when private interests interfere or even appear to interfere with our company's interests. All business decisions should be made solely in our company's best interests, and not for any personal gain.

## Fair and free market behaviour

We fully endorse the principles of fair and free competition as a fundamental component of the market economy. All TUBEX Aluminium Tubes employees are obliged to comply with the requirements of antitrust law and competition law. TUBEX Aluminium Tubes prohibits any behaviour that is aimed at or results in the hindrance, restriction or distortion of fair and free competition.

Our competitive position is based exclusively on our business success factors, in particular our innovative strength and our quality, reliability and fairness. With this in mind, we always comply with antitrust law when dealing with our competitors, business partners and customers.

Every employee is asked to immediately report incidents or suspicions of unethical behaviour to [compliance@tubex-tube.com](mailto:compliance@tubex-tube.com) (see point 10).



**We reject:**

- Any form of corruption in our global business operations
- Any form of bribery among employees or business partners
- Any business transactions that are designed to dishonestly influence our business procedures
- Any behaviour that is aimed at or results in the hindrance, restriction, or distortion of free and fair competition

## 6. Information handling and data protection

We secure and protect the confidentiality of sensitive information, data and corporate secrets. Our capacity for innovation is crucial to our success on the international stage. This is why we ensure that sensitive information, intellectual property rights and corporate secrets are appropriately protected and not shared without authorization.

We also respect the corporate secrets of our business partners and competitors. Our employees are duty-bound to keep sensitive information and corporate secrets confidential. In all business processes, we guarantee the protection of rights to privacy in compliance with the applicable laws. Furthermore, we have established binding principles for handling personal data.

## 7. Rights and responsibilities

We want the products and services from TUBEX Aluminium Tubes to always be at the forefront of the industry in terms of quality and reliability. We bear responsibility for our products and our work, and for their impact on our employees, our business partners, society and the environment. In order to fulfil this responsibility, we must all act in a way that is lawful and honest.

Environmental protection, health & safety, and high standards of hygiene are integral elements of every step in our manufacturing and sales processes. We guarantee the highest quality and safety for our products by complying with internal guidelines and with international and national regulations, and by ensuring seamless quality management.



„We guarantee the highest quality and safety for our products.“



## 8. Environmental responsibility

### Environmental protection

We respect our planet's natural habitats and are committed to conserving resources and reducing environmental pollution. Every TUBEX Aluminium Tubes employee plays a role in consistently improving our environmental performance.

Sustainable environmental protection is a cornerstone of our work. We operate with respect for the environment and in compliance with all laws and regulations that apply in the countries where we are active. Reducing emissions, preserving natural resources, safely handling or avoiding hazardous waste, and promoting waste recycling and re-use have the highest priority and are appropriately managed. We are committed to raising awareness, encouraging participation, and educating and training our employees in environmental matters.

We also work with our suppliers and customers to make our value chain greener – from sourcing and production to the use and disposal of our products.

### Environmental impact

We assess and identify the environmental impact of our business processes and products. Energy consumption and emissions are measured, monitored and controlled with the aim of minimising their environmental impact. Any activities which have the potential to harm human or environmental health are appropriately managed. We appoint external experts to evaluate our results and set targets for improvements.

By applying World Class Manufacturing principles, we can reduce energy, waste, and water use while making our factories and offices more efficient. We are also exploring ways of continuing to manage our impact even after we have maximised our energy reduction.

### Resource efficiency and the circular economy

Our products exist to protect both their contents and the planet. We aim to use natural resources (energy, water and raw materials) in a responsible, efficient and sensitive way. We invest heavily in the sustainable development of our tubes and in the use of environmentally friendly technologies and materials. The circular economy is a model that reduces waste and keeps materials in circulation for longer. Contributing to the circular economy is therefore one of TUBEX Aluminium Tubes' corporate values.

Our business is designed to minimise waste and optimise the way we use resources. We have a long history of working to reduce the life-cycle impact of our tubes. Our position on circularity is built around renewable and recyclable materials, responsible sourcing and doing more with less.

„We respect our planet's natural habitats and are committed to conserving resources and reducing environmental pollution.“



## 9. Responsible sourcing

We share our ethical, social and environmental principles with our suppliers, subcontractors, agents and consultants. All our requirements in respect of these principles are outlined in our Supplier Code of Conduct and we expect our suppliers, subcontractors, agents and consultants to fully comply with them.

In order to be able to fully satisfy our customers, we set ourselves the highest standards, which we also ask our suppliers to meet. The purchasing process for raw materials, packaging materials and external services plays a significant role in our certified quality management system.

As well as considering the economic and qualitative aspects, our purchasing decisions are also driven by social and ecological factors.

From our business partners, we expect honesty, compliance with legislation and ethical standards, and a willingness to keep developing and improving.

The following procedures are in place to ensure responsible supplier management:

- Acknowledgment of our Supplier Code of Conduct as part of supply contracts
- Evaluation and qualification of new suppliers through a questionnaire
- Annual supplier assessments
- Onsite audits



# 10. Compliance

The values and requirements of this Code of Conduct are binding for all employees of the TUBEX Aluminium Tubes Group. Each employee is responsible for complying with and implementing this Code of Conduct. Managers at all levels should actively set an example for the entire workforce in this regard. All business decisions must take this Code into account, and employees are supported by their superiors when putting it into effect.

## What happens in cases of non-compliance?

We encourage all our employees to uphold and nurture our values and standards. TUBEX Aluminium Tubes will not tolerate any violation of this Code of Conduct. Any misconduct will be dealt with in the framework of internal and legal regulations. Instructions given by superiors that contradict this Code of Conduct are not binding and must be reported immediately. Failure to comply with these non-compliance actions does not constitute misconduct on the part of employees.

## Who can report a violation?

We are committed to open and transparent communication within our company. All employees are asked to immediately report incidents or suspicions of violations of this Code of Conduct.

## What happens after a report has been received?

All incoming information will be processed quickly. As a first step, the information will be checked for conclusiveness and credibility. If these criteria are met, an internal investigation will be initiated. Everyone accused of a violation will have the opportunity to justify and explain their actions.

## Whistleblower protection and anonymity

Employees who report a suspicion in good faith must not experience any negative consequences. TUBEX Aluminium Tubes explicitly allows anonymous reports. These should contain as much detailed information about the compliance violation as possible so that we can carry out an internal investigation if necessary.

## Confidentiality

Any notification of misconduct will be handled in a highly confidential manner. Disclosing the identity of employees supplying such information also constitutes a violation of this Code of Conduct.

## How can violations be reported?



[compliance@tubex-tube.com](mailto:compliance@tubex-tube.com)



Austria: + 43 4352 37488 700

Russia: + 7 921 423 53 17

Slovakia: + 421 45 678 06 83



Address of respective plant  
To: Compliance



This Code of Conduct applies to all plants of TUBEX Aluminium Tubes:

**Tubex Tubenfabrik Wolfsberg GmbH**

Am Industriepark 8  
9431 St. Stefan  
AUSTRIA  
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**ZAO TUBEX Russia**

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