

SUSTAINABLE NATURAL RUBBER POLICY

KRAIBURG AUSTRIA 2022



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KRAIBURG Austria GmbH & Co. KG

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KRAIBURG Austria – company introduction

As an independent company of the KRAIBURG Group founded in 1947, we at KRAIBURG Austria in Geretsberg, Upper Austria, live by the following principle: “Our services aim at making our customers successful.” KRAIBURG Austria’s long company history has enabled us to acquire extensive experience and know-how in the processing of rubber which have made it a leader in today’s rubber industry. With more than 330 employees, KRAIBURG Austria is also an important employer in the region of Upper Austria.

Our long-term business relationships with our customers are based on mutual trust because for us, a handshake still counts. Despite its international nature, KRAIBURG Austria is still a family company that lives by values such as decency and modesty. Our employees maintain co-operative and personal relations with customers and suppliers. In cooperation with them, we produce those high quality products that have made us one of the preferred specialists in the rubber industry.

KRAIBURG Austria processes only the best quality rubber goods. With high quality materials, state of the art technology and impressive design, we manufacture innovative products which not only meet today’s market requirements but also fulfil EU demands and focus on sustainability in every step of our daily business. This goes without saying. The close interaction of research and development with production and quality assurance provides KRAIBURG Austria with important competitive advantages at the Geretsberg location. Internal feedback reaches the responsible department quickly and reliably and materials and processes are optimally adapted to our customers’ requirements. Individuality, flexibility, adaptability and sustainability are important to us. We have no external research departments and so we – as well as our customers – can benefit from synergy effects especially in the development of mixtures. We not only voluntarily subject ourselves to regular inspections and tests which impose increasingly high standards, but also seek regular advice from specialists. This way, we constantly improve ourselves and our products. KRAIBURG Austria has been focusing on the development, manufacture and sale of materials for tyre retreading ever since it was founded more than 70 years ago. Using retreaded tyres already contributes significantly to sustainability. But KRAIBURG Austria is also striving to drive sustainability across the entire value chain. The company prioritises all sustainable and environmentally friendly initiatives, from procuring raw materials to logistics processes, from development and production to shipping.



INTEGRATED MANAGEMENT SYSTEM AT KRAIBURG AUSTRIA

The ISO 9001:2015 certification of our quality management system has been in place since 1994 and has now developed into an integrated management system. Besides the quality standard, it now incorporates the requirements of the environmental standard ISO 14001:2015, which were met in 2021, and the EMAS III Regulation. A further milestone has been our membership of the GPSNR Policy Framework.

HUMAN RESOURCES

However, sustainability is not just about raw materials, their procurement and other product creation phases or logistics. It is above all about the people at KRAIBURG Austria. We firmly believe that by acting sustainably we will achieve economic success and thereby provide security, work and financial security for our employees, contributing both to their well-being and that of their families. Before taking action, we consider the impact our decisions will have on our neighbours and local communities, taking into account the interests of our shareholders, customers, suppliers and other stakeholders. Our corporate mission statement, compliance guidelines and environmental policy form the basis for our thoughts and actions and have priority in all our considerations.

RAW MATERIALS AND SUPPLIERS

KRAIBURG Austria is a European manufacturer of materials for tyre retreading. Compared to the well-known global manufacturers of new tyres, KRAIBURG Austria’s consumption of natural rubber is relatively low. Nevertheless, it goes without saying that we play our part in contributing to an overall sustainable supply chain for natural rubber.

Our primary goal is to source natural rubber exclusively from suppliers who are also members of the GPSNR Policy Framework and meet the resulting requirements. Where this is not possible, our suppliers are encouraged to reach agreement with their sub-suppliers in such a way that the fullest possible compliance with GPSNR requirements can be achieved and clearly demonstrated, at least in the medium term. We hold annual supplier meetings and take suppliers’ self-disclosure into account when assessing and taking into account the current developments for meeting the requirements. KRAIBURG Austria can also carry out audits of suppliers at any time, in which it considers and documents the sustainability aspect as well as the quality aspect.

