

# Adler Pelzer Group

## Code of Business Conduct



Adler Pelzer Group

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## Preamble

### Dear colleagues,

As we all know our Company Culture is driven by all actions taken every day by any APG people around the globe. This is the best way to testify the APG way of doing business in all areas of relationships (people, customers, suppliers, institutions).

Our values and behaviours inspire us every day to do things right and the right things for the sake of our Family.

Doing things right and the right things, can never be compromised with integrity, ethics and in full compliance with laws.

To avoid any potential misunderstanding on 'what and how' we intend to do business with all potential stakeholders, we make it clear what we expect from each of us every day.

This code of conduct has this aim, to reflect APG way of working and is nothing else that our full commitment to:

- focus on managing areas with ethical risks;
- provide guidance to staff to help recognise and deal with ethical issues;
- help maintain a culture of integrity, honesty, and responsibility within the Company.

It defines values and principles of ethical conduct relating to the smooth operation, reliability, and compliance with laws and regulations as well as the image of the Adler Pelzer Group, and all our employees, must comply with it.

All APG people must conduct themselves in compliance with the fundamental principles of honesty, integrity, correctness, transparency, objectivity, and the respect of the individuals, the pursuit of company objectives and in all dealings with people and institutions inside and outside the Company.

In no way may the pursuit of Adler Pelzer's interests justify actions not conforming to honest and ethical conduct.

If you have any question on our code, or concerns about potential ethical violations in your workplace, please refer immediately to your superior, the HR department or visit our Adler Pelzer Group website to find APG Whistleblowing Policy and further steps.

I'm not asking you to read this code as we have to have it in our DNA and, without any doubt, to live it every day.

We are in the market since years and, being part of the business and social community for such a long time cannot be based than on our values and behaviours.

As we - envision our future - each of us has the responsibility to continue and improve it, where possible, every day.

I'm expecting you to walk the talk!

Hagen, January 31st 2025

**Pietro Lardini**  
Chief Executive Officer

**Vito Frallonardo**  
Head of HR &  
Organizational Development

**Falk Thomas**  
Director Corporate Compliance &  
Legal Affairs



## Introduction

A Code of Conduct is a set of organisational rules and standards regarding the Company's values, ethics and vision.

This Code forms the basis for our behaviours and outlines how the Adler Pelzer Group expects its employees to behave and interact whilst at work.

The Adler Pelzer Group (known as “the Company”) is committed to setting high standards, and strives to do business in a legal, ethical and responsible manner.

Our lead in design, engineering and manufacturing makes us one of the most admired Companies in the world.

To protect the Company's reputation, we must comply with all local laws and regulations.

All employees must conduct themselves in line with the Company core values such as honesty, integrity, transparency, objectivity and confidentiality.

### Our Mission & Vision - We do business differently!

We will grow intelligently, profitably and in a socially and environmentally friendly manner.

We will be true to our historical and family-based roots, which allows us to support each other in a collaborative and unique manner, makes us what we are.

We want to be the global leader in our field of business, providing integrated and innovative solutions, working in partnerships with our customers.

**PASSION**

**PARADIGMA**

**PEOPLE**

**PACE**

**PROCESS**

**PRODUCTS**

**PERFORMANCE**



## Why do we have a Code?

You might face a situation where the right thing to do is not obvious.

This is where our Company Code of Conduct can help.

Whilst the Code of Conduct cannot answer every question, it can show you where to go to for guidance when the answer is not clear.

## How can the Code help you?

The code enables you to ...

- Understand what the Company expects from you.
- Conduct yourself honestly and ethically.
- Uphold our values and protect our reputation.
- Comply with the laws, regulations and standards that apply to our Company.
- Understand where to go to for assistance if you have questions.

## Who is covered under the Code?

It does not matter where you work or what you do for the Company – you have a responsibility to use good judgement and follow our Code. That includes every full-time or part-time employee at every level of the Company.

