

# Code of Conduct

April 2025



# Dear colleagues

RISE is a reliable partner for our customers, employees, suppliers and authorities. To earn and maintain this trust, we always take responsibility for our actions. It goes without saying that we comply with the law wherever we operate, respect fundamental ethical values and act fairly and sustainably. These responsibilities are firmly anchored in this Code of Conduct, which is the foundation for everything we do.

Our Code of Conduct sets out clear rules and principles to guide directors, managers and all employees. The Code of Conduct sets out the standards we set ourselves and the way we work together. It is a promise of responsible behaviour towards partners, society and the environment. Everyone at RISE helps to shape our future, always in their own area of responsibility, but as part of the bigger picture.

The behaviour of each individual at RISE is therefore important to our sustainable corporate success and reputation, and compliance with the above principles applies to all RISE employees, regardless of their position. Legally, ethically and morally impeccable behaviour is the basic condition of our activities. This is the only way we can live up to our standards and remain a successful and responsible company in the long term.

The Management of RISE



The Management of RISE

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1

# Responsibility



# Responsibility

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This Code of Conduct is more than just a document; it is an expression of our shared values and our commitment to integrity, fairness and professionalism. This Code serves as a guide for the daily actions of each and every individual in our company. It shows how we master internal and external challenges with a strong moral compass.

We recognise that compliance with this Code is critical in all areas of our business, from our interactions with colleagues and customers to the fulfilment of our social obligations. It sets out the standards by which we measure our actions and defines the expectations of everyone who acts on behalf of RISE.

Our aim is to promote a culture of openness, respect and trust by ensuring that all employees understand and agree to the principles and guidelines of this Code and live by them in their daily work. By implementing these principles, we not only strengthen our internal collaboration, but also our relationships with customers, suppliers and the wider community. Failure to comply with the Code of Conduct can lead to considerable damage, not only to our company, but also to us as employees and to our business partners.

We are committed to regularly reviewing and updating this Code of Conduct to ensure that it remains relevant and effective in meeting the challenges and opportunities we face as a company. We encourage all individuals in the company to make suggestions on how we can better fulfil our obligations and expect violations of this Code to be reported without hesitation.





# 2

## Behaviour Within the Company



# Behaviour in the Business Environment

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## 2.1. Compliance With Laws and Regulations

Adherence to laws and regulations, known as compliance, is a fundamental principle that ensures that our company and all its employees act in accordance with the legal framework. This includes national and international laws, industry standards and internal guidelines and regulations.

Every employee must know and understand the laws and regulations that are relevant to their specific role and the company's general business activities. This includes laws on data protection, labour law, anti-corruption, competition law and intellectual property. Employees are encouraged to report suspected violations of laws, regulations or company policies. The company provides secure and confidential channels to raise such concerns without fear of retaliation.

## 2.2. Anti-Corruption and Prohibition of Bribery

RISE stands for correct, transparent, fair and ethical business practices and does not tolerate any form of bribery or corruption. This excludes direct or indirect offers, promises, giving or accepting bribes, kickbacks or other unlawful benefits. Our company has a strict zero-tolerance policy towards any form of corruption, bribery, theft, embezzlement, fraud or extortion, whether in relation to public officials or in the private sector.

All employees are required to strictly comply with the anti-corruption laws of all countries in which we operate. We demand the same level of integrity from our customers and suppliers. Our employees are encouraged to report any suspicious behaviour or possible violations of the anti-corruption guidelines. There is a secure and confidential communication channel for such reports.

### 2.2.1. Accepting Gifts

We attach great importance to strong and positive business relationships with our customers, suppliers and other stakeholders. Although invitations and gifts can help to strengthen these relationships, we never use them to improperly influence business decisions or relationships. Management, executives and employees may not accept or demand, offer or grant any personal benefits in connection with business activities. This does not apply to gifts, favours, hospitality and other benefits if they are only of minor value and do not go beyond the limits of business practice in the region concerned. If employees are offered gifts, favours, hospitality or other benefits that may not be accepted because they are incompatible with the rules contained in this Code of Conduct, they must be refused firmly but politely.

# Behaviour in the Business Environment

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## 2.3. Avoiding Conflicts of Interest

We value and respect the private lives and personal interests of our colleagues. Nevertheless, all business decisions at RISE are based exclusively on the best interests of the company. It is essential to avoid conflicts of interest that could arise from the private interests or business activities of employees or related persons and organisations, especially if they could influence business decisions. Any potential conflict of interest must be disclosed by employees without being asked. The most important measure is open communication and transparency about existing conflicts of interest.

