

# Code of Conduct Integrity and Responsibility

## **Preamble**

As part of our business activities, we bear responsibility towards our own company, our business partners and the environment and society. In a globalized world with increasingly complex conditions, this is becoming more and more demanding.

The basis for this is the corporate value of integrity and responsibility. The mission statement expresses what our company stands for today and in the future:

These guidelines and agreements are unreservedly valid and binding for all employees. Based on this the present Code of Conduct summarizes the essential principles and rules for our actions and represents what we expect from us and our business partners.

The basic requirements for an honest and responsible business relationship between aas.tech and all business partners are laid down in this code of conduct.

## **Conduct in the Business Environment**

#### Compliance with Law

All our business partners expect from us that they can rely on aas.tech as a legally compliant company. For this it is necessary that we are familiar with our contractual obligations towards our business partners.

In turn, we expect our business partners to comply with our ethical and legal standards and adhere also to the principles of this Code of Conduct.

The essential basic principle of our actions is compliance with laws and regulations. At all times we observe the applicable legal regulations even if this may result in temporary economic disadvantages or difficulties for the company or individual persons in the company.

If internal work rules or regulations conflict with national laws, national law takes precedence.

Our employees are obliged to know the fundamental laws and regulations that are relevant to them. This includes information security and data protection regulations as well as regulations regarding correct competitive behaviour.

Our employees must know and follow the internal company regulations that apply to them. This includes the regulations on work environment safety. Corresponding information and documents will be made available by the company. Regular employee training courses take place on key issues.

A violation of applicable laws, regulations, and internal company rules such as this Code of Conduct can result in criminal as well as civil law measures. In addition to the company individual employees must also expect sanctions if the code of conduct is violated.

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## **Fair Competition**

aas.tech stands for innovative technological competence, customer orientation and, above all, for motivated and responsible employees. Corruption and antitrust violations threaten these cornerstones of our success and will not be tolerated. Bribes or cartel agreements are not a means for us to get an order. Before we break a law we renounce a business.

aas.tech supports fair and undistorted competition in compliance with competition and antitrust law. In almost all countries, relationships and agreements with competitors and business partners are prohibited by law.

Our employees are obliged to comply with the rules of competition and antitrust law.

We do not hold discussions with competitors to agree on prices or other inadmissible agreements on behaviour in the market.

We do not hold discussions with business partners about non-competition or the allocation or preference of customers.

We do not hold discussions with business partners about improper preference or the exclusion of business partners or suppliers.

We, in turn, expect our business partners to behave fairly and in compliance with competition and antitrust regulations in the market.

#### **Avoid Conflicts of Interest**

Our business decisions are made solely for the good of the company. aas.tech expects loyalty to the company from its employees. Conflicts of interest with private interests or other economic or other activities, including those of relatives or related persons or organizations, should be avoided right from the start. If they occur anyway, they must be resolved in accordance with the law. Complete transparency of the conflict is a prerequisite for this.

It is forbidden to invest in companies of competitors or business partners if this could lead to a conflict of interest. This is especially the case if the type and scope of a participation are capable of influencing actions in the activity within aas.tech in any way.

Employees must report in advance secondary employment in writing and obtain consent before they start work. As a rule, consent is only refused if legitimate operational interests, in particular an activity for a competitor, a weakening of the workforce due to the secondary activity or a violation of the Working Hours Act, prevent taking up the activity. The statutory non-compete obligations remain unaffected by this regulation.

## **Protection against Corruption**

The principle applies that no employee may give business partners undue advantages or attempt to do so. Especially this applies if the procedure is suitable for influencing the recipient's actions and decisions in an impermissible manner.

Our employees are not allowed to accept benefits that can be assumed to influence business decisions or transactions. This also includes personal gifts or benefits that result from our business relationships.

To avoid conflicts of interest, we ask our business partners to completely refrain from receiving gifts of any kind, especially in the run-up to Christmas.

#### **Money Laundering Prevention**

aas.tech satisfy the legal obligations to prevent money laundering and does not take part in money laundering activities.

Our employees are requested to have unusual financial transactions, especially in connection with cash, which could give rise to suspicion of money laundering, be checked by the management.

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## **Conduct in the Work Environment**

## Safe and Healthy Working Environment

Aas.tech offers its employees a working environment that is free from physical, psychological and verbal harassment or other abusive behaviour.

In turn, we expect our business partners to offer their employees a safe and healthy working environment.

## **Fair Working Conditions**

Trust, responsibility, the compatibility of work and family, team spirit, passion and fair play are our values.

