

# COMPLIANCE OF THE ALU MENZIKEN GROUP

## PREAMBLE

The Alu Menziken Group is a Swiss metalworking group headquartered in Reinach (AG). The four-site group of companies in three countries has focused on the production of high-tech lightweight construction components for the aerospace, automotive and specialty industrial sectors. International customers rely on the concentrated expertise and know-how of the Hidden Champion in the production of high-quality aluminum profiles, complex extruded products and sophisticated lightweight aluminum components. As a development partner, Alu Menziken accompanies its clients with decades of experience and technological expertise across all continents. The Alu Menziken Group consists of Alu Menziken Extrusion AG (production sites in Reinach and Menziken in Aargau in Switzerland), Alu Menziken Euromotive GmbH in Ranshofen, Upper Austria and Alu Menziken S.R.L. in Mediesu Aurit, Satu Mare county, Romania.

Alu Menziken is a wholly owned subsidiary of the Montana Aerospace AG industrial group.

This compliance record defines ethical rules of conduct imposed by the Alu Menziken Group. It forms the basis for all business relationships in Romania and abroad. Both the reputation of the company and the trust which the customers, suppliers, business partners and the people of Alu Menziken have to offer depend essentially on the sincere and responsible behavior of all employees (hereinafter referred to as "employees"). Each employee undertakes to comply with statutory regulations, other mandatory regulations and this Code of Conduct. The requirements for Alu Menziken business partners also include these principles, they are accepted and their compliance is guaranteed by all business partners. Alu Menziken wants to carry and communicate social, economic and ecological responsibility.

## 1 PRINCIPLES

### 1.1 Lawful behavior

Compliance with laws - whether at home or abroad - is a matter of course for Alu Menziken. Each individual employee is therefore obliged to observe the legal system in which he acts. We represent the principle of strict legality for all actions, measures, contracts and other processes of Alu Menziken. Each employee is personally responsible for complying with the laws in his area of work. It is strictly forbidden to induce third parties to act unlawfully or knowingly to participate in such acts.

The executives must live up to their exemplary role and demonstrate a high degree of social and ethical competence. You are responsible for adhering to and implementing the Code of Conduct in your area of responsibility. Violations of the law are disapproved and disciplined regardless of the hierarchical position of the employees in the company.

The maximum working hours according to the applicable labor law (working time law) of the respective locations apply. Mandatory breaks are granted and respected.

### 1.2 Responsibility for the reputation of Alu Menziken

All employees must pay attention to the reputation of Alu Menziken in the performance of their duties.

### 1.3 Behavior towards employees

Alu Menziken respects and protects the personal dignity of each individual and invests in their qualifications and competence. Alu Menziken does not tolerate discrimination, harassment or discrimination based on sex, race, disability, ethical or cultural origin, religion or belief, age or sexual orientation.

Alu Menziken respects the right to freedom of association of its employees under the applicable laws and regulations.

Alu Menziken meets its employees fairly and openly and expects every employee to pursue an objective, friendly and fair dealings with colleagues, employees and third parties. Every employee has access to clean toilets and drinking water in sufficient quantities.

Alu Menziken strives for a just and performance-related wage structure. Wages and salaries are governed by the applicable statutory provisions and individual contracts.

#### **1.4 PROHIBITION OF FORCED LABOR, CORPORAL PUNISHMENT AND CHILD LABOR**

Disciplinary action through direct or indirect violence is prohibited at Alu Menziken. Never allow an employee to be intimidated or forced to work. These include verbal, psychological or physical violence, as well as coercion or harassment (including sexual).

It is also forbidden to hire employees under the age of 15. The restriction of adolescent employment under the Youth Employment Protection Act must be observed.

## **2 AVOIDING CONFLICTS OF INTEREST**

### **2.1 Equity investments and ancillary activities**

To carry out secondary activities with companies competing with Alu Menziken or with customers and suppliers requires written approval from the management. Significant equity investments in competitors, suppliers or customers must be communicated to the HR manager without delay.

### **2.2 Orders from business partners for private purposes**

In order to rule out a conflict of interest between the company and the private sector, employees may not use their business partners, who are closely related to the respective area of responsibility, for private purposes. Exceptions must be agreed in advance with the supervisor and the HR manager.

