

# Code of Conduct of Salzburger Aluminium Gruppe



The Code of Conduct of Salzburger Aluminium Gruppe (hereinafter referred to as SAG) forms the basis of our everyday activities. It applies to all employees of the SAG Group, including subsidiaries and our business partners.

We have clearly defined standards with regard to ethics, morals, respect and law. Our Code of Conduct supports our employees in taking personal responsibility for performing their duties. The Code of Conduct is based on the laws applicable in Austria, human rights and the principle of human dignity and our internal rules and regulations.

Our employees are also obliged to use their judgement with responsibility and care. They may neither abuse their position for personal benefit, nor tolerate conduct that is not consistent with this Code of Conduct.

Each one of us is responsible for the implementation of and compliance with the Code of Conduct.



## **Our principles of conduct:**

- We observe laws and internal and external guidelines.
- Our conduct is characterised by respect and esteem.
- We undertake to act fairly, respectfully and to ensure safe working conditions.
- We respect human rights, prevent conflicts of interest and deplore any kind of discrimination.
- We set great store by fair and open competition.
- We do not accept any forms of corruption, bribery or money laundering.
- We protect our property.
- We take responsibility.

## **We observe laws and internal and external guidelines.**

The respective applicable national and international laws, the applicable judicature, official stipulations and other internal and external regulations must be observed in all business transactions and decisions. SAG does not tolerate any breaches of the law!

Every employee is obliged to inform him/herself of the legal provisions that apply within his/her area of responsibility and to observe them. As the laws and provisions of countries in which SAG operates may differ, we may also make country-specific additions or amendments to this Code of Conduct, in order to incorporate the specific national and regional laws, conventions and customs.

These individual additions or amendments must, however, be consistent with the standards of this Code of Conduct in so far as deviations pursuant to local law are not absolutely necessary. All individual amendments and additions require the approval of SAG.

## **Our conduct is characterised by respect and esteem**

Collaboration and conduct towards one another should be characterised by respect, esteem, team spirit, fairness and trust. We treat our employees, colleagues, customers and partners with appropriate respect, and the necessary level of objectivity and politeness at all times. Personal insults will not be tolerated and the privacy of each individual employee must be appropriately respected.

## **We undertake to act fairly, respectfully and to ensure safe working conditions**

Our employees are our most valuable asset. We therefore promote a working environment that is characterised by tolerance and respect for one another. We reject any form of child labour or forced labour. The minimum age of our employees is never less than any age at which someone may legally commence work.

## **We respect human rights, prevent conflicts of interest and deplore any kind of discrimination**



It is possible that within the scope of their work employees may find themselves in situations that constitute a conflict between their personal or economic interests and the interests of the company. In such situations, SAG expects all of its employees to act solely in the interests of the company. As such conflicts of interest cannot be ruled out, SAG requires such issues to be dealt with transparently.

### **Conflicts of interest**

All employees are obliged to inform the relevant contact persons immediately of any potential conflicts of interest, including situations in which a conflict of interest could be perceived to exist, without being requested to do so.

Conflicts of interest may arise in connection with the following aspects in particular:

- Ancillary activities may conflict with the obligations of SAG or result in a conflict of interests and therefore always require prior written approval from the company. This also applies to assuming executive functions. Commercial involvement with competitors or with business partners of SAG, particularly customers or suppliers, is not permitted. The company must be informed and see evidence of any such involvement by close relatives (spouse or life partner, parents, siblings, children or other persons).
- Conflicts of interest may also arise as a result of family relationships or close relationships with employees who are employed within the same company. The company must therefore be informed of such family relationships or close relationships.

### **Discrimination**

On the basis of the UN Universal Declaration of Human Rights and the European Convention on Human Rights, human rights are regarded as fundamental values that must be respected and observed by all employees.

Within SAG, no one should be treated differently on the basis of their gender, age, nationality, race, skin colour, religion or creed, social status, origin, marital status, physical or mental disability or sexual

orientation. We reject any kind of discrimination and endeavour to ensure that all employees treat one another with respect.

This also applies with regard to appointments, pay, promotions, further development, relocation, training, dismissals and so forth.

### **Sexual harassment**

We will not accept any form of sexual harassment in the workplace, irrespective of the form (for example, in the form of obvious advances, demeaning remarks, jokes, insinuating gestures or expressions, etc.). Any such conduct may be classed as harassment, even if it was not intended as such. These principles also apply to conduct in respect of external partners.

In the event of breaches, please contact the trusted employee representatives immediately.

## **We set great store by fair and open competition**

We declare ourselves as supporters of fair and open competition, and we regard this as forming an essential part of our long-term success as a company. We therefore do not undertake any activities that may restrict fair competition or that could constitute a breach of the provisions under competition law or anti-trust law. Anti-competitive behaviours such as making agreements with competitors regarding price, production levels, sales, tenders, etc. are prohibited. We will never knowingly provide misleading or false information about our products or services. Our purchasing decisions are based solely on objective criteria such as quality, deadline, price of products or services and customer service.



In particular, we ensure that we comply with the statutory provisions. As competition law may differ in each international location, all applicable laws and regulations must be observed without exception. A restriction of free competition and breaches of competition or anti-trust regulations will not be tolerated.

## **We do not accept any forms of corruption, bribery or money laundering**

### **Corruption and bribery**

We set great store by our independence and not being subject to external party influence. For this reason, we avoid situations that influence our impartiality or that could be perceived as such.

All employees are strictly prohibited from making offers or accepting benefits (e.g. gifts, invitations, purchasing opportunities offered at non-market rates, interest-free loans, etc.) whether directly or indirectly, if this is intended to influence business transactions in an improper manner, or if this could be perceived as such.

Occasional gifts, customary hospitality or other gratuities of low value that are in keeping with general business practice, where any influence upon a commercial or official decision is excluded at the outset, are permitted.

All other gifts must be declined or returned and the company must be notified of such gifts. Employees are prohibited from offering, granting, demanding or accepting sums of money at all times. Country-specific laws must be taken into consideration in any event.

### **Money laundering**

All employees are prohibited from taking measures that violate money laundering regulations. Money laundering is deemed to include in particular the introduction (e.g. by exchange or transfer) of monies or other assets originating from criminal activity into financial and business circles.

Likewise, employees of business partners are also prohibited from demanding or receiving any improper benefits. Suspicious payments or transactions that indicate the occurrence of money laundering must be reported to the trusted employee representatives immediately.

## **We protect our property**

We always treat the property of SAG and the property of third parties with the utmost care and respect. This also includes intellectual property such as inventions, research results, product developments, but also the expertise of our employees, patents, and so forth. All employees are required to handle this property responsibly and with the utmost care.

Confidential information of any kind that is obtained within the scope of professional activity, including information outside of an employee's own scope of duties, must not be used either for the pursuit of personal interests or be made accessible for use by third parties.

It must be ensured that company information of any type (documents, files, drawings, plans, pre-printed forms, etc. including copies thereof on paper or on electronic or other data storage media) is stored securely at all times. If such information needs to be taken outside of the company for business reasons, it must be safeguarded against viewing or access by third parties. We will not disclose any information for which disclosure has not been expressly approved. If we are reasonably required to pass confidential information to third parties, we will ask for a confidentiality agreement to be signed.

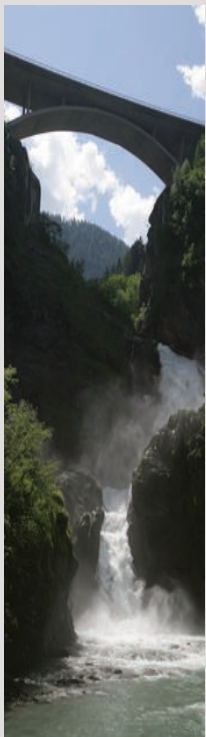
All employees are contractually obliged to maintain secrecy (the relevant confidentiality provisions of the respective employment contracts apply). This strict obligation to maintain secrecy also continues to apply after leaving the company. We take all necessary measures to protect electronic and non-electronic data from misuse by internal and external parties.

## We take responsibility

### Health and safety

We take our corporate responsibility with regard to health and occupational safety very seriously. The safety of our employees is of the greatest importance to us. With this in mind, we actively promote the acceptance of responsibility and take measures to increase awareness of health and safety above and beyond the statutory requirements.

SAG also takes a series of measures above and beyond its statutory obligations that contribute towards promoting health and preventing accidents, e.g.: safety briefings, suggestions for improvement system, health promotion programmes, among others.



### Environment

Preserving an intact environment in which we can all live forms an important part of our activities as a company and our company mission statement.

SAG helps to protect the environment by means of:

- Environmentally friendly processes
- Modern operational facilities
- Logistics
- Recycling and mindful product life-cycle

SAG also makes a further direct contribution by means of energy and metal recovery from secondary raw materials. In order to save fuel and energy consumption, our products are manufactured in special processes, at the end of which we obtain secondary products of high quality. It goes without saying that we subject our activities to a continuous internal and external audit and optimisation process, in order to implement environmentally friendly production processes as much as possible in the future.

By using light-weight construction materials and thereby reducing the associated weight, we cut vehicle emissions significantly – 1 kg of aluminium in a vehicle reduces CO<sub>2</sub> emissions by 20 kg during the utilisation phase (source: [www.aluinfo.de](http://www.aluinfo.de)). SAG associates sustainability with innovation – aluminium is green. Alutech GmbH holds ISO 14001-2004 environmental management certification.

We also advocate awareness of responsibility and sustainability in the use of our environment and natural resources.

## Information and contacts

The Code of Conduct is available in German and English; it is available to view on the intranet and also publicly on our homepage. A copy of the Code of Conduct is also available in all SAG personnel departments. New employees will receive a copy upon commencing employment in the company.



If you have any questions or to report breaches, please contact the following offices or staff members:

- Personal Service Centre
- Your manager
- Works Council

## **Reports of non-compliance with the Code of Conduct/consequences**

In the common interest, we would like to ensure that the agreed principles of conduct are adhered to and implemented. In the event that breaches of the provisions of our Code of Conduct are identified, the aforementioned trusted employee representatives must be notified immediately.

All reports will be treated confidentially and examined with care. In the case of any breach, disciplinary measures will be taken in accordance with the national applicable laws, employer/works council agreements and employment contracts. Severe breaches may result in consequences under employment law. SAG also reserves the right to seek compensation for losses and to initiate proceedings under civil law.

Severe breaches by our business partners may result in legal proceedings or in the termination of the business relationship. We will not accept any breaches of the principles of this Code of Conduct by our suppliers.

