

ALCAR GROUP

CODE OF CONDUCT FOR EMPLOYEES



ALCAR

YOUR WHEEL PARTNER

DEAR COLLEAGUES,

Increasing globalization, rising competition, and worldwide socio-political and climate challenges: Never before has it been so important for an international company to act according to uniform standards. For the ALCAR Group, it is inherent to act correctly, responsibly, and as a role model. Therefore, in addition to our corporate values, we have established a Code of Conduct, which provides binding principles and rules for all employees of ALCAR.

As a reliable partner, we also feel responsible for how we conduct ourselves in our dealings with customers, suppliers, employees, and other business partners. Our Code of Conduct supports the employees of the ALCAR Group understand their individual responsibilities when carrying out their business activities. It provides the basis for morally, ethically, and legally sound conduct by all employees of the Group.

Our employees are an essential part of our corporate success and play an important role in furthering our reputation and the trust placed in us. It is exactly for this reason that it is important for us to define unequivocal guidelines and principles for business ethics and morals based, materially, on the present Code of Conduct. When we all act in accordance with these guidelines, this Code of Conduct becomes an integral part of our corporate culture.

1 PREAMBEL

The ALCAR Group operates in a complex landscape of social, political, and legal frameworks due to its international activities, which must be adhered to. Violations of these frameworks, particularly those against a country's legal system, can incur significant financial losses for the company and severely damage its reputation.

The current Code of Conduct serves as the foundation for all business actions and decisions within the ALCAR Group. It establishes the basis for morally, ethically, and legally impeccable conduct by all employees of the corporation.

In the event of a breach of legal regulations, internal policies, directives, or provisions of this Code of Conduct, every employee must expect disciplinary consequences. Furthermore, violations may result in criminal and civil repercussions, such as claims for damages and liability.

The Code of Conduct is subject to periodic review and may be supplemented with specific guidelines, possibly applicable only to certain countries or regions, as needed.

2 SCOPE OF APPLICATION

This Code of Conduct applies to all employees of the ALCAR Group, including Members of the Management Board, managing directors, and other executives of the ALCAR Group (hereinafter the "employees"). In their employment contract, new employees must agree to comply with this Code of Conduct.

The ALCAR Group comprises all companies in which ALCAR Holding GmbH directly or indirectly holds at least 50% of the share capital or over which it exerts control in another manner.

In addition, this Code of Conduct shall be brought to the attention of any other company in which ALCAR Holding GmbH directly or indirectly holds at least 25% of the share capital, but over which it has no control, with the request that such company expressly acknowledge the Code of Conduct as part of its corporate decision-making structures.

It is in ALCAR's interest to demand morally, ethically, and legally impeccable behavior, not only from its own employees, but also from suppliers of goods and services, business intermediaries, consultants, and other business partners (hereinafter "business partners"). For this reason, ALCAR employees must work to ensure that business partners accept and comply with the separate "Code of Conduct for Business Partners."

3 RESPONSIBILITY FOR IMPLEMENTATION

Each individual employee is responsible for complying with and implementing the Code of Conduct.

The way the Group's executives implement the Code of Conduct should serve as a role model for all employees. They are also responsible for instructing their employees on how to handle the Code of Conduct, monitoring compliance, and, when necessary, providing training with the support of the relevant corporate authorities.

When interpreting the rules of the Code of Conduct, employees should also rely on common sense and question whether a specific course of action could be subject to criticism based on reasonable ethical and moral standards. Above all, the country-specific standards and customs must be considered. In the presence of legal regulations, there is no room for discretion.

In case of uncertainties or questions, employees can seek advice and decision-making support from their direct supervisors.

4 COMPLIANCE & RESPONSIBLE CORPORATE GOVERNANCE

4.1 COMPLIANCE WITH LAWS AND OTHER REGULATIONS

In all business actions and decisions, employees must strictly adhere to the applicable laws and other external and internal regulations of the corporation.

All employees are required to thoroughly familiarize themselves with the laws, regulations, and internal policies and directives applicable to their respective areas of responsibility. In cases of doubt, they should contact the relevant authorities (see section 3).

4.2 COMPETITION & ANTITRUST LAW

Transparent and fair behaviour in the market ensures the interests of both individual group companies and employees, as well as the overall competitiveness of the ALCAR Group in the long term. Restrictions on free competition and violations of competition and antitrust laws are inconsistent with the corporate philosophy, culture, and self-image of the ALCAR Group.

Violations of national or international antitrust laws can have serious consequences for the ALCAR Group and the affected employees. They may lead to significant fines and damages payments, and in some countries, even imprisonment for employees. Both oral agreements and coordinated behaviours are subject to penalties, just as written agreements are.

