

# AT&S Code of Conduct

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AT&S is committed to a high standard of ethical conduct, social and environmental responsibility in accordance with the Responsible Business Alliance (RBA), the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. We believe that respecting the requirements of all our stakeholders is the key to sustainable business.

The purpose of this “AT&S Code of 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 non-employees of the Management Board.

## Memorandum of Understanding about Conduct and Business Ethics

We believe that our [VISION, MISSION](#) and [VALUES](#) act as a steady compass for all our business.

Throughout the [MANAGEMENT](#), and generally as employees of AT&S, we assure conformance to a structured approach for corporate governance according to international guidelines, we commit to our integrated management system and we ensure our leadership for compliance. We avoid conflicts of interests and ensure protection of our assets as well as the non-disclosure of confidential business information. Maintaining accurate accounting books is the base to our self-conception as a respectable merchant.

We care about our [EMPLOYEES](#) by respecting human rights, ensuring humane treatment and taking care of their health and safety. Equal opportunities and protection from discrimination shall be provided to everyone. We motivate our employees and provide an environment of steady training and education. We respect the freedom of association as well as the right to collective bargaining. A reasonable number of working hours with a market-based remuneration is intended to establish a good work-life balance for our employees.

We enforce an [ETHICAL](#) way of business with full customer orientation based on uncompromised integrity and open communication without retaliation. We do not allow offering or demanding improper advantages. We accept and respect intellectual property as well as everyone’s privacy. As a good corporate citizen, we understand ourselves as an important part of our community. We demand the same ethical understanding and behaviour throughout our supply chain including but not limited to responsible sourcing of minerals.

We protect our [ENVIRONMENT](#), ensure an ecologically worthwhile use of resources of all kinds, prevent air emissions, reduce waste and set ambitious targets to constantly reduce our ecological footprint.

We provide best service to our [SHAREHOLDERS](#). We apply the principles of the Organization for Economic Cooperation and Development.

Board of Management



**Table of Contents**

1. Our Vision .....	3
2. Our Mission.....	3
3. Values.....	3
4. Management – We set the highest quality standards in our industry .....	4
4.1. Corporate Governance .....	4
4.2. Integrated Management System .....	4
4.3. Maintaining Accurate Accounting Books .....	4
4.4. Risk Assessment and Risk Management .....	4
4.5. Asset Protection and Non-Disclosure .....	4
4.6. Communication and Training .....	4
5. Employees – We care about people .....	4
5.1. Human Rights and Freely Chosen Employment .....	4
5.2. Humane Treatment and Disciplinary Actions .....	5
5.3. Health and Safety .....	5
5.4. Sanitation, Food, Housing .....	5
5.5. Young Workers .....	5
5.6. Equal Opportunities, Non-Discrimination.....	5
5.7. Freedom of Association and Right to Collective Bargaining.....	5
5.8. Working Hours.....	5
5.9. Remuneration .....	5
6. Ethics – We create value.....	6
6.1. Integrity .....	6
6.2. Conflicts of Interest .....	6
6.3. Open Communication and Non-Retaliation .....	6
6.4. Intellectual Property.....	7
6.5. Privacy.....	7
6.6. Corporate Citizenship .....	7
6.7. Trade Compliance.....	7
6.8. Supply Chain Management.....	7
7. Environment – We reduce our ecological footprint .....	7
7.1. Waste, Hazardous Substances Management and Materials Restrictions .....	7
7.2. Water Management .....	7
7.3. Energy Consumption, Green House Gases and Air Emissions .....	8
7.4. Responsible Sourcing of Minerals .....	8
8. Shareholders .....	8
8.1. Insider Trading.....	8
9. General Information and Contacts .....	8

## 1. Our Vision

### First choice for advanced applications

- Clear USP for all the markets we serve
- Best-in-class interface to the customer
- Innovative, sustainable solutions
- Clear value proposition in the high-end PCB industry
- Identify and anticipate key technological innovations
- Provide value-adding solutions
- Innovation and industrialisation are essential parts of our culture
- We constantly strive to be best in class in all of our processes

## 2. Our Mission

We set the highest quality standards in our industry

We industrialise leading-edge technology

We care about people

We reduce our ecological footprint

We create value

## 3. Values

### Open-Mindedness – We are open to and respect other people’s opinions, perspectives, cultures and new ideas:

We are visionary and innovative to anticipate customers’ needs.

