

Alutrim Europe GmbH
Code of Conduct

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Foreword

Integrity, responsible and sustainable business practices, and social responsibility form the foundation of our business policy. Compliance is a key factor in ensuring the long-term success of our company. We, Alutrim Europe GmbH, are committed to fair and transparent business practices. In doing so, we always act in accordance with the laws and regulations of all countries in which we operate.

As an internationally active company, Alutrim Europe GmbH is committed to and takes pride in acting responsibly and lawfully. We embrace this responsibility both as a company and as part of society, thereby securing our economic success in the long term.

The reputation and trust placed in us by our customers, employees, business partners, and society can be significantly damaged by inappropriate behavior on the part of individuals. That is why we all share responsibility for our company's reputation. The Alutrim Code of Conduct summarizes the essential principles and rules governing our actions and articulates the expectations we set for ourselves. These principles must be implemented and lived out by all employees in their daily work. The Code of Conduct describes the principles we adhere to in our daily interactions with one another as well as with customers and business partners.

Our internal guidelines supplement and elaborate on this Code of Conduct with detailed instructions.

It is essential for all Alutrim employees to read and understand the Code of Conduct, and to follow and actively implement it in their daily work. We all share responsibility for Alutrim's high reputation, and the trust placed in the quality and integrity of our business activities.

1. General Principles

The Code of Conduct contains our company's essential compliance principles and provides our employees with guidance on proper conduct in daily business life.

The goal of management is to adhere to ethical standards and create a work environment that promotes integrity, respect, and fair conduct. A strict business policy that adheres to the law and our principles serves the long-term success of the company.

All members of the company are bound by the Code of Conduct. It applies equally to all divisions and subsidiaries of Alutrim Europe GmbH as well as to all regions in which the company operates.

1.1 Target Audience and Scope

The Code of Conduct applies to all managing directors, executives, and employees of Alutrim Europe GmbH. Furthermore, the Code of Conduct also demonstrates to our business partners, suppliers, service providers, and the public that Alutrim is a partner that values trust, responsibility, team spirit, and fair play.

1.2 Compliance with Laws

We are committed to complying with legal regulations in all jurisdictions where we conduct business. This has always been a matter of course for our company—even when it results in economic disadvantages. We expect the same from our business partners, suppliers, and service providers.

We act with integrity and follow the legal regulations applicable to our business activities in all regions and countries.

We address the diverse interests of our customers and business partners with integrity, fairness, and honesty

1.3 Compliance is the responsibility of every single employee

The skills and dedication of our employees are our most valuable asset. We expect them to act with a sense of entrepreneurship and respect their personal responsibility. Every employee is personally responsible for complying with laws and regulations within their area of responsibility and, through their actions and conduct, makes a significant contribution to Alutrim's reputation. We place great importance on involving colleagues in our projects and decision-making processes to achieve our common goals reliably and consistently.

Managers serve as role models for all employees. They credibly exemplify the standards of this Code of Conduct and ensure that employees are familiar with and adhere to the Code of Conduct.

1.4 Reporting Violations

Every employee is obligated to report violations of the law, violations of the Code of Conduct, or other relevant guidelines. In principle, this should be done through the respective supervisor. In any case, however, the email address info.de@alutrim.de is also available for anonymous reports.

2. Conflicts of Interest and Acceptance of Benefits

A conflict of interest exists when business decisions are influenced by personal interests. Every employee is obligated to separate personal and business interests and to make decisions impartially and in the best interests of the company. We expect our employees to act with impeccable ethics when dealing with conflicts of interest. If a conflict of interest is suspected, the supervisor must be informed in every case.

2.1 Secondary Employment

We welcome and support our employees' volunteer work in associations or other institutions, provided that such activities do not conflict with Alutrim's interests and do not interfere with their obligations under their employment contracts. Secondary employment and (equity) investments in companies or organizations that are not part of Alutrim must not compromise Alutrim's interests. They are subject to disclosure or approval in accordance with labor law regulations.

3. Corruption and Bribery

Alutrim is firmly opposed to corruption and bribery. Conduct involving the use of unfair means in business transactions will not be tolerated. Employees of the company may not offer or accept any benefits from business partners that could impair an objective and fair business decision or even give the mere appearance of doing so.

3.1 Dinner Invitations and Gifts

Dinner invitations may only be accepted within the scope of customary business hospitality, provided they cannot be construed as improper influence. The acceptance of gifts is strictly prohibited. Exceptions may only be made for gifts of negligible value where refusal would be socially inappropriate due to local customs and where the recipient's business decisions are not influenced by the gift. The acceptance of cash and cash equivalents (e.g., gift certificates, securities) is prohibited in all cases. Local value thresholds for accepting gifts and invitations are defined on a country-by-country basis.

4. Fair Competition

We are committed to fair competition as a prerequisite for the social market economy and adhere to the laws protecting competition. All employees are obligated to comply with the rules of fair competition. Examples of impermissible conduct that we do not tolerate include the illegal exchange of information, price-fixing, and market-sharing agreements with competitors or suppliers. We expressly reject espionage, theft, and other illegal methods of gathering information about competitors or their business activities.

4.1 Export Controls and Economic Sanctions

Alutrim Europe GmbH complies with all applicable import and export control laws, sanctions, and embargoes that impose restrictions on the export or re-export of goods, software, services, and technology to certain destination countries, as well as prohibitions on transactions involving certain countries, regions, organizations, and individuals that are subject to such restrictions. We select our suppliers to the best of our knowledge and belief. We review any affected business partners as necessary.

5. Environment, Employee Well-being, and Human Rights

All Alutrim employees are responsible for ensuring a safe and healthy work environment. Safety regulations and practices must therefore be strictly adhered to.

