

apt Group Code of Conduct

introduction

The diverse requirements and challenges that the apt Group (hereinafter apt) is confronted with make it necessary to clarify which standards and behaviors our employees have to observe.

The Guiding Principles affirm our ongoing commitment to complying with laws and regulations, promoting justice and respecting cultural differences, accepting social responsibility, and protecting the environment and people's well-being. These principles are evidence of a deeply rooted corporate culture.

They create the framework for a climate characterized by trust and confidence, which promotes teamwork, innovation, customer orientation and the long-term success of our company.

The key to earning and maintaining the trust of the public, our customers, business partners and other stakeholders is the integrity and lawful conduct of our Group employees.

This code of conduct sets out the business conduct and conduct expected of every employee, regardless of their position. The rules of conduct specified in the Code are not intended to interfere with the private lives of employees, but rather to clarify which personal standards of conduct are expected of employees in a business context.

The aim of this code of conduct is to enable all employees to deal with ethical and legal issues appropriately and to offer them assistance in sensitive areas.

For the apt group



Michael Zint
Chief Executive Officer (CEO)

August 10, 2022, Monheim am Rhein

general

apt is one of the leading groups of companies in the European aluminum industry. With our apt Extrusions and apt Products divisions, we develop and manufacture technologically sophisticated extruded profiles and machined aluminum products, which we supply to well-known customers in the construction, transport, automotive and industrial sectors. With our manufacturing processes, we cover the entire value chain, from the raw material to the end product. With in-house remelting capacities, six extrusion lines, state-of-the-art further processing, two anodizing systems and a powder coating system, apt covers a wide range of competencies. – True to our credo: “Essential parts. Essential partners.”!

apt is not only committed to ecologically and socially responsible corporate management and ethical business conduct. In addition, we strive to create an optimal balance between people, society and corporate goals.

quality

With our integrated quality, energy and environmental management, we aim to continuously optimize the operational processes and procedures from the first inquiry to the dispatch of the goods/products. Continuous development is very important to us, so we address suggestions for improvements in all business areas.

Through systematic analysis of the actual situation in connection with corrective measures, we control our corporate organization in order to immediately identify potential and risks and immediately implement improvements to products, procedures, processes and services. Weak point analyzes and continuous improvement processes help us to ensure the best possible product and service quality and to achieve the lowest possible error rate in production and in the upstream and downstream areas while using energy efficiently and using environmental resources sparingly. A flawless execution of the individual work instructions and constant effort is very important to us in order to be able to provide the best possible quality for the customer and to be able to meet the delivery date on time.

These procedures are externally confirmed by certification of our management system according to DIN-EN-ISO 9001, 14001, 50001 and in some areas IATF 16949.

environment

The careful use of resources is one of the central tasks of sustainable management. apt undertakes to comply with existing environmental laws and regulations as well as the requirements of permits. For this purpose, the locations of the apt Group have introduced an environmental management system in accordance with DIN-EN-ISO 14001.

When procuring raw materials and auxiliary materials, as well as when making investments, we evaluate the possible energy consumption of the new acquisitions and, taking into account the economic requirements, we give preference to environmentally friendly alternatives.

Wastewater and waste is reduced to a minimum and recycled where possible. Appropriate labeling and treatment occurs from discharge or disposal in accordance with applicable laws and regulations.

Since we integrate the topic of environmental protection into our corporate culture in the best possible way, our employees have a great influence on the prevention of environmental pollution. We therefore separate waste whenever possible, switch off unused systems and remind each other to comply with our environmental protection goals. We help each other to continuously learn and improve our processes.

energy

One of our most important tasks at the moment is to constantly reduce the CO² footprint, which is why we are constantly working to save resources such as energy, water and raw materials and to reduce emissions and waste. We therefore melt down our own production scrap and cast new billets from it.

