

Code of Conduct for Business partner

(„CODE OF CONDUCT FOR BUSINESS PARTNERS“)

Introduction

Since the ASB Group was founded in 1985 - long before the term “compliance” became an important buzzword - it has been an elementary component of our corporate policy,

- conducting business with integrity and fairness,
- take responsibility for our employees, human rights and the environment, and
- to base our activities on the applicable laws of the countries in which the ASB Group operates.

This fundamental attitude is still the basis of our actions today and a key factor in ensuring the long-term and sustainable success of the ASB Group in the future.

We also expect our business partners to adhere to these values, which we have set out in our codes of conduct and guidelines. The term “business partner” includes all third parties who have contractual relationships with the ASB Group, including but not limited to supplementary workers, suppliers and other business partners (hereinafter referred to as “business partners”).

This Code of Conduct for Business Partners (hereinafter: “Business Partner Code”) is binding for every business partner. We expect our business partners to comply not only with laws and regulations, but also with the standards of this Business Partner Code. For us, it is an indispensable prerequisite for the selection, evaluation and cooperation with our business partners that they always act in accordance with the law and in compliance with ethical standards and must also take this into account when selecting their business partners.

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I. Law & Responsibility

All valid and applicable national and international laws, regulations and voluntary commitments must always be complied with by the ASB Group's business partners in order to avoid any legal violations and reputational damage that could lead to a disadvantage for the ASB Group. Among other things, business partners are obliged to prevent all human rights and environmental risks specified in the German Supply Chain Duty of Care Act (LkSG) and to fulfill the resulting human rights and environmental obligations in an appropriate manner.

II. Fair market behavior

Financial responsibility

Transparency and correctness are top priorities for the ASB Group. Its business partners keep their books and records at all times in accordance with applicable law and generally accepted accounting principles.

Disclosure of information

This includes, in particular, information on financial or non-financial topics such as sustainability initiatives, business activities, certifications and environmental standards.

The ASB Group's business partners make their business decisions exclusively on the basis of factually comprehensible, objective criteria.

Free competition and antitrust law

The ASB Group's business partners always behave fairly in competition and comply with the applicable antitrust and competition law. The business partners do not participate in agreements with competitors that violate antitrust law, nor do they abuse any dominant market position that may exist or engage in other anti-competitive business practices.

Import and export controls and economic sanctions

The ASB Group expects and demands from its business partners that they always consistently comply with the applicable and valid international and national regulations of foreign trade law, in particular export control and embargo regulations, and that they do not engage in any legally impermissible business activities with sanctioned persons, companies or organizations.

Combating corruption & avoiding conflicts of interest

The initiation of business relationships and the performance of ASB Group's business activities shall be based exclusively on transparent and objective criteria, e.g. quality, price, technological standard or reliability of the business partner.

The business partner rejects any form of corruption, bribery, theft, embezzlement, fraud or extortion. Nor does it tolerate illegal payments or the granting of other benefits to an individual, a company or a public official with the aim of influencing decision-making processes.

The ASB Group also expects that its business partners will not tolerate or make any form of unlawful contributions, particularly in business dealings with public officials and authorities in Switzerland and abroad. They also always ensure that their employees behave and act with integrity.

A conflict of interest is any situation in which employees of the business partner maintain a business relationship with an employee of the ASB Group that goes beyond the usual scope and whose decisions may influence the business of the business partner. The business partner is required to report the occurrence of potential conflicts of interest to the ASB Group (compliance@asb-group.de).

Whistleblowing, whistleblower system and supply chain complaints procedure, protection against retaliation

Business partners must maintain and comply with programs and processes that meet the legal requirements to ensure confidentiality, anonymity and protection of whistleblowers on the business partner and employee side. In any event, Business Partners are expressly required to report to ASB Group immediately any information or allegations received regarding a violation of this Business Partner Code. Also, if a Business Partner or one of its employees reasonably believes that an ASB Group employee has violated the Business Partner Code and/or its principles or that there is otherwise a risk of such a violation within the supply chain or that such a violation has already occurred, the Business Partner, its employees and/or its own contractors are encouraged to report their findings, complaints and concerns to ASB Group via the whistleblower system or supply chain complaint procedure under the Supply Chain Due Diligence Act on the ASB Group website.

