

## **CODE OF BUSINESS CONDUCT**

### **AOC AG**

#### **1 People: the human dimension**

##### 1.1 Diversity and non-discrimination

We strive for a diverse workforce. We recruit, employ and promote employees on the sole basis of their qualifications and abilities for the work to be performed and do not discriminate in any manner on the basis of race, ethnic background, nationality, age, religion, gender, sexual orientation or disability.

##### 1.2 Forced labour and child labour

We do not use forced labour or child labour; we act in line with conventions 138 (Minimum Age) and 182 (Worst Forms of Child Labour) of the International Labour Organization.

##### 1.3 Health and safety

With respect to health and safety we implement strict policies with the aim to create an incident and injury free work environment and to prevent the occurrence of occupational illness and health problems associated with our activities. At all levels, we expect our employees to play an active role in identifying and rectifying unsafe situations.

##### 1.4 Protection of personal information

We respect the privacy of our employees and those of our business partners, and for the storage and usage of personal data we implement appropriate technical and organizational measures taking into account the state of the art and the costs of implementation and the nature, scope, context, and purposes of the processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons.

##### 1.5 Freedom of association

We respect the right of our employees to freedom of association and collective bargaining.

##### 1.6 Social behaviour

We encourage our employees to adopt a civic-minded and socially responsible attitude, and to be sensitive to local traditions and customs.

##### 1.7 Employee development

We support our employees in their growth and personal development by offering them training, coaching and mentoring. We invest in the knowledge and skills of our employees on an ongoing basis to support their long-term employability.

1.8 Employee involvement

We create an atmosphere of candour and stimulate openness and accountability by involving our employees in the development and execution of our business objectives. We encourage and provide channels for employee feedback.

1.9 Fair remuneration

We pursue a fair and competitive remuneration policy with due recognition for performance.

1.10 Standards of business partners

We expect our suppliers, agents, distributors and other partners to work according to business principles as set forth in this Code.

1.11 Responsibility for people in the world

We contribute to the quality of life of our own employees, as well as other people of our society where possible, via our products as well as through providing products/technologies to those who need them.

**2 Planet: the environmental dimension**

2.1 Choice of products and production processes

In deciding what products we want to make, what production processes we want to use and what new technologies we want to develop, we are guided by our commitment to sustainability and safety, and we take public opinion seriously into account.

2.2 Continuous improvement

We continually evaluate and improve our products, working methods, production processes and services in order to make sure they are safe and acceptable from the point of view of our employees, our customers and other stakeholders.

2.3 Energy and raw materials

We make an ongoing effort to minimize the use of raw materials and energy.

2.4 Product Stewardship

In accordance with the principles of product stewardship, we identify the risks and environmental impact attached to our products during our production processes as well as during their entire lifecycle and look for opportunities to reduce these. In this context, we share relevant knowledge, expertise and experience with our suppliers, customers and other parties.

2.5 Information

We provide our customers and the general public with clear information about the environmental and safety aspects of our products and production processes.

### **3 Profit: the economic dimension**

#### **3.1 Laws and regulations**

We abide by applicable laws and regulations.

#### **3.2 Free and fair competition**

We value free and fair competition in all countries of the world. Therefore, we comply with competition laws in all areas where we operate and have implemented strict policies in this respect.

#### **3.3 Embargoes and trade law**

We respect applicable trade laws and restrictions as imposed by the United Nations or other national or supranational bodies or government, and we have implemented strict policies to ensure compliance therewith.

#### **3.4 Bribery**

We refrain from any form of corruption including extortion and active or passive bribery.

#### **3.5 Commission payments**

We ensure that any commission payment, agent fee or the like is based on a real, legitimate, documented service.

#### **3.6 Gifts**

We do not give or accept any gift or favour that could compromise or raise doubts about the neutrality of the decisions made by ourselves or our partners. We set (local) limits of acceptable levels.

#### **3.7 Money-laundering and suspicious transactions**

We refrain from any arrangement which appears to be used, or is suspected to be used, for money-laundering or other violations of the law. An active policy is pursued to avoid becoming complicit in illegal business practices, and suspected cases are reported to company management.

#### **3.8 Transparent accounting**

Our accounting records and supporting documents truly, fairly and completely describe and reflect the nature of the underlying transactions

#### **3.9 Conflict of interest**

Employees avoid any conflict of interest between the company's interests and their private interests and avoid any behaviour that could raise doubts about their integrity or the integrity of the company.

#### **3.10 Profit via Products contributing to societal needs**

Our mission is to develop profitable products which contribute to key societal needs.

### 3.11 Role in society

As long as conflicts of interest are avoided, we encourage our employees to play an active role in society, including activities in political parties and standing for election to public office, where this is appropriate in the light of local circumstances.

### 3.12 Donations to political parties

We do not make any payments or donations in kind to political parties or their institutions, agencies or representatives.

### 3.13 Public dialogue

We seek constructive dialogue with politicians and society to pursue our legitimate business interests. We base our arguments on facts and on scientifically sound, publicly stated positions.

### 3.14 Inside information

We instruct our employees on the prohibition of abuse of inside information and on the need to handle such information (especially share sensitive information) with due care. The applicable rules are published on the website.

### 3.15 Use and protection of company property and information

Our employees take good care of company property. They observe the Code of Conduct regarding the protection of company information and the use of the company's information and communication systems.