We see the protection of our natural resources as a joint task in which we involve our suppliers and partners as well as each individual employee.

chemical management

We are committed to labeling hazardous materials and chemicals and ensuring safe handling, storage and disposal. The use of the substances mentioned is reduced to a minimum and replaced by alternatives whenever possible. We strictly comply with all applicable laws and regulations relating to hazardous substances and chemicals. We are committed to complying with substance restrictions and product safety requirements set by applicable laws and regulations.

working conditions

apt is committed to respecting the human rights of all individuals who may be affected by our operations. We respect the basic principles set out in the Universal Declaration of Human Rights and relevant UN documents.

We respect and support internationally recognized labor rights, including the right to freedom of association and the right to collective bargaining within the framework of national laws and regulations. We do not tolerate any form of human trafficking or child labor and are fundamentally opposed to any type of forced or compulsory labor.

We strictly comply with laws relating to working hours, remuneration and other employment benefits within the framework of the applicable legal system.

Our staff is our greatest asset. Motivated, entrepreneurial and professional employees are, alongside our customers, the most important basis for our success. We see the future of our society and our corporate success in the training and further education of our employees.

We therefore undertake to comply with all laws and regulations on occupational health and safety and on hazardous substance management. Machines and systems are planned, purchased, operated and maintained by us in such a way that possible dangers are excluded, risks are minimized and operational disruptions are avoided.

We are convinced that, in principle, all accidents at work and occupational illnesses are avoidable. We guarantee the protection of our employees as well as visitors and employees of external companies equally at all locations. We also ensure comprehensive and effective emergency care in the event of injuries. No unsafe instructions are given. Incidents and potentially unsafe situations are reported or followed up in order to improve the safety culture and to be able to initiate preventive measures. All apt employees or employees working on our behalf have the right to refuse or stop unsafe work without suffering any disadvantage.

At the same time, we expect that each of our employees places high demands on themselves, their performance and their health and actively participates in their further development. We expect proactive behavior from all employees in order to be able to support a continuous improvement process.

A diverse and inclusive work environment leads to more innovation, learning, customer understanding, as well as leaders and specialists with cultural competence. That is why we guarantee equal opportunities and equal treatment, regardless of ethnic origin, skin color, gender, disability, ideology, religion, nationality, sexual orientation, social background or political attitude, insofar as this is based on democratic principles and tolerance towards those who think differently.

We value open, honest and respectful cooperation. All employees have a responsibility to contribute to a working environment based on mutual trust, transparency and respect. Harassment at work can take many forms – physical, verbal, sexual – and is experienced individually. apt therefore does not tolerate any form of harassment or pressure in the workplace, nor do we tolerate discrimination or corporal punishment.

apt promotes a culture of trust where employees can ask questions, seek advice, raise concerns and report suspected violations. Questions and concerns are taken seriously. Reports can be sent by email to: ethics@apt-alu-products.com. Anonymous reports are expressly permitted in order to enable a credible, effective and transparent handling of the topic. apt will not tolerate retaliation against any employee who, in good faith, has raised a possible issue, raised a concern, reported a violation, or participated in an internal investigation.

business conduct

We compete fairly in the markets in which we operate. We seek competitive advantage through our product offering based on innovation, research and development, not through unethical or illegal business practices. The acceptance or payment of bribes and kickbacks of any kind, whether in negotiations with authorities or with representatives of private companies, is therefore expressly forbidden for all apt employees. This also includes the sensitive handling of gifts, invitations or other favors, which may only be accepted or given to a modest extent. The framework of the applicable compliance rules must not be exceeded. We do not participate in anti-trust agreements with competitors, nor do we abuse a potentially existing dominant market position. We do not participate in money laundering activities and comply with legal obligations to prevent money laundering.

apt is committed to sustainable value creation and we want to make a positive contribution to economic and social development in local communities. Through our activities, business relationships, and support for charities, we give back to communities and neighbors. In addition, our employees naturally have the right to engage in political activities as private individuals. However,

financial or other support for political parties, party members or candidates for public office must never be made on behalf of apt.