As part of business activities, all employees are required to adhere to the following behavioural guidelines in particular:

- No agreements with competitors may be made regarding business matters that determine or influence competitive behaviour. This applies especially to agreements and arrangements aimed at or resulting in the fixing of prices, price components, or production capacities, the allocation of markets or customers, or the boycott of a customer or other market participants.



- In conversations or other contacts with competitors, no information about confidential matters such as prices, price components, sales conditions, costs, production capacities, utilization rates, inventory levels, or similar confidential information should be exchanged, even unilaterally.

Membership and activities in associations, professional associations, or other industry organizations can be an important basis for representing the interests of industry and business groups in national and international legislation and for preparing standardization activities. However, members of such associations, professional associations, or industry organizations are usually competitors.

Against this background, ALCAR has established strict rules for membership and activities in associations, professional associations, or other industry organizations, regardless of whether they are voluntary or mandatory memberships. These rules include, among other things, that memberships in such organizations must be approved by the managing director of the respective sales company. Employees working in sales require permission from the ALCAR Group management to participate in any kind of meetings or events organized by such organizations.

4.3 PREVENTION OF BRIBERY, CORRUPTION, AND ACCEPTANCE OF GIFTS

All employees are strictly prohibited from both directly and indirectly offering or accepting advantages if they are intended to influence business transactions in an impermissible manner or if such an impression could arise. The only exceptions to this rule are gifts of nominal value and hospitality within the framework of customary business practices. All other gifts must be declined or returned, and the supervisor must be informed accordingly.

Offering or accepting money or monetary benefits is strictly prohibited under any circumstances.

Country-specific laws and customs must always be considered.

4.4 MONEY LAUNDERING

Various states, including the states of the European Union and the United States, have enacted laws against money laundering. All employees are prohibited from taking actions alone or in collaboration with third parties that violate anti-money laundering regulations. Money laundering specifically refers to the infiltration (e.g., through exchange or transfer) of funds or other assets derived from criminal activities into the legal financial and economic cycle.

4.5 CONFLICT OF INTEREST

In the course of business activities, it is possible for employees to encounter situations where their personal or financial interests may conflict with the interests of the ALCAR Group or may potentially do so. In such situations, ALCAR expects its employees to act solely in the interest of ALCAR. Since such conflicts of interest cannot always be avoided, ALCAR obliges its employees to handle such issues transparently.

Every employee is required to disclose any current or potential conflicts of interest promptly and fully to their respective supervisor, even if only the appearance of such a conflict could arise, and to seek special approval if necessary.

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

- Secondary activities may contradict duties at ALCAR or lead to a conflict of interest. Therefore, secondary activities with competitors, customers, or business partners are prohibited. In all other cases, they require prior written approval from the supervisor with notification to the relevant HR department.
- Financial involvement with competitors, customers, or business partners of ALCAR (excluding minor shareholdings in publicly traded companies as long as they correspond to normal asset management) is not permitted. Such investments by close relatives must be disclosed in writing to the respective supervisor. Close relatives include the spouse or life partner of the employee, their parents, siblings, and children, as well as other individuals who have lived in the same household as the employee for at least one year.
- Transactions with customers or business partners of ALCAR, in which individuals involved in the decision-making process on the side of the customers or business partners, or the direct negotiating partners, are close relatives, must also be reported in a timely manner before commencing contract negotiations.

4.6 DATA PROTECTION

Companies within the ALCAR Group process personal data of employees, customers, and business partners as part of their business activities. ALCAR takes the protection of personal data very seriously. The processing of personal data (such as collection, use, disclosure, publication, and storage) is only permissible in compliance with legal provisions and ALCAR's data protection policies. All employees are required to handle personal data carefully and conscientiously.

4.7 TRADE CONTROLS AND SANCTIONS

International trade is a key component of the ALCAR Group's business strategy. Therefore, it is essential for group companies and all employees to conduct their activities in accordance with and in compliance with relevant trade control and sanction regulations in all countries where group companies or their employees operate. To ensure this, employees take necessary precautions to prevent violations of these regulations and requirements - this includes measures to prevent circumvention by suppliers or customers, in addition to applicable regulations on import, export, and customs.

4.8 CONFLICT MINERALS

Employees are also required to apply due diligence measures regarding conflict minerals (tin, tantalum, tungsten, and gold) and to support the efforts of their customers and business partners to avoid the use of raw materials whose proceeds directly or indirectly finance armed groups that violate human rights.

4.9 SECRECY OF CONFIDENTIAL INFORMATION

Any confidential information obtained during professional activities, including information outside one's own area of responsibility, must not be used for pursuing personal interests or made accessible for the benefit of third parties.