Nobody should have to choose between a child and a career. That is why we offer various measures to reconcile work and family, such as room for care during holidays, on bridging days or in an emergency. Flexible working time regulations and parent-friendly framework conditions support our employees in their family phase. Our family-friendly corporate culture thus creates more equal opportunities and promotes family awareness.

We attach particular importance to the further training of our employees. There are numerous opportunities for professional and personal training available.

## **Equal Treatment and Mutual Respect**

aas.tech is a quality-oriented company. Our employees are the key to success. We take responsibility for our employees and offer perspectives. Growth, flat hierarchy levels and an open ear are the basis for successful development.

A culture of equal opportunities, mutual trust and mutual respect are important values to us. All employees are judged according to the principle of equal treatment. The announcement of vacant jobs, hiring, remuneration, interaction with one another and the further promotion of our employees are carried out in compliance with all relevant laws and regulations.

#### Non-Discrimination

aas.tech does not tolerate any discriminatory behaviour based on ethnic origin, skin colour, gender, religion or belief, disability, age, sexual orientation, or any other reasons that are subject to the prohibition of discrimination.

Every one of us is responsible for creating a working environment that is characterized by tolerance, trust, and respect. We are aware of our obligation to respect the personal dignity, privacy and personal rights of all employees and our business partners.

## **Human Rights and Labour Rights**

We respect internationally recognized human rights and support their observance. We strictly reject any form of forced and child labour.

We recognize the right of all employees to form employee representatives on a democratic basis within national regulations.

The right to appropriate remuneration is recognized for all employees. The remuneration and other services correspond at least to the respective national legal requirements at the customary level in the industry.

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#### Work and Health Protection

The safety and health of our employees are alongside the quality of our products and economic success an equally high corporate value.

Safety and health of our employees are an integral part of our operational processes and are included in technical, economic, and social business decisions.

Each of our employees promotes safety and health protection in their working environment and adheres to the regulations on occupational health and safety. The management is obliged to instruct and support its employees in fulfilling this responsibility.

## **Conduct in the Social Environment**

#### **Environmental and Climate Protection**

When developing new products and operating our production facilities, we ensure that all of the resulting impacts on the environment and climate are kept as low as possible. We make sure that our products make a positive contribution to environmental and climate protection.

At aas.tech, every employee is responsible for treating natural resources with care and contributing to the protection of the environment and climate through their individual behaviour.

#### **Donations**

aas.tech does not provide any financial support. Especially no donations or sponsorship measures are made to political parties, party-affiliated or party-like organizations, individual elected official persons or candidates for political positions.

We see ourselves as an active member of our society and are therefore involved in different ways. We perform our social commitment solely in the company's interests.

## Responsibility for the Company's Reputation

The personal integrity and professional appearance of our employees help to preserve the reputation of aas.tech with customers and suppliers. Our code of conduct is the basis for this. Our employees base their behaviour and their decisions on the values and principles of conduct described here.

The reputation of aas.tech is determined by the appearance and actions of each individual employee, regardless of their position. The misconduct of an individual can also damage our company considerably.

We respect the right to freedom of expression and the protection of personal rights and privacy. Every employee should be aware that they can also be perceived as part and representative of aas.tech in their private lives and are therefore asked to maintain the company's reputation and reputation through their behaviour and appearance in public.

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## **Conduct in Handling with Information**

#### **Corporate Documentation**

Our basis is built on reliability, honesty, plausibility, and integrity.

aas.tech attaches great importance to open and truthful communication on the company's business transactions with business partners, employees, suppliers, the public in general and government institutions. Every employee ensures that both internal and external reports, records and other company documents are in accordance with the applicable statutory rules and standards and are therefore always complete and correct, as well as being timely and in accordance with the system.

#### **Confidential Documentation**

aas.tech has all personnel and material conditions to protect confidential information and business documents from access and inspection by non-participants and other third parties in a suitable manner.

## **Data Protection**

The protection of personal data is of particular importance to aas.tech. As part of our business activities, we collect, process, and use personal data from employees, customers and suppliers. aas.tech respects and protects the confidentiality of this data.

We actively implement and comply with the provisions of the General Data Protection Regulation (GDPR). Compliance with the data protection regulations is monitored by the aas.tech data protection officer.

# **Protection of our Company Property**

aas.tech property should be used responsibly and appropriately. We protect our property from loss, theft or misuse. Private use of company property is strictly prohibited.

The protection of our intellectual property is of essential importance for aas.tech. This includes, among other things, confidential information, trade secrets, copyrights, trademarks, logos, customer lists as well as our customers' applications, plans and projects. This protection includes the intellectual property of aas.tech and the intellectual property of our business partners.

The intellectual property of our company represents a competitive advantage for aas.tech and thus a particularly valuable asset that we defend against any unauthorized access by third parties with all means.

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