

Code of Conduct



Dear Colleagues,

Aluminiumwerk Unna AG Code of Conduct sets out the standards we use for our ethical conduct. With it we want to ensure mutual respect, honesty and fairness with work colleagues and business partners.

This Code applies to all of Aluminiumwerk Unna AG's business activities. It is a commitment to the social responsibility of our globally oriented company. In order to preserve the high reputation that our company enjoys among customers, business partners and the public, the impeccable and responsible conduct of every single employee is essential. This Code of Conduct is binding for all employees!

Volker Findeisen

CEO Aluminiumwerk Unna AG

Behavior in the business environment

Compliance with law and order

The observance of laws and regulations is, for us, an essential basic principle of economically responsible actions. We always observe the applicable legal prohibitions and obligations. If national laws have more restrictive regulations than those applicable at Aluminiumwerk Unna AG, then national law will apply.

Avoidance of conflicts of interest

Business decisions are made solely in the best interest of the company. Conflicts of interest with private matters or other economic and/or other activities, even through relatives or other related persons or organizations should be avoided from the beginning.

No employee may have private orders made by companies with whom he is in business contact, if he benefits from them. This applies in particular if the employee can influence directly or indirectly the awarding of contracts to these suppliers.

Employees are required to obtain permission for ancillary activities. The operation of a company as well as direct or indirect participation in a company must be reported, in writing, to Human Resources and requires the prior consent of Aluminiumwerk Unna AG. Excluded from this rule are share purchases for purposes of asset management or retirement provision up to 5% of the respective share capital.

Authorization may be prohibited if outside employment interferes with the legitimate interests of the company, interferes with the work performance, conflicts with the obligations of the employee in the company or there is a risk of conflict of interest.

Fair competition

Aluminiumwerk Unna AG stands for technological competence, customer orientation and motivated, responsible employees. This is what our reputation and sustainable economic success in global competition is based upon.

Corruption and antitrust violations threaten these guarantors of success and will not be tolerated! Kickbacks or cartel agreements are no means for us to receive or award an order. We would rather forego business and the achieving of internal goals than violate laws.

In order to maintain their independence, employees must not request gifts, benefits, personal services, or favours from business partners. Gifts or benefits exceeding a value of more than € 44 must not be accepted. The respective business partner should be informed that the refusal is due to the Aluminiumwerk AG Code of Conduct.

In case of exceptions in justifiable individual cases (for example, if rejecting a gift would be considered impolite in an international context and the acceptance does not entail a conflict of interest), management will be informed. The gifts will be given to Aluminiumwerk Unna AG by the employee.

Expenditures, in particular for entertainment and gifts where a precise separation of business and private interests is not possible - must be borne by the employee.

Invitations from business partners to business lunches or events can only be accepted if they are granted voluntarily, if the acceptance is for a legitimate business purpose and takes place within the scope of usual cooperation. The taking over of travel or accommodation costs by third parties is not permitted.

Violations are not tolerated and will lead to sanctions against the persons concerned. The Management Board and all senior executives and all other employees must be aware of the extraordinary risks that a corruption or antitrust case may entail for Aluminiumwerk Unna AG, but also for them personally. Each employee is encouraged to actively participate in the implementation of this Code of Conduct.



Behavior towards colleagues and employees

Equal treatment and non-discrimination

Equal opportunities, mutual trust and respect are very important to us. We promote equal opportunities and prevent discrimination in the recruitment of workers, as well as for opportunities for advancement, training and further education. We treat all employees equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, but also religious affiliation or belief, unless they are radicalized or extremist. Any kind of mental and physical violence is severely condemned. Aluminiumwerk Unna AG pursues all references concerning harassment or discrimination and takes appropriate measures within the framework of the applicable legal provisions.

Human and employee rights

We respect internationally recognized human rights and support their observance. We strictly reject all forms of forced or child labor and comply with the applicable German legal regulations. We recognize the right of all employees to form and maintain trade unions and employee representation on a democratic basis within the framework of legal regulations. The right to a fair remuneration is recognized for all employees. The remuneration and other benefits are at least in accordance with the respective legal standards or the applicable collective agreements.

Cooperation with employee representatives

For Aluminiumwerk Unna AG, a trusting and close cooperation with the employee representatives is an essential component and proven pillar of the corporate philosophy. For several decades, the body of trust and the works council has been integrated and the basis of supportive cooperation is mutual trust, and an open, constructive dialogue characterized by mutual respect.

Work-and Health protection

The health and safety of our employees is, in addition to the quality of our products and our economic success, an equally high corporate goal. Occupational health and safety are an integral part of all operations and are included in all considerations right from the start. Risk assessments are reviewed regularly to identify risks as early as possible and to implement appropriate measures to protect employees.

Each of our employees promotes health and safety in their work environment and adheres to the guidelines. Each leader is required to instruct and assist their employees in the exercise of that responsibility. The same safety standards apply to employees of subcontractors or service providers on site as to our employees and these are taught accordingly prior to commencement of their services.

Customers and visitors are also subject to specific safety instructions; these are handed out prior to each admission and explained before each tour.

To ensure a healthy and productive work environment for employees and business partners, the company bans the use of prohibited substances. The same applies to drugs and alcohol; employees in the workplace must not be under the influence of these substances.

Smoking in all closed rooms and workshops is prohibited. Smoking is only allowed at designated places outside the workshops and closed rooms.

Behavior in society

Sustainable environmental and climate protection

Sustainable environmental and climate protection as well as resource efficiency are important corporate goals for us. For this we have implemented a certified management system according to DIN EN ISO 14001 / DIN EN 50001.

Each employee is responsible for treating natural resources with care and contributing to the protection of the environment and the climate through their individual behavior.

Donations

Donations and other forms of social commitment stem solely from social responsibility. We make no financial contributions, in particular donations and sponsorship, to political parties in Germany or abroad, party or party-like organizations, individual mandate holders or candidates for political office.

Appearance and communication in public

We respect the right to freedom of expression, the protection of privacy and privacy itself. Every employee should be aware that even in their private lives they can also be perceived as a part of and representative of Aluminiumwerk Unna AG, and is therefore called upon to enhance the reputation of the company through their behavior and public appearance, especially towards the media.

All media inquiries relating to Aluminiumwerk Unna AG are to be referred to the management. Only the board or authorized company spokespersons make statements to the media!

Exceptions to this rule are statements by the works council if and to the extent that they are necessary for the performance of its statutory duties and if the employer has given cause for doing so.

Handling information

We rely on reliability and honesty, credibility and integrity. We value open and truthful reporting and communication about the business operations of the Company to investors, employees, customers, business partners, the general public and state institutions.

Each employee ensures that both internal and external reports, records and other documents are in compliance with applicable law.

Confidential information / inside information

We take the necessary steps to properly protect confidential information and business records from access or insight through unauthorized colleagues or other third parties.

Employees of the Company who have specific information about circumstances that are not publicly known may not trade or share this inside information, whether deliberately or with gross neglect of due care. He may only pass these on to employees or supervisors who are authorized to know about them.

Privacy and Information Security

The protection of personal data, in particular of employees, customers and suppliers, is of particular importance for Aluminiumwerk Unna AG. We only collect and process personal data if this is necessary or legally required for the fulfillment of the respective work task. No personal data may be collected or processed without the consent of the data subject or legal admissibility. Aluminiumwerk Unna AG has commissioned a qualified employee on the subject of data protection and information security.

Protection of corporate and customer property

We use the property and resources of the Company properly and carefully, protecting it against loss, theft or misuse. The intellectual property (know-how) of our company represents a competitive advantage for Aluminiumwerk Unna AG and is thus a valuable asset, which we defend against any unauthorized access by third parties.

We use tangible and intangible property of the company for corporate purposes only and not for personal purposes unless expressly permitted. Together with their supervisors, our employees are responsible for ensuring that the nature and extent of business travel is always commensurate with the purpose of the trip and are planned and carried out with due regard for time and cost aspects.

The property of our customers - which includes in particular the intellectual property - is protected against loss, theft or misuse and against any unauthorized access by third parties. Special procedures for internal use of these principles are implemented with UQN 3.086.

Implementation and contact person

Aluminiumwerk Unna AG actively promotes the communication of the guidelines and agreements underlying the Code of Conduct. The company management ensures its implementation and ensures that no employee incurs any disadvantage by complying with the guidelines or agreements.

Our leaders have a special role model function and can be specifically measured in their actions against the Code of Conduct. They are the first point of contact for questions on understanding the regulations and ensure that all employees know and understand the Code of Conduct. As part of their leadership role, they prevent unacceptable behavior or take appropriate measures to prevent breaches of the rules in their area of responsibility.

Trusting and good cooperation between employees and executives is reflected in honest and open information and mutual support.

All employees have access to their respective supervisor or the works council should they have further questions about the Code of Conduct. Third parties (customers, suppliers etc.) have the central e-mail address volker.findeisen@alunnatubes.com at their disposal. References to possible violations of laws or directives can be reported at any time. All information will be kept strictly confidential



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