Argor-Aljba **Code of Conduct**





Argor-Aljba Code of Conduct

Preamble: target and application area

This Code of Conduct is an integral part of our responsibility and conscious management structure. This Code applies to all employees and divisions of Argor-Aljba organization. Compliance with the principles described in this Code ensures and preserves our long-term business success and we guarantee, in every moment, a consistent and responsible treatment of all our employees, of our business partners and resources of the natural environment.

Furthermore, compliance with all binding statutory requirements at national and international level, as well as all commitments undertaken voluntarily, forms the basis of all corporate and business activities at Argor-Aljba. It is the employees' responsibility to know and understand the laws and internal rules applicable to their job responsibilities, and in case of doubts, ask their supervisors for additional information. Failure to comply with this Code will not be tolerated and may result in appropriate disciplinary action by the employer.

For the implementation and observance of the Code of Conduct, the Director and the supervisors are directly responsible for it. They ensure that their direct employees are informed in an appropriate form and that they follow and respect properly the rules of the Code of Conduct.

OUR RESPONSIBILITY AS A BUSINESS PARTNER

Ensuring fair competition

Argor-Aljba expects its employees to comply with the applicable laws for the protection of fair and open competition. The applicable statutory provisions generally prohibit agreements with competitors on prices and conditions, agreements with competitors for the purpose of market or customer allocation, concerted actions with competitors with respect to prices, conditions, markets or customers, as well as unfair practices.

The fight against corruption and laundering

Argor-Aljba is convinced of the quality of its products and services and of the performance and skills of its employees. Argor-Aljba strictly prohibits all forms of direct or indirect bribery of business partners and public officers. Employees of Argor-Aljba are prohibited from demanding or receiving business courtesies or from accepting the promise of such business courtesies as consideration for the purchase of products or services. Argor-Aljba prevents corruption in business relations, as well as in the procurement of goods and services.

Compliance with the basic principles of national and international trade

Argor-Aljba does not want to be abused for illegal purposes. This applies to all illegal behaviour by customers, third parties, brokers and business partners. The employees must not be involved in any illegal actions and any kind of similar behaviours won't be tolerated. It applies in particular to aiding tax evasion and tax fraud both in the home country and in other countries where Argor-Aljba is active. Argor-Aljba adheres to all national, multinational and supranational foreign trade regulations. All employees are obligated to adhere in particular to the applicable ONU regulations in force, the prescriptions on foreign trade, the import and export prohibitions, official approval requirements as well as the applicable duty and tax requirements.

Avoidance of conflicts of interest

Argor-Aljba expects that all employees have an obligation to act in the best interests of the company. Employees should avoid any activity, interest, or supplier outside of Argor-Aljba that could impair their ability to perform work objectively and effectively or that could give the appearance of interfering with their responsibilities performed on behalf of Argor-Aljba or its clients.

Similarly, financial investments of competitors, customers or suppliers are not admitted. Exceptions require written admission of the Management. Financial investments of close relationship must be communicated to the management.

Favouritism to specific business partners undertaken for the furtherance of private interests, in particular favouritism to family members, is prohibited. Even the appearance of favouritism for the furtherance of private interests through the their position or professional role, for example for discounts on purchase, etc..must be avoided.

OUR RESPONSIBILITY IN THE WORKPLACE

Creating and maintaining safe working conditions

Argor-Aljba seeks to preserve and promote the responsibility for its employees and therefore aims at maintaining a high level of attractive working environment. Argor-Aljba provides fair salaries and adequate hours for its employees and condemns all forms of forced and child labour. At Argor-Aljba work safety is a high priority and expects its employees, especially its executives, to be committed to ensuring occupational safety at all times.

OUR RESPONSIBILITY AS A MEMBER OF SOCIETY

Prevention of discrimination

Argor-Aljba expects its employees to respect different outlooks on life and cultural or country-specific characteristics when dealing with other employees (potential future employees) and business partners.

Argor-Aljba strives to provide a workplace and a working environment without distinction or discrimination on account of age, colour, national origin, race, religion, gender, physical or mental disability, or any other legally protected personal characteristic are not tolerated, and where everyone has an equal opportunity to work, advance, and contribute to our success.

Similarly, political or religious activities at the working place are not tolerated, either from employees or third parties. The choice of applicants (potential future employees) is based exclusively on objective and comprehensible criteria.

Environmental safety

Argor-Aljba's activities are based on compliance with the applicable regulatory requirements for environmental protection. Argor-Aljba has established processes and standards for ensuring legal compliance as part of its responsibility management. Argor-Aljba is committed to a respectful treatment of the resources of nature by reducing the amount of polluting waste materials and improving the efficiency of environmental protection structures. Argor-Aljba expects the same respect of the requirements from its business partners, and the choice of them is also based on these criteria.

Protection of the company assets

The commercial success of Argor-Aljba is based on the innovative ability of its employees and the know-how acquired over many decades. Proprietary and confidential information generated and gathered in connection with our business operations, but also those of the business partners, is a valuable asset. All employees are required to ensure that business or trade secrets of Argor-Aljba and of its business partners do not become known outside of Argor-Aljba. The unauthorized disclosure of business or trade secrets to third parties or their unauthorized use for personal purposes is not permitted.

Argor-Aljba expects its employees to treat the assets of Argor-Aljba responsibly, and to make commercially sound business decisions on the basis of risk-benefit analyses. Argor-Aljba also places great value on the integrity of its employees.

Dealing with the media

The provision of information to the public, including the media, in a transparent and consistent manner facilitates dialog and strengthens the image of Argor-Aljba. Official statements on behalf of Argor-Aljba, in particular statements to the media, may only be made by authorized management.