

Part 1 Policy and Strategy		
Section	Vision , Mission and Strategy	
Number of procedure	BES 007 ESG	Date 4-12-2023
Name of procedure	Business Conduct and Ethics	Revision number 2
Reason for change	Text added	



ALT Technologies Business Conduct and Ethics Policy

1. Human Rights & Working Conditions

- **Health, Welfare and Safety.**

ALT Technologies ensures the health, welfare and safety of employees and visitors, by providing awareness, support, training, and the necessary tools to identify and mitigate potential health hazards and risks, maintaining compliance with all applicable local regulatory requirements.

- **Child Labour and Forced Labour.**

Child labour is not tolerated, and the age of employment is in accordance with locally legally established minimum ages in the country where work is performed and shall be complied with. Any forms of physically abusive disciplinary practices are not tolerated, nor are any forms of forced, compulsory or involuntary labour, including human trafficking or Slavery.

- **Ethical recruiting.**

ALT Internal resourcing staff comply with all relevant legislation, statutory and non-statutory requirements.

- **Women's rights.**

ALT acknowledge that women's rights are human rights. As stated in the United Nations'1948 Universal Declaration of Human Rights, all humans are "born free and equal in dignity and rights". As such, ALT is committed to providing liberty, dignity, and equal rights to all their workers, regardless of gender.

- **Rights of minorities and indigenous peoples.**

ALT recognizes that certain groups of individuals may be particularly vulnerable to adverse impacts from discrimination, including indigenous people, national or ethnic, religious and linguistic minorities, children, LGBTQ+ people, people with disabilities, and migrant workers and their families. ALT is committed to respecting the rights of these individuals.

- **Diversity, Equity and Inclusion**

Diversity refers to the characteristics that encompass race, nationality, religion, beliefs, disabilities, gender, age, origin, sexual orientation, gender identity, values, work style, and activities. ALT believe it is important to not only respect diversity and promote an inclusive organizational culture, but also to understand each individual is different and we need to support and provide fair access, opportunity, and advancement that recognizes these differences. ALT values different perspectives and backgrounds as we conduct our business activities globally. ALT promotes diversity across our Group by ensuring an inclusive work environment and by recruiting, hiring, training and promoting employees from diverse backgrounds.

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- **Fair Working Conditions.**

Working conditions, working hours and compensation are fair and comply with regulations in the country where work is performed; complying with national provisions and agreements applicable to regulating working hours, minimum wages, overtime and Leave compensation, and legally mandated benefits.

- **Non-Harassment and Non-Discrimination**

ALT Technologies acts with integrity and fairness and does not tolerate harassment or discrimination on any basis, in accordance with applicable laws and regulations, including but not limited to age, race, religion or personal belief, colour, gender, gender identity, disability, national origin, marital status/parental status, pregnancy status, sexual orientation, or any other characteristic prohibited by law or otherwise irrelevant for the position. This principle extends to all decisions relating to hiring, promotion, transfer, recruitment, termination, benefits, rates of pay, and other forms of compensation or benefits provided.

- **Freedom of Association & Collective Bargaining**

ALT Technologies respects employees' freedom to join or not to join a labour union in accordance with local law. The rules of the various trade union organizations representing employees are recognized, as is an employee's right to be represented or not represented by trade unions or other representatives established in accordance with local legislation and practice.

- **Conflict Minerals**

ALT Technologies ensures responsible procurement in the Democratic Republic of Congo (DRC) in the extraction and trade of ores of tantalum, tin, tungsten, and gold ("Conflict Minerals") through abstaining from the procurement or usage of materials which are unlawful, or which are obtained through unethical or otherwise unacceptable means. As a matter of responsible sourcing, ALT Technologies will use best efforts for their suppliers not to acquire any raw materials that ALT Technologies has a reason to believe originate from the Democratic Republic of Congo or adjoining countries unless such materials are certified as "conflict free".

2. Environment & Sustainability

ALT conducts business in an environmentally friendly and responsible manner, taking a precautionary approach to environmental challenges by designing and developing products that consider the impact they have on the environment and the potential to re-use and recycle them. ALT complies with all applicable environmental laws and regulations and promptly develop and implement plans or programs to correct any non-compliant practices conform ALT Environment, Health, Welfare and Safety Policy.

- **Land, forest and water rights.**

ALT respects the rights to water and sanitation for people who could potentially be affected by their activities, including their employees, contractors and neighboring communities. ALT will seek to avoid any impacts to land, Forest or Water in Areas where we operate and, if not Feasible, we will adopt mitigation measures that remedy the Impact. ALT will avoid Forced Evictions or resettlement of any acquired land for our operating Activities.

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- **Decarbonization.**

Where possible, ALT will investigate ways to improve energy efficiency including quantifying, disclosing, and reducing greenhouse gas emissions and will incentivize their own suppliers to do the same. ALT will endeavor to source energy from renewable sources i.e. energy from non-fossil sources.

- **Soil quality.**

Where and when appropriate, ALT will identify, monitor, and control their impact on soil quality to prevent harmful soil changes.

- **Noise emissions.**

Where and when appropriate, ALT will identify, monitor, and control their noise pollution levels to reduce noise pollution as much as possible.

3. **Business Conduct & Ethics**

Standards of integrity, honesty and fairness are in place in all business activities. ALT Technologies has implemented a Code of Conduct, and implementation is highly recommended for our suppliers too. Regardless, activities are performed in a manner consistent with all applicable laws and regulations.

- **Antitrust and Fair Competition**

ALT Technologies strictly complies with all applicable antitrust laws, trade practice laws and any other laws, rules and regulations. ALT Technologies does not enter into agreements with competitors or other acts, which may unfairly impact competition, including, but not limited to, price fixing or market allocations.

- **Anti-corruption and anti-bribery**

ALT Technologies does not engage in nor tolerate any form of corruption, bribery, theft, embezzlement, or extortion, or the use of illegal payments for the purpose of influencing the decision-making process, whether or not in violation of applicable laws. ALT does not offer, grant, demand or accept bribes, illegal payments, payoffs, kickbacks, incentives, gifts, entertainment, favours or other benefit of a value in exchange for business opportunities.

- **Use of private or public security forces.**

ALT does not tolerate unlawful conduct on the part of security personnel toward employees or third parties. Security forces engaged by us are contractually obliged to respect all internationally recognized human rights and environment-related rights and to ensure that security personnel receive adequate guidance and training, where necessary, through appropriate regulations and measures.

- **Conflict of Interest.**

ALT Technologies discloses actual and potential conflicts of interest, including having a business associate, an

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immediate family member and/or relative, or a close friend that is employed by ALT Technologies.

- **Export controls and economic sanctions.**

ALT Technologies complies with all applicable import and export control laws, including without limitation, sanctions, embargoes and other laws, regulations, government orders and policies controlling the transmission or shipment of goods and technology.

- **Data Protection, Confidential Information, and Intellectual Property.**

ALT Technologies complies with all applicable laws concerning data protection, ensuring that any confidential business information or trade secrets gained by virtue of the business activities is maintained confidential and will not be improperly used or disclosed to third parties. ALT Technologies will not accept Counterfeit parts are unauthorised copies, substitutes, etc. which are not from the original or authorised manufacturer. Privacy should ensure an individual's right to make their decisions about who can process their data and for what purpose.

It is ALT Technologies' Financial responsibility to accurately and transparently record, maintain and report on company's financial activity.

It is ALT Technologies' duty to publicly disclose information in accordance with Laws, Rules and regulations. This includes information regarding labor force, Health, Welfare and Safety practices.

- **Whistleblowing & Protection against Retaliation.**

ALT Technologies is committed to a Grievance Mechanism for Whistleblowing and protection against retaliation. Access to Whistleblowing process and retaliation process for all stakeholders to report illegal or immoral business activities to authorities and to allow complaints or concerns to be raised anonymously with confidentiality and without retaliation.

- **Animal welfare.**

ALT will follow national and international legislation regarding animal welfare. And urge their Suppliers to follow this policy. Suppliers are strongly encouraged to strengthen the control over their respective part of the supply chain and to place the same demands on their sub-contractors.

This Policy Statement is applicable for all ALT Technologies Plants worldwide and ALT urge their Suppliers to follow this Policy Statement