## 2.4. Fair Competition: Compliance With Antitrust and Competition Law

RISE is committed to fair, open and unrestricted competition. To this end, it is essential that all employees act in accordance with the applicable antitrust and competition laws. We strictly reject any form of illegal agreements or other practices that could restrict competition, be it the exchange of sensitive information with competitors or the abuse of a dominant market position.

Fair and free competition is protected by the applicable competition and antitrust laws, which aim to prevent market distortions and contribute to the well-being of all market participants. In particular, agreements and concerted practices between competitors that have as their object or effect the prevention or restriction of free competition are prohibited. Exploiting a dominant market position is also unacceptable. This includes discriminatory treatment of customers without objective justification, refusal to supply, the enforcement of unfair prices and conditions or unjustified tying. Anti-competitive behaviour can seriously jeopardise the reputation of RISE and lead to high fines and penalties.



# Behaviour in the Business Environment

## 2.5. Prevention of Money Laundering

RISE consistently fulfils its legal obligations to prevent money laundering and does not participate in money laundering activities under any circumstances. We require every employee to report any unusual financial transactions, especially those that are settled in cash and could give rise to suspicion of money laundering, to the responsible finance department or the legal department for review. We only enter into business relationships with trustworthy partners whose business practices comply with legal requirements and whose operating resources are demonstrably legitimate. All incoming payments are immediately allocated to the corresponding services and recognised in order to ensure transparent and traceable payment flows.



# 3

## Behaviour Within Society





# Behaviour Within Society

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## 3.1. Human Rights and Fair Working Conditions

The United Nations Convention on Human Rights forms the basis of today's international human rights protection. The United Nations Universal Declaration of Human Rights and the European Convention for the Protection of Human Rights and Fundamental Freedoms set out the requirements and expectations of the international community with regard to respect for and observance of human rights. In addition, the labour standards of the International Labour Organization (ILO) set universal minimum standards for decent work.

RISE is strongly committed to full respect and compliance with human rights and core labour standards as set out in the International Bill of Human Rights and the conventions of the International Labour Organization. We explicitly reject any form of child, compulsory or forced labour and are committed to ensuring that all applicable labour and social laws and regulations are complied with.

We respect the dignity, privacy and personal rights of every individual and protect and grant the right to freedom of opinion and expression.

## 3.2. Environmental and Climate Protection and Ecological Responsibility

Environmental and climate protection and the assumption of ecological responsibility are central components of our corporate philosophy. These commitments reflect the company's commitment to operating sustainably and promoting positive environmental impacts while minimising negative impacts on the planet. Our goal is to integrate environmentally conscious practices in all areas of our business and to actively contribute to the protection of natural resources. Priority objectives are the conservation and protection of natural resources, the responsible use of raw materials, the avoidance, reduction, recycling and proper disposal of pollutants and waste.

The company is committed to using resources efficiently and responsibly. This includes reducing energy consumption, water and the use of green electricity wherever possible and practicable. We are actively committed to minimising CO2 emissions and other pollutant emissions from our operational processes. This also includes the promotion of climate-friendly technologies and means of transport.



# Behaviour Within Society

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## 3.3. Donations and Sponsoring

RISE supports this commitment by awarding donations and sponsorship. Donations are voluntary contributions with no expected consideration, while sponsorship funds are awarded on the basis of contractual agreements with defined consideration. This financial support serves to positively influence the reputation and public perception of RISE. To avoid conflicts of interest and ensure consistent behaviour within our company, all donations and sponsorship activities are carried out strictly in accordance with applicable law and internal guidelines.

## 3.4. Public Image and Communication

RISE emphasises truthful reporting and clear and open communication with employees, business partners, the press and interested members of the public in an honest and legal manner. Every employee has a responsibility to follow these principles when communicating in order to ensure that the company presents a uniform and consistent image. However, official statements may only be made by authorised persons. All enquiries must be forwarded to the responsible persons in Marketing and Communications.

A professional tone must be maintained in all forms of communication, whether verbal or written. Slang, inappropriate expressions or informal language are inappropriate in business contexts. Communication should always be respectful and polite, regardless of the hierarchy or role of the other person. This applies to emails, telephone calls, video conferences and face-to-face conversations.