### **2.3 Private and business expenses**

Expenses for business and private are strictly separated, mixing is prohibited. For business expenses, the principle of clarity, transparency and traceability (proof) applies.

## **3 HANDLING INFORMATION**

### **3.1 Documents**

Records and reports (internal and external) must be accurate and truthful. The principles of proper accounting and accounting must be observed. In particular, each transaction must be based on a truthful receipt and all transactions must be accounted for (or "off-books" transactions will not be tolerated). All funds and assets of Alu Menziken must be recorded in the bookkeeping; black boxes are strictly prohibited. The production of records, files and the like used for the Company's confidential information is only permitted if it is in the direct interest of Alu Menziken.

### **3.2 Confidentiality / Confidentiality**

Confidential information of Alu Menziken, to which the employee has access during the employment relationship, must be kept confidential and must not be passed on to third parties without authorization, used for its own purposes or made accessible in any other way. This includes confidential and proprietary information in connection with the business activities of Alu Menziken, in particular business and trade secrets, customer addresses, business plans, strategy documents. This list is not exhaustive.

The employee undertakes not to make any announcements to the media without the permission of the management. Alu Menziken reserves the right to demand the elimination of the condition contrary to the contract as well as the replacement of further damages. In addition, the employee undertakes not to recruit, either directly or indirectly, employees or customers of Alu Menziken with whom he had any contact during his employment. This secrecy obligation also applies after the end of the employment contract.



### **3.3 Privacy and Information Security**

Personal data may only be collected, processed or used to the extent necessary for specified, clear and legitimate purposes. Data quality and its protection against unauthorized access must be ensured to a high technical standard. The use of data must be transparent to those affected. Your rights of access and rectification as well as, if necessary, opposition, blocking and deletion must be upheld.

### **3.4 Inside information**

Inside information is any information about Alu Menziken or its business activities that has not been published. The applicable legal regulations regarding insider trading apply. Inside information is to be kept strictly confidential. In principle, they may not be passed on to third parties, even in abbreviated or summarized form. This also applies to passwords that allow access to electronically stored insider information. A transfer of insider information to employees or external consultants is only permitted if the recipient requires the information for the performance of their duties and is required to treat them with strict confidentiality.

## **4 BEHAVIORS AGAINST BUSINESS PARTNERS AND THIRD PARTIES**

### **4.1 Competition and Antitrust Law**

The Alu Menziken respects the fair competition. The Company complies with applicable laws protecting and promoting competition, including applicable antitrust laws and other competition laws. For Alu Menziken, competing for market share is governed by integrity. Every employee is obliged to comply with the rules of fair competition within the framework of legal regulations. In particular, competitors are not permitted to divide the territory or customer, agree or exchange information on prices / price components, supply relationships and their conditions, as well as capacity or supply behavior. The same applies to the exchange of information on market strategies and participation strategies. Collusion or exchange of information on research and development projects is only permitted in very limited exceptional cases. The market position of the company must not be unlawfully exploited, for example, to enforce price discrimination, deliveries of unsolicited products or refusal of supply.

### **4.2 Supplier and customer relationships**

Suppliers are to be selected solely on the basis of objective criteria, after adjustment of price, quality, performance and suitability of the offered products or services. Agreements with customers and suppliers must be complete and unambiguous, as well as including subsequent changes and additions. The internal regulations (organizational regulations and authority regulations) must be strictly adhered to by all employees.

### **4.3 Corruption, gifts and other benefits**

Agreements or ancillary agreements to agreements that relate to the benefit or favor of individuals in connection with the mediation, award, delivery, processing and payment of orders are inadmissible. It is prohibited to offer, promise or grant any benefits (money or any other value or other benefits) to employees, organs, associates or agents of Alu Menziken customers in order to obtain assignments for Alu Menziken. It does not matter whether the benefits are given or promised to the recipient or third parties, or whether they are directly or indirectly provided through agents (agents, consultants, distributors, etc.). It is also forbidden to accept such benefits in order to place orders on behalf of Alu Menziken. Employees who are unfairly influenced by customers or suppliers, or who try to influence them in an unfair way, are disciplined - regardless of any criminal consequences. Attempts by suppliers or customers to improperly influence employees of Alu Menziken in their decision are to be reported to the responsible supervisor. Commissions and fees paid to contract dealers, agents or consultants must be reasonably proportionate to their activities. The commissions and allowances must always be approved in writing by the Group Management. Distributors and agents or advisers may only be required to make standard contracts that are approved by the Legal Service and only after the Distributor, Agent or Advisor has been reviewed by the Legal Service and approved for the contract. In the case of bribery and bribery - subject to further claims by the employer - a contractually agreed right to terminate the contract without notice. Gifts and attention that have more than symbolic character are to be rejected. Such offers are to be reported to the supervisor.