The Code also applies to controlled subsidiaries and entities in which the Company either owns a majority or manages operations (all referred to throughout this Code as “the Company”). All employees have to know the Code of Conduct and should have understood it. In case of questions or if you have not read it, please refer to your HR department for support.

Anyone who works on the Company's behalf (including suppliers, consultants and business partners) must share our commitment to integrity by following the principles of the Code when providing goods and services to the Company or acting on our behalf. Suppliers, as a condition of working with us, must comply with our Supplier Code of Conduct.

# Policy Modifications and Confidentiality

## Policy Modifications and Waivers

We realize that the Code will not cover every possible circumstance, especially when issues arise with contracts or local laws. So our company may modify the Code, as necessary. Any waivers of the Code, however, must be approved by the Board of Directors.

## Confidentiality

Confidentiality is the entrusting of private information to a person with reliance on their fidelity or competence in circumstances where it is reasonable to expect that the information provided will be held in confidence.

All employees are responsible for maintaining the confidentiality of information gained during their employment with the Company. This obligation remains in effect after employment contracts end.

Confidential Company information should not be shared outside the Company or with employees who have no right to the information. Information within the Company must only be shared with employees who have the right to the data in line with their role and responsibilities.

Sharing of confidential Company information to employees who should not see it, could lead to disciplinary action.

### **It is the responsibility of all employees to:**

1. Maintain the confidentiality of information, except when disclosure is authorized or legally required. Confidential information includes all information not disclosed to the public that might be of use to competitors, or harmful to the Company or its customers, if disclosed.
2. Disclose to the public, in a timely and systematic manner, through appointed employees, information related to the Company that is required by law or that the Company has authorized for disclosure.
3. Prohibit, regardless of whether or not there is personal advantage or gain, the unauthorized disclosure or use of trade secrets, confidential business information or any other relevant information of the Company.
4. Comply with all relevant laws and regulations concerning copyright, trademarks, patents, data, trade secrets, software protection and others.

## Uphold the Law

### Your Rights as an Employee

Whilst we expect you to follow our Code, we recognize your rights as a Company employee. Nothing in this Code or in any Company policy is intended to limit or interfere with your rights under the respective applicable Law.

### Uphold the Law

The Company is subject to various laws and regulations in each of the countries or regions in which it operates, covering subjects as diverse as protection of free competition, trade relations, consumer protection, worker rights, environmental protection, for insider trading and incidence of taxes. These laws and regulations differ substantially in form and content due to different cultures, political traditions and systems; but failure to comply with any of them can result in serious damage to the company's assets and reputation.

It is the Company's policy to comply with all laws and regulations pertaining to its operations, and such laws and regulations should be carefully interpreted and administered.

Specifically, the Company complies and requires adherence to laws and adopts a "Zero Tolerance" policy on the use of child labour, slave labour, modern slavery, forced labour or involuntary labour, human trafficking, abusive practices and corrupt business practices in the supply chain, not limited to any organisational or hierarchical level in either our organisation, as well as in companies that supply goods, services or components.

It is essential to act in strict compliance with all applicable laws, including anti-bribery and anti-corruption laws, that apply to the Company's operations in the locations where it operates.

Employee salary, benefits and working hours shall comply with local regulations, the law and be in accordance with the provisions of relevant international conventions.

This is also valid and extended to our suppliers, subcontractors or to anyone that is directly or indirectly part of our supply chain of products and services.

Employees must not discriminate on the basis of colour, race, religion, sex, age sexual orientation, national origin, disability, marital status or political affiliation.

# Uphold the Law

## How to Make Good Decisions

Our goal is to always do what is right. If this is not clear ask yourself

1. Is it consistent with our Code?
2. Is it Legal?
3. Does it follow our policies?
4. Does it benefit the Company?
5. Would I be comfortable if my actions were made public?

If you can answer YES to all of these questions the action is probably okay. But if you answer no or even maybe these are indicators to STOP and get advice. After all, it is always better to ask before you act, especially when you are not sure.