We respect the right to freedom of expression and the protection of personal rights and privacy. Nevertheless, every employee should be aware that he or she may also be perceived as a part of and representative of RISE in private. We therefore expect everyone to behave in public in such a way that they uphold the reputation of our company at all times.

## 3.5. Taxes and Customs Duties

Our business activities at home and abroad trigger a wide range of tax and customs obligations. In addition to tax laws, we also comply with all relevant internationally recognised standards and principles. Furthermore, we do not engage in any aggressive tax or customs avoidance activities and do not utilise any artificial arrangements.

Taxes are paid where the actual economic value is created.

# 4

## Behaviour Towards Colleagues and Employees



# Behaviour Towards Colleagues and Employees

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## 4.1. Equal Treatment and Non-Discrimination

Anti-discrimination and equal rights are fundamental principles for us. We want to create a working environment in which all employees are treated equally and fairly, regardless of gender, race, religion, sexual orientation, disability, age, ideology or other characteristics that could lead to discrimination. In this way, we ensure that all employees have the same opportunities for recruitment, training and professional development.

RISE promotes respectful and cooperative co-operation, diversity and tolerance. We do not tolerate discrimination, sexual harassment, bullying or any other personal attacks on individuals or groups. This applies to our colleagues as well as in our dealings with third parties, such as suppliers, customers and business partners. Employees who experience or observe harassment are encouraged to report it.

We are committed to promoting diversity in the workplace and creating an inclusive working environment in which all employees feel valued and respected. Diversity in teams is seen as a strength that contributes to innovation and improved organisational performance.

## 4.2. Occupational Health and Safety

We see it as a central concern to offer our employees a healthy and safe working environment. A safe and healthy workplace is crucial for the well-being and productivity of our employees.

By observing and actively implementing the guidelines on workplace safety and health, every employee contributes to creating a safe and positive working environment. The company is committed to providing the necessary resources and promoting a culture of safety and health in order to minimise the risk of occupational accidents and work-related illnesses.

## 4.3. Harassment

Working together at RISE is based on respect, appreciation, reliability and mutual trust. Harassment of any kind has no place in our company. This includes in particular forms of sexual harassment, such as inappropriate comments, derogatory or ambiguous remarks, suggestive gestures, obscene depictions or disrespectful jokes. Such behavior is contrary to our values and will be sanctioned accordingly.



# 5

## Protection of Company Property



# 5

## Protection of Company Property

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Company property includes all physical and digital resources that belong to the company or that it provides in order to carry out business activities. This includes office equipment, computer hardware and software, mobile phones, company vehicles and intellectual property such as patents, copyrights and trade secrets.

Company property is to be used exclusively for legitimate business purposes within the framework of company regulations. Employees must treat company property with care and protect it from damage, loss or theft. This also includes compliance with all company security guidelines, particularly with regard to the use and storage of digital data and the use of IT resources.

All employees are obliged to respect and protect the intellectual property of the company and third parties. This includes patents, copyrights, trademark rights and trade secrets. The unauthorised use, publication or reproduction of protected material is strictly prohibited.





# 6

## Handling Information





# Handling Information

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## 6.1. Accounting and Financial Reporting

RISE keeps its books in accordance with commercial law. Accounts, working hour records and other operational records are the basis for operational accounting and for the tax authorities. All information and presentations must correspond to the facts, be comprehensibly documented and made available in a timely manner. We publish our period financial statements on time, which are prepared in accordance with national and international accounting standards.

Proper accounting requires the management, executives and all employees of RISE to cooperate conscientiously and truthfully in providing the necessary documents and information.

## 6.2. Confidential Company Information

RISE holds internationally protected patents and also possesses extensive trade and business secrets as well as technical know-how. Confidential information also includes internal knowledge about RISE that is not publicly accessible, as well as information that RISE has received from or about customers or suppliers. This knowledge is the basis of our business success. This data may only be made accessible to persons who have a legitimate interest in it and need it for the intended purpose. The unauthorised disclosure of such knowledge can result in high damages for RISE and can have consequences under employment, civil and criminal law for the employees concerned.

The obligation of all employees to treat information about RISE confidentially remains in force even after termination of the employment relationship or engagement with RISE.