It is essential to ensure that all types of company information (documents, excerpts, files, drawings, plans, forms, etc., including reproductions on paper as well as electronic or other storage media) are securely stored at all times. If such information needs to be taken outside the company for business reasons, it must be secured against access or inspection by third parties.

Strict confidentiality must be maintained regarding all operational and business secrets as well as group and company-relevant matters, including research and development processes, acquisition strategies or goals, significant investments, or divestments, regardless of their source of information. When involving external customers or business partners (e.g., suppliers, consultants), appropriate confidentiality agreements must be concluded.

Information from which operational and business secrets can be deduced must also be treated confidentially and made accessible only to those employees who require it for their professional activities. They must be securely stored by the employees. This also applies to information in which contractual partners of the ALCAR Group have an interest in confidentiality, especially if a corresponding confidentiality agreement has been concluded.

The obligation of confidentiality continues without restriction even after termination of the employment relationship.

Furthermore, the relevant confidentiality provisions of the respective employment contracts apply.

4.10 INTELLECTUAL PROPERTY

Intellectual property (including patents, trademarks, know-how, copyrights, etc.) is among our most valuable resources. To maintain our competitive edge, all employees are obligated to protect intellectual property and prevent competitors or other unauthorized third parties from accessing this knowledge. At the same time, ALCAR respects the intellectual property and know-how of our competitors, customers, and business partners.

4.11 PROTECTION OF CORPORATE PROPERTY & IT USE

The property and resources of the ALCAR Group must be used properly and carefully by employees and protected against loss, theft, or misuse. Communication facilities of the ALCAR Group, such as internet, intranet, and email, as well as all work tools, are intended for business requirements. Separate regulations for private use apply, as established by individual group companies.

In the context of IT usage, guidelines and security provisions must be adhered to limit general risks. IT devices (PCs, notebooks, etc.) must always be stored appropriately and secured with access protection

(e.g., password) to the extent technically possible. Personal passwords must not be shared with other employees or third parties. Clear and verifiable regulations must be established for substitutions.

If company-related data is stolen or cannot be found, an immediate report must be made to the respective supervisor. In the case of electronic data, access permissions must be blocked, or other appropriate steps taken promptly in consultation with the relevant IT department. In the case of personal data, the reporting process established in the data protection organizational policy must also be followed.

4.12 CORPORATE COMMUNICATIONS

All press releases and other information intended for the public from the ALCAR Group or individual group companies are exclusively issued by the respective managing directors or communication representatives. This applies to both traditional and digital communication channels.

5 SOCIAL RESPONSIBILITY

5.1 RESPECTING HUMAN RIGHTS & WORKING CONDITIONS

The corporate culture of ALCAR acknowledges and embraces the uniqueness and value of every individual, respecting their individual abilities. Based on the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact, and the core labour standards of the International Labor Organization (ILO), we consider human rights as fundamental values that all employees must adhere to.

5.2 PROHIBITION OF CHILD LABOR

The ALCAR Group is committed to combating all forms of child labour. Beyond the prohibition of child labour, it must be ensured that the employment of young workers does not endanger their health, safety, or development.

5.3 FORCED AND COMPULSORY LABOR, HUMAN TRAFFICKING, AND MODERN SLAVERY

At ALCAR, we are strictly opposed to forced labour, compulsory labour, human trafficking, and modern slavery. Forced and compulsory labour specifically refers to any work or services that are not voluntarily performed, or are obtained through coercion, including the withholding of identification documents, restrictions on movement, and debt bondage.

5.4 COLLECTIVE BARGAINING AND THE RIGHT TO FREEDOM OF ASSOCIATION

Furthermore, depending on the applicable law, the ALCAR Group acknowledges the freedom of association and the right of employees to join trade unions, form workers' representations, and negotiate collective agreements or similar inter-company agreements.

5.5 DIVERSITY, EQUAL OPPORTUNITIES, AND BAN ON DISCRIMINATION

ALCAR stands for equal opportunities and respect. Therefore, we refrain from any form of discrimination based on gender, marital or parental status, ethnic or national origin, age, disability, sexual orientation, religion, or other personal characteristics. The principle of respect towards our fellow human beings also extends to all forms of sexual harassment, such as overt advances, demeaning comments, jokes, vulgar language, suggestive gestures, or the display of inappropriate material in the business and production facilities of the group. Such behaviour may be considered harassment even if not intended as such.

5.6 REMUNERATION

Employee compensation must comply with applicable legal and collective bargaining regulations and ensure a living wage that covers the basic needs of employees and their families and enables them to maintain an adequate standard of living.