## What You Need to Do

**As an employee,**  
each of us has the responsibility to:

- **Know and live by the code.**  
Read it and follow it, along with any other policies that apply to your job.
- **Think before you act.**
- **Be open** – Communicate with your colleagues, supervisors or team members.
- **Use good judgement**, being honest and ethical in every action you take. If you are asked to violate the Code, do not do it. Report it immediately to your Manager.
- **Show integrity** – act with professional in the workplace.
- **Follow the law.** Understand the laws that apply to your job and our business. If you are ever unclear about a law or legislation, contact your Manager.
- **Ask for help.** When an answer is not clear, ask for guidance before taking any action.
- **Stay alert.** Pay close attention to any activity that is inconsistent with our Code, our policies or the law.

**If you are a manager,**  
you have additional responsibilities:

- **Model the Code and our values.**  
Promote a culture of integrity by making ethical decisions and showing honesty and integrity in everything you say and do.
- **Talk about the Code.**  
Read the Code and understand it. Refer to it, make ethics conversations part of your daily routine.
- **Be informed.**  
Recognize that you may not always find the answers that you need in the Code, so know where to go to for answers when there are questions.
- **Expect the best.**  
Discuss the importance of ethics and compliance and let employees know you expect them to always do what is right.
- **Be responsive.**  
Encourage employees to come to you with questions and concerns. Listen to them carefully and offer guidance.

## Violation and Whistleblowing

### When a Violation occurs

When one of our employees fails to follow our Code or applicable laws, ignores someone else's failure to follow the Code or pressures someone else to violate the Code, a violation has occurred. This can harm the Company's reputation and our bottom line.

We take all potential Code violations seriously. Code violations may lead to disciplinary action that matches the nature and circumstances of the violation, up to and including suspension without pay and termination of employment.

If an act violates the law, it could result in fines or criminal prosecution. Code violations are also documents in your employee records.

### Whistle-blower Process / Raising Concerns

Whistle Blowing is when an employee reports suspected past, present or imminent wrongdoing, or an attempt to conceal wrongdoing.

All Company employees are encouraged to speak up and raise any concerns you may have about any wrongdoing.

Maybe you sense something is not right at work?

Maybe you saw something or heard an act that may violate our Code our policies or the law, if so, you have a responsibility to share your concerns by reporting right away – even if you are not sure that a Code violation has occurred.

However the wrongdoing can occur it is important that all employees know what to do if they come across something that is fundamentally wrong, illegal or endangers others from the Company or from the public. Employees who speak up in good faith are protected from retribution, retaliation or reprisal.

The Company policy and procedures are in place to help you feel safe to speak up and will guide you through the process of raising a concern.

The Whistle Blower Policy is available via the [Company Intranet Page](#).

### What happens When you Report a Code Concern

- You may choose to remain anonymous, where permitted by law.
- If you do give your name, we will do all we can to protect your identity.
- We take every report seriously and will investigate it thoroughly.
- We expect everyone involved to cooperate fully and honestly.
- The Corporate Compliance Team will initially investigate the concern.

## Safeguarding Company Assets

The Company provides its employees with documents, equipment, work instruments, facilities and other tangible or intangible property (including intellectual rights and trademarks) belonging to the Company.

It also provides various types of computing and communication equipment, communication networks, internet access, e-mail, software and other computer equipment.

All these assets and information systems must be used specifically for the purposes of the Company's business, processes and services and must not be used for purposes that are not legitimate and must be used, maintained and safeguarded appropriately.

Any illegal use will be subject to disciplinary procedures and, if applicable, legal action.

Employees must act responsibly when using these networks and be aware that the Company reserves the right to monitor, audit, store, search or otherwise capture any electronic activity on equipment owned by or delivered to or connected with Company activities, including electronic mail and internet access.

Occasional personal use of the Company's computer equipment and communication networks does not limit the Company right to monitor, audit, search and store any activity, and you should not rely on the guarantee of confidentiality when making personal, private and occasional use.

