



## **Code of Conduct**

**May 01, 2023**

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## INTRODUCTION

Alpine Metal Tech GmbH and its subsidiaries, as an industrial group operating worldwide, pursues a responsible corporate management, guided by the principles of integrity, honesty, sustainability and transparency.

Alpine Metal Tech includes all companies in which we have a direct or indirect interest of minimum 50% or in which we exercise control in a different way. This includes also joint ventures where we have a controlling interest.

Due to our international activities, Alpine Metal Tech is subject to various social, political and legal obligations that must be followed. Violations of those, in particular violations of the laws or regulations, can cause considerable financial detriment to our business and lasting damage to our Group.

As one of the market and technology leaders, we pursue a long-term, sustainable, comprehensive growth strategy and value creation. We achieve our goals, among others, through high personal commitment, strong team spirit, open communication, relentless focus on quality innovation and ultimate customer orientation.

In our relationship with our employees, customers, suppliers and other business partners, we feel bound to certain values and commitments, which we summarize in this Code of Conduct (Code). The Code is both a framework and a guideline for sustainably responsible action within the Alpine Metal Tech Group.

A morally, ethically and legally sound behavior of all employees is critical for us and a core principle of our corporate culture, our DNA. The Code is applicable to all employees of Alpine Metal Tech, and we expect and encourage every employee to adhere to the standards of conduct set forth herein.

Any violation of this Code of Conduct will have disciplinary consequences. In addition, infringements can also have consequences for the person concerned in terms of criminal and civil law.

Any person associated with Alpine Metal Tech, who works for or on behalf of the Alpine Metal Tech Group, including contractors, consultants, agency personnel and business partners are requested to comply with this Code of Conduct, regardless of the jurisdiction they operate in (without prejudice to stricter requirements that need to be complied with under local law).

A shared belief, at all levels, in the principles and rules of the Business Ethics Conduct Code of Alpine Metal Tech Group, which is based on the principles of International Bill of Human Rights and

the EU Convention on Human Rights, will not only serve to reinforce the ties that bind the Group together, but also will have a positive effect on the way Alpine Metal Tech is perceived and judged by the communities where it operates.

## **RESPONSIBILITY FOR IMPLEMENTATION**

We expect each employee to feel personally responsible for the adherence to this Code of Conduct. Every employee can seek advice and assistance from his or her direct superior, the Human Resource Department or the Compliance Officers in case of questions related to this Code of Conduct.

Confidentiality will be maintained to the fullest extent possible. Retaliation against any employee who in good faith reports a concern to the company about illegal or unethical conduct will not be tolerated and will be countered with disciplinary measures.

### **1. Compliance with Laws and social Norms**

We comply with all applicable laws and regulations of the countries where we do business and respect their social norms.

### **2. Respect and Integrity, Non-Discrimination**

Alpine Metal Tech commits itself to comply with human rights norms within our sphere of influence and rejects any form of forced labor in its companies and the companies of our business partners. Alpine Metal Tech rejects child labor, irrespective of local legislation, throughout the Group and in the companies of its business partners.

Alpine Metal Tech guarantees equal opportunity and equal treatment, irrespective of ethnicity, skin color, gender, disability, family status, religion, ideology, age, faith, nationality, sexual orientation, social background or political conviction. We prohibit any kind of harassment or abusive behaviour. Employees and job applicants are assessed following the principle of non-discrimination.

The personal rights of each individual employee are protected. Respect and mutual consideration are important prerequisites for cooperation within the Alpine Metal Tech GmbH.

### **3. Fair Competition**

Rules to protect fair competition are an essential part of a free market economy. Alpine Metal Tech is committed to dealing fairly with its business partners as well as with third parties and Alpine Metal Tech supports free and undistorted competition based on compliance with the competition and antitrust laws.

Any form of agreement with competitors and concerted conduct aiming at or resulting in a restriction or avoidance of competition are prohibited.

No confidential information such as prices and sales terms, costs, production capacities, inventories or similar confidential information must be passed on, accepted or exchanged in any competition that permits conclusion about current or future market conditions.