We are committed to secrecy about all business circumstances of apt and its business partners. This confidentiality obligation also applies after termination of the employment or contractual relationship.

apt undertakes to treat and respect all personal information about employees, customers, business partners and suppliers carefully, confidentially and in full compliance with all data protection rights. The protection of this information is extremely important and is therefore carried out with the greatest care in order to continue to justify the trust placed in apt.

apt is open to the use of social media by its employees and trusts in their responsible use with regard to professional or private statements. All employees and associated persons are aware that as part of apt they act as ambassadors and also behave as such in their public image. When using social media, employees are expected not only to comply with legal requirements, e.g. B. data protection and copyright and trademark law, in particular the limits of freedom of expression. Statements that are intentionally damaging to business or reputation, threats and insults, false statements of fact and statements that endanger the peace of the company are not tolerated by apt and will result in consequences under labor law.

We comply with applicable laws and regulations to protect our intellectual property and the intellectual property of others, including patents, trademarks, copyrights and trade secrets.

The use, sale or possession of drugs, including cannabis, or weapons on company premises or during working hours is strictly prohibited and will be subject to disciplinary action. The consumption of alcohol and cannabis on company premises is also prohibited. It will not be tolerated for employees to come to work under the influence of alcohol or under the influence of unlawfully obtained or misused drugs or to work in this condition. The applicable laws must also be strictly observed for all business activities outside the company premises.

All apt employees and other company representatives have a responsibility to protect the property, assets and records of apt, customers, suppliers and other business partners. Tangible assets include machinery, equipment, tools, computer systems, personal computers, cell phones, files, records, inventory, supplies and buildings. Intangible assets must also be protected. This includes patents, trademarks, copyrights, know-how, confidential information, and the Group's reputation and standing. PCs and mobile devices provided by apt are to be considered the property of apt and may only be used by apt employees or external consultants.

Dealing with the Code of Conduct

We make all suitable and reasonable efforts to continuously implement and apply the principles and values described in this code of conduct and to eliminate any existing deficits as quickly as possible.

We communicate the Code of Conduct and its implementation to employees, business partners and other interested parties, e.g. B. by announcing it on your own website and on the company's intranet.

We expect our partners to ensure compliance with this code and to be able to demonstrate it through adequate documentation. apt reserves the right to request remedial measures in the event of non-compliance and, if necessary, to terminate the cooperation.



Furthermore, we expect our partners to report possible violations of the principles of the apt Group. This either directly with the apt contact person or anonymously by e-mail: ethics@apt-alu-products.com. Violations of laws may be reported to the appropriate authorities. We will then have the concern checked and processed immediately and objectively by the relevant department in the company.

The code of conduct was drawn up and defined by the management of the entire apt Group. The management team serves as a role model and ensures that the Code of Conduct is known and understood by all employees.

We encourage all employees, customers, business partners and suppliers to proactively submit innovative ideas that contribute to further social, economic or environmental improvements. apt appreciates the open exchange of new ideas and is willing to explore new opportunities (together). The document is updated as necessary and reviewed annually as part of the management review.

Appendix

United Nations Global Compact

The Ten Principles

The principles of the Global Compact are based on a worldwide consensus derived from

- the Universal Declaration of Human Rights
- Contributed to the International Labor Organization Declaration on Fundamental Principles and Rights work
- the Rio Declaration on Environment and Development and
- the United Nations Convention against Corruption

The Global Compact requires companies to recognize, support and put into practice a set of core values in the areas of human rights, labor standards, environmental protection and anti-corruption within their sphere of influence:

human rights

principle 1: Businesses should support and respect the protection of internationally proclaimed human rights and

principle 2: make sure they are not complicit in human rights abuses.

labor standards

principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining, as well as for

principle 4: the elimination of all forms of forced labour,

principle 5: the abolition of child labor and

principle 6: the elimination of discrimination in employment and employment.

environmental Protection

principle 7: Companies should support a precautionary approach when dealing with environmental problems,

principle 8: take initiatives to promote greater environmental responsibility, and

principle 9: encourage the development and diffusion of environmentally friendly technologies.

anti-corruption

principle 10: Businesses should work against all forms of corruption, including extortion and bribery.