The Company shall protect the personal data of all persons entering into a relationship with it in accordance with privacy regulations.

The data acquired in the course of their duties, which are also the property of the Company, are subject to legal requirements and the duty of confidentiality. These duties must be observed even after the relationship with the Company has ended.

Employees are also required to make all necessary efforts to prevent any wrongdoing through the use of the instruments of Information Technology – IT.

The following general principles should be followed to ensure that all of the Company's computing and communications equipment is used appropriately and effectively.

This is not a complete list, and you should remember that, whenever you are using electronic computing and communication media provided by the Company, you must act in the best interests of the Company and conduct yourself in a manner that complies with this Code of Conduct:

Please refer to the Company IT policies for further information.

## Safeguarding Company Assets

### What Else can you Do?

You are responsible for keeping all usernames and passwords to access systems confidential, and this information should not be shared with others. If you share or otherwise delegate the use of your username and password with others, you do not absolve yourself of responsibility for its use.

If you suspect, or become aware, that someone else is using your username and password without your authorisation, you must report it immediately to the Information Technology Team.

It will not be tolerated that any computer equipment or communication network provided by the Company be used for sexual or other harassment, employee political activity, personal gain or profit, illegal activities or activities that violate Company policy or have negative effect on the company.

### Examples of actions employees are prohibited from:

- Accessing, storing or distributing inappropriate or disrespectful material (e.g., obscene, pornographic, sexually explicit, lewd, hateful, explosive construction or prohibited material).
- Participate in email chains.
- Use for business activities for personal profit.
- Playing electronic games or gambling.
- Communicating in chat rooms not sponsored by the Company.
- Inappropriate use that may result in server closure.

### Employees are prohibited from:

- Possession and unauthorised disclosure of access codes to computer systems or data.
- Distributing equipment, devices or programmes designed to damage or interrupt a computer system or telecommunications system.
- Intercepting, hindering or illegally interrupting computer or electronic communications systems.
- Damaging information, data and computer programs and computer and telecommunications systems.
- Installing any borrowed or unauthorized software on the company's systems or without the necessary licenses, as well as making unauthorized copies of licensed programs for personal, corporate or outsourced use is prohibited.

For further information regarding electronic communication and other security policy standards, please consult the Legal Department and Information Technology.

## Health and Safety

The Adler Pelzer Group is committed to improving occupational health and safety of employees as an integral part of its business and as a strategic commitment to the Company's wider objectives.

For this purpose, we commit ourselves to:

- To consolidate an occupational health and safety culture that promotes risk awareness and responsible behaviour of all employees.
- Conduct institutional training, at certain periods of the employee's business life, and continuous training for operational staff.
- Promote and implement initiatives aimed at minimizing risks and eliminating the causes that may compromise the health and safety of employees, carrying out interventions of a technical and organisational nature, by introducing a risk management system, resources to be protected as well as through the implementation of an effective monitoring system and the adoption of preventive measures.

We believe that health and safety is not just about having premises and equipment in good condition, nor is it just adopting an Integrated Management System with policy and guidelines, but people committed to this and will protect each other.

So, each employee should look after his or her own health and safety and that of other colleagues in the workplace, who are subject to the effects of their actions or omissions, in accordance with the training, instructions and equipment provided by the Company.

### **All employees of the company must:**

- Know and comply with the safety and health rules, procedures and instructions in force at their workplace.
- Use the Individual Protective Equipment indicated as compulsory.
- Ensure that before starting work, all employees under your charge, have the necessary training and information, as well as the relevant qualification.
- Ensure that working conditions are conducive to the maintenance of health, employee protection and safety; Within the scope of its responsibilities, endeavour to improve health and safety conditions and to implement efficient occupational risk management.
- Avoid a large potential risk, we emphasise that the use of drugs, alcohol or illegal substances will not be tolerated in the workplace.

## Environment

We want to live with our environment in a safe and ecologically responsible way, emphasising environmental prevention and the rational use of natural resources and energy, ensuring that our activities are fully compatible with the surrounding land and environment.

For this purpose, we are committed to conducting business in an environmentally responsible manner, in the broadest sense and, in particular:

- Consider the environmental impact of new activities and new production processes.
- Use natural resources responsibly and consciously.
- Develop a constructive relationship of cooperation, on the basis of maximum transparency and trust, both internally and with the external community and institutions working in the management of environmental issues.
- Maintaining high levels of safety and environmental protection through the implementation of effective management systems.

In addition to adopting an Integrated Management System with appropriate policies and guidelines, we also have people who are aware of and committed to the rules and procedures and to the continuous improvement of the organisation's processes and environmental performance.

Within the scope of its responsibilities, endeavour to improve environmental performance and to apply efficient management of environmental aspects and impacts.

### **All employees of the company should:**

- Know and comply with the rules, environmental procedures and instructions in force at your workplace
- Maintain and respect operational controls and environmental programmes necessary for the prevention or mitigation of environmental impacts
- Encourage the responsible and controlled use of natural resources as a way of collaborating with the population's quality of life and preserving the environment
- Practice selective collection

# Sustainability

## Sustainability Mission Statement



Derived from Development Goals of the United Nations

## Reducing CO2 Emissions through innovative Solutions

We are committed to supporting the achievement of these goals. As a supplier to the global commercial vehicle and automotive industries, we strive to offer products that make a concrete contribution to reducing environmental impact. Our environmental responsibility is therefore anchored in our product concept: to manufacture vehicle components that, thanks to lightweight construction and design, contribute to reducing the overall weight, improving aerodynamics and thereby CO2 emissions of vehicles.

Compliance with all environmental legislation and regulations, as well as meeting the requirements for the international environmental management standard ISO 14001:2015, are essential measures to protect the environment. In order to manufacture and supply products that comply with legal regulations, we use already established processes and conduct regular reviews of the processes. The review of the processes mainly refers to the regular internal and external audits as part of the ISO 14001 certifications for the production plants. The results of internal and external audits are reported and necessary improvements are implemented.

In addition, our sites are certified in accordance with the IATF 16949 or ISO 9001 (Adler Pelzer Group's semi-finished good production sites) standard, which is recognized in the automotive industry. Compliance with the requirements is ensured through internal audits and audits by the certification companies. Based on the results, continuous improvement programs are pursued and the results communicated.

## Sustainability

Reducing greenhouse gas emissions is essential. Our CSR strategy has aims to reduce its Scope 1 and 2 emissions by 2026 and to become CO<sub>2</sub>-neutral in the long term (> 10 years).

In addition, the results are documented annually in our CDP report (Carbon Disclosure Project). The CDP report helps companies to evaluate their environmental impact according to the environmental policy and to improve the subsequent actions. Our planning for the calculation and regular monitoring of Scope 3 emissions has already begun in 2023.

### Energy and ressource efficiency

Environmental protection is an integral part of our product management. We also strive in our day-to-day business to improve the energy efficiency of our manufaction processes in all production sites, in order to achieve a more efficient and economical use of resources.

We continuously improve our processes to maximize the recyclability in all production steps, thus minimizing the environmental impact. All of our production plants have an environmental management system certified to the international standard ISO 14001. The environmental management system regulates the responsibilities and environmental protection to comply with legal requirements. This supports sustainable environmental compatibility of our processes and products with responsible use of resources by our employees.

Among the our policies, the concept of environmental management and protection is reflected in several documents, especially in the CSR strategy, the Code of Conduct for Employees, the Code of Conduct for Business Partners and the Environmental Guidelines for Suppliers. With the introduction of this internal set of rules, we demonstrate our commitment to environmentally conscious corporate management.

