



Code of Conduct for AGU and Suppliers

We require our suppliers to comply with the guidelines set forth in this document.

Our company is committed to strictly adhering to the Code of Conduct in all of its processes and actions. For this reason, as a supplier within the supply chain, you are also required to comply.

Our company operates in a sustainable and fair manner.

Management

Contents

1.	Ethics	3
1.1	Integrity in Business Transactions.....	3
1.2	Conflicts of Interest	3
1.3	Establishing channels for reporting unlawful conduct	3
1.4	Fairness in Competition	3
1.5	International Trade Controls.....	4
1.6	Protection of Confidential Information and Intellectual Property Rights	4
1.7	Confidentiality and Data Protection	4
2	Interacting with Employees and Other People	4
2.1	Prohibition of Child Labor	4
2.2	Freedom of Employment	4
2.3	Freedom of Association	5
2.4	Working Hours, Wages, and Other Benefits.....	5
2.5	Inclusion and Diversity	5
2.6	Fair Treatment	5
2.7	Local Population.....	6
3	Health, Safety, and Environmental Protection	6
3.1	Occupational Health and Safety	6
3.2	Process safety	6
3.3	Product Safety	7
3.4	Precautionary principle in environmental protection	7
3.5	Promoting greater environmental responsibility	7
3.6	Promotion of environmentally friendly technologies	7
4	Quality.....	8



4.1	Quality requirements	8
4.2	Protection measures and measures against product counterfeiting.....	8
5	Governance and management-systems.....	9
5.1	Legal and other requirements.....	9
5.2	Obilgation and Responsibility	9
5.3	Communication of sustainability principles in the supply chain.....	9
5.4	Systems, Documentation and Evaluation.....	9
5.5	Risk Management	9
5.6	Business Continuity	9
5.7	Continuous improvement.....	10
5.8	Training and Competencies.....	10
5.9	Transparency and control.....	10
5.10	Right to reviews.....	10

1. Ethics

We are committed to ethical conduct and integrity as a company in order to fulfill our social responsibility. We expect the same from our suppliers. This includes the following aspects:

1.1 Integrity in Business Transactions

Suppliers must prohibit, refrain from engaging in, and not tolerate corruption, extortion, embezzlement, misappropriation, and money laundering in any form. Suppliers may not offer or accept bribes or other unlawful inducements (e.g., kickbacks) in their business dealings with business partners or public officials. Suppliers must not offer AGU employees any gifts or other benefits for personal gain that could be construed as bribery. Gifts or hospitality must not, under any circumstances, be used to unfairly influence a business relationship and must not violate applicable laws or ethical standards.

1.2 Conflicts of Interest

Suppliers must inform AGU of any situation that could lead to a conflict of interest, such as when AGU employees derive professional, personal, and/or significant financial benefits or hold an ownership interest in a supplier's company.

1.3 Establishing channels for reporting unlawful conduct

Suppliers must promote and establish reporting channels for their employees through which they can file complaints or report possible unlawful conduct without fear of reprisal, intimidation, or harassment. Every report shall be treated confidentially. Suppliers must conduct investigations based on the reports and take action as necessary. They must notify AGU of any legal proceedings, administrative investigations, or criminal prosecutions that could interfere with their work for AGU or damage their own reputation or that of AGU. If a supplier or one of its employees believes at any time that an AGU employee has violated these principles, the supplier or its employee should report their concerns to [info\(at\)agu.de](mailto:info(at)agu.de).

1.4 Fairness in Competition

Suppliers must compete fairly and comply with applicable antitrust laws.



1.5 International Trade Controls

Suppliers must comply with the export control regulations applicable to their business and, when required, provide customs and other authorities with accurate and truthful information regarding such regulations.

1.6 Protection of Confidential Information and Intellectual Property Rights

Suppliers must use confidential information appropriately and protect it accordingly. Suppliers must ensure that sensitive data and the applicable intellectual property rights of their own employees and business partners are protected. Suppliers may not use the name or trademarks of AGU, our subsidiaries, or our products for promotional purposes without AGU's prior written consent.

1.7 Confidentiality and Data Protection

Suppliers' information systems that contain confidential information or data belonging to AGU must be properly managed and protected against unauthorized access and the unauthorized use, disclosure, alteration, or destruction of the data. Suppliers may collect personal information only for legitimate business purposes, use it only in a legal, transparent, and secure manner, and disclose it exclusively to authorized individuals. They must protect the information in accordance with security regulations, retain it only for as long as necessary, and require third parties with access to personal information to protect it.

