

Supplier Code of Conduct

apt Group

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For the apt group

January 2023,  Michael Zint, Chief Executive Officer (CEO)

apt Group Supplier Code of Conduct

As one of the leading groups in the European aluminum industry, the apt Group (hereafter apt) places a significant focus on sustainability and ethnic business conduct. apt sees itself as responsible for presenting its own ecological and social principles and expects suppliers, sellers and other stakeholders (hereinafter suppliers) to comply with these.

The Supplier Code of Conduct describes the requirements that are expected of our suppliers in terms of compliance with legal regulations on corruption and bribery, social and working conditions and the environment. apt requires its suppliers to share these commitments and make reasonable efforts to promote compliance with the principles of this Code among their own suppliers and subcontractors.



1. health and safety

1.1 Protection of the health and safety of workers

The supplier identifies the health and safety risks (in particular the physical, chemical, mechanical and biological risks) and takes all necessary measures to ensure the protection of its workers in their workplace and the infrastructure made available to them. Personal protective equipment is made available to employees in any necessary situation. The supplier complies with the legal regulations and the conditions of the ILO convention on occupational health and safety and ensures a safe and healthy working environment in order to maintain the health of employees, protect third parties and prevent accidents, injuries and work-related illnesses.

1.2 Prepare for Emergencies

The supplier identifies and evaluates emergency situations and takes all necessary measures to minimize their impact through the effective implementation of emergency plans. All workers have the right to refuse or stop unsafe work without penalty or consequences.

2. environment and energy

2.1 Energy Use and Greenhouse Gas Emissions

The supplier monitors its energy consumption and greenhouse gas emissions. He strives to continuously reduce greenhouse gas emissions using economical solutions. The supplier evaluates the “CO₂-footprint” of its operations and products. The use of renewable energies is to be given preference whenever possible. In addition, he constantly checks and improves his operational conditions to the extent that they have a negative impact on the environment. In particular, it reduces the negative environmental impact of water consumption and waste water, emissions of pollutants and greenhouse gases, use of materials and waste, and supports the preservation of soil quality and biodiversity.



2.2 Resource consumption, avoidance of environmental pollution and waste minimization

The supplier undertakes to optimize the use of natural resources, including energy and water. Effluents and waste are appropriately labeled and treated in accordance with applicable laws and regulations prior to discharge or disposal.

2.3 Responsible chemical management

The supplier undertakes to label hazardous substances and chemicals and to ensure safe handling, storage and disposal. All applicable laws and regulations relating to hazardous substances and chemicals must be strictly observed. Substance restrictions and product safety requirements set by applicable laws and regulations are mandatory.

3. working conditions

3.1 Equal Opportunity

Any discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political party affiliation, labor union affiliation, or other social origin in hiring, training, promotion, and of remuneration is not permitted. We expect our suppliers to commit to the principles of the Universal Declaration of Human Rights and to respect human rights.



3.2 Prohibition of Child Labor

The supplier does not employ children under the legal minimum employment age in the respective country. If there is no minimum age for employment, the Supplier will not employ children under the age of 15. The supplier does not employ persons under the age of 18 for hazardous work. Employees under the age of 18 only carry out work in accordance with legal requirements. apt reserves the right to take immediate action if child labor is identified that does not comply with the exceptions of the ILO Convention.

3.3 Prohibition of Forced Labor

Forced labor in all its forms is prohibited. The work must always be done voluntarily. Employees must be allowed to retain control of their identification documents (e.g. passport, work permit or any other personal legal document). The supplier ensures that the employees do not make any fees or other payments in order to be employed during the entire hiring phase and employment period. Supplier is responsible for payment of any fees and charges that may be incurred in connection with employment.

