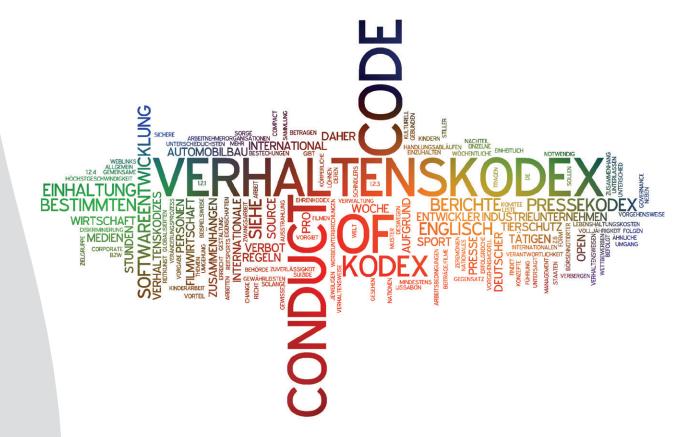


# **Code of Conduct**

- Blast machines
- Second-hand machines
- Conveyor systems
- Service and spare parts



#### **Preamble**

Our actions are in accordance with the applicable legal framework as well as a responsible basic ethical understanding, which are formulated in this Code of Conduct.

## 1. Basic understanding

This Code of Conduct is based on a common basic understanding of socially responsible corporate governance in the sense of the following guidelines. We assume responsibility within the framework of our respective possibilities and scope of action by taking into account the consequences of our entrepreneurial decisions and actions in legal, economic, technological as well as social and ecological terms. In this way, we contribute to the social and economic development of the countries and regions in which we operate.

Our actions are in accordance with the relevant legal regulations. We are guided by ethical values and principles, in particular integrity and probity as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the core labour standards of the International Labour Organization (ILO) as well as the United Nations Guiding Principles on Business and Human Rights.

This Code of Conduct sets out the basic principles of our actions, which we actively demand our employees worldwide to observe. The contents apply in all branches and business units of our company. We expect the same basic understanding from our business partners. It is not intended to create rights in favour of third parties.



## 2. Compliance with the law

Compliance with the applicable laws and other legal provisions of the countries in which we operate is a matter of course for us. If local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct. In cases where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, local law shall prevail. However, we will endeavour to comply with the contents of this Code of Conduct.

## 3. Integrity and compliance

We have taken appropriate Compliance<sup>1</sup> measures so that the following topics are adequately covered:

#### 3.1 Corruption

We do not tolerate corruption, bribery or extortion; they prevent fair conditions of competition.

Benefits which are connected with the intention or could give the appearance of influencing business decisions or procuring any other inadmissible advantage are neither promised, offered, granted, demanded or accepted in our business relationships nor do we allow ourselves to be promised such benefits. A particularly strict standard must be applied in dealings with persons to whom special criminal and liability regulations apply (e. g. public officials).

<sup>&</sup>lt;sup>1</sup> Compliance stands for the observance of legal requirements, regulatory standards, voluntary commitments and internal guidelines.





#### 3.2 Fair competition

We act in accordance with competition and cartel law and do not participate in price fixing, market sharing or customer, market or bid rigging.

#### 3.3 Money laundering prevention

Money laundering refers to the process of smuggling illegally generated money or illegally acquired assets into the legal financial and economic cycle. We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

#### 3.4 Protection of information and intellectual property

We protect confidential information and respect intellectual property; technology and know-how transfers shall be made in a manner that protects intellectual property rights and customer information, trade secrets and non-public information from misuse, mishandling, counterfeiting (plagiarism), theft, fraud or unauthorised disclosure. We comply with applicable trade secret laws and treat confidential information of our business partners accordingly.

#### 3.5 Data protection

We process, store and protect personal data in compliance with legal regulations. Thus, personal data is collected confidentially, only for legitimate, previously defined purposes and in a transparent manner. We only process personal data if it is protected against loss, modification and unauthorised use or disclosure by appropriate technical and organisational measures.

#### 3.6 Export control

We undertake to comply with the relevant legal standards for export control - in particular licensing requirements, export and support prohibitions - in the context of the transfer and export of our goods.

#### 3.7 Avoidance of conflicts of interest

We avoid internal and external conflicts of interest that could illegitimately influence business relationships. If this is not successful, we disclose these conflicts.





## 4. Health and safety

We safeguard the health of our employees by taking appropriate health and safety measures that adequately cover the following topics:

- Compliance with applicable laws and orientation towards international standards in terms of health and occupational safety;
- Appropriate workplace design, safety regulations and provision of suitable personal protective equipment;
- Implement preventive controls, emergency measures, an accident reporting system and other appropriate continuous improvement measures;
- Enable access to drinking water in sufficient quantity as well as access to clean sanitation facilities for staff.

We ensure that all our employees are properly instructed.

## 5. Remuneration and working hours

Remuneration is based on the applicable laws and is supplemented by the relevant national minimum wage laws

Employees are informed clearly, in detail and regularly about the composition of their pay. We comply with applicable laws and (international) labour standards regarding maximum permissible working hours.





## 6. Respect for human rights

We respect and support the observance of internationally recognised human rights and

- respect the personal dignity, privacy and personal rights of each individual;
- protect and grant the right to freedom of opinion and expression;
- do not tolerate unacceptable treatment of employees, such as physical and psychological hardship, sexual and personal harassment or discrimination.

#### 6.1 Prohibition of child labour

We do not tolerate child labour. We do not hire employees who do not have a minimum age of 15 years and ask for proof of age. In countries covered by the developing country exemption under ILO Convention 138, the minimum age may be reduced to 14 years. We do not hire employees for hazardous work who do not have a minimum age of 18 years according to ILO Convention No. 182.

#### 6.2 Prohibition of forced labour

Forced labour, modern slave labour or comparable measures that deprive people of their freedom are prohibited. All work must be voluntary and there must be the possibility to terminate the employment relationship.

#### 6.3 Freedom of association and collective bargaining

We respect the right of workers to freedom of association, freedom of assembly and collective bargaining to the extent that this is legally permissible and possible in the respective country in which we operate. If this is not permissible, we seek appropriate compromises for our employees.

## 6.4 Promoting Diversity and Diversity, Equal Opportunities

We promote equal opportunities and do not tolerate discrimination. We treat all people equally, regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, world view or other personal characteristics.





# 7. Environment, energy and climate protection

We act in accordance with applicable laws and follow international standards to minimise negative impacts on the environment and continuously improve our activities for environmental and climate protection.

### 8. Dealing with conflict minerals

In the future, we will take due diligence measures to avoid the use of conflict minerals in our products in order to prevent human rights violations, corruption and funding of armed groups or similar.

## 9. Supply chain

In future, we expect our suppliers to comply with the principles of this Code of Conduct or to apply equivalent codes of conduct. We will also encourage them to enforce the contents of this Code of Conduct in their supply chains. We reserve the right to check the application of this Code of Conduct by our suppliers systematically and on an ad hoc basis. This may take the form of questionnaires, assessments or audits. If there are still doubts regarding compliance with this Code of Conduct, the supplier will be requested to take appropriate countermeasures and to report the matter to the responsible contact in our company. If necessary, the cooperation will be terminated.

### 10. Consumer interests

As far as consumer interests are concerned, we comply with consumer protection regulations and appropriate sales, marketing and information practices. Particularly vulnerable groups (e.g. young people or pregnant women) enjoy increased attention.





# 11. Implementation and enforcement

In the future, we will make appropriate and reasonable efforts to continuously implement, document and apply the principles and values described in this Code of Conduct. All employees will be sensitised to the contents of the Code of Conduct and trained on relevant topics as required. Violations of the Code of Conduct will not be tolerated and may lead to consequences under labour law.

#### 11.1 Communication

We will communicate the requirements of this Code of Conduct and its implementation to employees, customers, suppliers and other stakeholders in an open and dialogue-oriented manner.

#### 11.2 Indications of violations

We offer our employees and business partners access to a protected mechanism to confidentially report possible violations of the principles of this Code of Conduct.

If you have any information, please contact the following person/office directly or anonymously:

Antonius Heitmann Managing Director info@agtos.de +49 2572 96026-0

## 12. Signature

Emsdetten, 08 February 2022

Place, date

#### **AGTOS**

Gesellschaft für technische Oberflächensysteme mbH Gutenbergstr. 14 48282 Emsdetten

Stamp of the company



Signature of the authorised signatory (Antonius Heitmann)

#### **AGTOS**

Gesellschaft für technische Oberflächensysteme mbH

Gutenbergstr. 14 48282 EMSDETTEN GERMANY



## **Competence in Wheel Blasting Technology**



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