

AT&S Code of Ethics and Conduct

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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 in our direct and indirect supply chain. We conduct due diligence in line with this AT&S Code of Ethics and Conduct and assume 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 operates 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 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. This also applies to direct and indirect suppliers, as well as all workers, including temporary, migrant, student, and contract workers, direct employees, and any other type of employment.

Prohibition of Forced Labour

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 must not be any unreasonable restrictions on workers' freedom of movement in the facility; likewise, there must not be 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 substitutions or changes to the employment agreement upon arrival in the receiving country are not allowed, unless these changes are made to meet the 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 the 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 maintains documentation on all leaving workers, and can only hold documentation if necessary to comply with the local law. In this case, at no time will workers be denied access to their documents. Workers should 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 will be repaid to the worker.

Young workers

AT&S prohibits the use of child labour at any stage of manufacturing. The term "child" refers to all persons under the age of 15 or under the minimum age for taking up employment in the respective country, whichever is higher. In Austria this can mean under the age of 14, if a person has fulfilled compulsory schooling, which is in accordance with ILO Convention No. 182. AT&S has implemented an appropriate mechanism to verify the age of workers. Workers under the age of 18 (young workers) are exempt from 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, proper 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 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 higher rates of injury and illness. AT&S does not support working hours exceeding the maximum set by local law. Furthermore, a work week 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. All workers receive equal pay for equal work and qualification. In compliance with local laws, workers are compensated for overtime at pay rates greater than the regular hourly rates. Deductions from wages as a disciplinary measure are not permitted. For each pay period, workers will 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.

Non-discrimination / Non-harassment / Humane Treatment

AT&S does not tolerate any harassment or unlawful discrimination in the workplace. Workers should 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 and disability. Should there be an additional need for accommodation for religious practices and disability, workers are called upon to contact their 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 and collective bargaining

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. In conformance with local law, AT&S respects 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 should 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. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers are allowed to elect and join alternate lawful forms of worker representations.

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, 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 health and 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 identified, 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/tag out), and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers are provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Gender-responsive measures are taken, such as not having pregnant women and nursing mothers 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. AT&S allows workers

to remove themselves from imminent harm and not return until the situation is mitigated, without fear of retaliation.

Industrial hygiene

Worker exposure to chemical, biological, and physical agents is identified, evaluated, and controlled according to the hierarchy of controls. If any potential hazards are 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 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. AT&S provides workers with safe and healthy working environment, which is maintained through ongoing, systematic monitoring of workers' health and working environment. 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.

Machine safeguarding

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

Sanitation, food and housing

Workers are 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 maintained, clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting and adequate conditioned 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. Health information and training includes content on specific risks to relevant demographics, such as gender and age. 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

Across all business functions, 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 obtained, maintained, and kept current and their operational and reporting requirements are followed.

Pollution prevention and resource conservation

Emissions and discharges of pollutants are 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 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 identified, labelled, and managed to ensure their safe handling, movement, storage, use, recycling, or reuse, and disposal. Hazardous waste data are tracked and documented.

Solid waste

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

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 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 has implemented a water management program that documents, characterises, and monitors water sources, use and discharge; and seeks opportunities to conserve water; and controls channels of contamination.

All wastewater is 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 an absolute, corporate-wide greenhouse gas reduction goal and reports against it. Energy consumption and all relevant Scope 1 and 2 - and significant categories of Scope 3,- greenhouse gas emissions are tracked, documented, and publicly reported. AT&S always strives to improve energy efficiency and to minimise its energy consumption and greenhouse gas emission.

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 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 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 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 must 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 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 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, gold and cobalt 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, training, communication, worker / stakeholder engagement and access to remedy, audits and assessments, corrective action process, documentation and records and supplier responsibility.

AT&S meets social responsibilities and to achieve success in the marketplace, the company and their agents uphold the highest standards of ethics including the following:

1) Company Commitment

AT&S has established sustainable governance, environmental, product stewardship, occupational health and safety, supply chain and people and human rights policy statements affirming the company's commitment to due diligence and continual improvement, endorsed by executive management. Policy statements are made public and communicated to workers in a language they understand via accessible channels.

2) Management Accountability and Responsibility

AT&S identifies senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

3) Legal and Customer Requirements

AT&S established a process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

4) Risk Assessment and Risk Management

AT&S established a process to identify the legal compliance, environmental health and safety, labour practice and ethics risks, including the risks of severe human rights and environmental impacts associated with the company's operations. AT&S determines the relative significance for each risk and implements appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5) Improvement Objectives

AT&S has established written performance objectives, targets and implementation plans to improve the company's social, environmental, and health and safety performance, including a periodic assessment of the company's performance in achieving those objectives.

6) Training

AT&S established programs for training managers and workers to implement company's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

7) Communication

AT&S established process for communicating clear and accurate information about the company's policies, practices, expectations, and performance to workers, suppliers, and customers.

8) Worker/Stakeholder Engagement and Access to Remedy

AT&S has established processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process aims to obtain feedback on operational practices and conditions covered by this Code, and to foster continuous improvement. Workers are given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

9) Audits and Assessments

AT&S conducts periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

10) Corrective Action Process

AT&S has established a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

11) Documents and Records

AT&S creates and maintains documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

12) Supplier Responsibility

AT&S established a process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.

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: