

# ATM CODE OF CONDUCT AND GUIDELINES

(as of 23/02/2024)

ATM Recyclingsystems is committed to ethical and lawful behaviour in all business matters. This Code of Conduct sets forth the policies and procedures to guide employees, officers and management in the performance of their duties and responsibilities and to ensure compliance with the Company's commitment to legal and ethical behaviour.

These policies and procedures apply to all employees, officers and directors of ATM Recyclingsystems.

## ATM Policy on Labour Conditions and Human Rights

### **Child Labour:**

We do not use or support any form of child labour.

### **Wages and benefits:**

The remuneration we pay our employees is at least equal to the legally applicable minimum wage. We orientate ourselves towards both industry-specific and locally customary remuneration and social benefits that ensure a decent standard of living for our employees.

### **Working hours:**

Working hours, including overtime, comply with applicable local legislation.

### **Modern slavery (i.e. slavery, servitude and forced or coerced labour and human trafficking):**

We oppose all forms of modern slavery (i.e. slavery, servitude and forced or coerced labour and human trafficking).

### **Freedom of association and collective bargaining:**

We respect the rights of employees to freedom of association and collective bargaining in accordance with the legislation applicable to them.

### **Harassment and non-discrimination:**

We do not tolerate harassment or discrimination within the workforce. We do not discriminate on the basis of ethnic origin, nationality, social background, gender and gender identity, sexual orientation, age, disability, religion, party or trade union membership.

## **ATM Guideline on Business Ethics**

### **Corruption, extortion and bribery:**

We prevent all forms of corruption, extortion and bribery.

### **Data protection:**

We treat company and personal data with respect and comply with applicable legislation.

### **Financial responsibility (accurate records):**

We ensure accurate and complete financial records and disclose full, fair, accurate, timely and understandable financial results and other material information.

### **Disclosure of information:**

We fully disclose information regarding working conditions, occupational health and safety, environmental practices, business activities, structure, financial condition and economic performance of the company in accordance with industry practices.

### **Fair competition and antitrust law:**

We comply with competition and antitrust laws.

### **Conflicts of interest:**

We take appropriate precautions to prevent relationships, activities or transactions where private interests or relationships have influenced or could potentially influence a business decision.

### **Counterfeit parts:**

Our products are clearly labelled and traceable within the supply chain. We notify our customers immediately and take appropriate legal action to protect the market if we become aware of counterfeit parts in circulation.

### **Intellectual property:**

We respect the intellectual property of our customers and market participants.

### **Export controls and economic sanctions:**

We comply with restrictions on the export of goods and trade with countries sanctioned by international laws and regulations.

### **Whistleblowing and protection from retaliation:**

All employees must be able to report known or suspected misconduct or violations without fear of retaliation. Any action or retaliation against an individual who in good faith reports an actual or suspected violation is strictly prohibited.

### **Ethical Recruitment:**

ATM Recyclingsystems is committed to ethical recruiting practices. We ensure that all recruitment processes are fair, transparent and non-discriminatory. No form of forced labour, child labour or

human trafficking is tolerated. Our employees are selected on the basis of their qualifications and skills, regardless of gender, origin, religion, sexual orientation or other discriminatory factors.

**Women's rights:**

We are actively committed to promoting women's rights in the workplace. We ensure equal rights in terms of pay, promotion opportunities and career development. Discrimination on the basis of gender is not tolerated and we support measures that promote the participation of women in all areas of the company.

**Diversity, equality and inclusion:**

ATM Recyclingsystems values and promotes diversity among its employees. We strive for an inclusive work environment where all employees are treated equally regardless of their background, religion, ethnicity, disability or sexual orientation. Discrimination is not tolerated and we are committed to an inclusive corporate culture.

**Rights of minorities and indigenous peoples:**

We respect the rights of minorities and indigenous peoples. Our business activities take into account their cultural, social and land-related rights. We are committed to protecting their communities, land rights and cultural heritage and endeavour to work together respectfully.

**Use of private or public security forces:**

The use of private or public security forces is conducted in strict compliance with ethical standards and human rights principles. We regularly monitor and evaluate their activities to ensure that no human rights violations occur. Employees, communities and assets are protected in a legal and responsible manner.

**Land, forest and water rights and forced eviction:**

ATM Recyclingsystems is committed to respecting land, forest and water rights in its business activities. We avoid forced evictions and are committed to the sustainable use of natural resources. Our activities are conducted in accordance with local and international laws that ensure the protection of the environment and communities.

## ATM Environmental Policy

### **Principles:**

We are committed to comprehensive environmental protection and integrate principles of sustainable development into all business processes. Our commitment extends beyond the fulfilment of legal requirements to ensure a positive environmental impact. Through continuous improvement, we set measurable goals to monitor and improve internal and external environmental standards.

Preserving the environment is firmly anchored in our corporate culture. We see ourselves as pioneers in sustainable practices and endeavour to combine ecological responsibility with entrepreneurial success. These principles guide us in our daily work and characterise our vision of an environmentally friendly future.

### **Greenhouse gas emissions:**

We are actively committed to reducing greenhouse gas emissions and strive to continuously increase energy efficiency.

### **Greenhouse gas emissions reporting:**

With regard to greenhouse gas emissions, we place particular emphasis on transparency and responsibility. We are committed to producing regular reports and to observing and monitoring the development of our emissions. This enables us to analyse emissions in detail and identify further opportunities to reduce emissions.

### **Energy efficiency and renewable energies:**

We continuously strive to increase energy efficiency in order to utilise resources more effectively. At the same time, we are increasingly focusing on renewable energies in order to promote sustainable energy sources and minimise our environmental impact.

### **Decarbonisation:**

Our efforts are focused on minimising the carbon footprint of our activities. Switching to low-carbon technologies and promoting decarbonisation measures are key steps towards reducing our environmental footprint.

### **Sustainable resource management:**

We are committed to the sustainable management of our resources and pursue a responsible approach to natural raw materials. This includes the conservation and preservation of our natural resources.

### **Waste avoidance, reuse and recycling:**

Our policy aims to minimise waste volumes, promotes the reuse of materials and supports comprehensive recycling practices. By closing the cycle, we help to protect the environment.

### **Animal welfare and biodiversity:**

We are committed to treating wildlife with respect and are committed to protecting biodiversity. Our activities take into account the preservation of habitats for animal species and the protection of endangered species.

**Land use and deforestation:**

Sustainable land use is an integral part of our environmental strategy. We actively avoid deforestation and focus on responsible land use in order to maintain ecological balances.

**Soil quality:**

We strive to protect and preserve soil quality. Our business practices take into account the sustainable use of soils in order to minimise negative impacts.

**Noise emissions:**

The reduction of noise emissions is an important concern. We implement measures to minimise our impact on the noise environment and ensure harmonious coexistence with the local community.