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## 1. Our Code of Ethics

### 1.1. General principles

In the course of introducing a compliance system, Alpitronic has provided for and introduced various rules of conduct for managers, employees and business partners. These regulations have been provided for, among other things, in Alpitronic's "Code of Ethics", which serves as the cornerstone of the company's ethical goals. Special attention is paid to alpitronic's suppliers, for whom this separate "Supplier code of conduct" is provided.

When selecting, assessing and supporting new and existing business partners, Alpitronic attaches great importance not only to economic criteria but also to business ethics, integrity, legally compliant conduct, compliance with labour standards and environmental protection. The Supplier Code of Conduct reflects this understanding of good business practice. To this end, it sets binding minimum requirements for social and environmental standards among our business partners.

## 2. Principles of the Supplier Code of Conduct

### 2.1. Scope of application

Business partners within the meaning of this Supplier Code of Conduct are all companies or partners from which Alpitronic obtains supplies and services. Our Supplier Code of Conduct is the basis of our business relationships and thus also a binding part of the contracts with our business partners. We expect our business partners not only to follow the principles of this Supplier Code of Conduct themselves, but also to communicate them to their suppliers and business partners and to take reasonable measures to ensure that their suppliers and subcontractors also follow them.

### 2.2. Communication

To ensure that the principles of this Supplier Code of Conduct are lived in practice, we expect our business partners to make the Supplier Code of Conduct available to all employees through appropriate channels. In addition, we expect the business partner to establish or participate in an effective grievance mechanism for individuals and groups who may be affected by negative impacts.

### 2.3. Compliance with laws

Compliance with all applicable laws and regulations of the countries in which we operate is a matter of course for us. We expect the same from our business partners. If national or local legislation differs from the requirements of this Supplier Code of Conduct, the stricter regulation for the protection of people and nature must always be observed.

## 3. Social standards and human rights

Compliance with human rights as well as good and safe working conditions are absolute basic conditions for responsible business management at Alpitronic. Together with our business partners, we assume responsibility for the protection of employees in our value chain and the associated communities.

### 3.1. Occupational safety and health protection

The business partner undertakes to protect the health and safety of its employees. The business partner is obliged to regularly assess hazards and potential health risks, to take the necessary protective measures and to document both in a risk assessment. The principles of an occupational health and safety management system should be observed: Hazards should be avoided wherever possible and, where this is not possible, protective measures should be taken and employees instructed in them.

## **3.2. Preventing child labour**

The minimum age for employment must be observed, depending on the national law. Under no circumstances may young employees be subject to compulsory education. This must be ensured through robust age verification measures prior to the commencement of employment. Approved workplace training programmes that comply with all laws and regulations are strongly encouraged. However, employees under the age of 18 are subject to special protection. Hazardous work and work that has a negative impact on their health, safety or development are therefore prohibited.

## **3.3. Prevention of forced labour**

All work must be done on a voluntary basis. Business partners shall not engage in, participate in or benefit from forced labour, modern slavery or work performed under threat of punishment or coercion. Bonded or involuntary prison labour shall not be used.

## **3.4. Equal opportunities and non-discrimination**

Employees shall be treated fairly and with respect. Therefore, no form of direct or indirect discrimination shall be tolerated in the workplace that is contrary to the idea of equal opportunities and equal treatment. In particular, gender, race, religion, age, family circumstances, sexuality, origin or membership of an employee representation may not be a reason for differentiation, exclusion or preference in the workplace.

## **3.5. Remuneration**

The remuneration of employees must be at least equal to the national minimum wage. Where there are no statutory or collectively agreed regulations, remuneration shall be based on the industry-specific, locally customary and collectively agreed remuneration for services. It must be ensured that the wages paid for a standard week are sufficient to cover the basic needs of the employees and their families.

## **3.6. Compliance with working hours**

Working hours must not habitually exceed the maximum working hours provided for in the respective country. Overtime must be worked voluntarily. Adequate breaks and rest periods must be provided in accordance with laws, industry standards or collective agreements.

## **3.7. Appropriate disciplinary action**

Disciplinary action shall in no way diminish the dignity and rights of employees and shall be in accordance with applicable law. Degrading treatment, corporal punishment and psychological or physical coercion are not permitted. Disciplinary measures must always be recorded in writing. In addition, they must be explained orally to employees in clear and understandable terms.

## **3.8. Freedom of association and right to collective bargaining**

The business partner shall respect the right of their employees to freedom of association and collective bargaining within the framework of national laws. Employees or their representatives shall be able to communicate openly and without fear of discrimination or reprisal with management and to express ideas and concerns about working conditions. This also applies in countries where the right to freedom of association and collective bargaining is restricted.

## **3.9. Employee grievances**

The business partner shall ensure that its employees have the opportunity to report their concerns and complaints, including in confidence. The handling of internal complaints should be systematic and comprehensible and documented. The business partner shall inform Alpitronic without being asked about complaints that are relevant for the cooperation with Alpitronic.

