



AUTO LEDER ATELIER



CODE OF CONDUCT
for Employees, Business Partners
and Suppliers

Version 2

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Preface

Auto Leder Atelier GmbH plays an important role for the automotive industry as a provider of vehicle finishing services and supplier of interior components. Establishing and adhering to clear rules of conduct and setting a good example is a necessity to gain, strengthen and maintain the trust of customers, suppliers, shareholders and employees, among others. A professional and integrity-based work attitude is at the core of everything we do.

The way in which Auto Leder Atelier GmbH presents itself and its business lines, offers its products and services and deals with its customers creates the image of our company. Our reputation is a valuable asset that we are constantly working to build and improve. The Code of Conduct helps us to strengthen our reputation and to create clarity regarding the way we intend to deal with each other and how we would like to be perceived as a company in society.

The introduction of a Code of Conduct is a practical measure to create a safe and pleasant working environment within the corporate culture. It is based on guidelines about desirable and undesirable behavior. As a company, we are judged based on the behavior of the people who work there. Therefore, it is important that the behavior is in line with the expectations of the people working with us and with the core values of the company. The Code of Conduct is a living document that can be adapted and/or supplemented if necessary.

We expect all employees, business partners and suppliers to act according to these Rules of Conduct and to comply with them.

Furthermore, these Rules of Conduct are the driving force of our vision, our employees and our company.

Based on the following principles: We respect and value all our employees. We strengthen and encourage the development of all our employees and focus on achieving great results. We aim to inspire each other and empower each other to achieve our mission and strategy. Each and every one of us can make a decisive contribution to the implementation of our strategy and will be rewarded for doing so.

Auto Leder Atelier GmbH expects that this Code of Conduct is observed by both our employees and our business partners and suppliers.

The management team at Auto Leder Atelier GmbH sets a good example and ensures that all employees, both long-standing and new, are familiar with the Code of Conduct. The members of the executive management team and the supervisors pay attention to the compliance with the Code of Conduct.

All employees act in accordance with the wording and spirit of the Code of Conduct.

All employees may be approached as to the extent to which their conduct complies with the Code of Conduct.

If you notice a violation, please report this to your supervisor or the responsible Compliance Officer.

Violation of the Code of Conduct may result in disciplinary action. Serious violations may result in termination of employment. If required by law, violations will be made public.

Company Philosophy

Our Vision

Auto Leder Atelier is the market leader in terms of quality, service and costs for the supply of refined interior components and for retrofitting interiors in premium vehicles. ALEA is a full-service supplier, from the development right up to the spare parts supply.

Our Mission

In our manufactory we live our passion for the processing of high-quality materials and in doing so achieve flawless implementations that are true to detail. In addition, we stand for quality “Made in Germany”.

Our Values

Our actions are the basis for sustainable products and satisfied customers:

Quality – We are proud to produce our products with the best materials and to market the results in the highest quality.

Customer focus – We create added value for our customers through excellent quality, our professional service and fair pricing.

Innovations – We continuously evaluate our market potential, the competition and the market conditions. We adapt our company accordingly and develop new strategies, technologies and solutions.

Integrity & Transparency – We treat our employees, customers and suppliers with respect, irrespective of religion, skin color, nationality or cultural background. We stand for respectful and transparent communication.

Expertise – We create a working environment in which our employees can successfully develop their skills and competencies and put them to the best possible use.

Responsibility – We take care of our environment and comply with local laws and regulations.

Rules of Conduct

Social interaction

We treat each other openly, honestly and respectfully.

Honesty and respect

We do not tolerate harassment or discrimination based on race, skin color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status. We are expected to report discriminatory behavior or harassment immediately. We treat each other honestly and politely. We work together professionally, respectfully and as equals, regardless of our position. We keep to decisions once they have been made.

Inappropriate behavior

We refrain from any form of inappropriate behavior towards colleagues. Inappropriate behavior is understood to be any behavior that violates the personal integrity of others.

Wages and social security benefits

The wages paid to employees must comply with all applicable laws regarding remuneration, including laws regarding minimum wage, overtime and legally established social security benefits. Deductions from wages as a disciplinary measure are not permitted. The calculation basis that is used to pay workers is provided in a timely manner in the form of a payroll statement.

Working hours

The work time of employees must not exceed the maximum number of hours specified by the law. In addition, except in emergencies or exceptional situations, weekly working hours should not normally exceed 60 hours, including overtime. Employees are entitled to at least one day off per seven days.

Child labor

At Auto Leder Atelier there is no child labor. Our suppliers are also obligated to observe this.

Involuntary labor

We do not use any type of forced or involuntary labor in any form. All work must be voluntary; employees are free to part with their employer and terminate their employment in accordance with agreed notice periods. We expect our suppliers not to engage in human trafficking and not to use forced labor within their company or supply chain.

Procurement of raw materials

We procure our materials and raw materials responsibly. Details on raw material procurement are specified in the Quality and Environmental Policy section.