In order to facilitate the latter, each business partner will inform its employees and/or contractors in an appropriate manner about the possibility of direct reporting, which can also be made anonymously if requested and to the extent permitted by law, about this ASB Group whistleblower system and supply chain complaints procedure. The ASB Group's external rules of procedure for the whistleblower system and the supply chain complaints procedure, as amended from time to time, can be accessed and viewed by every business partner and their employees and contractors at any time on the ASB Group website.

Conflict materials and high-risk raw materials

Without exception, the ASB Group expects its business partners to comply with all valid and applicable legal regulations on conflict materials and to fulfill their due diligence obligations for responsible supply chains. It is fundamental for the ASB Group that minerals, in particular tin, tantalum, tungsten, gold and the corresponding ores and metals, must be acquired conflict-free.

In the event that a product contains one or more of the so-called conflict materials or high-risk substances - such as cobalt, which is an important raw material - the ASB Group requires its business partners to provide it with complete and transparent information about their supply chain up to the smelter and the origin of the material at any time upon request. The use of mercury is prohibited. The ASB Group reserves the right to review this in the form of a supplier audit.

Smelters without an appropriate and adequately audited due diligence process must be consistently excluded from the business partners.

III. Employees & social responsibility

The ASB Group expects its business partners to comply with the applicable national and international legislation on labor standards, wages and working hours. If no such national legislation exists, the so-called core labor standards of the International Labor Organization (ILO) apply. Furthermore, the ASB Group expects that the employees of its business partners always receive remuneration that is at least in line with the applicable national laws and the legally valid and guaranteed minimum income, including social benefits, and enables them to earn a decent living. The ASB Group expressly reserves the right to review the core labor standards and minimum remuneration of its business partners in the form of an audit.

The ASB Group's business partners shall always respect the rights of their employees to form employee representative bodies, trade unions and collective bargaining in accordance with the applicable national and international legislation. The business partners shall ensure that employees have the freedom to form or join trade unions and that the trade unions can operate in accordance with the laws of the place of work, including the right to strike and the right to collective bargaining. Forming, joining and remaining a member of a trade union must not be used as a reason for unjustified discrimination or retaliation.

No child labor/forced labor

The business partners of the ASB Group know, consider and observe at least the core labor standards of the International Labor Organization (ILO), refrain from any form of child labor and refrain from any form of forced or compulsory labor, servitude, debt bondage, slavery or slave-like practices in their companies. The ASB Group's business partners may not employ children under the age of 15 or young people who are required to attend school full-time under the applicable law of the country of employment. Insofar as legal exceptions permit, internships for schoolchildren, which are coordinated with the respective schools, are permitted. In addition, a business partner does not require any deposits (financial or otherwise) or practice the retention of identity documents as a condition of employment of its employees. In order to avoid debt bondage, the granting of loans to employees is prohibited, with the exception of the granting of employee loans at reasonable and customary market conditions. Employees may only work for the business partner on the basis of a written employment contract, during the working hours agreed in the employment contract and at the salary agreed in the employment contract. It shall also ensure that its own business partners comply with the above mandatory requirements at all times.

Diversity and equal opportunities

The ASB Group is fully committed to promoting diversity, equality and inclusion in all areas of its business. It respects the diversity of people in its workforce, among its business partners and in the communities in which it operates. All business partners are encouraged to promote these values and ensure that their business practices and HR policies are based on inclusion and equality.

No discrimination

The ASB Group expects its business partners to ensure a working environment that is consistently free of any form of discrimination. Consequently, business partners are prohibited from disadvantaging or discriminating against anyone on the basis of personal characteristics such as gender, skin color, religion, nationality, political opinion, ideology or other beliefs, ethnic origin, social background, disability, health status, age, sexual orientation, trade union

membership or any other personal characteristics. In particular, the ASB Group also respects, promotes and protects women's rights, strives for equality and expects the same from all its business partners.

To ensure ethical recruitment, the ASB Group also relies on recruitment practices in which applicants are assessed without discrimination and impartiality. Integrity, transparency, trust and performance are at the forefront of this process. The ASB Group also expects its business partners to ensure that their recruitment methods are fair, transparent and free from prejudice.

