

Code of conduct

Fairford Holdings Europe AB, our owners, has in place a Corporate Social Responsibility – Group Policy (first published March 2016), that we in AP&T fully comply to. If you need a copy, ask AP&T CSR responsible.

Social Principles

All companies within AP&T Group shall include human rights and labour rights aspects into their management systems and evaluate risks and performance on a regular basis.

In some countries social aspects are covered in the national legislation and no significant further activities need to be taken. Even so, as many companies have subsidiaries, suppliers or business partners on a global market with a variety in legislation, degree of implementation and culture, documented risk assessments shall be updated regularly on operations and supply chain and serve as the basis for action plans.

1. **Businesses should support and respect the protection of internationally proclaimed human rights. (UN Global Compact Principle 1)**
All companies within AP&T Group must comply with all applicable laws and respect internationally recognized human rights, wherever they operate. The corporate responsibility to respect human rights exists independently of States' human rights duties. This means that companies have a responsibility to respect human rights also if they are operating in an area of weak governance.
2. **Businesses should make sure that they are not complicit in human rights abuses. (UN Global Compact Principle 2)**
Complicity means being implicated in human rights abuse caused by another company, government, individual or other group. A company could for example, indirectly become part of human rights abuses via a supplier who violates human rights. All companies within AP&T Group shall strive to have a system in place to evaluate the performance of their supply chain and other business partners in connection to human rights.
3. **Businesses should uphold the freedom of association and the right to collective bargaining. (UN Global Compact Principle 3)**
All companies within AP&T Group shall respect the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal. All companies within AP&T Group shall also have in place non-discriminatory policies and procedures with respect to trade union organisation, union membership and activities in connection to collective bargaining. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and for bargaining.
4. **Businesses should uphold the elimination of all forms of forced and compulsory labour. (UN Global Compact Principle 4)**
Labour should be freely given. Workers should not be required to lodge "deposits" or their identity papers with their employer and employees should be free to leave their employer after reasonable notice in accordance with established rules. All companies within AP&T Group shall make sure that they do not directly or indirectly through their business partners make use of any form of forced, compulsory labour or modern slavery.
5. **Businesses should uphold the effective abolition of child labour and young workers. (UN Global Compact Principle 5, ETI Base Code 4)**
Child labour is damaging to a child's physical, social and mental development because it deprives children of their childhood and their dignity. They are deprived of an education and may be separated from their families. All companies within AP&T Group need to have sufficient knowledge about countries, regions and sectors, economic activities in which there are greater likelihood of child labour and have policies and procedures in place to enable the determination of whether or not child labour is a problem within the business as well as the means to act properly when child labour is discovered. This includes to exercise influence on subcontractors, suppliers and other business

affiliates to combat child labour. ILO conventions¹ provide the framework for national law to prescribe a minimum age for employment that must not be less than the age for completing compulsory schooling, and in any case not less than the age of 15 years. Young persons under the age of 18 shall not be employed during night hours or in hazardous conditions.

6. **Businesses should uphold the elimination of harassment or discrimination in respect of employment and occupation. (UN Global Compact Principle 6, ETI Base Code 7)**
Discrimination in employment and occupation means treating people differently or less favourably because of characteristics that are not related to the requirements of the job. These characteristics could be: race, colour, gender, religion, political opinion, national extraction, social origin, age, disability, HIV/AIDS status, trade union membership and sexual orientation. All companies within AP&T Group shall have assigned responsibility for equal employment issues at a high level and have systems and policies in place to make sure that qualifications, skill and experience are the basis for the recruitment, placement, training and advancement of staff at all levels. Records shall be kept on these activities.
7. **Businesses shall provide safe and hygienic working conditions (ETI Base Code 3)**
All companies within AP&T Group shall provide a safe and hygienic working environment. There shall be a system in place to prevent accidents and injury to health by minimising hazards, so far as is reasonably practicable, and by providing regular and recorded health and safety training to all employees. The responsibility for health and safety shall be assigned to a senior management representative.
8. **Businesses shall see to that living wages are paid as a minimum (ETI Base Code 5)**
All companies within AP&T Group shall have a system in place to monitor and record that wages and benefits paid for a standard working week, at a minimum meet national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs and to provide some discretionary income. All employees shall have written agreements describing the employment conditions, receive specified pay slips and be insured by the employer during working hours. Deductions from wages as a disciplinary measure shall not be permitted.
9. **Businesses shall see to that working hours are not excessive (ETI Base Code 6)**
Working hours must comply with national laws, collective agreements and be based on international labour standards. Overtime shall be according to national law, agreements between employer or employer's organisation and labour's organisation and compensated according to valid agreements or according to agreements between the employer and the employee.
10. **Businesses shall provide regular employment (ETI Base Code 8)**
All companies within AP&T Group shall to every extent possible make sure that work performed, both in their own operations and in the operations of their suppliers, is on the basis of recognised employment relationship established through national law and practice. Labour-only contracting, sub-contracting, home-working arrangements, or apprenticeship schemes shall not be used to avoid obligations towards employees arising from labour and social security legislation, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.
11. **Businesses shall not allow harsh or inhumane treatment (ETI Base Code 9)**
Physical abuse or discipline, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. All companies within AP&T Group shall have clear guidelines to prevent and act upon all forms of inhumane treatment.

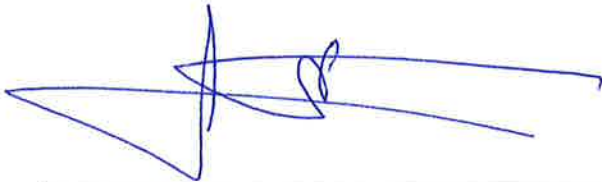
¹ Minimum Age Convention No. 138 and the Worst Forms of Child Labour Convention No. 182

Business Ethics

1. Employees' behaviour shall be underpinned and guided by our core values in all situations. We endeavour to attract, develop and retain qualified and motivated co-workers in a professional environment. We expect our employees to apply to AP&T Groups core values and act with honesty and integrity in all situations and in connections to co-workers, customers, suppliers, owners, organisations, authorities and any other business partner.
2. Employees should respect property and confidentiality Company property and resources, as well as our intellectual property, should be used for legitimate business purposes only and not be used for personal gain or for others to profit from. Employees have the duty to protect our intellectual property, just as they have the obligation to respect that of our business partners. Employees shall keep all information provided to them in their professional role during their employment confidential. As employees we have an obligation to respect and preserve confidential information entrusted to us at all times, unless disclosure is specifically authorized or legally required. The obligation to preserve confidential information continues even after an employment has ended.

Responsible Sourcing of Raw Materials

1. The AP&T's Responsible Sourcing of Raw Materials (RSRM) Policy extends our Supplier Code of Conduct to the furthest reaches of our upstream supply chain in support of human rights, labor, health, safety and environmental protection and business ethics. We require our suppliers to incorporate these RSRM requirements in their own sourcing practices, contracts and supplier management.
2. We believe, through strong partnerships with our suppliers and key stakeholders, we can positively influence our raw materials supply chain.
3. To the extent tin, tungsten, tantalum, and gold (3TG) are contained in our products, it is AP&T's goal to use conflict free minerals.
4. AP&T's responsibility for materials and our due diligence practices are applied to materials originating from Conflict-Affected and High-Risk Areas (CAHRAs), as defined by the Organization for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, ("OECD Guidance") and the related supplements for 3TG, including cobalt and mica.
5. We require our suppliers to conduct due diligence to understand the source of the conflict minerals and other requested raw materials used in AP&T products, source responsibly, and not knowingly provide products containing minerals that contribute to conflict.



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