

CODE OF CONDUCT FOR BUSINESS PARTNERS

SCOPE AND SUBJECT MATTER



This code of conduct is valid for the Thöni group and its business partners. It sets out important values, principles and courses of action and aims to ensure compliance with legal requirements and ethical standards through its target group and the creation of a work environment which encourages integrity, respect and fair behaviour.

OPEN AND FAIR COMPETITION, PROTECTION OF BUSINESS SECRETS



Business partners commit to fair competition, to comply with the antitrust rules and to avoid conflicts of interest. In particular, counterfeit products are detrimental to fair competition and must therefore be pursued with the legal means available. Business partners have to be informed immediately of any knowledge of plagiarism of their products. Intellectual property and trade secrets of competitors, customers and suppliers shall be safeguarded and respected. Special attention therefore needs to be paid to the processing, safekeeping and disclosure of proprietary or confidential information.

FIGHTING CORRUPTION AND MONEY LAUNDERING



Business partners are obliged to strictly follow national and international provisions to combat corruption and money laundering and will make appropriate arrangements for this purpose. Granting and accepting of gifts and/or benefits, which exceed the amount customary in that particular place or country, must be strictly forbidden. Financial records, accounting records and accounts must be complete and accurately reflect transactions and results and be in accordance with the generally accepted accounting principles.

HUMAN RIGHTS AND WORKING CONDITIONS



Business partners are obliged to always strictly adhere to applicable laws and regulations. These include in particular the respect of human rights, the protection of minorities, the creation of fair working conditions and the prohibition of child and forced labour. Working time, wages and social security benefits must be no less than the legal requirements and in accordance with fair standards. Diversity, equal rights and inclusion must be encouraged: this includes recruitment and access to training and promotions without discrimination based on ethnicity, skin colour, gender, sexual orientation, marital or family status, personal relationships and health status. At the same time, business partners confirm their commitment to a fair dialogue with employee representatives and to respect the freedom of association of their employees. Hiring or using private or public security staff to protect a corporate project is strictly forbidden, if, as a result, any of the previous obligations are violated.

When acquiring, developing or alternatively using land, forests and waters, the use of which secures the livelihood of one person, they must, under no circumstances, be forcibly evicted or dispossessed. The rights and the preservation of the habitat of indigenous peoples is to be particularly protected.

COMPLIANCE OF THE PROTECTION AND HEALTH OF MEMBERS OF STAFF

Our business partners are obligated to protect the physical and mental health of their employees. The valid statutory safety requirements shall be observed without exception and preventative measures such as analysing potential risk factors for the continuous improvement of occupational safety shall be undertaken.

COMMITMENT TO ENVIRONMENTAL PROTECTION

Protecting the environment and the passing of a fair, ecological heritage to future generations are very important. Business partners are expected to take appropriate measures to preserve the ecosystem with the objective of protecting the biodiversity, to stop deforestation and to sustainably pursue, to protect and to restore land use. In addition, business partners must make serious efforts to use efficient and environmentally friendly technologies, which ensure a responsible and economical use of natural resources. Special attention shall thereby be paid to energy efficiency, greenhouse-gas emissions, air and noise emissions, water consumption, waste avoidance and recycling. The aim is to continuously minimize the environmental impacts caused, until complete decarbonization and the exclusive use of renewable energy is achieved. The applicable laws and regulations concerning chemical substances, which are present in the final product or the production process, are complied with and the safe handling of waste and chemical products must be ensured.

Business partners are taking serious measures to establish a continuous improvement process in order to achieve the goals defined in terms of environmental performance. This can be implemented through, e.g., relevant ISO certification, a greenhouse-gas report or an external sustainability assessment.

ANIMAL WELFARE IN THE SUPPLY CHAIN

In addition to protecting the environment, animal welfare must be considered along the supply chain to the same extent. The suppliers concerned are expected to implement standards and best practice methods to ensure the protection of animals. In all cases, national and international provisions for animal protection as well as the principles of the World Organisation for Animal Health (WOAH) must be complied with for the welfare of animals.

ENVIRONMENTAL IMPACTS OF ALUMINIUM PRODUCTION



Business partners have to promote socially responsible and environmentally friendly mining, e.g., of the raw material bauxite and only source primary aluminium from appropriate suppliers. Business partners are committed to the ASI standard and will seek to attain and maintain the relevant certification.

ETHICS, DATA PROTECTION AND INFORMATION ABOUT VIOLATIONS



Business partners promote the compliance with relevant legal requirements and ethical standards and commit to comply with statutory provisions in relation to data and informer protection. Processing of personal information will therefore be made exclusively on the basis of statutory provisions. To protect informers, a suitable channel, which enables certain breaches of Union law to be reported anonymously, must be set up.

COMPLIANCE OF EXPORT CONTROLS AND ECONOMIC SANCTIONS



Various product-related, personal or country-specific sanctions, export controls and import regulations limit or forbid the movement of certain goods, services, technologies and financial transactions. Business partners are obliged to comply with national and international laws, EU regulations and, if necessary, cooperate with the competent authorities.