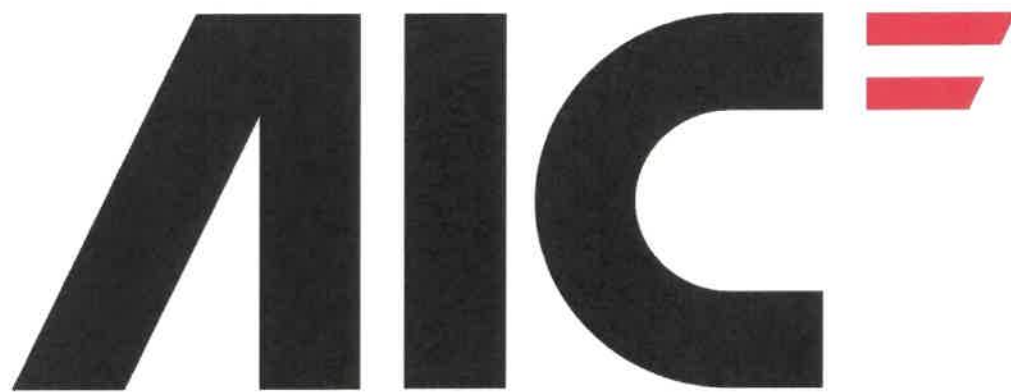


Code of Ethics

Compliance guidelines



AUSTRIA IRON CASTING

The principles behind our business ethics

Our commitment

Our commitment reflects the way in which we carry out our day-to-day business. We observe our Code of Ethics ('CoE') in each of the steps we take. We take full responsibility for our decisions, which we make based on substantiated data.

Our employees, customers and suppliers are our most valuable asset, so we show them respect, honesty and trust.

This Code of Ethics should not only outline the rules that apply to our day-to-day interactions, but also give our customers and suppliers an insight into our way of thinking.

Scope of application

The present Code of Ethics applies to **AIC Casting GmbH and all its subsidiaries.**

The CoE should provide our employees, customers and suppliers with guidelines for observing the values and principles that apply at our company.

We expect our ethical values to be observed not only by our employees, but also by our suppliers and customers.

Business principles

- **We observe laws**
- **We communicate openly, honestly and effectively with our business partners**
- **We take the effect on our business partners into consideration when making decisions**
- **We do our very best**

Customers

Our overriding principle is to provide products of premium quality at competitive prices via a transparent sales process.

We always observe laws and apply appropriate business ethics in our business relationships.

Suppliers

We undertake to apply the rules of the Code of Ethics when working together with our suppliers. We also expect our suppliers to know our CoE, to observe these and to confirm these on request.

We strive to create long-term partnerships with all our suppliers.

Employees

Our employees are the most valuable asset our company has. We undertake to treat our employees fairly and observe equal opportunities in our HR policy.

We respect our employees' privacy and treat them with respect.

We also undertake to provide our employees with a safe and healthy working environment and an atmosphere of open and honest communication.

Competitors

Although competition with our competitors is intense, we always observe law and order. The quality of our products, our transparent pricing policy and our technical expertise are our unique selling points and support us in this area.

Public welfare

We undertake to be a socially responsible company wherever we are working in the world.

We observe all laws and make efforts to improve public welfare by protecting natural resources, encouraging our employees to take part in public life and by leading by example at all times.



OUR CODE OF CONDUCT

Product quality and safety

Safety and the health of our customers, end customers, our employees and all the people who use our products, either directly or indirectly, are the main focus of our attention when we manufacture our products.

All the necessary quality tests are conducted and documented correctly in accordance with the relevant specification or standard.

Purchasing and sales

We market our products in a transparent fashion. We do not conclude any sales whose success is the result of an unlawful act or a breach of our CoE.

We do not make false statements or comparisons to discredit our competitors.

All employees who do work for AIC Casting GmbH (either directly or indirectly) must observe relevant anti-bribery laws and rules set by our customers.

Free gifts are generally allowed provided that their value and frequency do not exceed what is typically allowed in the business.

Any presents aimed at gaining an illegal competitive advantage, and which are in breach of the recipient's, or their employer's, guidelines, are forbidden in all situations.

Bribes are not offered or paid under any circumstances.

The sales we conclude with our suppliers are characterised by credible product quality, price and supplier performance.

Gifts must not be accepted in order to gain contracts on false pretences or influence this process.

Intellectual property and confidentiality

We respect the legitimate property rights and trade secrets of our customers, suppliers and third parties.

We will never pass on confidential information, either directly or indirectly, to third parties without the express consent of our business partners.

We expect the same from our customers and suppliers. This confidentiality will also be maintained after the business relationship has finished.

Due to intensive global competition, collecting information about our competitors, competitors' products and manufacturing techniques is an essential and routine part of our business activity.

AIC Casting GmbH does not, however, use any illegal means, such as theft or fraudulent misrepresentation, to obtain this kind of information.

Protection of assets

Our assets, i.e. tangible assets (office equipment, plant and equipment, financial assets and IT systems) and intangible assets (trade secrets, patents, intellectual property, confidential business and technical information, know-how in relation to business and product activities) are always used correctly and with the approval of the management.

Company assets are not used for personal gain. All transactions in a business context must be approved by the management and be consistent with authorisations given and internal inspection and approval procedures.

Company documents

All company assets, liabilities, revenue, expenditure and business transactions must be recorded accurately and in full in the company's books and annual reports. Legal provisions and financial policies provide a basis in this area.

Well-founded economic analysis and financial plans are used as a basis for decision-making.

Work environment

We undertake to provide all our employees with working conditions that do not pose any known risks to health and safety.

The work environment we have is free from discrimination and harassment.

Employees will be managed in a way that is conducive to a productive working atmosphere.

All companies in the AIC Group observe the same provisions concerning consumption of alcohol, drugs and other mind-altering substances.

AIC Group prohibits the use, sale, consumption and distribution of illegal drugs on the company premises.

Equal opportunities

We undertake to treat our employees and applicants fairly without exception. We only consider factors that are relevant to legitimate business interests.

Privacy

We respect our employees' privacy. Personal data is only used in accordance with national laws. We are not interested in how our employees spend their free time, unless this is inconsistent with the rules set in their employment contract.

Employee communications

We inform our employees in good time of current events, including (but not exclusively) in relation to products, quality issues and customer relationships.

We provide open channels of communication to give our employees the opportunity to express their thoughts, concerns and opinions freely.

An important part of this is the employee survey, which is carried out periodically.

Further training

We aim to support our employees in their professional development. Highly qualified employees with professional training provide the basis for our products.

Wages, salaries and employee benefits

We aim to keep qualified and dedicated employees in the company on a permanent basis by providing them with competitive salaries and employee benefits.

Conflicts of interest

All managing directors, managers, employees and authorised representatives must be loyal to AIC Casting GmbH and avoid any conduct when dealing with customers and suppliers that might seem to represent a conflict between personal interests and those of Gienanth Group.

Actual and potential conflicts of interest must be reported to the supervisor immediately for review.

Disclosure of information not in the public sphere

All employees and authorised representatives treat information not in the public sphere as confidential. This type of information is only disclosed by the company's authorised spokespersons.

Authorised representatives

All authorised representatives working on behalf of our company observe our company's guidelines.

We try not to ensure that external authorised representatives do not circumvent our Code of Ethics.

Environmental protection

We undertake to conduct our business activity in an environmentally friendly fashion, in a way that protects the environment. We obtain all the necessary permits and observe all the necessary rules and regulations.

We aim to avoid waste and take the environment (energy, water, air, waste) into consideration when making our decisions.

Political commitment

We deliberately avoid any form of political commitment or influence. Our name and assets should not be used to support any political parties or candidates at national or international level.

We encourage our employees to take part in political events. Our employees are not discriminated against for being involved in politics in their private lives.

Equal treatment

We treat all employees equally, regardless of skin colour, race, gender, religion, nationality, political affiliation, sexual orientation, social background, age or disability.

Competition and cartel law

We undertake to observe competition and cartel legislation around the world. We do not get involved in collusive tendering or price fixing. We do not divide up markets with our competitors, nor do we abuse our market position.

Child and forced labour

We condemn child labour and forced labour and do not make use of these under any circumstances. We never allow our suppliers to manufacture products that are created in improper work conditions. In the event that an incident is confirmed, we terminate our business relationship with the respective supplier or customer immediately.

Human rights

We respect civil and human rights and view these as our most valuable asset. We are convinced that we can create a healthy work environment free from dangers for everyone if we work together.

Notification of violations

If an employee becomes aware of violations of the CoE or other regulations, he or she can report this to his or her supervisor or directly to the General Management.

Such information can be provided in person, by telephone or by email to

compliance@aiccasting.at

Anonymous information is also possible. Business partners can also choose to provide information via email.

COMPLIANCE WITH THE CODE OF ETHICS

All employees and authorised representatives undertake to observe the rules set out in the Code of Ethics in its current form.

The company's senior management is responsible for creating a company culture and instilling business practice in its staff that encourages open and honest communication in the company.

Senior management is also responsible for communicating the rules of the present CoE to all employees.

Non-compliance with the CoE or one of its provisions may lead to serious disciplinary measures, or even to dismissal.



Dr. Sarmini Markus
Geschäftsführender Gesellschafter/ CEO



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Geschäftsführender Gesellschafter/ CEO