## 4. Environmental protection

The protection of the environment is also a central task for Alpitronic and its business partners. Accordingly, we are jointly committed to using resources efficiently and responsibly, to avoiding damage and to continuously reducing the emission of climate-damaging gases.

### 4.1. Environmental legislation

All laws, regulations and standards for the protection of natural resources and the environment shall be complied with. In addition, the Business Partner undertakes to obtain all necessary permits and licences and to comply with the conditions and ancillary provisions of such permits and licences.

### 4.2. Environmental management systems

The business partner undertakes to continuously minimise environmental impacts and hazards as well as resource consumption. Business partners should pursue these goals systematically and be able to demonstrate this through a certified environmental management system. This applies in particular to business partners with their own production sites.

If the company does not have a certified environmental management system, a responsible person should be appointed who is entrusted with the implementation of environmental goals and programmes in the company.

### 4.3. Climate protection and reduction of pollutants

The business partner undertakes to continuously reduce emissions that are harmful to the climate. The business partner should participate in the development and application of climate-friendly products and processes in order to contribute to the reduction of greenhouse gas emissions. Further harmful emissions to air, water or soil should also be prevented or reduced as far as possible.

## 5. Compliance and fair cooperation

### 5.1. Business integrity and compliance measures

The business partner shall ensure that it operates an effective system in its company, in particular to prevent corruption, violations of anti-trust law, money laundering offences and economic offences, which is suitable for taking precautions to ensure that employees act in accordance with the rules. This system is based on a risk assessment of the company and is subject to continuous improvement with regard to the measures taken, structures and processes.

### 5.2. Anti-bribery and prevention of money laundering activities

Corruption and white-collar crime (e.g. embezzlement or fraud) are not tolerated in any form. Our business partners and the persons acting on their behalf neither actively offer, promise or grant advantages (bribery, granting of advantages) nor passively request, allow themselves to be promised or accept advantages (bribery, acceptance of advantages) with the aim of obtaining a contract or other preferential treatment. Invitations or gifts are not misused as a means of exerting influence. Our business partners comply with the relevant legal obligations to prevent money laundering and do not participate directly or indirectly in money laundering activities.

### 5.3. Taxes and correct accounting

Our business partners must consistently comply with tax law requirements. Furthermore, truthful and complete accounting must be carried out for all business activities.

## 5.4. Antitrust and Competition Law

Our business partners shall refrain from any unlawful conduct, such as agreements with competitors to restrict or distort fair competition or the free market, and shall also otherwise comply with all antitrust and competition law requirements.

## 5.5. Customs and foreign trade law

Our business partners comply with national and international customs laws as well as foreign trade, anti-terrorism and embargo regulations. They undertake to observe the applicable restrictions and prohibitions on foreign and domestic trade in certain goods, technologies or services as well as countries and persons.

## 5.6. Avoidance of conflicts of interest

All actions and decisions must be based on objective criteria. Our business partners shall create the necessary conditions for this by avoiding conflicts of interest with private or other economic or other activities and by countering any appearance of such with maximum transparency.

## 5.7. Protection of confidential information, third-party property rights and data protection

Our business partners undertake to respect trade and company secrets and other proprietary rights of third parties and to protect personal data. This also includes handling exchanged documents with care and carefully storing data and information requiring secrecy that is not in the public domain and protecting it against unauthorised access by third parties. The applicable data protection regulations shall be complied with.

## 6. Compliance with the Supplier Code of Conduct

Our goal is long-term supplier relationships based on trust. To this end, we develop approaches and solutions for compliance with the Supplier Code of Conduct together with the business partners and in the supply chain, which secure the cooperation and make it more sustainable.

### 6.1. Verification of compliance with the Supplier Code of Conduct

Alpitronic may at any time verify compliance with the Supplier Code of Conduct through measures such as self-disclosure by suppliers, submission of certificates and information by third parties. The business partner allows Alpitronic, if necessary, also without prior notice, to check during normal business hours by means of an audit on site (on the premises of the business partner or at other locations where services are provided on behalf of the business partner) whether the principles of this Supplier Code of Conduct are being complied with. This can be done by Alpitronic or by commissioned third parties.

### 6.2. Mechanism in case of non-compliance

If violations of these principles and requirements of this Supplier Code of Conduct are identified, the business partner undertakes to take improvement measures within a reasonable period of time. Violations by the business partner of the principles and requirements of this Supplier Code of Conduct shall be considered a material non-compliance with the contractual relationship. Alpitronic is thus entitled in this case to suspend the business relationship in whole or in part and, in the event of continued non-compliance, to terminate it after setting a reasonable deadline.

## 7. Contact and possibility of complaint

For reporting compliance violations or suspected cases as well as violations of the principles of this Supplier Code of Conduct, business partners can use Alpitronic's independent contact point for this

# Supplier Code of Conduct

(for suppliers and business partners of Alpitronic)



purpose. The regulations of Alpitronic define clear responsibilities and processes for the clarification of indications, guarantee confidentiality and offer the greatest possible protection for all parties involved.

Contact: [odv@Alpitronic.it](mailto:odv@Alpitronic.it)

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