### Environment

We set specific targets for the reporting year to improve energy and ressource efficiency:

- Use of renewable energy: switch to "Green Energy" contracts; projects for photovoltaic systems in the plants; constrcution of a wind turbine.
- New production processes: APG ECO Line, among others.
- Circular economy/recycling: APG REC Line; use of recycled material in production processes.
- Fuel switch: including the consumption of conventional fuel; avoidance of business trips.

## We compete fairly avoiding Conflicts of Interest

We compete fairly and within legal boundaries. We know that everyone benefits from a competitive marketplace, so we follow the Antitrust and fair competition laws in all locations where we operate and avoid even the appearance of unfairly restricting another company's ability to compete against us.

Customer relations, suppliers, competitors, employees, trade unions, labour organisations and bodies, institutions, authorities and public officials should be based on the principles of righteousness, transparency and efficiency; fair competition in quality, price and services; and in compliance with applicable laws and regulations.

Fair dealing means that no illicit advantage will be taken through manipulation, omission or misrepresentation of relevant facts, misuse of confidential information or similar practices.

It is forbidden, directly or indirectly, or through third parties:

- Distributing gifts, loans or favours in an effort to sell products or services or to influence business, labour or government decisions.
- Distribute, offer or promise money, gifts or payments, in any form, or exert unlawful pressure or promise any object, service or favour to directors, agents or employees of public authorities or public servants or their families or spouses, in order to induce them to perform actions contrary to their official duties.
- Engaging in misleading behaviour that may cause a public authority to make mistakes and, in particular, using or presenting false statements or documents or attesting things which are not true or omitting information in order to obtain funds, loans or other payments from the State, a public body, the European Union or any other source where the Adler Pelzer site is located for the benefit of or on behalf of the Company.
- Using contributions, financing or other assignments of any kind, granted by the State, by a public body, in the European Union or from any other place of origin where the Adler Pelzer plant is located for purposes other than those for which they have been designated.
- Change, anyhow, operating a computer or telecommunications system of a public body or interfering illegally, by any procedure, with data, information and programmes contained therein or belonging to it, in order to make an unfair profit at the expense of other parties. Get involved, directly or indirectly, in any irregularity that might favour or prejudice one of the Parties during civil proceedings, labour, criminal or administrative.
- Exerting undue pressure (offers or promises of money or other goods) or using illegal coercion (violence or threats) on a person summoned to appear before legal authorities and formulate statements to be used in criminal proceedings - when that person has the right to remain silent - in order to induce him or her not to declare himself or herself, or to make a false statement.

## Building transparent Relationships

The continued enhancement of our customer relationships and the protection of our reputation around the world are of vital importance to us.

Professionalism, competence, goodwill, respect and fairness are the guiding principles and style of conduct to be followed when dealing with customers.

It is essential, therefore, that relations with clients are marked by full transparency and rectitude, respect for the law and independence from any form of internal and external conditioning.

Contracts and communications with clients should:

- Be clear and simple.
- Comply with the rules in force, without resorting to evasive or improper practices.
- Comply with the company's commercial policies and the parameters defined.
- Be complete, so as not to overlook any important element that could affect the client's decision.

In the context of commercial relations with customers, it is forbidden to behave in a way that may damage consumer confidence while at the same time undermining market security and transparency.

The quality and safety of our products and services and their fair and accurate presentation to the customer are key elements in this relationship.

It is the Company's policy to provide products and services that satisfy customer needs and meet applicable government requirements.

Our management systems, standards and corporate quality objectives guarantee safety and quality for our products and services, and seek to preserve natural resources, preventing environmental pollution. They are regularly assessed and updated to meet new requirements and refined to drive continuous improvement.

### **It is the responsibility of all employees of the Company:**

- The application of the Integrated Management System guidelines in the development of its products, operational systems, and processes. Meeting the effective needs of customers promptly and correctly because our consumers deserve quality treatment.
- Compliance with working standards and customer requirements.
- The analysis, implementation and validation of quality and productivity performance improvement actions, always seeking operational excellence.