Handling of resources and equipment

We treat our operating resources and company equipment with care and are responsible for their proper use.

Freedom of association

Open and direct communication between employees and employers is an important means of solving issues. Therefore, we respect the right of employees to freedom of association, to join trade unions, to appeal to labor representatives or to join works councils in accordance with local laws.

Duty of care

We take good care of the operating equipment that is provided to us and are responsible for its proper use and care. We adhere to company policies regarding the use of the Internet, email, social media, telephone, and company or leased vehicles.

Care of operating equipment

We never leave operating equipment or data unattended and take measures to prevent theft or loss. We immediately report damage or loss of equipment or data to the immediate supervisor. An employee may be required to pay damages if the loss, theft or damage to equipment or data occurred as a result of the employee's intentional or negligent conduct.

Dealings with other interested parties

We are diligent in our dealings with other parties and do everything possible to ensure an independent stance and to avoid conflicts of interest.

We take a service-oriented approach towards our customers.

In our communication and dealings with other parties, we act objectively, transparently, service-oriented, factually and in a clear and balanced manner. Contracts we enter into are understandable and verifiable and are concluded on the basis of applicable procedures and regulations. We always provide services and deliver goods on the basis of terms that are consistent with the market.

Conflicts of interest

We keep our personal and professional interests strictly separate. We ensure that any perception of a conflict of interest is avoided.

Data protection and privacy

When collecting, storing, processing, transmitting and disclosing personal information, data protection and information security laws and government regulations must be observed.

Fair competition

The standards of fair business, fair advertising and fair competition shall be observed. In addition, the applicable antitrust laws are to be applied. Dealings with competitors, in particular collusion and other activities such as influencing prices and conditions, are prohibited.

Secondary activities

We do not engage in secondary activities that may interfere with our personal performance at Auto Leder Atelier GmbH or that may be detrimental to the interests of our company. We report secondary activities to our supervisor.

Presents from business partners

To avoid conflicts of interest, we do not accept presents or invitations in exchange for a service in return. We inform our supervisor if

we are offered presents or invitations (with a value exceeding EUR 25.00 or at an inappropriate frequency). We do not offer presents or other complimentary gifts to business partners without the prior consent of our supervisor.

Representing Auto Leder Atelier GmbH

We speak, behave and dress appropriately, correctly, decently and politely.

Handling information

We handle information carefully, both in internal and external communications. We are aware of the fact that some information is strictly confidential, but also that some information must be made public or disclosed in accordance with the law, internal company policies and corporate regulations.

Confidentiality

We do not disclose technical, financial, operational or other information/data without consent. We do not provide data or information to third parties when we know or reasonably believe that confidentiality or non-disclosure is required. We handle employee personal data with care.

Acquiring, using and sharing information

We use sensitive or useful information, data or business knowledge that we acquire through our work only to fulfill our responsibilities. We do so at all times in accordance with the law, our in-house policies and operating instructions.

We share information only with those for whom the information is intended and do so in an objective and aware manner. We disclose information about our business operations that may be commercially advantageous or disadvantageous in accordance with the law, our corporate policies and operating instructions. We do this in a targeted, (equally) timely and non-discriminatory manner.

Preferential treatment

We are impartial. No market party receives preferential treatment from us.

Compliance with the law

We take note of and comply with all applicable (European and) national laws and regulations, as well as all corporate guidelines and (work) instructions.

Below Rules of Conduct and examples of how to act accordingly are listed.

Respect

- We treat others with respect, even when we disagree.
- We do not differentiate between employees on the basis of their origin, religion or skin color.
- We respect the achievements of others.
- We listen to what our colleagues/customers have to say and expand on their ideas.
- We respect each other's individuality and diversity.
- We talk to each other and not about each other.
- We are compassionate.
- We are open to criticism.
- We look out for each other.
- We respect the environment, avoid waste and unnecessary pollution.

Integrity

- We keep our promises and fulfill our agreements.
- Our aim is to be able to explain what we do and why.
- We treat information confidentially.
- We respect each other's boundaries.
- We immediately report corruption and any attempts to the company management and take immediate action against any violation.

Professionalism

- We continuously improve our quality standards based on our QM Manual.
- We solve problems as quickly as possible, constantly look for new solutions and have the courage to take the initiative.
- We fulfill the requirements expected of our role.
- We know what is expected of a professional employee based on the aforementioned points.
- Every order is handled professionally.
- We regularly review/evaluate procedures, agreements and ways of working.
- We are open to learning new things.

Commitment

- Contribute to an inspiring working atmosphere based on commitment, humor and enjoyment of work.
- Let the business world know that every line of business at Auto Leder Atelier GmbH is a reliable partner.
- Work with pleasure to deliver a great end product.
- Act appropriately, diligently and reliably.
- Encourage critical thinking by example.
- When customers complain about our products or services, take them seriously and forward their complaint to the responsible department or your supervisor.
- Use this feedback to improve our products and processes.