All business partners are also required to respect, promote and protect the rights of the local communities in which they operate and the rights of minorities, indigenous peoples and other vulnerable and disadvantaged groups throughout the supply chain at all stages of collaboration. ASB Group recognizes the importance of including and protecting the aforementioned communities, minorities, indigenous people and other groups, will work with them respectfully, fairly and in partnership and expects the same from its business partners.

No unlawful forced eviction, no unlawful seizure of land, forests and waters

Every business partner of the ASB Group is prohibited from carrying out unlawful evictions. Any unlawful eviction, robbery and confiscation as well as any other unlawful deprivation of land, forests and waters through acquisition, development or other use must also be strictly prohibited.

Prohibition of hiring or using private or public security forces to protect the business project

Each business partner undertakes not to use private, public or state security forces to protect its business, its business processes and its business projects if there is a risk of torture, cruelty, disproportionate violence, inhuman or degrading treatment, injury to life and limb or impairment of the right to form organizations and freedom of assembly due to a lack of instruction or control by the business partner when deploying the security forces.

IV. Data protection, confidentiality and information security

To protect confidential and personal information, data and projects, the business partner must store them securely and protect them from access by third parties

The ASB Group expects and requires its business partners to comply with all relevant legal regulations on data protection and to collect, process and use personal data only under the conditions of the applicable data protection regulations. The GDPR applies to companies within the EU,

Business partners may only use information for authorized purposes and in an appropriate manner. All business partners of the ASB Group undertake not to disclose any confidential data and trade secrets to third parties without authorization or to use them themselves for their own purposes not authorized by the ASB Group.

IT security is of fundamental importance to the ASB Group, not least because of the considerable number of risks to the security of the information and data of the ASB Group, its customers, its business partners and all persons associated with the ASB Group, which can be caused by unauthorized access to the IT systems of the ASB Group, by the loss and misuse of data or, for example, by manipulation via malware or malicious software. The business partners are expected to ensure that they themselves and their business partners provide appropriate IT security

in their respective companies and take suitable measures to ensure that they, their business partners and other third parties do not jeopardize the security of the information and data of the ASB Group, their customers, their business partners and the persons belonging to the ASB Group.

V. Protection of intangible property and prohibition of plagiarism

The assets of the ASB Group and its business partners also include intangible assets (e.g. software code, logos, utility models), information, ideas and the know-how of its employees. Business partners are obliged to respect the rights to these assets, to protect them and not to use them without authorization. This applies in particular to the intellectual property of third parties, which may only be used in a permissible manner for an identifiable business purpose.

The procurement and use of plagiarized or knowingly counterfeit materials or products is prohibited for all business partners. Any infringements of intellectual property rights, including but not limited to infringements of patents, trademarks and copyrights, also constitute serious violations of the principles of the ASB Group, which must be refrained from by the business partners.

VI. Umwelt

Every business partner of the ASB Group is obliged to avoid harmful soil changes, water and air pollution, harmful noise emissions and excessive water consumption that significantly impair the natural basis for the preservation and production of food, deny a person access to safe drinking water, impede or destroy a person's access to sanitary facilities or harm a person's health.

In addition, the ASB Group expects and requires each of its business partners to comply with the applicable national energy and environmental laws and regulations in force at its operating and/or production sites and geographical areas of activity, that the business partner also creates the best possible transparency with regard to its own emissions and upstream emissions and that it takes effective measures to reduce its direct and indirect CO₂ emissions and continuously works on improvements in this regard.

The use of renewable energies and alternative energy sources must be further promoted and given preference wherever possible. The consumption of raw materials must be reduced to a minimum in all business activities, and particular attention must be paid to the sustainable use of energy and water resources.

Any emissions that lead to a deterioration in air quality must be reduced to a minimum. Every business partner of the ASB Group is required to continuously monitor the environmental impact.

The use of reusable materials must be continuously expanded and the generation of waste must be reduced to a minimum. Recyclable materials must always be separated. The release of substances that pose a risk to people and the environment must be avoided at all costs. The export of hazardous waste must be avoided.

The ASB Group expects all its business partners to improve the value of their own waste products in order to promote the recycling and reuse of raw materials.