We encourage dialogue and teamwork to grow constantly through openness, feedback and by supporting others.

We promote tolerance and openness in a multicultural environment to meet eye to eye.

### Commitment – We are result-oriented and keep our promises – both create trust:

We preserve integrity in line with our Code of Conduct to ensure sustainable business.

We inspire people to generate enthusiasm and passion.

We are decisive and drive for results to achieve and exceed goals.

### Responsibility – We take ownership of our tasks and face the consequences of our behaviour

We act goal and impact oriented in line with our Vision and Mission to focus on the essential things.

We create an atmosphere of continuous learning and improvement to develop based on an open feedback culture.

We show holistic thinking to ensure sustainability regarding business ethics, environment and social responsibility.

## 4. Management – We set the highest quality standards in our industry

### 4.1. Corporate Governance

AT&S fully commits to a systematic approach to integrate governance structures which identify the distribution of rights and responsibilities among different participants in the corporation, such as the Management Board, Supervisory Board, managers, shareholders, creditors, auditors, regulators, and other stakeholders. AT&S ensures structured systems in terms of rights and equitable treatment of shareholders, interests of other stakeholders, roles and responsibilities of the board, integrity and ethical behaviour, disclosure and transparency.

AT & S Austria Technologie & Systemtechnik Aktiengesellschaft shares have been listed in Austria on the Vienna Stock Exchange since 20 May 2008. In order to qualify for inclusion in the Prime Market, companies must submit a declaration of commitment to comply with the Austrian Code of Corporate Governance. AT&S therefore expressly commits itself and reiterates to comply with the Austrian Code of Corporate Governance.

### 4.2. Integrated Management System

A comprehensive management system is a cornerstone for sustainable corporate governance. In line with the OECD Guidelines for Multinational Enterprises, AT&S has applied ISO 9001, ISO 45001, ISO 14001 and ISO 50001 to ensure a high level of quality, health and safety, environmental and energy standards, respectively. Through the integrated management system, processes are in place to identify and monitor customer requirements, supplier performance and applicable laws and regulations. Assessments, audits, management reviews, maintenance of records and documentation and corrective action plans ensure compliance with the AT&S Code, local laws and regulations.

### 4.3. Maintaining Accurate Accounting Books

AT&S maintains complete and accurate accounting records that are free of errors or potential errors in accordance with legal requirements and the accounting principles applicable to the respective location. All AT&S transactions are to be properly, accurately, truthfully and fairly recorded in the accounting books.

### 4.4. Risk Assessment and Risk Management

Risk and opportunities management is a fundamental part of conducting business within the AT&S Group. AT&S operates a Group-wide risk management system in accordance with the Austrian Code of Corporate Governance, an internal control system in accordance with COSO (Committee of Sponsoring Organizations of the Treadway Commission) standards, as well as internal audit based on the IIA (Institute of Internal Auditors) standard. Thus, legal compliance is ensured and environmental, health and safety and labour practice and ethics risks associated with AT&S's operations are identified and control systems are implemented to mitigate the identified risks.

### 4.5. Asset Protection and Non-Disclosure

Every AT&S employee is responsible for protecting AT&S's assets, which include, but are not limited to, physical assets, such as equipment and buildings, as well as intellectual property such as trade secrets and confidential information, research and development information passwords and access to electronically stored data. Particularly all customer-related business information is fully included in this non-disclosure commitment.

### 4.6. Communication and Training

AT&S attaches high value to reliable and appropriate communication towards its stakeholders and provides communication and training on the provisions of this Code to its employees.

## 5. Employees – We care about people

### 5.1. Human Rights and Freely Chosen Employment

AT&S respects and complies with the principles of international human rights such as the Universal Declaration of Human Rights and the Conventions of the International Labour Organization (ILO). AT&S does not allow or tolerate any form of child labour, forced or bonded labour or any kind of (modern) slavery or human trafficking and does not tolerate working conditions that are in conflict with international or national laws and practices. Each and every employment is voluntary and every employee has the right to resign without penalty after giving a reasonable notice period.

## 5.2. Humane Treatment and Disciplinary Actions

AT&S does not allow or tolerate any behaviour including gestures, language and physical contact, that is harsh, violent, sexually coercive, bullying, public shaming, threatening, abusive or exploitative, and is fully committed to protect its employees against any such behaviour.

