

# AT&S Code of Ethics and Conduct

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- Table of contents
- AT&S Purpose..... 3
- AT&S Code of Conduct ..... 3
- LABOUR ..... 3
  - Freely chosen employment..... 3
  - Young workers ..... 3
  - Working hours ..... 4
  - Wages and social benefits ..... 4
  - Humane treatment..... 4
  - Non-discrimination / Non-harassment ..... 4
  - Freedom of association ..... 4
- HEALTH AND SAFETY ..... 5
  - Occupational safety..... 5
  - Emergency preparedness ..... 5
  - Occupational injury and illness ..... 5
  - Industrial hygiene..... 5
  - Physically demanding work..... 5
  - Machine safeguarding..... 6
  - Sanitation, food and housing ..... 6
  - Health and safety communication ..... 6
- ENVIRONMENT ..... 7
  - Environmental permits and reporting..... 7
  - Pollution prevention and resource reduction ..... 7
  - Hazardous substances ..... 7
  - Solid waste ..... 7
  - Air emissions ..... 7
  - Materials restrictions ..... 7
  - Water management..... 7
  - Energy consumption and greenhouse gas emissions ..... 7
- ETHICS ..... 8
  - Business integrity..... 8
  - No improper advantage ..... 8
  - Disclosure of information ..... 8

**AT&S Code of Conduct**  
**D.GR.ESG-01CEGK.16**

Intellectual property ..... 8

Fair business, advertising and competition ..... 8

Protection of identity and non-retaliation..... 8

Responsible use of minerals..... 8

Privacy..... 8

MANAGEMENT SYSTEMS ..... 9

General information and contact ..... 10

## AT&S Purpose

We partner to shape, develop and deliver advanced technology solutions to support societies' greatest needs, thereby ensuring profitable, sustainable growth.

## AT&S Code of Conduct

AT&S is committed to a high standard of ethical conduct, and to social and environmental responsibility in accordance with the Responsible Business Alliance (RBA), the OECD Guidelines for Multinational Enterprises, the UN Global Compact, the UN Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights (UDHR), the International Labour Organization (ILO), the Social Accountability International (SAI) and the Ethical Trading Initiative (ETI). We believe that respecting the requirements of all our stakeholders is the key to sustainable business.

The purpose of this "AT&S Code of Ethics and Conduct" is to describe how AT&S conducts its business and how we work with each other, with customers, suppliers and others. This Code applies to all employees of the AT&S Group including all its subsidiaries (collectively referred to as "AT&S") and to members of the Management Board

## LABOUR

AT&S is committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, and contract workers, direct employees, and any other type of employment.

### Freely chosen employment

AT&S does not permit forced, bonded (including debt bondage) or indentured labour, involuntary or exploitative prison labour, slavery or labour based on human trafficking. This includes transporting, harbouring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility; likewise, there shall be no unreasonable restrictions on entering or exiting facilities provided by AT&S including workers' dormitories or living quarters. As part of the hiring process, all workers are provided with a written employment agreement that contains a description of terms and conditions of employment in their native language or a language the workers understand well. Foreign migrant workers must receive the employment agreement prior departing from their country of origin and there shall be no substitution or changes allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work must be voluntary, and workers are free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. AT&S, agents, and sub-agents will not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. AT&S can only hold documentation if such holdings are required by law. In this case, at no time will workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

### Young workers

AT&S prohibits the use of child labour in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Exemptions can be made for employment for apprenticeship purposes. AT&S has implemented an appropriate mechanism to verify the age of workers. Workers under the age of 18 (young workers) shall not perform work that is likely to jeopardise their health or safety, including night shifts and overtime. AT&S ensures proper management of student workers through proper maintenance of student records, rigorous

**AT&S Code of Conduct**  
**D.GR.ESG-01CEGK.16**

due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. All student workers are provided with appropriate support and training. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

**Working hours**

Studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness. AT&S does not support working hours exceeding the maximum set by local law. Further, a workweek must not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers are granted at least one day off every seven days.

**Wages and social benefits**

Compensation paid to workers complies with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure are not permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labour will be within the limits of the local law.

**Humane treatment**

AT&S does not allow any harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; the same applies to the threat of any such treatment.

**Non-discrimination / Non-harassment**

AT&S does not tolerate any harassment or unlawful discrimination at the workplace. Workers shall not be discriminated against or harassed based on race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. At some production sites, workers are provided with reasonable accommodation for religious practices. Should there be an additional need for accommodation for religious practices, workers are called upon to contact the local HR team. In addition, workers or potential workers are not subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way

**Freedom of association**

In conformance with local law, AT&S shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

## **HEALTH AND SAFETY**

AT&S recognises that in addition to minimising the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. The company also recognises that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace. AT&S is certified according to the ISO 45001 occupational health and safety standard, which is established throughout the Group.

### **Occupational safety**

If workers are exposed to potential health and safety hazards (chemical substances, electrical and other energy sources, fire, vehicles, and fall hazards), these hazards are to be identified and assessed, and mitigated using the Hierarchy of Controls; this includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Pregnant women and nursing mothers are not exposed to any risks that could have detrimental effects on the health of the mothers or their children. Some production sites provide reasonable accommodation for nursing mothers. Should there be additional needs for such accommodation, workers are called upon to contact the local HR team.