Cooperation

- All business lines and departments work together to achieve the objectives of Auto Leder Atelier GmbH.
- Share knowledge and information in the company and thereby promote efficiency and effectiveness in the company.
- Help each other and promote a strong team spirit and work performance.

Performance orientation

- Provide high quality work collaborating with your colleagues.
- Protect yourself and your colleagues from making mistakes.

- Agreements are valued and respected.
- Have the courage to ask your colleagues for help.
- Be open to changes (both within the company and in the market).

Transparency

- An agreement is an agreement.
- Agreements are made together.
- Take responsibility and have the courage to say no.
- Communicate clearly and directly (with the right person).
- Double check that you have been understood.
- Arrive on time and cancel in a timely manner if you are running late.

Environmental protection

- Protection of resources
- Separation of recyclable materials
- Use of e-mobility

Quality and Environmental Policy

Continuous improvement

It is our goal to systematically and continuously improve the operational environmental protection and performance as well as the overall performance of the company, with regard to our own processes, on the basis of the currently applicable quality and environmental regulations, customer requirements and other specifications.

Management

The management and all employees are committed to implementing and maintaining this Quality and Environmental Policy. Our executive managers create alignment between the purpose and direction of the company. They aim to create and maintain the working conditions in which all employees can fully commit themselves to achieving the goals of our company.

Responsible employees

At all levels, our employees are the essence of our company. The comprehensive involvement of our employees enables them to use their skills for the benefit of the company. We develop the knowledge and awareness of our employees through continuous education and training courses, and motivate them to act responsibly – even beyond the scope of their business activities.

Communication and customer focus

We communicate openly with interested parties, customers and authorities on all relevant issues related to our company. We encourage our business partners to act in accordance with equivalent guidelines and also to actively promote environmental protection. As we are dependent on our customers, we must understand their current and future needs in order to meet their requirements and strive to exceed their expectations.

Ongoing technical development

The environmental impact of new activities, products, technologies and processes is assessed before they are introduced. The legal requirements, together with customer requirements, constitute a mandatory minimum criterion in this context. The use of environmentally friendly processes and technologies is promoted with the aim of saving resources such as raw materials, energy and water.

Sustainability and low environmental impact

We take the necessary measures to avoid the harmful environmental impact of our activities and products. We use raw materials, water and energy sparingly and reduce environmental impacts to a minimum. Where possible, this is done directly at the point of origin (e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, by saving, by recycling or by reusing materials).

In this context, we also take extensive measures for accident prevention and damage limitation. General emissions from operations (air and noise emissions) as well as greenhouse gas emissions are to be classified, routinely monitored, reviewed, and treated as necessary prior to their release. To ensure safe handling, transportation, storage, use, reuse, recycling, and disposal, we identify substances that pose a hazard when released into the environment. We handle these substances accordingly, complying with the applicable laws and regulations on labeling for recycling and disposal.

Sustainability requirements on our suppliers

We expect all our suppliers to comply with all applicable environmental protection laws and regulations, including licensing and reporting requirements.

We also place the following demands on our suppliers in the area of production: Pollution prevention and resource conservation; safe handling, storage, movement, use and disposal of hazardous substances and chemicals; controlled use and reduction of wastewater; as well as monitoring and control of air emissions (including volatile chemicals, aerosols, caustics, particulate matter, ozone-depleting chemicals and combustion by-products).

Our suppliers declare that the products, components and materials sold to us or included in the products we sell do not contain tantalum, tin, tungsten or gold originating from the Democratic Republic of Congo or any neighboring country that directly or indirectly supports armed groups.

Binding obligations

We fulfill our binding obligations.

Monitoring and evaluation

We regularly assess the status of our company's integrated management system as well as the technical and organizational procedures and processes in order to identify weaknesses and to initiate appropriate prevention or improvement measures. The impact of our company's current and planned activities on the local environment is regularly monitored and evaluated. All effective decisions are based on the analysis of data and information.

Responsibility

Employees

The most important aspect is that the behavior of all our employees must be in accordance with the Code of Conduct and the Rules of Conduct. Employees are encouraged to give feedback to their colleagues about their behavior and to ask their colleagues for feedback regarding their own behavior.

Supervisors / Management

Supervisors are expected to act as role models. In addition, if an employee's behavior is contrary to the Code of Conduct, they must address this and take appropriate action if necessary.

Compliance Officer

At Auto Leder Atelier GmbH, the role of Compliance Officer is assumed by Günther Schwanitz (Managing Director and Owner). Within the company, the Compliance Officer is responsible for ensuring that the Code of Conduct is observed and adhered to.

Person of trust

At Auto Leder Atelier GmbH, there are two trusted persons to whom you can confidentially report any issues. These issues can then be anonymously passed on to the right person within the company.

Within Auto Leder Atelier GmbH, Mario Haufe (Deputy Managing Director) and Anna Deininger (Assistant to the Management) are instructed as persons of trust.