

Compliance with our Code of Conduct

How we conduct our business is as important as the business itself. This Code of Conduct ("Code") is our plan of action for doing business the right way. It underpins our values by providing guidance on how to interact with colleagues, suppliers, customers, competitors and the public. The code thus creates a framework with ethical standards within which all team members operate.

Lead by example

The company encourages all team members, but especially supervisors, executives and managers, to demonstrate integrity and inspire trust.

Supervisors, executives and managers are required to

- to behave correctly at all times and to serve as a role model for appropriate action
- Promote a culture of rule compliance and ethical behavior
- Create an environment where team members feel comfortable asking questions and raising concerns
- Prevent retaliation against team members who raise concerns

Ask for advice and express concerns

Team members are encouraged to report violations or suspected violations of this Code in a timely manner. This should be done without fear. The Company will not tolerate retaliation against any Team Member who reports suspected misconduct in good faith. Good faith means that, as a reporting team member, you have provided all available information and trust its authenticity.

Reports in good faith can be made to anyone you trust in key positions at Lenzing Papier GmbH, for example

- your direct supervisor or
- your manager's manager or
- the works council or a member thereof

Reports can be submitted in the following ways

- personal
- by telephone
- by email

to each person listed above

Prohibition of retaliation — raising concerns is safe

The Company will not tolerate intimidation or retaliation against any Team Member who makes a report in good faith.

Our commitment

Our team members are our company's most important asset.

It is our team members who bring new ideas, implement them every day and respond to the needs of our customers with excellent service. We strive to foster an environment that makes Lenzing a great place to work. We are also committed to treating the communities in which we operate with respect.

We do this by fulfilling our commitments as set out in our culture focus:

- We strive to create an inclusive work environment in which all team members can contribute fully, regardless of their background.
- We value the diversity and individuality of all our team members.
- We attract, develop and retain talented people from different backgrounds with an inclusive attitude.
- We are committed to excellence in everything we do.
- We strive for excellence and the best results.
- We create development and training opportunities for our highly committed employees.
- We promote a positive environment for collaboration and team building.
- We strive to respond quickly and agile.

Human rights

The company is committed to conducting business in a way that respects the rights and dignity of all people.

We respect internationally recognized human rights in accordance with the "Declaration on Fundamental Principles and Rights at Work" of the International Labor Organization (ILO) and the "International Charter of Human Rights". Our commitments are set out in our Human Rights and Labor Standards Policy. All team members are encouraged to promptly report any human rights violations they notice or experience. You can find more information about this in our human rights and labor standards policy.

Every team member has the same opportunity to contribute to the success of the company. To achieve this goal, all team members are required to treat each other with respect. Inhumane treatment is strictly prohibited by the company and violates the company's rules and this code. The company treats all team members fairly and does not discriminate against anyone based on, for example:

- Gender
- Age
- Origin, skin color, nationality, ethnicity
- Social background
- Sexual orientation
- Family obligations (including pregnancy)
- Disabilities
- Political views
- Sensitive health conditions
- Marital status
- Religion

Freedom of association and the right to collective bargaining

The Company recognizes and respects the right of all Team Members to freedom of association and their right to form or join organizations of their choice in accordance with local laws. This includes unions and other labor organizations of their own choosing.

Forced labor and bonded labor

The company prohibits all forms of forced labor, serfdom, conscription, or involuntary work. Slavery and human trafficking are also strictly prohibited. The work of all team members is voluntary at all times.

Working age, child labor

The Company complies with all local labor laws regarding minimum age and child labor laws. Under no circumstances is child labor practiced. All team members must meet minimum age requirements according to local laws. The company maintains official documentation that proves the date of birth of all employees.

Wages, working hours and compensation

The company ensures that all team members receive at least the legally required minimum wage in the country in which they are employed. In addition, all team members are compensated for overtime at least to the extent required by local regulations. The Company is committed to paying team members accurately and on time.

We are committed to:

- Providing safe and healthy working conditions
- Ensuring compliance with applicable legislation regarding safety and security health and internal and external standards
- Training, further education and motivation of our team members to behave safely
- Continuous improvement of our services in the areas of safety and health protection
- Identification and management of occupational safety and health hazards

The Company does not permit the abuse of drugs or alcohol as this poses an unacceptable safety risk.

Acting ethically in our business activities

The company does not tolerate bribery, nor corruption or blackmail. We are committed to operating our business solely on the integrity of our products, services and people. Corruption hinders the development of trustworthy markets and can harm not only our company, but also the communities in which we do business. The company has defined the following anti-bribery and anti-corruption principles ("ABC Principles"):

- We ensure that every commission payment or referral fee is based on a real, legitimate and documented service.
- We do not offer, promise, accept or solicit bribes or kickbacks.
- We ensure that we act appropriately when dealing with public officials.
- We are transparent about corporate sponsorships, charitable donations and political contributions. We expect all those who provide services for or on behalf of the Company to conduct their business ethically.

What does this mean for all of us?

We will not make, offer or promise any payments, gifts, services, offers of employment or other items or benefits of value intended to improperly influence the actions of government officials or private individuals in order to further Lenzing's business interests.

We never offer anything or services of value that could be construed as payment or gift for the purpose of business gain or preservation.

We already avoid the appearance of bribery when dealing with suppliers, customers, government officials, business partners or other parties.

Conflict of interest

All team members are committed to always acting in the best interests of the company. A conflict of interest arises when personal interests, activities or relationships influence our objectivity and loyalty to the company.

Examples of potential conflicts of interest:

- Personal relationships (e.g. employment or care of close relatives or friends)
- Engaging in activities that compete with the interests of our company Use company property, information or resources for personal gain or for the benefit of others
- Employment outside the company that negatively affects one's own work performance
- Acceptance of personal or financial benefits from services provided to suppliers, customers or competitors

What does this mean for all of us?

We avoid activities that actually or even appear to create a conflict of interest with the company.

We work with suppliers, customers and other parties to our business in an objective, professional and fair manner.

Suppliers, customers, certification companies and other interested parties are allowed to conduct unannounced audits.

We do not accept any payments, fees, loans or services from any person or company as a condition of doing business with them on behalf of the Company.

We do not use the company for improper personal gain or embezzlement of the company's assets.

Integrity in the market

We do not conduct discussions on sensitive topics such as pricing policies, discounts, sales conditions or customers - when dealing with competitors, industry organizations and standard-setting bodies or when participating in seminars and congresses.

We do not enter discussions with actual or potential competitors about the sale of our or their products.

We do not bribe or attempt to bribe customers or suppliers to help our business or harm our competitors' business.

We do not engage in any behavior that could create the appearance of unfair competition or abuse of a dominant position in the market.

Lenzing, April 13th, 2026



Ernst Brunbauer
Managing Director



Harald Bodner
Chairman of the works council