

Foreword

ATTEC International GmbH is bound by the following code of conduct within the framework of its voluntary commitment. The Code of Conduct is binding for all employees and business partners of ATTEC International GmbH. It sets out our values, principles and actions that determine our business activities.

With the Code of Conduct, the company management pursues the goal of being able to guarantee compliance with ethical standards, the creation of a respectful working environment and fair dealings with each other. Our corporate policy is based on compliance with applicable laws, regulations, ethical principles and voluntary commitment. For our sustainable success, it is necessary to identify risks and opportunities at an early stage and to involve our business partners in the process. We understand sustainability to mean taking responsibility for the economic, ecological and social impacts of our actions.

We therefore also expect our business partners who work with us to accept this Code of Conduct and thus at the same time ensure the protection of every employee of their company and their subcontractors.

An anonymous complaint mechanism is available to our employees and business partners. No reprisals will be exercised against employees or business partners that indicate violations of legal requirements or the contents of this Code of Conduct.

Scope and Scope

1. Environmental protection
2. Human rights and labour rights
3. Data protection and IT security
4. Protection of intellectual property and assets
5. Transparent business relationships
6. Fair market behaviour
7. Due diligence to promote responsible supply chains
8. Integration of sustainability requirements in the company

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1. Environmental protection

ATTEC International GmbH is committed to the sustainable protection of the environment, for which the local environmental laws and regulations are met or exceeded. We train our employees to use natural resources with caution, as this is an integral part of our corporate culture. We strive to keep the environmental impact as low as possible in all phases of our business activities.

We try to reduce greenhouse gas emissions by using environmentally friendly and energy-efficient equipment and equipment. We are increasingly using sustainable or recyclable materials for the operation of our company and include environmental sustainability in the selection of our suppliers. Suppliers with a certification or corresponding orientation according to ISO 14001 are given preference by us when awarding contracts.

The products we sell are largely recyclable, with the use of e.g. Chromium VI and lead are dispensed with, especially in production for the automotive industry.

We strive to use our planet's natural resources with care. Therefore, we pay attention to the economical use of energy, water and renewable raw materials. To maintain our quality, we strive for mindful land and forest use, as well as the highest possible use of renewable energies to keep the environmental and health damage caused by us as low as possible. We are explicitly pursuing this approach to support animal and species conservation. We keep noise emissions caused by us as low as possible.

We actively avoid waste by demanding that our partners provide packaging that is as environmentally friendly and recyclable as possible. When procuring, we rely on reusable packaging wherever possible. If this is not the case, we recycle as much waste and chemicals as possible through waste separation.

We expect our partners to be committed to protecting the environment and complying with our guidelines.

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2. Human rights and labor rights

We do not tolerate child labor, and we strictly adhere to the minimum age for employing minors. We feel bound by Convention 138 of the International Labour Organization (ILO). This regulates that children under the age of 15 are not allowed to work, except that the exceptions in Articles 6 and 7 of the ILO apply.

We do not allow overtime and night work for employees under the age of 18 and everything is done not to harm the health, safety, morale and development of minors.

We reject any kind of discrimination and harassment. We adhere to the Gender Directive 2002/73 in its current form to implement the principle of equal treatment of women, men and diverse people regarding access to employment, vocational training and career advancement as well as with regard to working conditions.

No one may discriminate, discriminate against or harass employees or their business partners on the grounds of ethnic origin, skin color, gender, religion, nationality, sexual orientation, social origin, age, physical or mental limitations, civil status, or pregnancy. We recognize the rights of minorities and indigenous peoples. We respect the right to membership in a trade union and the right to a political attitude, insofar as this respects our state principles and includes the tolerance of dissenters. We are raising awareness among our employees accordingly.

The remuneration and benefits we pay significantly exceed the national minimum standards for fair remuneration and additional benefits. We base our pay on the local remuneration to offer our employees a secure basis for their lives. We comply with local working time laws and observe the ILO minimum standard of a maximum of 48 hours per week with a minimum break of 24 hours per week. Regarding the weekly permissible overtime, we are also guided by the demands of the ILO.

We comply with local occupational health and safety laws and train our employees free of charge in accordance with ILO Convention 155. We are continuously working to improve implementation and provide emergency plans, fire protection equipment and first aid materials. We have appointed first aiders in accordance with the legal requirements, so that first aid can be provided on site in the event of an accident at work.