## Fair Competition

Ethics and integrity are an integral part of our market operations and we aim to protect the value of fair competition by avoiding collusion and predatory behaviour. Thus, we avoid any practice that could be characterised as unfair competition. The Company and its employees must comply with the principles and rules of free competition and must not violate any applicable laws on competition, antitrust and consumer protection. It is forbidden to engage in any conduct that violates the regular and free exercise of trade and commerce and that, as such, is detrimental to commercial trust and good faith in business.

For this reason, all employees must:

- Avoid any measure that is aimed at an illicit limitation of competition and infringes the legal provisions on the subject.
- Avoid in any way making secret pacts on prices or sales conditions with competitors, secret pacts on renunciation of competition, submission of fake offers and division of customers or other segmentation criteria.
- Avoid any intention to influence people with decision-making power through the granting of offers, gifts or special attentions addressed specifically to them or to people of their personal relationship.
- Rejecting unacceptable comments and rumours about competitors, trying to discredit them, since these kinds of manoeuvres do not go unnoticed by the market and constitute a "foul play" with which we do not agree.
- To respect the rights of third parties in relation to intellectual property and to comply with the regulations for the protection of the distinctive marks of intellectual or industrial products (trademarks, patents) by implementing controls on compliance with the regulations for the protection of industrial property rights.
- Do not market products that use brand names, numbers or inscriptions that are false enough to cause a misunderstanding of the real origin, source or quality of the work or product.

In case of questions or doubts about these items, the Legal Department should be consulted in advance.

### Can I ever accept a gift?



**ONLY ACCEPT IF IT IS:** Modest in value, a token item like a pen, t-shirt or approved for a large group of employees.



**DO NOT ACCEPT IF IT IS:** Given in exchange for some action, any value of cash or cash equivalent like a gift card, more than modest in value or not available to others.

### What else can you do?

Learn to stop a bribe – bribes come in many forms, and they are not always obvious. A gift, the promise of a job, the offer of a trip, a charitable contribution – all can be considered bribes, if offered in exchange for any decision or favourable treatment.

## Corporate Social Responsibility

### Rights of Minorities and Indigenous People

Adler Pelzer Group respects applicable local, national, international, and traditional rights concerning land, water and resources. In particular, the rights of indigenous people and local communities shall be respected, promoted and protected throughout our supply chain in accordance with the UN Declaration on the Rights of Indigenous People.

We respect the rights of local communities and indigenous people who may be affected by doing business in our partners locations and take into account the local impact of all our business activities.

We ensure throughout our Operations and in our supply chain to avoid potential adverse impacts on the health, safety and living conditions of the effected local communities and indigenous people by taking appropriate preventative measures. In our Operations and in our supply chain we do neither unlawfully engage in the forced relocations of local communities and indigenous people unlawfully contribute to their involuntary relocation.

### Use of Private or Public Security Forces

If we use our own security forces to protect our Operations we ensure we respect internationally recognized human rights, we will not contract private security staff or use public security forces that fail to respect human rights.

### Biodiversity, Land Use & Deforestation

We ensure that our business activities do not contribute to or benefit from the illegal conversation of natural ecosystems. This also applies to illegal deforestation, which mainly refers to the conversion of natural forests into unusable areas. we perform due diligence with regards to our supply chains. If our value chains involve risks of the conversion of natural forests or other natural ecosystems our Partners must perform due diligence measures to support the long-term protection of these natural ecosystems, including the protection of natural and cultural assets.

## Public Affairs

### Financial Activities

All records and reports, whether they are internal or external must always be accurate and truthful. We observe and work within our accounting principles, this requires all data and records to be correct, complete and up to date. We comply with anti-money laundering legislation and promote ethical practices and compliance with regulatory requirements. We maintain governance, management, financial and risk management arrangements and controls.