2 Interacting with Employees and Other People

We are committed to treating our employees fairly and with respect and to upholding human rights. We expect the same from our suppliers. This includes the following aspects:

2.1 Prohibition of Child Labor

We prohibit child labor in our supply chain. Suppliers must prevent any form of child labor within their organizations.

The definition of child labor is based on the International Labor Organization's core labor standards and the principles of the UN Global Compact. If local law prescribes a higher legal minimum age for workers or a longer period of compulsory education, the higher age applies.

2.2 Freedom of Employment

We do not tolerate slavery, servitude, or forced labor in any form whatsoever, nor human trafficking in our supply chain.

Similarly, debt bondage, indentured servitude and involuntary prison labor are not accepted. Practices such as withholding personal property, passports, wages, educational certificates, work permits, or other documents for unreasonable reasons are unacceptable.



2.3 Freedom of Association

Suppliers must maintain open and constructive communication with their employees and employee representatives.

In accordance with local laws, suppliers must respect the right of employees to freely associate, form and join labor unions, appoint employee representatives, establish a works council, and participate in collective bargaining.

Suppliers must not discriminate against employees who serve as employee representatives, so that they can perform their duties without fear of reprisal or discrimination.

2.4 Working Hours, Wages, and Other Benefits

Suppliers must comply with the applicable legal regulations and the ILO standards regarding working hours.

Compensation must be paid to employees regularly, on time, and in full accordance with applicable laws and must comply with applicable national laws on compensation. Compensation and other benefits should enable employees and their families to maintain an adequate standard of living. Wage reductions as disciplinary measures are permitted only in accordance with applicable national law; this does not affect any potential claims for damages based on contractual or statutory grounds. Suppliers are expected to offer their employees fair and competitive compensation and other benefits and to advocate for equal pay for work of equal value.

It is recommended that suppliers offer their employees appropriate opportunities for continuing education and professional development.

2.5 Inclusion and Diversity

Equal treatment of all employees must be a fundamental principle of suppliers' corporate policies.

Discriminatory behavior typically — whether intentional or unintentional — relates to irrelevant personal characteristics such as age, disability, ethnic origin, marital status, gender, gender expression and identity, genetic information, national origin, physical characteristics, political affiliation, pregnancy, religion, social background, sexual orientation, union membership, or any other unlawful criterion. Suppliers must ensure that their employees are not harassed in any way. AGU encourages suppliers to create an inclusive and supportive work environment by prioritizing diversity in their hiring practices.

In addition, AGU encourages its suppliers to maintain an active supplier diversity program that supports collaboration with companies with diverse ownership structures.

2.6 Fair Treatment

Suppliers must treat their employees fairly, ensuring an environment free from sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion, and verbal abuse, as well as from the threat of such treatment. Furthermore, suppliers are expected not to terminate employment contracts without cause and not to deem the termination of an employment contract based on an employee's performance lawful without presenting clear evidence. Employees are free to decide when to leave their employment, subject to statutory notice periods. They must be compensated promptly



and in full for work performed prior to leaving the company in accordance with applicable laws.

2.7 Local Population

Suppliers should take responsibility for the communities in which they operate by addressing residents' concerns and ensuring healthy and safe living conditions. They are encouraged to create jobs, engage in local procurement, provide training and continuing education opportunities, and support infrastructure development at the local level.

3 Health, Safety, and Environmental Protection

We are committed to protecting the health and safety of our employees. We also strive to act in an environmentally responsible manner and to conserve resources. We expect the same from our suppliers. This includes the following aspects:

3.1 Occupational Health and Safety

Suppliers must adequately protect their employees from chemical, biological, and physical hazards. Physically demanding tasks and workplace conditions, as well as risks arising from the use of workplace infrastructure, must be managed in such a way that employees are protected from hazards.

Suppliers must ensure appropriate controls, safe work procedures, proper maintenance, and the necessary technical safeguards to reduce health and safety risks in the workplace and to prevent accidents and occupational diseases. In addition, suppliers must provide their employees with appropriate protective clothing. Safety information regarding identified workplace hazards or hazardous substances — including components in intermediate products — must be made available to employees for training and protection purposes. Minimum requirements for a safe and healthy work environment include the provision of drinking water, adequate lighting, appropriate room temperature, good ventilation, sanitary facilities, and, where applicable, safe and healthy company housing.

3.2 Process safety

Suppliers must implement safety programs to manage and maintain their work processes in accordance with applicable safety standards. These programs must be tailored to the facility and the process risks. Suppliers must appropriately communicate, disclose, and control risks inherent in their processes and products to ensure that affected or potentially affected third parties are protected. In addition, major incidents must be analyzed and communicated in a timely manner. For hazardous facilities and processes, suppliers must regularly conduct specific risk assessments and implement measures to prevent incidents such as chemical spills, fires, or explosions.