Disciplinary actions, if required, are clearly controlled by written procedures and documentation and mutual discussion between the employees and the management.

## 5.3. Health and Safety

AT&S's occupational health and safety management is based on the principle of prevention, providing our employees with a healthy and safe working environment according to industry standards and applicable laws and regulations. AT&S provides its employees with appropriate training in all health and safety relevant areas. Additionally, a company physician is available to support the overall approach in every plant. We fully comply with the ISO 45001 standard to reduce the risk of our employees to the very minimum. The corresponding procedures and management systems to prevent, manage, track and report health and safety related issues including but not limited to emergency preparedness, industrial hygiene including personal protective equipment free of charge, machine safeguarding and physically demanding work are in place and communicated, and training courses are provided to all employees. Pregnant women and nursing mothers are to be protected from working conditions which might jeopardise the mother's or child's health including but not limited to handling of hazardous substances.

## 5.4. Sanitation, Food, Housing

AT&S provides access to clean toilet facilities and potable water. If food and/or dormitories are provided by AT&S, sanitary food preparation and clean and safe accommodation with hot water for showering, adequate lighting and reasonable personal space are provided, respectively.

## 5.5. Young Workers

AT&S does not allow or tolerate any form of child labour, and implements an appropriate mechanism to verify the age of workers. AT&S exclusively supports the employment of persons at the age of 15 in learning programs in accordance with local laws and regulations. Young workers under the age of 18 shall be strictly protected from work that is likely to jeopardise their health or safety, including night shifts and overtime. Through a management system appropriate support and training for all student workers is ensured. The wage rate for student workers, interns and apprentices is in accordance with local law.

## 5.6. Equal Opportunities, Non-Discrimination

We support and encourage diversity in our workforce as well as at our customers and suppliers. We provide equal opportunities for all employees and applicants regarding hiring, wages, promotions, rewards or access to training. AT&S strives to treat all people equally, no matter which age, caste, national origin, religion, disability, gender, pregnancy, sexual orientation, union membership or political affiliation. Medical tests are not used in a discriminatory way and costs for mandatory medical tests are borne by AT&S. In case of any special requirements related to religious practices, please feel free to contact our confidant (see chapter 9).

## 5.7. Freedom of Association and Right to Collective Bargaining

AT&S respects the right of all employees to form and join trade unions of their choice and will follow the results of the respective collective bargaining agreements according to local laws and regulations.

## 5.8. Working Hours

AT&S complies with applicable laws, industry standards and applicable collective bargaining agreements on working hours and overtime compensation. We do not support workweeks of more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers have at least one rest period of a minimum of 24 hours every seven days.

## 5.9. Remuneration

The AT&S Group provides to all employees worldwide a transparent compensation package, which is benchmarked against market and industry standards in the respective local environments and is supposed to stimulate a high level of self-responsibility and entrepreneurship. In any case, AT&S complies with all applicable laws, industry standards and relevant collective bargaining agreements. Accordingly, workers are compensated for overtime in accordance with local laws and regulations. Deductions from wages as a disciplinary measure are not permitted.

## 6. Ethics – We create value

### 6.1. Integrity

AT&S employees shall be straightforward and honest in all professional and business relationships. All employees are requested to cooperate fully with internal investigations. Fair and truthful dealing, advertising and competition shall be the base of all our actions and relationships. All forms of improper advantages promised, offered, authorised, given or accepted by bribery, corruption, collusion, extortion, embezzlement, data manipulation or similar are treated with zero tolerance. All business operations and dealings without exception must be transparently performed and accurately reflected on all business books and records.

### 6.2. Conflicts of Interest

Conflicts of interest may arise unknowingly or occur when personal or family members' interests interfere with the interests of AT&S, or its existing or potential customers or suppliers (collectively referred to as "counterparty"). To avoid conflicts of interest, the following shall be observed:

Employees shall avoid any actual or potential conflict of interest situation. Examples of such conflicts of interest include but are not limited to:

- working on AT&S business where the counterparty is your existing, or was your previous, employer, or involves a member of your family (i.e. your spouse, partner, parents, children and their respective partners)
- you or a member of your family has an ownership or management interest in a counterparty.

If there is uncertainty about whether a conflict of interest exists, or how a conflict of interest should be handled, the employee must disclose in writing all relevant information to his/her superior (or another superior who is not subject to a conflict of interest) and the AT&S Compliance Manager.