KRAIBURG AUSTRIA’S POSITION AT THE SUPPLY CHAIN

As a manufacturer of rubber compounds, KRAIBURG Austria is relatively far down the supply chain. KRAIBURG Austria exerts no direct influence in the process that begins with the plantation operators, goes through the local middlemen, the processing companies and finally the traders. We source all our natural rubber exclusively from traders. When selecting traders, we not only ensure they meet our quality requirements for natural rubber, we also place great emphasis on the extent to which they meet our sustainability requirements.



SUSTAINABLE NATURAL RUBBER POLICY

1. Compliance with legal regulations and anti-corruption

1.1 CRIMINAL LAW

In their own best interests and the interests of KRAIBURG, all employees must respect and comply with applicable local, national and international laws on human rights, labour, land use, and the environment. Disregarding criminal law may in individual cases not only result in criminal prosecution of the employee involved but may also lead – in the case of business-related offenses – to severe fines at KRAIBURG's expense as well as substantial damage to KRAIBURG's reputation among customers, suppliers and the public. The internal BCP is designed to help employees differentiate legal from illegal behavior in areas that are relevant to everyday work. In particular:

1.1.1 CORRUPTION

Under German criminal law (as well as under foreign criminal law), corruption in the private sector and towards public officials is penalized. KRAIBURG will not tolerate any action that could be perceived as corruption. Employees of KRAIBURG must therefore not demand, allow themselves to be promised or accept any benefits for themselves or for third parties in return for promising to provide specific competitive advantages (receiving a bribe). Conversely, the offer, promise or granting of such a benefit (bribing) is not permitted either. This also applies in particular to public officials or persons entrusted with special public service functions in view of their official function, unless they have legally effective permission

from their supervisor. The granting or receipt of benefits that are reasonable and appropriate with respect to the specific business relationship is not liable to prosecution. The value of benefits of this type for KRAIBURG employees must not exceed €50. If benefits in excess of this amount are to be granted or received, approval from the compliance officer or management board must be obtained in advance. Approval can only be granted if the benefit is not related to a specific business. The compliance officer must be involved in advance whenever public officials are to be granted any benefits.

1.1.2 BID RIGGING

KRAIBURG will neither arrange nor coordinate its tenders with other bidders if the bid is subject to a formal tendering procedure. Bid-rigging is illegal in public and selective tendering as well as in public and private awarding procedures.

1.1.3 FRAUD AND ABUSE OF TRUST

Business partners of KRAIBURG must not be misled upon facts that are obviously of note for their commercial and financial decisions. KRAIBURG employees are obliged to give customers accurate, clear and detailed information. Management board and employees are held to represent the commercial interests of KRAIBURG. Accordingly, they must not dispose upon KRAIBURG property or commit KRAIBURG towards third parties if such disposal or

commitment is not related to an economic benefit of equal value. Discounts, bonuses and allowances for customers must therefore lie within the range predetermined by the management board. Individual cases, in which discounts or other benefits granted to customer businesses are to exceed this range, must be authorized in advance by the supervisor.

1.1.4 TAX EVASION / CUSTOMS DUTIES

KRAIBURG files its tax declarations truthfully. Employees duly clear all declarable goods.

1.2 ANTITRUST LAW

Competition and free market economy are essential elements of a free society. Their protection is in the interests of our company. All directors, officers and employees who are in contact with competitors, customers or other business partners must comply with antitrust laws at all times. Disregarding antitrust laws may result in serious sanctions for KRAIBURG. In the past, antitrust authorities have imposed drastic fines upon companies that could amount to up to 10% of their annual group turnover. Additionally, customers and suppliers can claim compensation for damages in such cases. Under German law, drastic fines can also be imposed on employees involved in the violation. In the U.S. and in some European countries misconduct can be penalized with imprisonment.

1.2.1 RESTRICTIVE AGREEMENTS AMONG COMPETITORS

Restrictive agreements among competitors are usually violating competition (antitrust) laws and therefore prohibited. The term „agreement“ is interpreted extensively. Even informal conduct and mere exchanges of information are included. The most important restrictive agreements include:

- Fixing and coordination of prices, mark-ups or other pricing matters (e.g. discounts, allowances, terms of credit) with competitors;

- Agreements among competitors that determine capacities or procurement quantities;
- Partitioning of markets, particularly allocating customers and territories to each other and demarcating product ranges or series;
- Non-compete obligations that restrain a company from supplying customers of a competitor;
- Exchange of non-public sensitive industry information, such as turnovers, prices, strategies, customer data or market shares.

