



# ALPLA CODE OF CONDUCT

## TABLE OF CONTENTS

### Foreword

### 01 Scope

### 02 ALPLA values

### 03 Sustainability commitment

### 04 Conflicts of interest

### 05 Anti-corruption policy

### 06 Land rights

### 07 Human rights and labour standards

### 08 Confidentiality and protection of intellectual and physical company property

### 09 Compliance, monitoring and misconduct

The ALPLA Group is represented in many of the world's countries. The size of the company and its cultural diversity enrich our day-to-day working lives whilst challenging us at the same time. As we are a diverse and multicultural group of companies with a global focus, we need a shared understanding of what constitutes ethically irreproachable business practices. This Code of Conduct establishes a framework for strong cooperation amongst all parties and therefore lays a basis of trust in the form of shared values. We expect all employees to comply with legal requirements and internal regulations.

This Code of Conduct will be amended on an ongoing basis to reflect developments in the business and regulatory environments.

Unless otherwise expressly indicated, all terms referring to persons include men and women on an equal basis.

Nicolas Lehner, CCO

Günther Lehner, CEO

Philipp Lehner, CFO

Klaus Allgäuer, CTO

Walter Ritzer, COO

## 1 SCOPE

This Code of Conduct applies to all employees worldwide who work at an ALPLA Group company or a company in which ALPLA holds a controlling interest, whether they are employed on the basis of an employment contract, a service contract or as part of temporary work arrangements. This Code of Conduct helps employees, executives and all business partners to understand the values and principles underpinning our company and thus serves as a basis for taking decisions and action.

It is important that all employees have the opportunity to find out about the principles and behavioural rules that apply. Therefore, our Code of Conduct will be available in numerous languages. The English version of the Code of Conduct will serve as the benchmark.

Dealings with our suppliers and business partners will also be governed by our Code of Conduct at all times. With this in mind, we expect our suppliers and business partners to undertake to observe our 'Supplier Code of Conduct' if they do not have an equivalent code of conduct of their own.

## 2 ALPLA VALUES

The vision, mission, values and principles of our corporate identity establish the framework for cooperation within the company as well as with other stakeholders (e.g. customers and suppliers) and representatives:

- > Fair and respectful dealings with each other

- > A spirit of partnership: each and every employee is part of our success
- > Mutual consideration
- > Equal treatment of all individuals, and appreciation of different cultures
- > Responsible, sustainable and future-oriented actions and decision-making

Our Code of Conduct conforms with internationally recognised ethical standards and the principles of the Ethical Trading Initiative Base Code, the United Nations Global Compact, the United Nations Guiding Principles and statutory legislation. We respect and support these values and principles, which we regard as the basis for our day-to-day decision-making and actions.

## 3 SUSTAINABILITY COMMITMENT

Sustainability has always been a key issue for us. Here at ALPLA, sustainability means incorporating social, environmental and ethical interests into the core strategy and, as a result, our business operations. It is our long-term holistic vision to harness human, natural and economic resources in an efficient and sustainable manner. This corresponds to the ALPLA three-pillar sustainability model, which seeks to attach equal importance to environmental, economic and social matters.

## 4 CONFLICTS OF INTEREST

The actions of all ALPLA employees must be solely geared towards the success and interests of the company. All employees are therefore re-

quired to avoid situations in which their personal interests could come into conflict with those of the company. Conflicts of interest also occur in situations that do not relate to the direct personal interests of the employee, but rather to those of close relatives (e.g. husband, wife, partner, children, siblings, parents).

Should conflicts of interest nonetheless arise, they must be disclosed immediately and in full to the line manager of the employee concerned.

Potential conflicts of interest include:

- > Work at/investments in other companies, especially competitors, that could constrain the employee's ability to do their job at ALPLA
- > Ownership of significant interests in companies that are business partners of ALPLA (this does not apply, of course, to private financial investments, such as share portfolios)
- > Business dealings with companies or private individuals with ties to close relatives or similar ties (spouse, parents, children, people living in the same household)
- > Secondary employment that may run contrary to the interests of ALPLA
- > Donations and sponsorship
- > The use of company facilities for private purposes (exceptions must be expressly approved by senior management)

## 5 ANTI-CORRUPTION POLICY

ALPLA is committed to free and fair competition. This commitment includes the rejection of any form of corruption. It is prohibited to offer, prom-

ise, grant, demand or accept financial or other advantages.

It can, in individual cases, be difficult to distinguish between legitimate gifts and corrupt behaviour. For more details on how to behave when dealing with third parties, particularly customers, suppliers and official bodies, please refer to our **Anti-Corruption Policy**.