Furthermore, when carrying out AT&S business, employees shall never directly or indirectly offer, request or accept, nor make agreements herewith for, any bribes and/or iniquitous or illegal interests, benefits, kickbacks, gifts and gratuities, entertainment, transportation and accommodation. Acceptance of occasional gifts or benefits of immaterial or purely symbolic value is permissible. AT&S employees shall comply with all applicable laws and internal regulations and reflect their behaviour based on the AT&S values and this Code of Conduct, including respecting the codes of conduct of our counterparties.

No employee shall operate in any other business that competes with AT&S. All ancillary activities, participations and consulting activities which operate in the business field of AT&S have to be approved by the management of AT&S. Any self-employed commercial activities are to be reported to AT&S. For any unclear situation, concerns or questions related to a possible conflict of interest, we ask and encourage you to contact the Compliance Officer to clarify any such matter.

### 6.3. Open Communication and Non-Retaliation

AT&S respects, encourages and values free exchange of thoughts, ideas, concerns and questions. We provide a communicated process for our personnel to be able to raise any concerns without fear of retaliation. Any attempts or real kinds of retaliation against employees who report or ask questions about possible violations of laws, procedures or regulations will be disciplined. Any concerns raised by employees will be handled confidentially and the identity of whistleblowers will not be disclosed and treated anonymously if this is legally possible.

To ensure anonymity whistleblowers may use the "AT&S – We Care" platform for reports of compliance violations, which is available at <https://www.bkms-system.net/ATS>. This platform has been established to give employees and external third parties the possibility to report violations of compliance requirements related to AT & S Austria Technologie & Systemtechnik Aktiengesellschaft and its worldwide affiliated companies ("AT&S"). The platform is safe for data protection and – if chosen by the whistleblower – also allows anonymous reporting (although AT&S encourages whistleblowers to state their name). Specifically trained examiners will investigate reports in a confidential manner, and the identity, if disclosed, will not be revealed. Whistleblowers can be assured that submitting reports related to actual or potential serious compliance violations containing true information, in good faith, will not result in negative consequences. Any kind of defamation, misinformation or other abuse of this platform is absolutely unacceptable. Please use this platform in a responsible way. Trust and collaboration are vital for AT&S!

#### 6.4. Intellectual Property

Intellectual property rights are crucial to develop new products and ideas. We respect all kinds of intellectual property rights and confidential information of third parties and protect our intellectual property. Transfer of technology and know-how is to be done in a manner that protects our and others' intellectual property rights. Customer information is to be safeguarded.

#### 6.5. Privacy

AT&S commits to protect the personal information of everyone we do business with, including suppliers, customers, consumers and employees. We comply with privacy, information security and general data protection laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

**6.6. Corporate Citizenship**  
AT&S accepts its responsibility as a corporate citizen in the communities in which the company runs operations and is committed to open communication with its stakeholders. AT&S agrees to unconcealed dialogues with all authorities, social and public interest groups.

#### 6.7. Trade Compliance

AT&S is committed to complying with all applicable import and export laws and regulations in the countries where we do business.

All employees are obliged to take notice of internal communications and procedures regarding sanctions and import-export restrictions affecting our business. Where an AT&S employee knows or suspects that parts, materials, or services are sourced from persons or entities in breach of or the sale or transportation of AT&S products or services are in breach of any sanctions requirements, the employee must notify the applicable line manager and such responsible managers as determined by AT&S through its trade compliance and export control regulations.

#### 6.8. Supply Chain Management

AT&S is committed to ensure with appropriate measures (e.g. audits) that working conditions along the AT&S supply chain are safe, that workers are treated with respect and dignity, that the use of temporary, dispatched or outsourced labour is within the limits of local law and that manufacturing processes are environmentally responsible. Therefore all our suppliers and their subcontractors are expected, in all of their activities, to operate and behave in full compliance with the "AT&S Supplier Code of Conduct". Furthermore, we expect our suppliers to fulfil the requirements of the RBA – Responsible Business Alliance in the latest version, or comparable standard, and to respect the laws, rules, and regulations of the countries in which they operate. Suppliers have to ensure that these principles also apply to their sub-suppliers.

## 7. Environment – We reduce our ecological footprint

Environmental protection, ISO 14001 certification for all production facilities and a pro-active approach, is high on the management agenda of AT&S. It is the objective of the company to combine the factors of quality, environment and human beings in an integrated management system, aiming at a sustainable economic success.