Provided that economic cooperation among competitors is beneficial to the public, it may be exempt from competition (antitrust) regulations under strict conditions. Among other things, this includes purchasing groups, research communities, development communities and production communities as well as agreements on technical standards.

1.2.2 AGREEMENTS WITH CUSTOMERS AND SUPPLIERS

Agreements with customers or suppliers may be subject to competition (antitrust) legislation as well.

Companies not only run the risk of having fines imposed on them, but also the danger that distribution and purchasing agreements that violate competition (antitrust) regulations will be invalid and thus unenforceable. The following agreements may be affected:

- Agreements that oblige the customer to resell at minimum or fixed prices;
- Supply agreements that bind the customer to buy 100 percent of its requirements for a certain product from a specified supplier;

Exclusive distribution agreements; Agreements that restrain customers or suppliers from buying certain products from or supplying specified goods to specifically named companies.

1.2.3 ABUSE OF A DOMINANT MARKET POSITION

Market-dominating or strong companies must not abuse their position to weaken competition at the expense of competitors, customers or suppliers (unless there is an objective justification). Market domination is usually thought to exist at a market share of 33%–40% (defining correct individual market demarcations may be difficult). The following examples constitute an abuse of a dominant market position:

- Discrimination between similarly situated customers or suppliers;
- Refusal to supply (e.g. delisting of customers);
- Demanding excessive prices;
- Predatory pricing (i.e. pricing goods below costs);
- Loyalty rebates that reward the customer retroactively for pooling their purchases at a market dominating company.

1. Compliance with legal regulations and anti-corruption

1.3 MISCELLANEOUS

KRAIBURG and its employees are committed to comply with all other applicable laws and ethical standards. The information below is meant to serve as overview of important obligations.

1.3.1 PRODUCT SAFETY, TRAFFIC SAFETY AND CONSUMER PROTECTION

KRAIBURG develops high-quality products that meet applicable legal and safety requirements.

Quality management systems evaluate and control our products.

The systems ensure that our products represent the “state of the art and science” and meet the relevant safety standards and specifications. This particularly applies to products used in sensitive areas of traffic safety.

KRAIBURG is responsible for detecting, reporting and remedying possible safety problems. We report defects to the responsible authorities, if necessary, and take all necessary measures to ensure product safety and consumer protection.

1.3.2 CONFIDENTIALITY AND DATA PRIVACY

As a company, KRAIBURG owns valuable patents and know-how. All employees are obliged to observe strict confidentiality in relation to this type of information and all other trade and business secrets. Information that contracting partners and customers regard as sensitive is also included in this obligation. Such data and information must not be disclosed to third parties. The legal principles for protecting personal data must be complied with at all times. This obligation continues after the end of employment.

1.3.3 PROHIBITION OF MONEY-LAUNDERING AND FINANCING OF TERRORISM

KRAIBURG complies with all applicable laws against money-laundering and financing of terrorism.

Channeling money and other assets into the legal economic cycle to disguise the fact that they directly or indirectly originate from crimes constitutes money-laundering. Financing of terrorism means supporting terrorist organizations financially and in other ways. KRAIBURG therefore always checks the identity of customers, business partners and third parties. Our company's cash flows are transparent and open.

1.4 EXPECTATIONS ON OUR NATURAL RUBBER SUPPLIERS

KRAIBURG Austria also expects its natural rubber suppliers to comply with all the obligations and aspirations mentioned in points 1.1 to 1.3 and to demand the same from their sub-suppliers.



2. Efforts to maintain healthy and functioning ecosystems

2.1 KRAIBURG AUSTRIA COMMITMENT

KRAIBURG is committed to ecologically sustainable business practices. All employees are therefore obliged to protect the soil, water, air, biological diversity and cultural assets.

Environmental damage must be avoided by using appropriate environmental protection measures consistent with the applicable laws. Damage caused to the environment must be reported to the supervisor in charge and remedied. All rules on animal welfare must also be complied with:

- Measures to minimise impacts on biodiversity
- Measures to support the protection of wildlife, including rare, threatened, endangered

2.2 WHAT WE EXPECT FROM OUR SUPPLIERS

Here at KRAIBURG Austria, we have been making considerable efforts to address these issues for many years. As they are far beyond the immediate area of influence of KRAIBURG, we have very broad expectations of our suppliers and their sub-suppliers in this regard.

These include statements on:

- Avoiding deforestation
- Natural rubber not from HCV and HCS areas
 - o Natural rubber from areas that have been deforested or where HCVs have been cut back after the deadline of 1 April 2019 shall be considered as noncompliant with this Directive.
 - o Producing and Sourcing natural rubber in a way that does not degrade High Conservation Values (HCVs)“
 - o Identification and management of areas for development and conservation follow the methodology and dance consistent with the HCV Approach and with the High Carbon Stock Approach (HCSA)
- Measures for the long-term protection of natural forests and other ecosystems
- Restoration of deforested and degraded rubber landscapes
- All rules on animal welfare must also be complied with.
 - o Measures to minimise impacts on biodiversity
 - o Measures to support the protection of wildlife, including rare, threatened, endangered and critically endangered species from poaching, over-hunting and habitat loss in areas

- Measures to prevent air, water and soil pollution.
- Protecting water quantity and quality, preventing water contamination from agricultural and industrial chemicals
- Reduction of water consumption.
- Measures to prevent erosion and sedimentation.
- Measures to protect soil quality
- Prevention of soil contamination, erosion, nutrient depletion and soil subsidence
- Measures to prevent slash-and-burn. Not using open burning/ fire in new or ongoing operations for land preparation, land management, waste management, or any other reason other than in justified and documented cases of fire break establishment, waste management for sanitary reasons where public garbage collection is not available, phytosanitary and other emergencies.
- Measures for the protection of peatlands. Preventing the development of our sourcing from natural rubber plantations on peat, regardless of depth, extent, or status (wet, drained or dry).

3. Activities to respect all human rights

3.1 GENERAL

KRAIBURG Austria strives to avoid causing or contributing to negative human rights impacts and to prevent any harm in connection with its business activities. KRAIBURG Austria expects the same level of commitment to respecting human rights from its suppliers. KRAIBURG Austria also strives to respect and protect internationally recognized human rights (including upholding the UN Guiding Principles on Business and Human Rights (UNGPR) by avoiding causing or contributing to adverse human rights impacts and preventing or mitigating any harm linked to company operations.

In addition, KRAIBURG Austria aims to implement and maintain a grievance mechanism (consistent with UNGP effectiveness criteria) as soon as possible, suitable for receiving complaints and providing the opportunity to address adverse human rights impacts caused by the production or sourcing of natural rubber and expects the same from its suppliers. KRAIBURG Austria expects the same level of commitment to respecting human rights from its suppliers.

3.2 COMPLIANCE WITH HEALTH AND SAFETY REGULATIONS

KRAIBURG's staff members are obliged to ensure a safe and healthy workplace at all times. They must always comply with applicable safety regulations. Any deficiencies are to be reported to the supervisor in charge and remedied. Upholding applicable labour

rights and labour laws in the jurisdictions where operating, the UN Guiding Principles on Business and Human Rights, and the intent of the International Labor Organization's eight core conventions.

3.3 EQUAL OPPORTUNITY, ANTI-DISCRIMINATION AND RESPECTFUL CONDUCT

All KRAIBURG employees treat all people, especially those with different origin and experience, with respect and integrity. Discrimination on the basis of race, gender, religion or ideology, disability, age or sexual orientation will not be tolerated (ILO Convention No. 111 and No. 100). KRAIBURG stands for an open-minded, upright and tolerant company culture. KRAIBURG is wholeheartedly committed to the protection of human rights. We will not enter into business with any company that violates these fundamental rights, e.g. by exploiting employees, adolescents or children

3.4 PROMOTING A HUMANE LIVING ENVIRONMENT AND WORKING CONDITIONS

In addition to its own efforts towards achieving this goal, KRAIBURG Austria also expects its suppliers to contribute towards the creation of a socially sustainable supply chain and to promote humane working conditions and a decent living environment.

- Measures to actively prevent child labour
- Compliance with the legally prescribed minimum wages. Wages paid must be at an adequate and living wage level.

- Promote reasonable and fair working hours that do not exceed those required by local laws or locally applicable limits.
- Measures to design a safe working environment and active efforts to prevent and minimise health risks and accidents. This includes making the necessary personal protective equipment (PPE) available.
- Promoting diversity and gender equality
- Written contracts in a language that is understandable for the employees, in which all rights, duties and working conditions are listed.
- Measures to provide decent living conditions for staff who are provided with on-site accommodation
- Measures to promote the economic, social and cultural rights of local communities, including access to education and employment
- Freedom of association and collective bargaining (ILO Convention No. 87 and No. 98)
- No forced labour (LO Convention No. 29 and its 2014 Protocol)
- No child labour (ILO Convention No. 138 and No. 182). 9
- Decent living wages
 - o No abusive practices (ILO Convention No. 105)“ and
 - o Safeguards apply to all workers, including contract, temporary and migrant workers.

4. Commitment to promote decent living conditions in local communities

4.1 PROMOTING RESPONSIBLE LAND PURCHASING AND RESPECTING LAND RIGHTS

KRAIBURG Austria recognises and respects the customary, traditional and communal land ownership rights of indigenous peoples and local communities.

KRAIBURG Austria supports decent living conditions of local communities (e.g. drinking water, adequate housing sanitation). We also support the right to food and food security of individuals, households and local communities.

KRAIBURG Austria undertakes not to knowingly contribute, directly or indirectly, to acts that could lead to the illegal appropriation of land to the detriment of local communities or populations and expects the same from its suppliers.

KRAIBURG Austria does so by ensuring that, prior to any activity that might affect IP/LC rights to their lands, territories, and resources, their free, prior, and informed consent (FPIC) is secured. This includes when planning, establishing restoring, or transforming corporate plantations and/or industrial sites, as well as associated infrastructure. The FPIC process is done in a culturally appropriate manner and follows credible accepted methodologies and associated GPSNR guidance. IP/LC have the right to give or withhold their consent to any activity that is subject to the FPIC process. We expect the same from our suppliers.

In addition, KRAIBURG Austria expects its suppliers, for example, to:

- Carrying out operations in accordance with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP).
- Where operations impinge on IP/LC rights, compensating or accommodating IP/LC through appropriate, mutually agreed measures reflecting and described in the negotiated outcomes of the FPIC process.
- Adopting measures to provide remedy through mutually agreed procedures in cases where the company previously has caused or contributed to the appropriation of or harm to the lands, territories, or resources of IP/LC without securing FPIC. Implementation is jointly monitored by the community and the GPSNR member and/or by mutually agreed third party(ies). The accepted methodologies to be followed for the FPIC process are:
 - UN-REDD (2012) Guidelines on Free, Prior and Informed Consent
 - RSPO (2015) Free, Prior and Informed Consent for RSPO Members
 - FAO (2015) Free, Prior and Informed Consent Manual
- Ensuring ongoing land tenure and access rights and upholding traditional rights of access for hunting and gathering of animals and plants for the purpose of subsistence and indigenous cultural and religious traditions, customs and ceremonies.
- Avoid land grabbing practices and approaches
- Establish ongoing effective and culturally appropriate channels for dialogue with indigenous peoples and local communities

5. Efficient use of raw materials and energy and reduction of CO₂ footprint

5.1 PROTECTION FOR THE ENVIRONMENT AND CLIMATE

KRAIBURG Austria is aware that the supply chain of natural rubber can have a negative impact on the environment and the climate if it is not grown, produced or processed in a sustainable way. We are committed to promoting and supporting an environmentally conscious supply chain for natural rubber. Our goal is to manage the environmental impact of our products throughout their life cycle and we also aim to be an international leader on environmental issues in the industry.

5.2 COMBATING CLIMATE CHANGE

KRAIBURG Austria is convinced that confronting global warming and climate change is not just the political responsibility of every nation but also requires virtually every company to play a key role in tackling the problem. KRAIBURG Austria is committed to reducing and mitigating its carbon footprint and meeting these commitments is part of its daily work.

KRAIBURG Austria also expects its suppliers to manage their operations in such a way that greenhouse gas emissions can be reduced.

5.3 PROMOTING RESOURCE EFFICIENCY

The increasing global demand for natural rubber is leading to increased pressure on the relatively limited geographical area in which rubber trees grow. In the development of its products, KRAIBURG Austria considers the need to continuously increase and improve the efficiency of natural resources and not least of natural rubber.

KRAIBURG Austria commits to and expects its suppliers to:

- Design operations to increase resource efficiency
- Implement measures to minimize rate of energy consumption
- Implement measures to avoid, reduce and, if necessary, recycle production waste
- Implement measures to minimize water consumption
- Offering or supporting training for natural rubber producers, including smallholders, to improve yield and quality

6. Systems and processes to drive effective implementation of policy components

KRAIBURG Austria commits to setting public, timebound and geographic-specific targets and milestones with their associated indicators/metrics for applying its commitments.

To implement and demonstrate progress towards compliance with the above policy components, we commit to:

- conducting periodic management reviews
- Maintaining an active, regular stakeholder dialogue to provide relevant information, and to afford Opportunities for feedback and suggestions related to fulfillment of the company's commitments.
- planning and securing the necessary resources
- Embedding commitments in corporate governance decision-making processes, systems and performance metrics of corporate management, relevant business units, joint ventures, and company affiliates and subsidiaries
- Conducting internal and external audits (ISO 9001:2015, ISO 14001:2015 EMAS III)
- conducting periodic calculations of the Corporate Carbon Footprint (Scope 1, 2 and 3)
- Participating in/supporting multi-stakeholder planning and policy efforts that uphold the GPSNR principles at a landscape, jurisdictional or other spatial level.

7. Supply chain assessment, traceability and management



KRAIBURG Austria commits to conducting supply chain mapping and assessing suppliers for social and environmental risk to prioritize risk mitigation actions.

KRAIBURG Austria generally records all material flows in its SAP system. We expect our natural rubber suppliers to ensure and document traceability at a minimum to an appropriate jurisdictional level, to know or control the conformance of purchased materials with GPSNR Policy Framework. The level of traceability will differ for each „node“ of the supply chain and will be documented, with justification for why the desired level of traceability may not be reached for all supply chains and plans to achieve this level. The appropriate jurisdictional level will be defined in the implementation guidance.

KRAIBURG Austria also expects its natural rubber suppliers to give preference to sourcing only natural rubber from upstream suppliers who themselves comply with the GPSNR guideline components. Where this is not possible, natural rubber suppliers are encouraged to look for alternative suppliers that meet these criteria. In instances of supplier non-conformance with GPSNR Policy Framework, we will work with our natural rubber suppliers to develop time-bound implementation plans to move towards conformance and/or remediation or past or ongoing harms. Conducting supply chain mapping and assessing suppliers for social and environmental risk to prioritize risk mitigation actions.

We commit to communicating to all suppliers of natural rubber that material produced and processed in accordance and conformance with the GPSNR Policy Framework will be preferred. Providing time bound requirements for meeting the policy requirements, and ensuring that supplier codes and contracts, engagement activities, and other mechanisms reflect these supplier expectations.

We commit to regularly engaging the supply chain (both direct and indirect suppliers) to support their conformance with company commitments through effective incentives, support mechanisms, and purchase monitoring systems.

In instances of supplier non-conformance with GPSNR Policy Framework, developing we will work with our natural rubber suppliers to develop time-bound implementation plans to move towards conformance and/or remediation or past or ongoing harms.



8. Monitoring and reporting on progress on, and conformance with policy components

KRAIBURG Austria aims to monitor and report progress on the reporting and implementation of the policy components through the following measures.

- Environmental statement published annually (EMAS certified company) publicly
- Annual supplier survey as a result of SBT with regard to defined standards
- Applying monitoring systems and practices to incorporate crowd-sourced information from local stakeholders and affected parties regarding non-conformance with commitments. Information sources may be informal or formal.
- Preparation for the implementation of the Supply Chain Act supplier audits
- Regularly monitoring progress and outcomes toward company commitments in order to ascertain performance.



