

Code of Conduct

Aluminium-Werke Wutöschingen AG & Co. KG, together with its Board of Directors, management team and staff (hereinafter known as "AWW") undertake to manage the company in a socially responsible manner. They actively work towards this, in particular to act ethically and legally at all times in the areas of working conditions, social and environmental tolerance, competition and transparency by observing, complying with and supporting the values and principles set out below.

1. Compliance with laws

We comply with current laws and other legal regulations in the countries in which AWW is active.

2. No corruption or bribery

AWW does not tolerate any corruption or bribery in the sense set out in the "United Nations Convention against Corruption valid from 14 December 2005".

3. Fair competition

We comply with the rules of fair competition and cartel law; AWW shall support ethically and legally fair competition in its dealings with rivals.

4. Observance of the basic rights of employees

- AWW bases its actions on ethical values and principles and therefore supports equal opportunities and equal treatment of employees notwithstanding their sex or age, their ethics and nationality, their social and cultural origin, any disabilities, sexual orientation, political or religious convictions.
- AWW respects the rights of employees to freedom of association, freedom of assembly and to collective and wage-bargaining negotiations as long as this is legally permitted and possible in the country concerned.
- AWW supports human rights. It complies with the human rights set out in UN Charter of Human Rights (Universal Declaration of Human Rights, UN Resolution A (III) of 1948).
- AWW respects private life and the personal rights of every individual.
- It upholds the health and safety of its employees and provides a safe and healthy working environment to prevent accidents and injuries.
- AWW protects its employees from physical punishment and from physical, sexual, mental or verbal bullying or abuse and prevents forced labour.
- AWW upholds the right of freedom of opinion and the right to express such opinions.
- AWW guarantees to comply with working standards relating to remuneration and in particular relating to the level of remuneration and maximum working hours set out in current laws and regulations.

5. Child labour

AWW complies with the ban on child labour, in other words the employment of people below the age of 15 unless local regulations specify a higher limit and no exceptions are permitted (Conventions No. 138 of 1973 and No. 182 of 1999 of the International Labour Organization (ILO)).

6. Protecting the environment

- AWW complies with the provisions and standards of the relevant environmental protection regulations and acts in a green manner.
- It treats natural resources responsibly.
- It strives to minimise pollution and to continuously improve its environment protection procedures.

7. Data protection

AWW will comply with all relevant laws and guidelines for the collection and processing of personal data.

8. Business partners

- AWW undertakes to promote compliance with this code of conduct with its suppliers and other business partners wherever possible and where there is scope to do so and
- to promote the principles of equal opportunities in its selection of business partners and in its dealings with them.

Wutöschingen, 16 January 2015

BOARD OF DIRECTORS OF ALUMINIUM-WERKE WUTÖSCHINGEN AG & CO.KG

Burghard von Westerhold

Frank Aehlen