### **Emergency preparedness**

AT&S identifies and assesses potential emergency situations and events. Their impact is minimised by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures focus on minimising harm to life, the environment, and property.

### **Occupational injury and illness**

AT&S has procedures and systems in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

### **Industrial hygiene**

Worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled according to the Hierarchy of Controls. If any potential hazards were identified, opportunities to eliminate and/or reduce the potential hazards will be looked for. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers are provided with and use appropriate, well-maintained, personal protective equipment free of charge to protect their health. Protective programmes are ongoing and include educational materials about the risks associated with these hazards.

### **Physically demanding work**

Worker exposure to the hazards of physically demanding tasks is identified, evaluated, and controlled. Such tasks include manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks.

**AT&S Code of Conduct**  
**D.GR.ESG-01CEGK.16**

**Machine safeguarding**

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

**Sanitation, food and housing**

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by AT&S or a labour agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting and heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

**Health and safety communication**

AT&S provides workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information is clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers are encouraged to raise any health and safety concerns without retaliation.

## **ENVIRONMENT**

AT&S recognises that environmental responsibility is integral to producing world-class products. In this context, the company identifies the environmental impacts and minimises adverse effects on the community, environment, and natural resources within its manufacturing operations, while safeguarding the health and safety of the public. AT&S is certified according to the environmental management system ISO 14001, which is established throughout the Group.

### **Environmental permits and reporting**

All required environmental permits (e.g. discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

### **Pollution prevention and resource reduction**

Emissions and discharges of pollutants are to be minimised or eliminated at the source or by practices such as adding pollution control equipment; improving production, maintenance, and facility processes; or by other means. Natural resources, including water, fossil fuels, minerals, and virgin forest products, are to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

### **Hazardous substances**

Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labelled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

### **Solid waste**

AT&S implements a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste.

### **Air emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion by-products generated from operations are characterised, routinely monitored, controlled, and treated as required prior to discharge. Ozone-depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. AT&S conducts routine monitoring of the performance of its air emission control systems.

### **Materials restrictions**

AT&S adheres to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labelling requirements for recycling and disposal.

### **Water management**

AT&S implements a water management programme that documents and characterises water use and discharge, and controls channels of contamination. All wastewater is to be characterised, monitored, controlled, and treated as required prior to discharge or disposal. AT&S conducts routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

### **Energy consumption and greenhouse gas emissions**

AT&S has established a corporate-wide greenhouse gas reduction goal. Energy consumption and all relevant Scope 1 and 2 greenhouse gas emissions are to be tracked, documented, and publicly reported against the greenhouse gas reduction goal. AT&S always strives to improve energy efficiency and to minimise its energy consumption and greenhouse gas emissions.

## **ETHICS**

To meet social responsibilities and to achieve success in the marketplace, AT&S upholds the highest standards of ethics; these include:

### **Business integrity**

The highest standards of integrity are to be upheld in all business interactions. AT&S has a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

### **No improper advantage**

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorised, given, or accepted. This prohibition also covers promising, offering, authorising, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

### **Disclosure of information**

All business dealings are transparently performed and accurately reflected on the company's business books and records. Information regarding AT&S's labour, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

### **Intellectual property**

AT&S respects intellectual property rights; transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and safeguards customer and supplier information.

### **Fair business, advertising and competition**

Standards of fair business, advertising, and competition are to be upheld.

### **Protection of identity and non-retaliation**

AT&S maintains programmes that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers, unless prohibited by law. The company has a communicated process for its personnel to be able to raise any concerns without fear of retaliation.

### **Responsible use of minerals**

AT&S has established a due diligence process in accordance with the Responsible Minerals Initiative (RMI) with regard to the source and chain of custody of tantalum, tin, tungsten and gold used in AT&S products. This is to ensure that these minerals are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

### **Privacy**

AT&S commits to protecting the reasonable privacy expectations of personal information of business partners, including suppliers, customers, consumers and employees. AT&S complies with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

## MANAGEMENT SYSTEMS

AT&S has established management systems with a scope that is related to the content of this Code. The management systems include, for example, the commitment to corporate social and environmental responsibility, management accountability and responsibility, legal and customer requirements, risk assessment and risk management, improvement objectives, grievance procedures, audits and assessments, documentation and records, and supplier responsibility.

## General information and contact

Compliance with our Code of Conduct is important to us and we undertake to identify and investigate relevant offenses and to react appropriately in order to protect AT&S and its employees. Therefore, we ask you to report any misconduct you observe.

Questions or concerns regarding the application or interpretation of this Code of Conduct as well as potential violations must be reported to the line manager. Any practice or action not consistent with this Code must be corrected; in severe cases, disciplinary action will be taken.

There will be no negative consequences when an employee acts in good faith and reports potential or specific violations in connection with this Code of Conduct.

If an AT&S employee is uncertain about how to act in a certain case, or if an employee identifies a case of potential misconduct, there are several options to obtain information or make a report, including contacting the line manager, the local HR management, the Compliance Officer or the ESG Manager.

Reports submitted by employees are treated anonymously and confidentially. To ensure anonymity, whistleblowers can use the "AT&S – We Care" platform <https://ats.net/en/company/corporate-governance/business-ethics/>

Seen and accepted

Name:

Date:

Signature: