



atlas[®]

SUPPLIER
**CODE OF
CONDUCT**

future is now.



At ATLAS, we take social responsibility for people and the environment. We are committed to fair and socially responsible corporate governance by adhering to the requirements based on the principles of the relevant international conventions of the „International Labour Organization (ILO)“, the „Universal Declaration of Human Rights“, and the „UN Human Rights Conventions“.

This Code of Conduct serves as a binding guideline for ethical behavior and responsible business practices.

Our code ensures that all employees and suppliers act in accordance with our high standards and values.

The protection and promotion of the rights of all employees are the key focus.

1. PROHIBITION OF CHILD LABOR AND PROTECTION OF YOUNG WORKERS

We expect our business partners to commit to the effective abolition of child labor in accordance with ILO Convention 182. The applicable legal minimum age for employment or work, which must not be below the age at which schooling ends and not below 15 years of age, as per ILO Convention 138, ILO Recommendation 146, and the UN Convention on the Rights of the Child, must be adhered to. In the hiring process, appropriate mechanisms for determining age are used to prevent child labor. Individuals aged 16 and over will only be employed if the nature of their work does not endanger their life, health, or physical and mental well-being, and if they receive appropriate training or vocational education in the respective industry.

2. PROHIBITION OF FORCED OR COMPULSORY LABOR

ATLAS does not accept any form of economic activity based on forced or compulsory labor, debt bondage, or slavery. This includes any type of work or service demanded from a person under the threat of penalty for which they have not voluntarily offered their services (compliance with ILO Convention 29, ILO Convention 105, and the Universal Declaration of Human Rights). Employees can exercise their right to terminate their employment and leave the company at any time. Neither we nor third parties providing labor to us are allowed to charge employment fees or retain identification documents or money as leverage. Additionally, we reject all forms of modern slavery and human trafficking.





3. HEALTH PROTECTION AND SAFETY

Applicable local regulations regarding occupational safety, health and safety at the workplace, as well as building safety and fire protection must be adhered to in order to minimize the risk of accidents and occupational diseases. Where necessary and appropriate, employees will be provided with adequate personal protective equipment. In immediate danger situations, employees have the right and the duty to leave their workplace immediately and without permission. Vulnerable persons such as young employees, young mothers, pregnant women, and people with disabilities are given special protection. Our principles refer, among others, to ILO Convention 155 and Recommendation 164 (Occupational Health and Safety), ILO Convention 159 (Vocational Rehabilitation and Employment of Disabled Persons), and ILO Convention 183 (Maternity Protection).

4. FREEDOM OF ASSOCIATION & RIGHT TO COLLECTIVE BARGAINING

All business partners of ATLAS have the right to association, open communication, direct confrontation, as well as humane and fair treatment in accordance with ILO Convention 87 (Freedom of Association), ILO Convention 98 (Right to Organize and Right to Collective Bargaining), and ILO Convention 135 (Workers' Representatives).

5. PROHIBITION OF DISCRIMINATION IN EMPLOYMENT AND OCCUPATION

Any form of discrimination, exclusion, or favoritism regarding employment (including hiring, salary, benefits, promotion, dismissal, or retirement), which is based on gender, race, religion, age, disability, sexual orientation, nationality, or social or ethnic origin, and which leads to the cancellation or impairment of equality of opportunity or treatment in employment or occupation, will be avoided. Our

business partners respect ILO Conventions 100 (Equal Remuneration) and 111 (Discrimination in Employment and Occupation), the United Nations Convention on the Elimination of All Forms of Discrimination against Women, and the United Nations Convention on the Elimination of All Forms of Racial Discrimination.

6. DISCIPLINARY MEASURES

Employees must be treated with dignity and respect, values that are enshrined in the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights. Any form of undignified treatment, abuse, harassment, intimidation, and unlawful penalties against employees is prohibited and will not be tolerated. Any disciplinary measures will be documented in writing and in a form understandable to the employee.

7. WORKING HOURS

Our business partners comply with the relevant national legislation, current collective and company agreements, and common industry standards for regulating regular working hours, break times, rest days, and overtime. We also protect the right of employees to terminate their employment relationship while observing the respective notice period. Our actions are based, among others, on ILO Convention 102 (Social Security – Minimum Standards), ILO Convention 1 (Working Hours – Industry), and ILO Recommendation 116 (Reduction of Working Hours).



8. SALARY

All business partners of ATLAS must comply with the relevant legal regulations or applicable collective agreements regarding wages and benefits, as well as ILO Convention 131 (Establishment of Minimum Wage). Minimum wages must not be violated. We also expect that wages and benefits are sufficient to cover basic needs. Wages are not withheld and are regularly paid in a form suitable for the employee. Wage deductions are only allowed within the legal or collective agreement framework and must be specified. Employees are regularly informed about the composition of their remuneration. Employees will be provided with clear information about the essential working conditions, including working hours, remuneration, and payment and settlement modalities. Wage deductions are never allowed as a disciplinary measure.

9. MANAGEMENT SYSTEM

We recommend that our business partners set up a management system that supports the content of this Code of Conduct. This management system helps fulfill the aforementioned requirements. It is designed to ensure that (a) the compliance with applicable laws, regulations, and customer requirements regarding the operation and products of business partners, (b) the compliance with this Code of Conduct, and (c) the identification and minimization of operational risks in relation to the areas covered by these requirements are guaranteed.



10. HANDLING OF CONFLICTS OF INTEREST

Our corporate culture is based on integrity, transparency, and fairness. We commit to handling potential conflicts of interest responsibly and expect the same from our business partners. All employees must immediately and openly report any potential conflicts of interest, including financial interests, personal relationships, and secondary employment. Our business partners are committed to avoiding or reducing conflicts of interest. This includes adjusting tasks or relinquishing financial interests. Their decisions are independent and objective. Personal interests never influence their business decisions. Employees are also encouraged to identify and report potential conflicts. In unavoidable conflicts, approval is required. All disclosures and measures are treated confidentially. Our business partners ensure protection and integrity.

Compliance with these principles strengthens the trust of our stakeholders and also secures our corporate reputation. By acting together, we ensure our pursuit of business excellence.

11. OVERALL 11.1 ENVIRONMENT

Since our integrated management system includes certification according to ISO 14001, our business partners should also have an environmental management system or an equivalent standard. External auditing is strongly recommended but not mandatory.

11.2 ETHICS

We stand for the fight against corruption and conduct our business without engaging in corrupt practices, including bribery of public or private officials or the payment of bribes to such persons. Our principle for supplier and customer relationships prohibits our employees from accepting money from suppliers and sets strict limits on the acceptance of promotional items, personal gifts, and offers of hospitality. We expect the same standards from our business partners. In managing corporate records, our business partners ensure integrity, transparency, and accuracy. They commit to the proper handling of competition data, protected company information, and other intellectual property. They act with integrity and lawfully, adhering to legal requirements for fair competition, antitrust law, and honest and truthful marketing.



11.3 COMMUNICATION AND ENFORCEMENT

The business partner communicates the contents of the Code of Conduct to employees, contractors, and, if applicable, to other third parties. It should be clear to the business partner that compliance with the Code of Conduct is fundamentally ensured. The disclosure of trade secrets, business secrets, or any other competitive or protected information is excluded from this requirement for legal reasons.

The business partner adheres to this Code of Conduct in their actions. They encourage their own business partners to apply the Code of Conduct. They assist their partners in designing their supply chain in such a way that human and labor rights are respected, and working conditions are continuously improved. Any significant violation of the stated obligations will be regarded as a breach of contract by the business partner. If possible, we give the business partner the opportunity to implement corrective actions and continue the collaboration under improved conditions.

We look forward to a good cooperation, which we aim to continue responsibly, with care for people and the environment.

Hendrik Schabsky
CEO

Date

Signature

Company Stamp