



AM MEGA

CODE OF CONDUCT

Acting with integrity around the world

January 2022

AM MEGA

CODE OF CONDUCT

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Why we have a code of conduct

At the core of the Code of Conduct (**Code**) are the attitude, behaviour and actions that make Ammega a special place to work and will drive our long-term success. Our values inspire and inform the Code:

Customer centricity

We are customer-centric because we know that we succeed when our customers succeed and that customer satisfaction drives customer loyalty.

People focus

Our carefully selected people, experts in their fields, are our most valuable resource working together as one company creating our unique advantage.

Entrepreneurship

We encourage entrepreneurial thinking and empower our people to take intelligent risks and make sound decisions.

Agility

Speed is a key driver in our industry. We aim to respond quickly towards our customers, optimising our delivery time and making fast decisions at all levels in our organisation.

Responsibility

We are part of a larger business community that we can help improve by working responsibly, by maintaining and increasing transparency, and by acting with integrity as good corporate citizens at all times.

Who is covered by the code

The Code applies to all employees of the Ammega Group of companies (**Ammega**).

Ammega's managers bear special responsibility. Each manager must set an example for adherence to the rules and values described in the Code. Managers are responsible for ensuring that their team members comply with the Code.

The Code applies to agents, representatives, consultants and contract staff of Ammega. They must endorse the Code and formally accept that its provisions apply to them.

Doing the right thing

Ammega complies with the laws and regulations of the countries in which we do business.

Unlawful actions are against Ammega's interests, can result in criminal prosecution, civil damages and may harm our reputation, or cause us to lose business.

If you act unlawfully you are personally liable to criminal prosecution.

If you have any doubts about a course of action, ask yourself:

- is it legal?
- is it consistent with our Code?
- does it comply with our policies?
- would it reflect well on me and Ammega if my actions were made public?

If you can answer “**Yes**” to these questions, your proposed actions are almost certainly appropriate.

If you are still undecided about a situation, please consult your line manager, the Chief Compliance Officer, the General Counsel or use our SpeakUp® line.

The Code will help you to ensure that Ammega always does the right thing and that integrity is ingrained in our culture.

Reporting concerns

You have a duty to report your concerns promptly, even if you are not sure that a breach of the Code has occurred. When you do so, you help protect Ammega’s reputation and ensure that issues are resolved quickly and correctly.

If you sense that something is not right at work, please refresh your understanding of the Ammega SpeakUp® Policy [here](#) and follow its guidance.

Ammega appreciates your help in avoiding or uncovering misconduct and will not allow any form of retaliation against any employee who (in good-faith) reports a concern or participates in an investigation.

Breaches of the Code

Breaches of the Code will not be tolerated and will result in disciplinary measures. If a Code breach violates the law, it could result in fines or criminal prosecution for Ammega and the employee concerned.

When you fail to follow the Code, Ammega policies or applicable laws, ignore another person’s failures or pressurise someone to commit a violation, you are in breach.

Governance

The Group Executive Committee (GEC) oversees and administers the Code. The GEC consults the Chief Compliance Officer, General Counsel and Head of Internal Audit in enforcing the Code.

The GEC will promote the Code, create an environment in which employees feel comfortable about raising concerns and will ensure that employees receive training and other information to bolster the Code.

Should the Code or any other Ammega policy contradict relevant local, regional, national or international laws or regulations, the relevant laws or regulations prevail.

The GEC will review the Code regularly to make sure it is appropriate adequate and effective.



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DEMONSTRATE INTEGRITY

We do not pay bribes

We compete fairly

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We travel and entertain responsibly

We preserve Ammega's records

We pay our taxes

We document our transactions honestly, accurately and completely

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We do not pay bribes

Ammega does not tolerate any form of corruption. Our success is based on the quality of our products and services. We never offer or accept anything else to get business. We do not permit facilitation (or “grease”) payments to government officials or private individuals, to secure or speed-up routine actions.

You must follow anti-bribery and anti-corruption laws wherever Ammega does business. Failure to do so, could result in significant fines, criminal proceedings, prison sentences and serious damage to Ammega’s reputation.

Ammega does not offer or accept any improper benefits to or from our business partners. Learn to spot a bribe (e.g., a gift, job offer, charitable contribution, hospitality) and get approval before offering or accepting anything.

Be extremely careful when interacting with government officials.

Commissions or compensation may only be paid for services approved and performed and their value must be appropriate for the services received.

For further details and guidance, please read Ammega’s Anti Corruption Policy [here](#).

We compete fairly

We comply with antitrust and competition laws in all locations where we do business. We build market share and brand loyalty by delivering products and services superior to our competitors, not by anti-competitive practices.