3.3 Product Safety

Suppliers must comply with product safety regulations, properly label their products, and communicate the requirements for handling the products. They must provide the relevant parties, as needed, with the applicable documentation containing all necessary safety-related information regarding all hazardous substances. This includes product information, safety data sheets, registration and approval confirmations, uses, and exposure scenarios. Suppliers should proactively and transparently share information with all relevant parties regarding the health, safety, and environmental aspects of their products.

3.4 Precautionary principle in environmental protection

Suppliers apply the precautionary principle regarding environmental and climate risks. Appropriate preventive measures are taken as soon as there is a reasonable suspicion of potential serious or irreversible environmental impacts, even in the absence of full scientific certainty.

3.5 Promoting greater environmental responsibility

Suppliers continuously reduce their environmental and climate impacts. This includes reducing greenhouse gas emissions, energy and water consumption, waste, and air emissions, as well as protecting biodiversity and natural resources. Measurable targets and improvement programs are to be implemented.

3.6 Promotion of environmentally friendly technologies

Suppliers foster the development, introduction, and dissemination of environmentally friendly technologies, materials, and processes. Investment decisions are to take into account improvements in energy efficiency, the circular economy, resource conservation, and emission reduction.

4 Quality

We have committed ourselves to high standards regarding the quality, safety, and effectiveness of our products and services, in compliance with applicable laws and regulations. This encompasses the following aspects:

4.1 Quality requirements

Suppliers must meet generally recognized quality standards or contractually agreed quality requirements in order to provide goods and services that consistently satisfy the needs of AGU and its customers, deliver the promised performance, and are safe for their intended use. Suppliers must promptly address any critical issues that could negatively affect the quality of the goods and services. Suppliers must inform AGU of changes to the manufacturing or delivery process if these could impact the specifications of the goods supplied or services provided.

4.2 Protection measures and measures against product counterfeiting

Suppliers must meet generally recognized quality standards or contractually agreed quality requirements in order to provide goods and services that consistently satisfy the needs of AGU and its customers, deliver the promised performance, and are safe for their intended use. Suppliers must promptly address any critical issues that could negatively affect the quality of the goods and services. Suppliers must inform AGU of changes to the manufacturing or delivery process if these could impact the specifications of the goods supplied or services provided.

5 Governance and management-systems

We are committed to an effective management structure that supports compliance with applicable laws within our company and fosters continuous improvement regarding the expectations set out in this Code of Conduct. We require the same of our suppliers. This encompasses the following aspects:

5.1 Legal and other requirements

Suppliers must be aware of and comply with all applicable international, national, and local laws and regulations, contractual agreements, and internationally recognized standards. Furthermore, suppliers must align their practices with generally accepted industry standards, obtain and maintain all applicable permits, certificates, licenses, and authorizations, and conduct their operations at all times in accordance with the restrictions and requirements of such authorizations.

5.2 Obligation and Responsibility

Suppliers must comply with the principles set out in this Code of Conduct by providing appropriate resources within their companies and incorporating all applicable principles into their policies and procedures.

5.3 Communication of sustainability principles in the supply chain

Suppliers must also implement the sustainability principles set out in this Code of Conduct within their upstream supply chain.

5.4 Systems, Documentation and Evaluation

Suppliers must develop, implement, apply, and maintain management systems and controls related to the content of this Supplier Code of Conduct. They must possess the necessary documentation to demonstrate compliance with the principles of this Code of Conduct.

5.5 Risk Management

Suppliers must implement mechanisms for the regular identification, assessment, and management of risks in all areas covered by this Supplier Code of Conduct and with reference to all applicable legal requirements.

5.6 Business Continuity

Suppliers are encouraged to develop appropriate business continuity plans for the operational activities that support AGU's business.



5.7 Continuous improvement

Suppliers must demonstrate their commitment to continuous improvement by setting performance targets, executing implementation plans, and taking the necessary measures to rectify deficiencies identified during internal or external audits, inspections, and management reviews.

5.8 Training and Competencies

Suppliers should develop, implement and maintain appropriate training to provide their managers and employees with an adequate understanding of the principles of this Code of Conduct that apply to them, as well as applicable laws, regulations and generally accepted standards.

5.9 Transparency and control

Suppliers are encouraged to report externally on their impacts on the economy, society, and the environment in accordance with the principles set out in this Supplier Code of Conduct.

5.10 Right to reviews

Suppliers grant AGU the right to assess their sustainability performance, subject to reasonable advance notice, in order to evaluate the supplier's compliance with the principles of AGU's Code of Conduct. The assessment is conducted directly by AGU or by a qualified third party, for example in the form of an evaluation or audit.