### Public Relations

Relations with Public Authorities and Public Institutions (e.g. ministries and their local offices, public bodies, organisations working in the public service sector, local and regional authorities, competition and market authority, personal data protection authority) are maintained by the Company representatives or authorised managers.

It is forbidden to engage in any conduct either directly, indirectly or through a third party to offer promise of money, gifts or payment under any form, or put unlawful pressure or promise any object, service or favour to Directors, Officials or employees of any Public Authorities or Servant to their relatives or cohabitants in order to influence them to undertake action contrary to their official duties.

It is forbidden to undertake deceptive conduct which might cause a public authority to commit errors, and in particular it is forbidden to use or submit statements or documents that are false or attest to things that are not true, or to omit information in order to obtain grants, loans, or any other payments from the State, a public body or the European Union for the benefit or on behalf of the Company.

It is forbidden to use contributions, funding or other allocations of any kind, granted by the State, by a public body or the European Union for purpose other than which they were attended.

If business relations are held with public authorities, including participation in public tenders, it is necessary to operate in accordance with the law and with correct business practices.

It is forbidden to alter in any way the operation of a computer or telecommunications system of a public body, or to illegally interfere by any procedure, with the data, information and programmes contained in it or belonging to it, in order to make an unjust profit at the expense of other parties.

The correct operation of the Civil Service, and in particular the judiciary, is also guaranteed through the ban imposed on all parties required to comply with this Code of Conduct, to engage directly, or indirectly, in any wrongdoing that may favour or harm one of the Parties over the course of civil, criminal or administrative proceedings.

## Public Affairs

In particular it is forbidden to put pressure (offers or promises of money or other assets) or use the unlawful coercion (violence or threats) on a person summoned to appear before the legal authorities and make statements to be used in criminal proceedings, when that person has the right to remain silent, in order to lead the same person to not make a statement or to make a false statement.

### Cooperation with Authorities

In our dealings with authorities, the Company cooperates fully when lawful investigations are conducted by the Company or the authorities.

### Customs, Trade and Exports

All transactions, All transactions, regardless of cross-border or within the same country, may be subject to national and international customs, trade and/ or export controls. The Company is committed to comply with all customs, trade and export control regulations.

# Community Management

## Care for Communities

### Human Rights

Respect for human rights is one of the Company's fundamental values.

Through our actions and policies we strive to respect and promote human rights by upholding the UN Guiding Principles on Business and Human Rights with all our relationships, including employees and suppliers.

### Show that we care – be a good Neighbour

Protect the safety of your co-workers, suppliers and the public, follow laws regarding working conditions. Ensure that our suppliers and other business partners do the same.

### Help us preserve the environment

Do your part by using resources responsibly, helping to curb emissions, recycling and following environmental laws and regulations

## Trade Unions / Workers Representatives

Employees, without distinction, have the right to join Trade Unions of their own choosing and to bargain collectively. The Company adopts an open attitude towards legitimate activities of Trade Unions. Workers representatives are not discriminated against and have access to carry out their respective functions in the workplace.

## Communication and Data Protection

### Communicate responsively

All employees of the Company must use social media wisely.

If the subject of the Company comes up whilst you are on Social Media, please make sure it is clear your views are that of your own and you are not speaking for the Company.

You must never disclose confidential information about the Company, our customers, suppliers, competitors or business partners.

Never post anything that might constitute a treat, intimidation, harassment or bullying.

### Protection of Personal Data

Keeping personal information secure is critical to our employees, our business and our reputation. We recognize this responsibility and follow the laws requiring us to protect personal information that can identify an individual. Many employees work with Personal Data (including sensitive personal information) as part of their jobs. If you are one of them guard this information well by following the Company policies regarding the access, transfer and use of this information.

Personal Information includes (but is not limited to) the following:

- Email addresses
- Telephone numbers
- Employee ID number
- IP-addresses
- Financial information
- Medical information
- Names of family members
- Government identification numbers

### Appendix

The Adler Pelzer Group Code of Business Conduct is frequently reviewed on an annual basis.

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