

Code of Conduct for Employees of the ALUMINIUM RHEINFELDEN Group

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1. Mission statement

- We focus our attention on people, caring for the environment and a safe product with a consistently high quality.
- We treat each other with appreciation and respect, and we value our customers, suppliers and partners.
- As managers of the Rheinfelden Aluminium Group, we treat our subordinate employees in a trusting, just and fair manner.
- We offer young people sound and future-oriented training as an accredited training enterprise.
- We work in a team and consider all departments in our thinking. The only way we can continually improve the company and manage efficient processes is if we think of ourselves as 'we'.
- Transparency, cooperativeness and humanity are important elements of our company culture and are guaranteed by responsible leadership.
- As part of our QM system, we continually improve our services and products on a systematic basis in the interests of all those involved.
- Our research and development work ensures improvements of products in line with market requirements and constant optimisation of existing products.
- We assist our customers in meeting their needs with our individual and customised solutions.
- We work together on meeting the company targets and support one another in achieving them.

2. Conduct in accordance with applicable laws

We comply with the applicable laws in line with our values. Unlawful conduct puts our company's operations at risk because it can lead to a serious loss of reputation, criminal prosecution, compensation and a loss of orders.

Employees who act unlawfully will be prosecuted. Law-abiding conduct serves to protect those involved and the company.

All employees are required to inform themselves about the applicable laws and regulations in their area of responsibility and to abide by these.

In case of doubt, they can contact the appropriate specialist departments or their direct superiors.

3. Competition

We abide by the laws on the protection of competition and do not reach agreements with competitors regarding our competitive conduct.

In particular, agreements on prices and conditions, the division of markets and regions, the allocation of customers and the coordination of proposal preparation or production strategies are prohibited. In this regard, both explicit agreements and concerted practices are inadmissible. The exchange of information with competitors, which may form the basis of such a concerted practice (e.g. prices, costs, margins, conditions, customers, production capacities), is inadmissible. Violations of these prohibitions are vigorously prosecuted by competition authorities and may lead to sanctions for the company that threaten its survival.

Bribery is unlawful and poses a substantial risk to our employees and our company. It must be refrained from in any event. We do not offer our business partners undue advantages and do not make use of such.

Commissions and remunerations that traders, agents or advisers receive may only be paid for admissible services actually provided and must be proportionate to these services.

We abide by the regulations applicable to cross-border trade. This predominantly applies to the observance of existing import and export restrictions, the obtaining of necessary permits and the payment of stipulated duties and taxes.

The Customs Department must be consulted in the event of any uncertainty. The observance of these provisions is subject to regular inspections by the authorities. Violations may entail considerable sanctions against those responsible and the company.

Ancillary business activities of an employee require the prior approval of the respective management team. This particularly applies with regard to ancillary activities for competitors, customers or suppliers or those financially involved in such. Should close relatives be involved in such activities or holdings, this must be reported to the Human Resources Department.

We strictly separate business and private interests and do not use our work at the Aluminium Rheinfelden Group to gain private advantages. The commissioning of business partners for private purposes must be prevented. Business partners may not be favoured on the basis of private interests.

4. Taxes and subsidies

We abide by all statutory regulations regarding taxes and subsidies and provide no assistance in the event of tax evasion or subsidy fraud.

All employees must keep in mind that the detection risk for tax offences is particularly high on account of the regular and careful checks carried out by the tax authorities.

Suspicious very quickly result in the involvement of prosecution authorities.

In the event of involvement of customers or suppliers, control reports are sent to their responsible tax authorities and vice versa.

The assessment of transactions with regard to taxes and subsidies is often difficult. The Finance and Accounting Department must be involved in this case as a general rule.

5. Product safety

We place the most stringent requirements on the quality and safety of our products. We carefully inspect our products and assist the customer in preventing risks. The role of Product Safety Officer is filled and trained at the subsidiary Rheinfelden ALLOYS GmbH & Co.KG.

We abide by the REACH regulations in full.

6. Occupational safety, health and environmental protection

We provide a safe working environment. Safety regulations are strictly abided by and constantly assessed for their effectiveness. Defects must be reported and rectified without delay.

We have set up a system of consequences and zero tolerance for this purpose.

We handle natural resources sparingly. We avoid all negative impacts on the environment.

7. Company property and business secrets

We protect the intellectual and material property of the Aluminium Rheinfelden Group.

We handle equipment carefully and in accordance with its purpose. We use equipment including PCs, laptops, landline and mobile phones in accordance with internal regulations provided by the IT Department.

Unnecessary costs are to be avoided. We handle the provided means and materials responsibly.

We make business decisions on the basis of commercially comprehensible analyses of opportunities and risks.

As a technology company heavily involved in the area of research and development, we are particularly dependent on the protection of our inventions and expertise.

We are therefore particularly prudent in our handling of business secrets. Confidential information may not be made available to unauthorised third parties. This also applies to confidential information that we receive from our business partners.

8. Documentation of business transactions and privacy

Documentation, samples and measurements taken from ongoing production processes must be archived in accordance with applicable retention periods to ensure traceability. Documents relevant to the authorities must be filed in a suitable, legally compliant format. Tampering must be ruled out in accordance with the state of the art.

We exclusively use the personal data of our employees and contracting partners for the purposes for which they were made available to us and treat these as confidential.

9. People at the centre of our activities

9.1 Human dignity

Human dignity is sacrosanct. Respectful and understanding treatment is an intrinsic part of daily operations.

9.2 Non-discrimination rules

We reject unequal treatment based on gender, race, origin, religion, ideology or disability and other discriminatory conduct. We do not tolerate any discrimination or harassment towards our employees. We work with employee representatives on the basis of trust.

9.3 Prohibition of forced labour and child labour

Employees must be protected from corporal punishment and from physical, sexual and psychological harassment. The privacy of each employee is respected.

The prohibition of forced labour in any form is observed. In general, we observe the applicable regulations regarding the prohibition of child labour.

10. Scope and implementation

This Code of Conduct is mandatory for all employees of the Aluminium Rheinfelden Group worldwide. Violations of this Code will not be tolerated and will result in disciplinary action.

The primary contact for every employee in case of queries or uncertainties relating to the principles of conduct is his/her direct superior.

Each employee is also entitled to contact the works council.

Each company of the Aluminium Rheinfelden Group and each department is responsible for the observance of the Code of Conduct as well as all internally stipulated rules.

Rheinfelden, 31/07/2017