

# CODE OF CONDUCT FOR ALMAMET BUSINESS PARTNER

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## Preamble

Global business operations carry the responsibility to uphold the fundamental principles of human coexistence. Accordingly, compliance with all applicable laws and regulations, and in particular respect for the rights of every individual, constitutes a core principle guiding the actions of all ALMAMET companies.

This commitment extends not only to our own operations, but also to our suppliers, contractors, consultants, and other partners to ensure that their practices align with ALMAMET's values.

This Code of Conduct sets out ALMAMET's principles and expectations for its Business Partners. Its purpose is ensuring that their practices align with ALMAMET's values and comply with applicable laws and regulations.

The principles and requirements outlined in this Code are based on ALMAMET's Human Rights Policy and Corporate Code of Conduct, and are further informed by the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the Universal Declaration of Human Rights, and the United Nations Convention against Corruption.

## 1. Compliance & Ethical Corporate Governance

### Compliance with Laws

Business Partners shall comply with all applicable national laws and international regulations.

### Prohibition of Corruption and Improper Benefits

Business Partners shall not engage in any form of active corruption (offering or granting benefits, bribery) or passive corruption (requesting or accepting benefits).

Business Partners shall not offer gifts or other personal benefits (e.g., invitations) to ALMAMET employees or their close relatives if the value or circumstances could create the impression that a specific behavior is expected in return.

Gifts of minor value and hospitality within normal business practices are permissible.

### Fair Competition

Business Partners shall not restrict free competition or violate national or international antitrust laws. They shall refrain from agreements or actions that influence competitive behavior (e.g., price-fixing, market allocation) or from sharing confidential ALMAMET information (e.g., prices, sales terms, costs, capacity, inventories).

### Protection of Information, Intellectual Property, and Data

Business Partners shall appropriately protect ALMAMET's confidential information and intellectual property. Confidential information must remain secure.

Business Partners shall respect intellectual property rights and comply with applicable laws to avoid infringements, including third-party rights.

Processing of personal data of ALMAMET employees, customers, or partners (collection, use, storage) shall comply with applicable data protection laws.

### Trade Control and Sanctions

Business Partners shall comply with all applicable trade control and sanction regulations in the countries in which they operate.

## 2. Social Responsibility

### Respect for Human Rights & Working Conditions

Business Partners shall respect and uphold human rights as fundamental values, in line with the International Bill of Human Rights, UN Guiding Principles on Business and Human Rights, and UN Global Compact principles.

## Prohibition of Child Labor

Business Partners shall prohibit child labor in their operations and at direct suppliers, complying with ILO Conventions No. 138 and No. 182. Employment of young workers must not jeopardize their health, safety, or development.

## Prohibition of Forced Labor, Human Trafficking, and Modern Slavery

Business Partners shall comply with ILO Conventions No. 29 and No. 105 and prevent forced labor, human trafficking, and modern slavery in their operations and at direct suppliers.

## Diversity, Equal Opportunity & Non-Discrimination

Business Partners shall prevent discrimination or harassment based on gender, family status, ethnicity, age, disability, sexual orientation, religion, or other personal characteristics. Equal pay for equal work must be ensured.

## Compensation and Working Hours

Business Partners shall provide fair remuneration and working hours in compliance with applicable laws, ensuring a decent standard of living and preventing excessive physical or mental fatigue.

## Occupational Health & Safety

Business Partners shall provide a safe and healthy workplace, including personal protective equipment, and comply with local occupational safety laws. Implementation of safety management systems (e.g., ISO 45001, OHSAS 18001) is recommended.

## Security Personnel

If employing private or public security personnel, Business Partners shall ensure human rights are respected in their duties.

## Local Communities & Indigenous Peoples

Business Partners shall respect local communities and indigenous peoples, avoiding negative impacts on health, safety, and livelihoods, including unlawful displacement or land appropriation.

# 3. Environment & Climate Protection

Business Partners shall comply with all applicable environmental laws and internationally recognized standards, including Minamata, Stockholm, and Basel Conventions. They shall minimize environmental risks, conserve resources, and implement an environmental management system (e.g., ISO 14001, EMAS) if feasible.

## Carbon Footprint

Business Partners shall develop and implement CO<sub>2</sub> reduction targets for their operations and supply chain (Scope 1, 2, and 3), aligned with the Paris Agreement, and provide verifiable data to ALMAMET. Independent verification (e.g., Science Based Targets Initiative) is recommended.

## 4. Supply Chain Management

Business Partners shall implement measures to identify, prevent, and mitigate negative impacts on human rights and the environment across their entire supply chain.

They shall communicate the principles of this Code, particularly Sections 2 (Social Responsibility) and 3 (Environment & Climate), to their own suppliers and subcontractors, and monitor compliance.

Business Partners shall also comply with applicable supply chain due diligence regulations, including the German Supply Chain Act (LkSG).

An implementation of risk management systems or certification under recognized initiatives is recommended.

## Conflict Minerals

Business Partners shall comply with all applicable laws regarding conflict minerals (tin, tantalum, tungsten, gold) and provide information on origin and supply chain.

## Management Systems

Business Partners are encouraged to implement a Quality Management System (QMS) certified to ISO 9001 to ensure consistent product and service quality, process reliability, and continuous improvement.

In addition, certification to ISO 14001 (Environmental Management) and ISO 45001 (Occupational Health and Safety) is highly recommended to demonstrate a systematic and effective approach to managing environmental impacts and workplace safety.

## 5. Reporting Misconduct

Business Partners are encouraged to establish whistleblowing mechanisms for reporting violations of this Code, either openly or anonymously.

They shall also inform their employees and direct suppliers about the availability of ALMAMET's whistleblowing system: [compliance@almamet.com](mailto:compliance@almamet.com)

## 6. Cooperation and Consequences

ALMAMET reserves the right to audit Business Partners' processes, due diligence measures, and the implementation of corrective action plans.

Business Partners shall provide requested documents, information, and access to personnel as reasonably required.

They shall also participate in training on the principles of this Code and confirm attendance in writing.

Failure to comply may result in corrective actions, suspension, or termination of the business relationship.

## Supplier Acknowledgment

**I/we, the undersigned, confirm that I/we have read, understood, and agree to comply with the *ALMAMET Code of Conduct for Business Partner*.  
We commit to uphold the principles and requirements described herein.**

Supplier Company:

Name:

Address:

Representative:

Position:

Date:

Signature:

Stamp (if applicable):

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