If in some nations gifts of courtesy and custom are acceptable, they are permissible provided that they do not create dependency. National law must always be observed. Government officials must not be allowed to influence a decision with donations.

#### **4.4 Donations**

Alu Menziken can grant money and material donations for education, science, culture and social concerns in the sense of civic engagement.

The allocation of donations must always be transparent, which means that both the recipient and the specific use must be known, comprehensible and verifiable at all times. Alu Menziken looks away from party donations.

### **5 PRODUCT QUALITY, SAFETY AND SUSTAINABILITY**

Alu Menziken is guided by the principles of sustainability. We meet the high quality and safety requirements of our customers and implement the necessary improvements. To live up to our responsibility towards future generations, we ensure that our products and manufacturing processes are sustainable, ecological, economic and social in nature, and always state-of-the-art. If, despite all efforts, defects have occurred, we act to eliminate them in accordance with legal stipulations and contractual obligations.

The company has set up a management system that reflects these requirements. It is being continuously developed.

### **6 WORK SAFETY, HEALTH, FIRE AND ENVIRONMENTAL PROTECTION**

Alu Menziken ensures the safety of employees in the workplace and provides a health-oriented work environment. It is the task of all employees to avoid risks to people and the environment, to minimize their impact on the environment and to use resources sparingly. Processes, business premises and equipment must comply with the applicable legal and internal regulations on occupational safety as well as health, fire and environmental protection. Alu Menziken supports a continuous development to improve the working environment as well as an environmentally aware action of the employees.

If necessary, Alu Menziken takes measures to prevent health damage and accidents. Employees are trained in occupational safety at regular intervals.

Applicable laws, standards and procedures are integrated within the company and are observed and regularly monitored. Alu Menziken works continuously to avoid and reduce environmental pollution. They guarantee the proper disposal of waste, especially hazardous substances. This also applies to wastewater and emissions.

### **7 INFORMATION AND TRAINING**

Each employee is to be provided with this Code of Conduct and to expressly refer to the provisions contained therein. In case of uncertainty about correct behavior, the employees can discuss this with their supervisor or the HR manager. The employees of Alu Menziken are informed about changes in connection with this Code of Conduct.

### **8 MESSAGE OF IRREGULARITIES**

Each employee has the right to inform the Human Resources Manager about circumstances that indicate a violation of the rules contained in this Code of Conduct. This can also happen anonymously if necessary. The information will be investigated and, if necessary, corrective action taken. The employee who reported the incident must not be harmed in this respect, in particular, no termination may result.



## 9 SANCTIONS

Deliberate misconduct and violations of the applicable legal regulations and company regulations (regulations, instructions, etc.) will not be tolerated. Violations of the Code of Conduct can lead to consequences and also to claims for damages. All rule violations will be investigated.

## 10 SURVEILLANCE

Each area is responsible for complying with the rules contained in this Code of Conduct as well as other proprietary rules in their area. Managers are responsible for ensuring that violations of the Code of Conduct and subsequent regulations are discovered, tracked and corrected. They will issue a statutory report to the Compliance Officer at regular intervals.

## 11 ENTRY INTO FORCE

This regulation will come into effect on April 7, 2021 and repeal all previous regulations. It is valid until revoked by the management.

Place, Date: Revised, 07.04.2021

A handwritten signature in blue ink, appearing to read 'Mr. Adams', written over a horizontal line.

Markus Adams, CEO

A handwritten signature in blue ink, appearing to read 'Alexander Zwickl', written over a horizontal line.

Alexander Zwickl, CFO