As a socially responsible employer, Alutrim views its employees as a valuable asset. We expect a high level of commitment from them and, in return, share our business success with them. We respect the personal dignity, privacy, and personal rights of every individual. Our human resources policy helps provide all employees with opportunities for professional and personal development.

The following principles apply both to internal collaboration and to conduct toward external parties. Furthermore, we commit and encourage our suppliers, service providers, and business partners to incorporate these core values into their corporate policies and to apply them in practice.

5.1 No Human Trafficking, No Forced Labor, and No Child Labor

We reject all forms of human trafficking, forced labor, and compulsory labor, as well as child labor. All work performed within the company, as well as at suppliers, service providers, and business partners, must be performed voluntarily and compensated fairly. We are particularly committed to the abolition of slavery, forced labor, and exploitative child labor, and we require our suppliers and service providers to do the same as part of our supplier management program. The minimum age for employment, as stipulated by applicable government regulations, is strictly observed at Alutrim and among its suppliers.

5.2 Equal Treatment and Equal Opportunity

We work together with women and men of different nationalities, cultures, religions, and skin colors. We do not tolerate discrimination or exclusion based on sexual orientation or for any other reason, nor do we tolerate sexual or other forms of personal harassment in the workplace. We require our suppliers, service providers, and business partners to implement these principles in their business practices. These principles apply to the hiring of new employees, to existing employment relationships, and to the career advancement of our employees. The only factors that matter are performance, personality, skills, and suitability.

5.3 Freedom of Association and Assembly

Alutrim recognizes the right of employees to organize and requires its suppliers and service providers to implement this in accordance with national legislation.

5.4 Environment

The protection of people and the environment, as well as the sustainable use of natural resources, are corporate goals of the highest priority for us. Through appropriate leadership from management and the commitment of our employees, our company aims to conduct its business in an environmentally responsible manner and continuously works to improve its activities in the areas of environmental protection and ecological balance.

The careful use of water, energy, and raw materials, as well as noise protection and the preservation of air and soil quality, are important commitments we uphold every day. We also require this commitment from our partners when procuring materials and services. Every employee must contribute to these goals through their own behavior.

5.5 Occupational Safety

Our employees deserve a safe and healthy work environment. Alutrim therefore places the highest priority on compliance with health and safety guidelines and requires the same from its suppliers, service providers, and business partners both domestically and abroad. This applies to the technical design of workstations, facilities, and processes as well as to safety management and personal conduct in daily work. The work environment must meet the requirements of a health-oriented design.

Employees are obligated to immediately report any violations of these principles to the appropriate departments within the company. Every employee shares responsibility for workplace safety in their area. All occupational health and safety regulations must be strictly enforced. Any safety concerns must be reported immediately and investigated by the occupational safety specialist.

5.6 Employment Contract, Compensation, and Working Hours

All work performed is governed by an employment contract. Any employee may leave the company at any time, provided they observe the statutory or contractually agreed notice period. We ensure compliance with minimum wage requirements.

Alutrim does not make any illegal or unauthorized wage deductions and does not use wage deductions as a disciplinary measure. Overtime is worked and compensated in accordance with the applicable company agreements.

Working hours comply with legal regulations (e.g., the Working Hours Act, the Federal Leave Act) and are described in the employment contract and in the shift schedule. Overtime is performed in accordance with the company agreements.

We require our suppliers, service providers, and business partners, both nationally and internationally, to implement the requirements set forth in Section 5.6.

6. Transparent Handling of Information and Its Protection

Our ability to innovate is a key factor in our success in the face of international competition. As a leading global technology group, the protection of intellectual property rights and knowledge is of particular importance to Alutrim. We ensure that sensitive information and trade secrets are adequately protected and not disclosed without authorization. We also respect the trade secrets of our business partners and competitors. Our employees are obligated to treat sensitive information and trade secrets as confidential. Public communications and responses to media inquiries are handled exclusively by the employees designated for this purpose.

6.1 Financial Responsibility

Alutrim manages its financial affairs responsibly and transparently and regularly reports on its financial performance. All material business transactions are documented in a traceable manner. Both internal and external reports (e.g., account statements, quality reports, time sheets, expense reports) must be accurate and complete so that recipients can form an accurate picture. Financial records are prepared in accordance with applicable law and generally accepted accounting principles. We adhere to the document retention

periods required by commercial, tax, or special laws, and store these documents in a structured and traceable manner.

6.2 Data Protection and Information Security

The protection of our customers' and business partners' data, as well as any personal data, is of the utmost importance to us. We support the security of data and processing procedures through appropriate technical and organizational measures. Every employee must observe the data protection and information security rules relevant to their area of responsibility with due care.

6.3 Plagiarism and Intellectual Property

The market success of our products is inextricably linked to their quality and design. We hold all employees to the same high standards regarding creativity, diligence, orderliness, and precision. We do not tolerate any conduct that intentionally or negligently leads to a reduction in our quality. We respect intellectual property, such as inventions, designs, and symbols, names, and images used in commerce, and will not use or publish them without authorization. This applies in particular to intellectual property protected by patents, copyrights, or trademarks.

7. Company Property

All employees are required to treat our company's property with care. Company resources and facilities must be used sparingly, carefully, and in accordance with their intended purpose. Company property may not be used for unauthorized personal purposes.

If there are any uncertainties or questions regarding compliance-compliant conduct, our employees may contact their immediate supervisor at any time. In addition, the Compliance Organization, particularly the Compliance Helpdesk, is available to our employees as a point of contact for all compliance matters.

Contact Compliance Helpdesk

Email: info.de@alutrim.de