## 6 LAND RIGHTS

We protect and foster the land rights of local populations and indigenous peoples. We respect the ownership rights and deeds of individual indigenous people and local residents. All negotiations in respect of their property and land, as well as its use and transfer, are conducted in accordance with the principle of contractual transparency and disclosure, with voluntary and information-based prior consent.

## 7 HUMAN RIGHTS AND LABOUR STANDARDS

### Freely chosen and formal employment

Our employees are in freely chosen employment. We do not accept any forced or involuntary labour of any kind. The work performed by our employees is carried out on the basis of a formal employment contract, which, in turn, is based on national employment law in the country concerned.

### Freedom of assembly and the right to collective bargaining

All employees have the right to establish and join a trade union, as well as conduct collective bargaining negotiations.

**Safe and hygienic working conditions**

Safe, hygienic working conditions and strict observance of occupational safety regulations are the cornerstones of our working organisation. Our employees must be given maximum protection. Therefore, the consumption of alcohol or drugs is not permitted during working hours.

**No child labour**

We do not tolerate child labour under any circumstances, and seek to completely prevent it.

**Minimum wage**

Wages and salaries are paid in accordance with national statutory requirements. They must always cover the basic needs of our employees.

**Working time**

Our working times conform with international standards and do not exceed the limits imposed by the national laws of the country concerned.

**No discrimination**

All forms of discrimination are prohibited, both within ALPLA and in dealings with third parties. Our company is enriched by diversity. Decisions taken in respect of employees or applicants must not be based on their nationality, religion, sexual orientation, gender, etc.

**No harassment**

Sexual harassment, physical or verbal abuse, bullying and other types of disrespectful behaviour will not be tolerated at ALPLA.

**Migrant workers**

All employees at ALPLA meet the legal criteria to work in the country concerned.

All statutory requirements must be observed in the country in question. We expect the same from our business partners.

## 8 CONFIDENTIALITY AND PROTECTION OF INTELLECTUAL AND PHYSICAL COMPANY PROPERTY STANDARDS

ALPLA requires all employees to treat the company's intellectual and physical property/information with the utmost care. By 'information' or 'intellectual property', we mean all financial data, technical data, research, contracts and correspondence within the ALPLA Group, irrespective of the method of storage, editing or transmission used.

All records and reports must be accurate and truthful, and must be stored in accordance with applicable legislation. As the aforementioned documents generally relate to internal matters, confidentiality must be observed. This continues to apply after employment has ended and also covers employee, supplier and customer data. Personal data may only be stored and processed if it is necessary to do so for the performance of duties at the company. Confidential information may not be disclosed to third parties.

In particular, the IT regulations pertaining to software, hardware, email and the Internet must be observed. Each individual user has a duty of care in respect of any devices or data entrusted to them.

Passwords or access codes must be kept secret and may not be disclosed or compromised.

All business data generated and administered on ALPLA IT systems must be stored on a server-based system so that this data can be backed up and, if necessary, restored.

## 9 COMPLIANCE, MONITORING AND MISCONDUCT

This Code of Conduct is displayed in all HR departments, where it can also be viewed/requested in the relevant national language. When joining the company, new employees will be familiarised with our values and principles and will be asked to confirm that they have read and understood the Code of Conduct. The digital version of the Code of Conduct, along with translations into a range of languages, is available in Insight, our in-house information system.

If any employee is unsure about how to apply these rules, if they witness any non-compliance or if they have any grievances, they can contact their line manager or the Compliance Officer at Corporate Headquarters in Hard (Austria):

---

**ALPLA Werke Alwin Lehner GmbH & Co KG**  
**Compliance Officer**  
**Mockenstrasse 34, 6971 Hard, Austria**  
**compliance@alpla.com**

---

The Compliance Officer undertakes to treat all enquiries in a professional and confidential manner. Any potential and suspected breaches of the Code of Conduct will be taken seriously when reported and, on request, will be treated confidentially and on an anonymous basis. The facts of the case will be investigated impartially and with due care. If breaches are identified, the necessary corrective and/or disciplinary measures will be initiated.

Where there is doubt as to whether a situation or action constitutes a breach or not, it may help to ask the following questions:

- 
- > *Is it legal?*
  - > *Is it ethical?*
  - > *Does it comply with the ALPLA principles?*
  - > *Does it strengthen the good reputation of the company?*
- 

If the answer to any one of these questions is 'no', we advise against the action concerned. If you are still unsure, the Compliance Officer will be happy to answer your questions.

Furthermore, compliance with the values and principles outlined is verified globally in the form of internal and external audits carried out by impartial third parties and documented in the corresponding audit reports. In this way, we ensure that all regulations and provisions are observed at the individual companies of the ALPLA Group.

By the same token, it is in the interests of the company to not only look inwards in terms of its focus on ethical and sustainable dealings with people and natural resources. Therefore, we also expect our suppliers to observe the values and principles outlined.