

AX-Code of Conduct

For Corporate Social Responsibility

PREAMBLE

ALUNOX Schweißtechnik GmbH affirms its Corporate Social Responsibility as a part of its global business activities.

The present AX-Code of Conduct for Corporate Social responsibility (hereinafter called CoC) determines as a guideline in the industry, especially regarding working conditions, social and environmental compatibility, transparency, trustful collaboration and dialog.

The employees of ALUNOX Schweißtechnik jointly support the content of this CoC .

That conform to our common value base, especially in our commitment to the social market economy.

1. BASIC UNDERSTANDING OF SOCIAL RESPONSIBILITY IN CORPORATE MANAGEMENT

A mutual, basic understanding of social responsibility in corporate management forms the basis of this CoC. This means ALUNOX assumes responsibility by bearing in mind the consequences of its business decisions and actions on economic, technological, social and environments levels and brings about an appropriate balance of interests. It is geared universally held ethical values and principals, especially integrity, honesty and respect of human dignity.

2. WHERE THE CoC APPLIES

This CoC applies to all Business Units of ALUNOX Schweißtechnik. ALUNOX commits to promoting adherence to the content of this CoC at every point it can for its suppliers and in other parts of the value chain.

3. CORE VALUES FOR SOCIAL RESPONSIBILITY IN CORPORATE MANAGEMENT

ALUNOX will proactively work to ensure that the values mentioned below are put into practice and adhered to both now and in the future.

3.1. ADHERENCE TO LAWS

ALUNOX will abide by the laws in effect and other legal requirements of the countries where it is in business. For countries that have a weak institutional framework, the company will carefully examine what good company practices from its home country should be applied to enable supportive, responsible company management.

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3.2. INTEGRITY AND ORGANIZATIONAL GOVERNANCE

3.2.1. ALUNOX gears its activities towards universally held ethical values and principals, especially integrity, honesty, respect of human dignity, openness and non-discrimination of religion, philosophy of life, gender and ethics.

3.2.2. ALUNOX rejects corruption and bribery as stated in the relevant UN convention¹. ALUNOX uses suitable means to promote transparency, behavior and action of integrity, responsible leadership and accountability in management.

3.2.3. ALUNOX pursues clean and recognized business practices and fair competition. With respect to competition, it focuses on professional behavior and high standards of quality for work. ALUNOX fosters partnership and trusting interaction with the supervisory authorities.

3.3. CONSUMER INTEREST

As far as consumer interests are affected, ALUNOX abides by regulations that protect the consumer, as well as appropriate sales, marketing and information practices. Groups that are in special need of protection (e.g. protection of minors) will receive special attention.

3.4. COMMUNICATION

ALUNOX will communicate in an open way and is oriented towards a dialogue about the requirements of this CoC and about its implementation among employees, clients, suppliers and other stakeholders. Every document and all information will be duly produced. They will not be unfairly changed or destroyed. They will be properly stored. Company secrets and any partner's business information will be sensitively handled and kept in confidence.

3.5. HUMAN RIGHTS

ALUNOX is committed to promote human rights. ALUNOX respects human rights as stated in the charter of the United Nations², especially those named in the following.

3.5.1. PRIVACY

Protection of privacy.

3.5.2. HEALTH AND SAFETY

Ensuring health and work safety, especially by the warranty of a safe and health-promoting work environment, avoiding accidents and injuries.

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3.5.3. HARASSMENT

Employee protection against bodily punishment and against physical, sexual, psychological or verbal harassment or abuse.

3.5.4. FREEDOM OF CONSCIENCE

Protection and guarantee of the right to freedom of conscience and freedom of expression.

3.6. WORKING CONDITIONS

ALUNOX abides by the following core work standards from ILO³:

3.6.1. CHILD LABOR

The prohibition of child labor, i.e. the employment of persons younger than 15 years old, as long as the local legal requirements do not specify a higher age limit and as long as no exceptions are permitted.⁴

3.6.2. FORCED LABOR

The prohibition of forced labor of any kind.⁵

3.6.3. REMUNERATION

Work standards concerning remuneration, especially in regards to the level of remuneration as stated in the laws and requirements that are in force.⁶

3.6.4. EMPLOYEE RIGHTS

Respecting the rights of the employee to freedom of association, freedom of assembly and collective bargaining, as long as this is legally permitted and possible in the respective country.⁷

3.6.5. PROHIBITION OF DISCRIMINATION

Treatment of all employees in a non-discriminatory way.⁸

3.7. HOURS OF WORK

ALUNOX abides by the work standards concerning the longest permitted working time.

3.8. ENVIRONMENTAL PROTECTION

ALUNOX fulfills the requirements and the standards for environmental protection that affect its operations and acts in an environmentally conscious way at all locations where it is in operation. For additional responsibility for natural resources, it holds to the principles from the Rio Declaration on Environment and Development.

3.9. CIVIC COMMITMENT

ALUNOX contributes to the social and economic development of the countries and regions where it is in business and promotes appropriate, volunteer activities by its employees.

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4. IMPLEMENTATION AND APPLICATION

ALUNOX will make every appropriate and reasonable effort to implement and to apply the principles and values described in the CoC both now and in the future. Any contractual partners will be informed about the basic measures upon request and within the scope of a reciprocal cooperation, so that it becomes observable how keeping these measures is fundamentally guaranteed. No rights exists to disseminate operational or business secrets related to competition or any other information that is in need of protection.

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(Location, date)

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Franz-Josef Stapel
General Manager

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Volker Jendges
Brand Manager and QM-Officer

- 1 UN Conventaion against corruption in 2003, in force since 2005
- 2 General explanation of human rights, UN Resolution 217 A(III) from 1948
- 3 ILO = International Labour Organization =
- 4 ILO-Convention No. 138 from 1973 and ILO-Convention No 182 from 1999
- 5 ILO Convention No. 29 from 1930 and ILO Convention No. 105 from 1957
- 6 ILO Convention No. 100 from 1951
- 7 ILO Convention No.87 from 1948 and ILO Convention No. 98 from 1949
- 8 ILO Convention No. 111 from 1958

Adherence by Default:

All suppliers (and their subsidiaries), consultans and contractors entering into a commercial relationship with ALUNOX Schweißtechnik GmbH from the day of entering into such a relationship will also be deemed as adhering to the ALUNOX Code of Conduct, and the written entitlement document (i.e. purchase order, contract, frame agreement, etc.) will be considered as acceptance.

By adhering of this Code of conduct, each ALUNOX supplier accepts to be assessed or audited by ALUNOX or by a third party mandated by ALUNOX on the above mentioned principles.

I hereby acknowledge that I am authorized representative of the company below, have carefully reviewed the substance of the above document and confirm the full compliance with the CoC.

Supplier Company Name: _____

Name and title of the supplier representative (print): _____

Date: _____ Signature and company stamp: _____