Each business partner further undertakes to label hazardous materials, chemicals and substances and to ensure their safe handling, movement, storage, reuse, recycling and disposal. All valid and applicable laws and regulations relating to hazardous materials, chemicals and substances must be complied with. Compliance with substance restrictions and product safety requirements established by applicable laws and regulations is mandatory and binding.

The ASB Group also attaches great importance to the preservation of biodiversity, sustainable land use and protection against deforestation and land degradation. All business partners are required to actively take these principles into account in their business practices. This applies in particular to the disturbance of the biological balance of soils, which can lead to their unusability, and to illegal deforestation, which includes, for example, the conversion of natural forests into agricultural land. The ASB Group expects all business partners to work to protect habitats and take measures to preserve soil quality.

Finally, each business partner undertakes to comply with the environmental obligations contained in the following three international conventions:

- The Minamata Convention on Mercury of October 10, 2013,
- the Stockholm Convention on Persistent Organic Pollutants of May 23, 2001 and
- the Basel Convention on Transboundary Movements of Hazardous Wastes and their Disposal of March 22, 1989.

VII. Animal welfare

It is of particular importance to the ASB Group that its business activities take into account the protection and welfare of animals. The ASB Group therefore expects its business partners who process animal products to implement standards and best practices to ensure animal welfare along the entire supply chain. The ASB Group is committed to ensuring that alternative animal-free methods are preferred where this is legally possible and justifiable. Business partners are obliged to comply with national and international regulations on animal welfare and animal testing, including the German Animal Welfare Act and the European Union's Directive 2010/63 (the so-called Laboratory Animals Directive).

The ASB Group is also committed to the following ethical principles and expects its business partners to share these values and implement them throughout the entire supply chain

- the "Five Freedoms" of the Farm Animal Welfare Committee (FAWC) for assessing the welfare of animals (freedom from hunger, thirst and malnutrition; freedom from discomfort; freedom from pain, injury and disease; freedom from fear and suffering and freedom to act out normal behavior)
- the "3Rs principle on animal experiments (reduction, refinement, replacement)
- the principles of the World Organization for Animal Health (OIE) on animal welfare (Terrestrial Animal Health Code and Aquatic Animal Health Code)

VIII. Occupational health and safety

All business partners must comply with the applicable and valid legislation on health protection and occupational safety. Business partners shall support the safety and health of their employees through sufficient and appropriate measures, such as preventive and consistent occupational health and safety and a safe and healthy working environment. Business partners must also implement the following measures to minimize the risks of occupational accidents:

- Creation of sufficient and appropriate safety standards in the provision and maintenance of the workplace, the workplace and the work equipment,
- Provision of suitable protective measures to prevent exposure to chemical, physical or biological substances,
- Implementation of measures to prevent excessive physical and mental fatigue, in particular as a result of unsuitable work organization with regard to working hours and rest breaks,
- Ensuring adequate training and instruction of employees.

IX. Conclusion

The ASB Group assumes for every business relationship that its business partners accept and comply with the principles of conduct and requirements of this Business Partner Code and align their business activities accordingly. The ASB Group reserves the right to regularly review compliance with these principles of conduct and requirements for the identification, reduction and avoidance of risks in the entire supply chain between all business partners in an appropriate manner, e.g. through audits.

The business partners must pass on the principles of conduct and requirements of this Business Partner Code of Conduct along their supply chain to their business partners, in particular their suppliers and subcontractors, and ensure that these principles of conduct and requirements are applied and implemented throughout the entire supply chain.

The ASB Group points out that any violation of the principles of conduct and requirements of this Business Partner Code can lead to significant consequences. In the event of suspicion of non-compliance with the principles of conduct or requirements of this Business Partner Code, the ASB Group expressly reserves the right to demand immediate information about the relevant facts

Finally, the ASB Group reserves the right to terminate individual or all contractual relationships with business partners extraordinarily and without notice if this Business Partner Code and its principles of conduct and requirements are not complied with, if necessary after setting a reasonable deadline for rectification or elimination of the breach.

If you have any uncertainties or questions about this Business Partner Code or the topic of compliance, any business partner can contact us at any time at (compliance@asb-group.de) to the ASB Group.

The ASB Group would already like to thank its business partners for their cooperation in complying with this Business Partner Code and thus actively contributing to ensuring a sustainable basis for a successful future for the ASB Group and our joint cooperation.