# 6

## Handling Information

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### 6.3. Data Protection

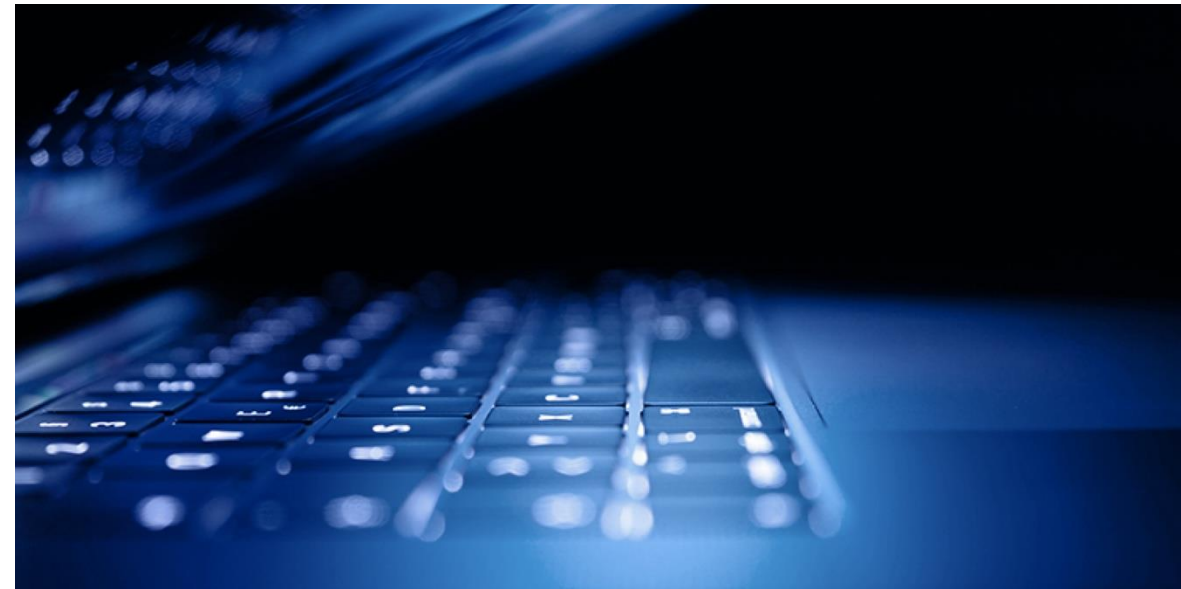
The protection of personal data of employees, customers, suppliers and business partners, as well as informational self-determination, is of particular importance to RISE. RISE implements technical and organisational measures to protect sensitive and personal data.

It is important to collect and store only the data that is absolutely necessary for the respective business purposes. Data that is no longer required should be securely deleted in accordance with company guidelines and legal requirements.

All employees are obliged to comply with the relevant data protection laws and regulations, such as the General Data Protection Regulation (GDPR). This includes the proper handling of personal data and the protection of the rights of data subjects. Regular training courses on data protection and information security increase employees' awareness and expertise in this area.

### 6.4. IT Security

RISE uses technical and organisational measures to ensure appropriate technical protection against unauthorised access, loss or damage to sensitive data. All data required in the course of our business activities is critical to the operation of the company. We therefore protect it against alteration, falsification or loss.



7

Suppliers





# 7

## Suppliers

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RISE is committed to the values set out in the Code of Conduct and expects suppliers and subcontractors to respect and promote these values. The actions of suppliers may also have a direct or indirect impact on RISE's reputation and the trust that RISE has earned from its customers and other market participants.



# 8

## Implementation and Compliance



# 8

## Implementation and Compliance

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In order to maintain integrity and trust in our company, it is essential that our Code of Conduct not only remains a formal document, but is actively practiced in our daily business operations. Consistent enforcement and careful monitoring of this Code are critical to ensure that all employees understand and follow the ethical standards and behavioural guidelines set forth.

The responsibility for enforcing the Code lies with the management and executives at all levels. It is their responsibility to set an example through their own behaviour and to ensure that their teams understand and implement the Code. Managers are encouraged to promote open discussions about the Code and to act appropriately in the event of violations.

Violations of the Code of Conduct will not be tolerated and may result in disciplinary measures ranging from warnings and suspensions to dismissal. In cases where legal provisions have been violated, legal action may also be taken. The following options are available for reporting violations of this Code of Conduct, internal regulations or (national) legal provisions:

- Direct superiors
- Management Board
- Human Resources
- Whistleblower platform





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