3.4 Hours of Work and Compensation

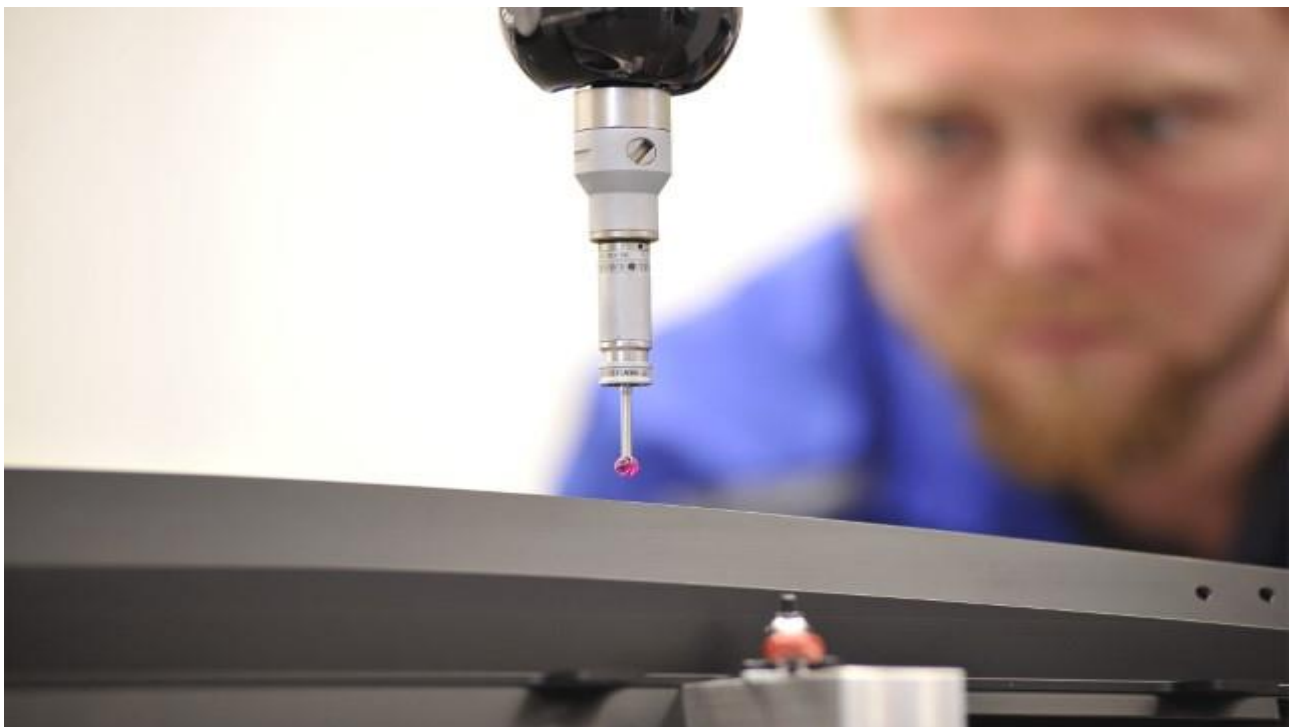
Supplier shall comply with applicable laws relating to hours of work, wages and other labor benefits under the applicable jurisdiction.

3.5 Right to Association and Freedom of Speech

The supplier recognizes the right to freedom of association and collective bargaining to the extent permitted by law.

3.6 Complaints Management

Supplier employees should be able to communicate openly and without fear with management. This is especially true when employees report company practices that violate laws or internal regulations in good faith.



4. business ethics

4.1 Corruption, Extortion and Bribery

The supplier undertakes to comply with the legal provisions on combating corruption. Supplier undertakes to conduct its business in an ethical manner and in accordance with all applicable rules and regulations. He does not promise or grant any benefit to improperly influence actions or gain an improper advantage. The supplier does not tolerate any form of blackmail or bribery.

4.2 Fair Competition

The supplier does not participate in agreements with competitors that violate antitrust law, nor does he abuse a potentially existing dominant position.

4.3 Money Laundering

The supplier does not participate in money laundering activities and complies with legal obligations to prevent money laundering.

4.4 Privacy and Data Protection

The supplier must ensure that data protection and information security laws are complied with.

4.5 Conflict of Interest

The supplier strictly separates business and private interests. Individuals must not abuse their own position in the company for their own benefit or for the benefit of their own family or friends.

4.6 Financial Responsibility

The supplier keeps books and records in accordance with applicable law.



5. Sustainable Sourcing

Supplier will make all reasonable efforts to communicate and enforce the principles of this Supplier Code of Conduct throughout its supply chain to its suppliers and other subcontractors.

6. management systems

When selecting and working with its suppliers, apt attaches importance to the fact that they actively operate a quality management system according to ISO 9001, an environmental management system according to ISO 14001 and an energy management system according to ISO 50001 or equivalent systems in their currently valid version. In addition, apt endorses an occupational safety management system based on ISO 45001.

7. dialog

apt expects its suppliers to report potential violations of the principles outlined to the apt Compliance Office (ethics@apt-alu-products.com) Report.

Upon request, the supplier shall provide apt with information on the implementation of and compliance with the requirements of the supplier code. apt reserves the right to verify compliance with the code. Suppliers are always encouraged to establish their own binding guidelines for ethical conduct.

apt reserves the right to request remedial measures in the event of non-compliance and, if necessary, to terminate the cooperation.

8. signature

I hereby certify that I am an authorized representative of the company named below and have carefully read and understood the contents of this document.

Company name of the supplier

Representative's name and title

Date, signature, company stamp