AP&T Supplier Code of Conduct

This Code of Conduct defines the basic requirements placed on suppliers and third-party intermediaries to the AP&T Group in terms of their responsibilities toward stakeholders and the environment. The requirements of this AP&T Supplier Code of Conduct are based on the principles of the United Nations Global Compact, the Ethical Trading Initiative and AP&T's internal standards and values.

The supplier and/or third-party intermediary undertakes to comply with the following:

Legal Compliance
All AP&T Group suppliers shall comply with the laws and regulations of the applicable legal systems. If the local laws and/or any applicable collective bargaining agreement(s) are stricter in relation to AP&T's suppliers and/or sub-contractors than this AP&T Supplier Code of Conduct, such laws or collective bargaining agreement(s) are applicable. In all cases where local law is less strict than this AP&T Supplier Code of Conduct, AP&T Group suppliers shall adhere to the requirements described in this document.

Human Rights and Labor Practices
All AP&T Group suppliers shall include human rights and labor rights in their management systems and evaluate risks and performance on a regular basis.

In some countries, national legislation covers social aspects, which relieves the supplier from taking significant additional measures. However, because many companies have subsidiaries, suppliers or business partners on the global market that are subject to differing legislation, degrees of implementation and cultures, documented risk assessments of operations and the supply chain shall be updated regularly 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 AP&T Group suppliers, regardless of where they operate, shall comply with all applicable laws and respect internationally recognized human rights.

2. **Businesses should make sure that they are not complicit in human rights abuses (UN Global Compact Principle 2).**
   All AP&T Group suppliers shall strive to have a system in place to evaluate the performance of their supply chain and other business partners with regard to human rights.

3. **Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining (UN Global Compact Principle 3).**

4. **Businesses should uphold the elimination of all forms of forced and compulsory labor (UN Global Compact Principle 4).**

5. **Businesses should uphold the effective abolition of child labor and young workers (UN Global Compact Principle 5, ETI Base Code 4).**
   ILO conventions[1] 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 at night or in hazardous conditions.

6. **Businesses should uphold the elimination of 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 favorably because of characteristics that are not related to the requirements of the job. These may include race,

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

color, gender, religion, political opinion, national extraction, social origin, age, disability, HIV/AIDS status, trade union membership and sexual orientation.

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 must be a system in place to prevent accidents and injury to health by minimizing hazards so far as is reasonably practicable and by providing regular and recorded health and safety training to all employees.

8. **Businesses shall ensure that living wages are paid as a minimum (ETI Base Code 5).**
   All AP&T Group suppliers shall have a system in place to monitor and record that wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher.

9. **Businesses shall ensure that working hours are not excessive (ETI Base Code 6).**
   Working hours shall comply with national laws and collective agreements and be based on international labor standards.

10. **Businesses shall provide regular employment (ETI Base Code 8).**
    All AP&T Group suppliers, to every extent possible, shall make sure that work performed is on the basis of a recognized employment relationship established through national law and practice.

11. **Businesses shall not allow harsh or inhumane treatment (ETI Base Code 9).**

Environmental Protection
All AP&T Group suppliers shall act in accordance with the applicable statutory and international standards regarding the environment. All AP&T Group suppliers shall minimize environmental pollution and make continuous improvements in environmental protection. All AP&T Group suppliers shall establish a reasonable environmental management system.

Responsible Minerals Sourcing
1. We believe that through strong partnerships with our suppliers and key stakeholders, we can positively influence our raw materials supply chain.

2. To the extent that tin, tungsten, tantalum, and gold (3TG) are contained in our products, it is AP&T's goal to use conflict-free minerals.

3. AP&T's responsibility for materials and its 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 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.

4. All AP&T Group suppliers shall 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.

Fair Operating Practices
We believe that long-term success in business is only possible where there is free and fair competition. Based on this fundamental principle and our legal obligation, it is the policy of AP&T and its suppliers to conduct business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting with integrity in our business dealings wherever we operate.
AP&T Group suppliers are not permitted to offer, promise, give, accept or solicit bribes (directly or indirectly, including through business partners). We will uphold all laws relevant to countering bribery and corruption.

AP&T Group suppliers shall ensure that private interests do not interfere with business interests.

Supply Chain
All AP&T Group suppliers, with reasonable effort, shall ensure compliance with this AP&T Supplier Code of Conduct.

Whistleblowing Procedure
All AP&T Group suppliers shall have a whistleblowing procedure. AP&T Group is committed to maintaining the highest standards of honesty, openness and accountability and therefore takes all misconduct very seriously, whether committed by staff or associated persons. AP&T's whistleblowing procedure can be found on the company's website: www.aptgroup.com.