5.7 WORKING HOURS

Clear guidelines for employee working hours must be established, adhering to legal requirements and mitigating excessive mental and physical fatigue among employees.

5.8 TRAINING AND DEVELOPMENT OPPORTUNITIES

We promote the professional and personal development of our employees. Through appropriate training and development opportunities, we help our employees expand their skills and actively shape their career prospects. Managers are responsible for identifying development potential, providing regular feedback, and supporting employees in their professional growth.

5.9 LOCAL COMMUNITIES AND INDIGENOUS PEOPLES

ALCAR expects all employees to support local communities and indigenous peoples in the vicinity of ALCAR Group companies. Specifically, efforts should be made to avoid any negative impacts of ALCAR's business activities on the health, safety, and livelihoods of local communities and indigenous peoples.

5.10 SECURITY PERSONNEL

Wherever we employ security personnel to protect ALCAR Group facilities, we ensure that they respect human rights and adhere to our code of conduct. When engaging public and private security service providers, appropriate measures must also be taken to ensure that the rights of all parties involved are upheld by the respective security service.

5.11 DONATIONS AND SPONSORSHIPS

ALCAR is committed to social responsibility through various means. Companies within the ALCAR Group are permitted to provide monetary and in-kind donations, primarily to support humanitarian and social projects, as well as cultural and scientific institutions, and educational initiatives.

Such financial contributions must not be made to circumvent other provisions of the Code of Conduct or applicable guidelines of the ALCAR Group. ALCAR does not make any donations or other financial contributions to politicians, political parties, party-affiliated organizations, or organizations pursuing political, non-exclusively social agendas. This includes advertisements in party media or media outlets of party-affiliated organizations.

5.12 WORKPLACE SAFETY

Safety and health of employees are central core values for ALCAR and have top priority. Continuous improvements of the working environment as well as diverse prevention and health measures form the foundation of the successful health & safety corporate culture of the ALCAR Group. All employees are responsible for promoting safety and health protection in their work environment and for adhering to safety standards, guidelines, and regulations for occupational health and safety. This also applies to companies and their employees acting on behalf of ALCAR.

5.13 HUMAN RIGHTS IN THE SUPPLY CHAIN

These principles also apply to our conduct towards customers and business partners. Furthermore, we are committed to ensuring that our business partners—especially our direct suppliers—take appropriate measures to identify and, if necessary, eliminate or minimize risks to human rights compliance.

6 ENVIRONMENT & CLIMATE PROTECTION

Sustainable production practices, responsible resource management, and the use of state-of-the-art technologies are integral to the corporate philosophy and operational activities of the ALCAR Group. At the same time, these principles form the basis for the claim to long-term leadership in product and service quality. All areas of the production chain are geared towards the efficient use of resources (especially raw materials and energy) and the minimization of environmental impacts of processes and products. Intensive research into the development of environmentally friendly steel and aluminium processing processes and

products, measures to increase efficiency, reduce emissions, and save energy, as well as transparent and efficient environmental management, enable the sustainable minimization of the environmental impacts of the processes and products of the ALCAR Group.

Employees of the ALCAR Group are required to comply with all relevant environmental laws and regulations as well as internationally recognized environmental standards.

ALCAR commits to the goals of the Paris Climate Agreement, improving its carbon footprint through a commitment to low-carbon production and extensive research and development of new technologies, and aims for long-term carbon neutrality. However, the ALCAR Group not only ensures the minimization of environmental impacts in its own plants and subsidiaries but also requires its business partners—especially its immediate suppliers—to do the same.

7 REPORTING MISCONDUCT

Employees of the ALCAR Group may encounter violations of the Code of Conduct, other internal policies and regulations, or legal requirements. The ALCAR Group encourages all employees who observe or suspect such violations, without fear of retaliation, to report them to one of the following channels:

- Reporting to their immediate supervisor.
- Reporting to the management or the relevant legal or human resources department of the respective group company.
- Reporting through the web-based whistleblowing system, which can be anonymously used by both employees and external whistleblowers: <https://alcar-group.hintbox.at/>

In order to encourage trusted communication, it is expressly stated that employees who report violations of laws, the Code of Conduct, or other internal rules and regulations in good faith will not face reprisals or negative repercussions of any kind whatsoever as a consequence of their actions. The foregoing also applies to any other person furnishing important information of this kind pertaining to the investigation of misconduct. However, the ALCAR Group expressly reserves the right to take disciplinary action against employees who raise false accusations deliberately or through gross negligence.

In principle, compliance violations should be openly identified, i.e., the name of the party reporting the violation should be reported. Where requested, whistleblowers are assured full confidentiality when reporting a violation under their name.



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