AT&S constantly strives to improve its environmental performance and provides information on reduction targets and performance to the public within the non-financial report.

AT&S encourages all employees to responsibly use available resources. The contribution of every single person is required to prevent waste of water, energy, and material during our daily business. Everyone's caretaking about his/her direct surrounding can already reduce extensive use of resources and limit the consumption to a reasonable amount.

#### 7.1. Waste, Hazardous Substances Management and Materials Restrictions

AT&S has implemented a waste management concept and dedicated waste managers on every site to maintain the high-set level of identifying, managing, reducing and responsible disposing of the solid waste stream.

AT&S provides a holistic approach to identify, label and manage chemicals and other materials posing a hazard to humans or the environment in order to ensure their safe handling, movement, storage, use, recycling or reuse and disposal. AT&S adheres to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing.

#### 7.2. Water Management

AT&S is committed to a water management which includes the documentation, characterisation and monitoring of water sources, especially the use and discharge of water. Furthermore, AT&S seeks opportunities to conserve water where vital and to



control channels of contamination. In order to meet the local requirements, a routine monitoring of the performance of wastewater treatment and containment systems is executed to ensure optimal outcome and regulatory compliance.

### 7.3. Energy Consumption, Green House Gases and Air Emissions

AT&S fully complies with all legal requirements on air emissions and constantly strives to reduce emissions and environmental impact of operations, and established a corporate-wide greenhouse gas reduction goal. AT&S has set up a control system regarding the tracking and documentation of energy consumption and all relevant Scope 1 and 2 greenhouse gas emissions

### 7.4. Responsible Sourcing of Minerals

AT&S has a policy to reasonably assure that the tantalum, tin, tungsten, cobalt and gold in the products we manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in known conflict areas. AT&S exercises due diligence on the source and chain of custody of these minerals. AT&S exercises due diligence regarding the origin and chain of custody of these raw materials and is committed to the RMI (Responsible Minerals Initiative) which acts in accordance with the United Nations and OECD Guidelines for Multinational Enterprises.

## 8. Shareholders

### 8.1. Insider Trading

AT&S, as a company listed at the Vienna Stock Exchange, acknowledges its responsibility to prevent the abuse of its compliance-relevant or inside information by appropriate measures and in accordance with the applicable laws and regulations, and also respects laws and insider rules that might apply to other parties, such as customers or suppliers. All employees are therefore required to arrange their conduct in this regard accordingly.

We consider any information that is not public “compliance-relevant” or “inside information” if an investor would see such information as substantial for his or her investment decision. It is strictly forbidden to misuse compliance-relevant or inside information and to buy shares, sell shares, or to advise the purchase or sale of shares using such information. Compliance-relevant information or inside information has to be handled in strict confidence. With regard to its financial instruments, AT&S has adopted the more specific “Capital Market Compliance Directive”, which applies to all companies within the AT&S Group and all employees, in particular to persons working in defined confidentiality areas, and also provides more detailed instructions, guidelines and support in order to ensure compliance with capital market laws and regulations. In case of any questions or concerns, AT&S Capital Market Compliance Officers shall be contacted.

## 9. General Information and Contacts

Integrity is a key value for AT&S. We care about proper conduct of our business and we are obliged to detect, investigate and react appropriately to any relevant offence to protect AT&S and its employees! Therefore, we encourage you to report misconduct when witnessed.

Questions and concerns about the application or interpretation of this Code of Conduct, as well as potential violations need to be reported to superiors. Any practice or act which is inconsistent with this Code must be corrected, in serious cases disciplinary actions have to follow.

There will be no adverse consequences as a result of an employee acting in good faith and reporting potential or specific violations related to the Code of Conduct as already committed and agreed in our “Open Communication and Non-Retaliation” clause.

If an AT&S employee is not sure what is the right thing to do in a specific case, or if an employee has discovered a case of possible misconduct, or an employee has any special requirements related to religious practices, there are many sources of information available to help and various options to report, including the employee’s superior, the “local HR Management”, the “Compliance Officer” as well as the “Corporate Sustainability Manager”. Any concerns raised by employees will be handled strictly anonymously and confidentially. To ensure anonymity, whistleblowers may use for reports of compliance violations the “AT&S – We Care” platform, available at <https://www.bkms-system.net/ATS>.





**Acknowledged and agreed**

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_