#### **4. Anti-Money Laundering**

Alpine Metal Tech's objective is to maintain business relationships only with business partners whose business activities comply with legal requirements and whose financial resources are of legitimate origin. Alpine Metal Tech does not support money laundering.

All employees must adhere to anti-money laundering laws. Employees are also required to comply with applicable rules on recording and accounting for cash and other transactions and contracts.

If employees of Alpine Metal Tech Group find themselves in circumstances that are dubious in terms of anti-trust legislation, negotiations shall be discontinued immediately and the Compliance Officer shall be informed.

#### **5. Fight against Corruption**

Alpine Metal Tech has a zero-tolerance policy towards bribery, fraud, theft and other forms of corruption.

Alpine Metal Tech commits itself to refusing gifts or donations that could trigger a conflict of interests. Neither bribes nor other illegal payments and donations may be accepted, offered or made.

Exceptions to this rule are solely gifts of nominal value and hospitality within the limits of ordinary business practice. All other presents shall be refused or returned.

Our suppliers' compliance with anti-corruption practices are important to us and shall be assessed.

#### **6. Conflict of Interest**

It is possible that employees encounter situations in which their personal or economic interests come or may come into conflict with the interests of Alpine Metal Tech. Alpine Metal Tech expects its employees to act exclusively in the interest of the Group. Should there be a conflict of interest, Alpine Metal Tech requires its employees to deal with it in a transparent manner.

All employees must ensure that their personal interests are not inconsistent with their obligations to the Alpine Metal Tech Group or its customers and business partners.

Every employee is required to fully disclose any and all actual or potential conflicts of interest, and – if necessary – to seek specific approval of a course of action.

Every member of the Group Management Board has to disclose all conflict of interests or functions or activities that could potentially lead to a conflict situation with the Alpine Metal Tech Group. The members of the Group Management Board shall refrain from exercising their voting rights in matters concerning their personal interests or the interests of natural or legal persons related to them.

## **7. Corporate Information / Secrecy**

The commercial and technical know-how of Alpine Metal Tech is crucial for the long-term success of the Group. Therefore, all employees must ensure that any of Alpine Metal Tech know-how that is not publicly available is kept strictly confidential and that no unauthorized third parties gain access to company data, know-how and confidential information.

In the event the disclosure of certain confidential know-how becomes necessary in the course of a business relationship, employees need to ensure that the third party is bound by a confidentiality agreement before any confidential information is disclosed.

In the event Alpine Metal Tech receives confidential information from its customers or business partners, employees must apply the confidentiality standards set forth in the respective confidentiality agreement.

## **8. Insider Information**

People having insider knowledge are prohibited from dealing with the relevant securities pursuant to the applicable legal requirement.

Alpine Metal Tech ensures that insider information is only made accessible to authorized individuals. None of Alpine Metal Tech's employees provides such information to family members or other individuals.

Use of insider information is subject to criminal sanctions and will result in disciplinary consequences. Passing on insider information to other persons internally or externally is strictly prohibited and can have legal consequences.

## 9. Employment

Alpine Metal Tech places great emphasis on apprenticeship and knowledge transfer. Alpine Metal Tech creates an environment, which provides personal and professional prospects for our employees, in which exceptional performance and results can be achieved and are also rewarded. Alpine Metal Tech invests in the skills and competence of its employees. Our goal is to promote the economic wellbeing of the enterprise and the long-term employment and personal development of all its staff through training and other development measures.

Alpine Metal Tech strives for long-term, constructive dialogue with the employees' representation.

Alpine Metal Tech commits to limit the use of non-regular employment for specialised and non-core activities, where possible, and commits to ensuring that temporary staff receives the same rights as permanent employees and a fair compensation.

## 10. Working Hours and Remuneration

Alpine Metal Tech adheres to the applicable national laws with regards to working hours and supports its employees in achieving a healthy work-life balance. Our wages, salaries, benefits and any overtime compensation are in line with the applicable national law and respective labour agreements. Any deduction from wages /salaries for disciplinary purposes is strictly forbidden for every employee.

The system reflects the legal requirements, prevailing standards within the industry and local conditions, and includes premiums and bonuses for individuals or groups as a reward for especially praiseworthy achievements.

## 11. Human rights due diligence

Alpine Metal Tech is committed to respect Human Rights and to observe UN guiding principles on Business and Human rights. A Human Rights Due Diligence process is performed annually by all companies of the Group that seeks to identify, prevent, mitigate and account for how our Group companies address its actual and potential impacts on Human Rights. Where we as a company identify as having caused or contributed to adverse Human Rights impacts, we shall provide for or cooperate in their remediation through legitimate processes.



In all instances, the Management Board and managers, and also every employee must obey to applicable national law, as well as the principles of International Bill of Human Rights, and EU Convention on Human Rights, and above all act ethically.

Alpine Metal Tech commits itself to respect and support international human rights and to treat our staff fairly and with respect. In addition, the requirements of the local rules and regulations with regard to the work environment are fulfilled. Above all, Alpine Metal Tech commits to provide a safe working environment: accidents and injuries at work must be prevented. Alpine Metal Tech commits to respect freedom of assembly, the right to collective bargaining of our staff and to not discriminate against unions or union staff.

Any kind of compulsory/forced labour or work linked with any kind of punishment is forbidden. No staff can be forced to surrender articles of value or personal documents to the employer apart from personal documentation required to be submitted per law.

We do not tolerate any form of child labour. Alpine Metal Tech shares the opinion that every child must be protected against commercial exploitation as well as any kind of work that is hazardous or may affect education, healthiness or personal custody of the child.

With regards to women's rights, Alpine Metal Tech respects international standards, including UN Convention on elimination of all Forms of Discrimination Against Women (CEDAW).

Alpine Metal Tech also respects the legal and customary rights and interests of local communities in their land and livelihoods and their use of natural resources.

## 12. Environment

As a quality-leading company, Alpine Metal Tech takes great care to have an ecologically clean living space. Therefore, Alpine Metal Tech is actively involved in environmentally safe and resource-friendly production, conscientious handling of valuable resources and an intact working world. Technologically innovative design features as well as the recyclability of its products are very important to Alpine Metal Tech.

Alpine Metal Tech is aware of its responsibility to protect the environment and is committed to comply with applicable environmental laws and regulations, treatment and disposition processes to ensure that the methods by which goods are produced, and wastes are treated and disposed, do not unreasonably harm the environment.

Alpine Metal Tech has opted for foresight and precaution, the use of environmentally friendly technologies and continuous, systematic enhancement of the environmental efficiency of its

company. Alpine Metal Tech ensures that the employees are made aware of applicable environmental laws and regulations and ensures that the operations comply with applicable requirements concerning generation, storage, treatment and disposition of hazardous waste.

### **13. Responsible Sourcing**

Alpine Metal Tech is committed and determined to source all its raw materials from responsible sources whenever possible taking into account social and environmental considerations. The Group's suppliers shall be asked to follow Alpine Metal Tech's Code of Conduct, which includes the Group's principles of sustainable sourcing.

### **14. Conflict affected and high-risk areas**

Alpine Metal Tech sources the majority of its raw materials from well-known suppliers within the European Union, which minimizes risk in social and environmental legislation and ensures a high level of enforcement in the country of production. Still, Alpine Metal Tech covers these areas in its due diligence and in its questionnaires.

### **15. Health and Safety**

Alpine Metal Tech is committed to its responsibility for the safety and health of its employees. Alpine Metal Tech ensures a healthy and safe work environment with appropriate measures to constantly assess and decrease risks and to prevent accidents. Alpine Metal Tech provides periodical training to make its employees more security-conscious and to give them practical skills in dealing with sources of danger.

Continuous evaluation and training are installed and allow us to optimize the workplace safety performance on an ongoing basis.

### **16. Data Protection and Data Safety**

At Alpine Metal Tech we act with care and diligence when receiving, processing and storing information (e.g. financial data, technical data, operational data, customer information, file notes, etc.). In this respect, we adhere to data security standards and procedures as customary in the market to prevent the unauthorized access, amendment or destruction of such information. Any applicable data protection laws need to be complied with.

The IT department will ensure that employees only have access to such data and confidential information which they need for the fulfilment of their duties and that the access to such data shall be limited by way of appropriate technical means. Regular checks shall be carried out whenever an employee is leaving the company.

## 17. Report of misconduct

Stakeholders such as employees, customers, suppliers, shareholders and partners of Alpine Metal Tech Group may become aware of violations of this Code of Conduct, other internal guidelines, or of laws or regulations. The stakeholders are encouraged and free to report any such misconduct identified by them through the following means:

- Report misconduct via the anonymous online reporting tool on the company website:  
<https://montanaaerospace.integrityline.com/frontpage>
- Report to the Alpine Metal Tech Group compliance department (compliance@montana-aerospace.com)

Additionally, employees of Alpine Metal Tech may also use the following reporting channels:

- Report to the management of the respective Group company
- Report to the direct superior
- Report to the competent legal or HR department of the respective Alpine Metal Tech Group company

All reports received shall be carefully investigated and, upon request, treated absolutely confidential in accordance with the applicable “Whistleblower Regulation”. No one who, in good faith, reports a misconduct shall be subject to retaliation or shall suffer intimidation, harassment, discrimination or adverse employment consequences because of such report. Moreover, an employee who retaliates against someone who has reported a concern in good faith is subject to disciplinary actions up to and including dismissal or termination of employment.

To promote open and honest communication, it is expressly noted that stakeholders reporting violations of laws or regulations, this Code of Conduct or other internal guidelines and rules shall not suffer any adverse consequences whatsoever because of the report. This shall also apply to other persons contributing material information to the investigation of misconduct.

Alpine Metal Tech Group expressly reserves the right to take disciplinary action against employees



who intentionally or grossly negligently make false accusations.

We will follow all legal prohibitions for retaliation and will grant employees the right to speak about misconduct. At any case, we will make an effort to preserve legality and business ethics.

### **18. Prohibition on political contributions**

To avoid the appearance of impropriety or to prevent conflicts of interest, we prohibit corporate political contributions (both monetary and in-kind) to political candidates, political parties or party committee on behalf of Alpine Metal Tech.

### **19. Employee political and civic activity**

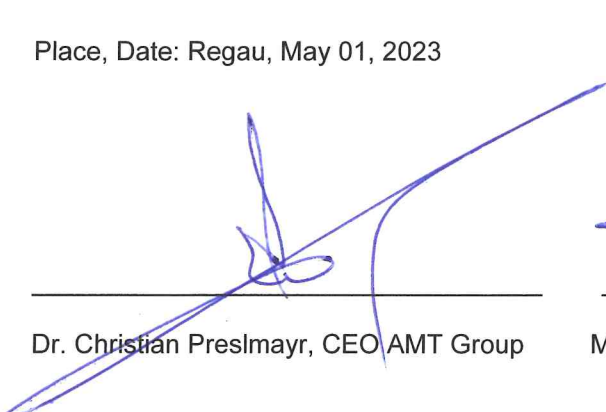
The company's employees have the right to participate in the political process by making personal contributions from personal funds, subject to applicable legal limits and in accordance with this Code. Employees will not be reimbursed by the company directly or otherwise through compensation increases for personal contributions or expenses.

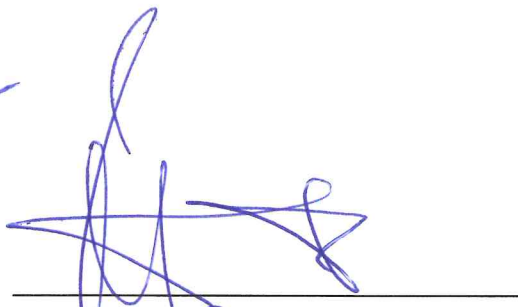
Employees may voluntarily participate in campaign activities but must do so in their free time.

### **20. Entry into force**

This regulation comes into force on May 01, 2023 and cancels all previous regulations. It is valid until revoked by the business performance.

Place, Date: Regau, May 01, 2023

  
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Dr. Christian Preslmayr, CEO AMT Group

  
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Mag. Dietmar Zieher, CFO AMT Group