We provide a hygienic environment that complies with national laws, and our business premises meet the required standards.

Our employees are free to form and join trade unions or employee representatives. We expect our partners to also provide their employees with alternative opportunities for association that at least complies with local legislation.

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We recognize and respect the existence of land use laws, customary and community rights, indigenous peoples and individuals. We refrain from unlawful evictions as well as unlawful deprivation of land, forests or waters.

We expect our business partners to take precautions and create a workplace that adheres to our principles and protects the physical and psychological integrity of employees.

3. Data protection and IT security

All employees of ATTEC International GmbH handle and protect the personal data of our business partners and employees with the utmost care. We collect, collect, process, use and store personal data only in accordance with the legal requirements. Our employees are sworn to secrecy and are not allowed to pass on, publish or make available trade secrets to third parties . We respect and comply with the data protection requirements of the European Union.

We pay attention to IT and IT security and adhere to applicable regulations. In order to secure the data, we have committed ourselves to taking all measures that are suitable to protect our IT system against both internal and external data theft. This applies in particular to passwords misused in our company, as well as unauthorized downloading of files and inappropriate material from the Internet.

4. Protection of intellectual property and assets

All employees of ATTEC International GmbH consciously treat the company's own know-how and protect it carefully. We attach great importance to the careful and responsible handling of the products manufactured, the work equipment used, and the intellectual property used.

Each employee is responsible for ensuring that information related to our intellectual property is not disclosed to the outside world. Just as we protect our own intellectual property, we also respect the intellectual property of others. Trade secrets must be treated confidentially. They are only disclosed to employees during their business activities.

We respect the tangible and intangible assets of the company and do not use them for non-business purposes. We demand that our employees handle our company's assets responsibly. Every employee takes care of the protection of assets through honest and careful handling.

5. Transparent business relationships

All employees of ATTEC International GmbH bear responsibility for their own actions. Efforts must be made to ensure that the business partners act accordingly. We expect our employees to act as ambassadors for the company to protect and promote the company's reputation.

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We are not influenced by financial, personal interests or relationships and make decisions exclusively based on objectively comprehensible criteria.

Any form of corruption and bribery is prohibited, and we act against such practices. Bribes, improper payments or benefits may not be made and will be punished. Acceptance of corresponding payments or services is strictly prohibited. We use control mechanisms to ensure that bribery, theft, embezzlement, fraud, tax evasion or money laundering are prevented.

We expect our business partners to behave in accordance with the law regarding our principles and will take measures to remedy any deviations as quickly as possible.

6. Fair market behaviour

We respect and request fair and free competition. We also expect this from our business partners as the basis of our cooperation. To this end, the applicable competition and antitrust law requirements are followed. There are no agreements or agreements with competitors, suppliers or customers. All parties ensure that there is no exchange of information relevant to competition law that could unduly influence or restrict competition. We comply with the applicable laws in the import and export of the products we distribute.

We comply with the applicable laws against money laundering and all information is protected in accordance with the applicable requirements.

As a matter of principle, we do not grant monetary and in-kind donations to political parties, individuals or organizations whose goals contradict our corporate philosophy or damage our reputation. Donations and sponsorship measures are only granted within the framework of a transparent approval process. We expect our business partners to behave in the same way and actively demand this.

7. Due diligence to promote responsible supply chains

We want to be able to guarantee the highest possible sustainability in our supply chain. We actively demand compliance with the REACH requirements and local standards from our affected suppliers and take this into account when selecting suppliers. We do not work with companies that finance armed conflicts or commit or tolerate serious human rights violations such as child labor, forced labor or slavery.

We are committed to keeping the supply chain free of conflict minerals, which are covered by the laws and regulations governing the sourcing of minerals from conflict areas.

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8. Integration of sustainability in the company

We are committed to continuously raising awareness and training our employees to improve our sustainability. To this end, the content of this Code of Conduct is also part of the ongoing training courses in the company.

To be able to provide evidence of the appropriate training, we keep a corresponding written record and regularly update the knowledge of our employees' compliant behavior. A representative for the conduct agreed in the Code of Conduct is appointed within the company. Employees can contact this representative with their concerns.

Düsseldorf, 06.08.2024



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