

### **Business Partner Code**





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### Forword



Dear business partner,

over the course of 40 years, we have grown to become the leading specialist in pre-finished light metal cast components. We owe our corporate success to our strong commitment to developing first-class products.

All business interactions in the ae group are governed exclusively by applicable laws. We also firmly believe that our responsibility extends across the social, environmental and economic principles of sustainability to ensure value added growth.

We always follow high standards and expect the same approach from all business partners with whom we cooperate. This Business Partner Code sets out our minimum standards and clarifies the fundamental principles that all our business partners are expected to implement.

The ae group reserves the right to suspend or terminate a business relationship in the event of non-compliance with our principles or applicable law. In addition, our business partners are obliged to ensure the implementation of these requirements throughout the supply chain of their business partners.



Christian Kleinjung CEO



Andreas Nikisch





## Human rights and social responsibility



Furthermore, they are obliged to respect the dignity of the individual in every business activity and to ensure the holistic implementation of human rights. Any form of human trafficking, child labor and forced labor is completely unacceptable. We expect our business partners to strictly adhere to the legally required minimum age for employment as well as to ensure that employees are free to perform any work.

In connection with conflict minerals, the due diligence and disclosure obligations (CMRT report) must be complied with in order to prevent human rights violations in connection with their mining, extraction or trade. We trust that our business partners will actively strive to further improve the human rights situation at their sites and prevent negative influences on human rights.

Furthermore, ae group business partners must accept the right to collective bargaining and freedom of association in accordance with applicable law.

The ae group expects its business partners to assume social responsibility with regard to their employees and to comply with appropriate remuneration and working hours in accordance with applicable laws. The further development of employees should be valued and supported to the same extent.





### Equality on workplace



The ae group does not tolerate any discrimination on the basis of religion, origin, race, disability, pregnancy, age, sexual orientation, gender or trade union or political activity, or as a result of any other characteristic protected by applicable law, and require their business partners to prohibit any discrimination.

The implementation of and compliance with all legally applicable requirements for a healthy working environment are mandatory for our business partners. We expect our business partners and their employees to implement all regulations and to actively promote employee safety and health and prevent occupational accidents.





## Natural resources and environmental protection

An intact environment is a fundamental part of our living space, therefore it is of highest priority to respect it. The extraction and use of natural resources & energy has to be done carefully, their consumption has to be reduced to a minimum by continuously improving efficiency. Environmental impacts are to be identified, regularly monitored, reviewed and documented. In case of violation of limit values or legal/official regulations, corrective measures are to be initiated immediately.

This applies in particular to the contamination of soils & waters, treatment and discharge of waste water, disposal of waste, handling of air emissions and hazardous substances.





# Responsible chemical management

The ae group is careful in handling chemicals to protect its employees, the environment and society. Chemicals used are continuously recorded and monitored. The ae group is committed to complying with applicable environmental protection laws as amended. Therefore, our business partners are required to comply with these obligations as well, to identify and monitor chemicals and other materials that pose a risk to the environment, and to ensure their safe handling, transportation, storage, reuse, reprocessing and disposal.





### Product compliance

The ae group is recognized for the highest quality and product standards. To meet these, we are committed to safety requirements, all applicable rules, regulations and standards. We expect the same high level from our business partners and, moreover, that they deliver identical products of the same high quality. We do not tolerate illegal or unethical behavior by its business partners with respect to their products.





## Fair and free market behavior

### Antitrust and competition law

As ae group, we believe that free and fair competition is an essential part of a free market economy. As a result, our business partners must ensure compliance with applicable antitrust and competition laws in all aspects of their business activities. The ae group expects all business partners to refrain from any action that has the purpose or effect of hindering, restricting or distorting free and fair competition.

### ae group prohibits in particular:

Anti-competitive agreements, contracts or arrangements with potential or specific competitors, primarily, but not limited to agreements, which have the intention to fix premiums and prices, limit the quantity or quality of services or products supplied, distort offers, divide markets, or allocate customers;

Abuse of a leading position in a particular market;

Agreements or restrictions between customers and suppliers that have the objective of restricting or preventing fair and free competition in violation of applicable laws.





## Anti-corruption and money laundering



### Anti-corruption

The ae group prohibits any form of bribery that would result in a tangible or intangible benefit to which there is no legal entitlement.

Our business partners must generally boycott, in particular in the business relationship with ae group, the direct or indirect acceptance, granting or offering of material or immaterial benefits if these are intended for benefits to fraudulently influence business processes, to carry out or accelerate an official act or if they create the impression to that effect.

Particularly when dealing with authorities and public officials, the ae group expects its business partners to ensure that their employees comply with the law and act with honesty.

### Money laundering

Money laundering is the process of transferring illegally generated money or illegally acquired assets into the legal financial and economic cycle in order to disguise their origin.

We as ae group will take action against money laundering and expect the same from our business partners by taking appropriate measures to ensure compliance with national and international laws and standards.





## Conflicts of interest

We expect business decisions to be made exclusively on the basis of factual, true and objective criteria and in the interest of the ae group. They are to be avoided already in the approach of a possible occurrence. Should conflicts of interest arise, the person concerned must disclose them to ae group without delay.

### Export control



The ae group expects all business partners, without exception, to diligently implement all applicable international trade regulations and to comply with import and export control regulations, including applicable economic embargoes, until further notice.





# Handling information and data protection

Our business partners must ensure the careful handling and confidentiality of all information, regardless of how and in what form (verbal, physical, digital, etc.) it is received and exchanged by ae group ag.

All data must be protected in terms of integrity, completeness, availability and confidentiality.

They may not be circulated without express permission and in view of the applicable laws. Business secrets and the intellectual property of ae group ag must be protected and may not be used inappropriately or disclosed to third parties.

Violations of these principles must be reported to ae group ag immediately.





## Notification of possible violations

Our business partners are obligated to report legal or ethical violations as well as any criminal acts that could have an impact on the ae group. The ae group does not tolerate any retaliation against persons who report potential violations in good faith and relies on the same approach with its business partners.

If you have any questions about this Business Partner Code and its implementation, business partners can contact the ae group Corporate Compliance department directly.

#### **Corporate Compliance**

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