If your role in Ammega involves you in sales, dealing with distributors, pricing our products and services or attending trade shows, make sure you know how antitrust laws apply or seek guidance from the General Counsel.

Never enter into an agreement or understanding, of any kind, with a competitor to:

- set prices on our products or services;
- refuse to deal with a customer or supplier;
- rig bids;
- divide territories, markets or customers; or
- prevent another company from entering the market

Be careful at conferences and trade shows. Do not discuss or exchange information with competitors about pricing, costs, margins, terms or conditions of sale, product development, marketing strategies or clients.

Obtaining information about our competitors is normal business practice, but make sure you do it lawfully. Use public or other permitted sources.

Be straightforward about Ammega and what we sell.

Do not make disparaging remarks about our competitors or inaccurate comparisons between their products and ours.

Follow the advice in Ammega’s Antitrust Policy [here](#) and remember that certain sanctions against violations of competition law could pose a threat to the continued existence of Ammega.

We avoid conflicts of interests

Never allow your personal interests to influence your responsibilities to Ammega. Every work-related decision you make must be objective and with Ammega’s business interests in mind.

A conflict arises when you allow personal interests to interfere with the business decisions you make as an employee. Even the appearance of a conflict can be damaging.

Ask yourself:

- could my personal interests or relationships influence the decision I make?
- could it look that way to a neutral bystander?

If you answer “**Yes**” to either of these questions, you are probably conflicted. Ask the Chief Compliance Officer, if you are not sure.

Potential conflicts must be disclosed and approved by the CEO.

Understand the types of situations that can lead to conflicts of interests (or the appearance of a conflict) by reading the Ammega Conflicts of Interests policy [here](#).

We travel and entertain responsibly

Do not exchange gifts or entertainment that could look like an attempt to improperly influence a business decision. Recognize when an offer is excessive under the Ammega Anti-Corruption policy [here](#).

Excessive	Acceptable
A meal in a restaurant for your family paid for by a supplier who does not attend	Lunch with a supplier
Travel and accommodation at a golf resort	A round of golf at a local course with a contractor
A Swiss watch	A desk clock with a consultant’s logo
A case of wine	A drink with a distributor
A conference gift-bag containing expensive electronic items	A conference gift-bag filled with snacks and toiletries

Most of our business partners have their own rules on gift giving, but if you find yourself in the rare situation that you are worried about insulting the giver (e.g., if you have been presented with an excessive gift in front of a group), accept the gift, but inform the Chief Compliance Officer. The gift can be given to charity or raffled among colleagues. Later, inform the giver of our policy, to prevent similar occurrences in the future.

Be sure that any business travel you undertake on behalf of Ammega is for a legitimate business purpose and is reasonable and appropriate under the circumstances.

We preserve Ammega's records

All documents, databases, voice messages, mobile device messages, computer documents, files and photos are records.

We must:

- maintain these records and protect their integrity for as long as required;
- maintain official record keeping systems to retain and file records required for business, legal, financial, research or archival purposes; and dispose of your records according to the Ammega records retention policies and procedures
- Never destroy documents in response to, or in anticipation of, an investigation or audit.

We pay our taxes

We do not engage in tax evasion or subsidy fraud.

Any attempt to evade paying Ammega's true tax liability (or facilitating tax evasion by others) is illegal and can subject the relevant Ammega entity and its employees to criminal liability.

Dealing with such highly technical subjects as corporate taxation, subsidies, VAT and the like, requires specialist knowledge, training and ability. Always consult the Chief Tax Officer on these matters.

We document our transactions honestly, accurately and completely

We record significant business transactions clearly and on time.

Follow all internal policies, procedures and generally accepted accounting principles, so that Ammega's records fairly and correctly reflect all its transactions.

Never accelerate or defer the recording of revenue or expense to meet a budgetary or other target.

We respect international trade rules and sanctions

Our products are used worldwide, so we must be careful to comply with the laws and regulations that govern international trade. This includes abiding by import and export restrictions, obtaining permits and paying customs duties and taxes.

We do not conduct unauthorized business with countries or third parties that are subject to trade embargoes or economic sanctions.

If you are responsible for, or involved in, the sale or movement of Ammega goods and services across international borders, make sure you know the ultimate use and end-user of our products or services and comply with the relevant rules.

For guidance, please see our Sanctions policy [here](#).



RESPECT PEOPLE & THE ENVIRONMENT

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Human rights

Respect for human rights is one of Ammega's fundamental values. Our Human Rights Policy is derived from:

The United Nations (UN) Universal Declaration of Human Rights and the two International Covenants making up the International Bill of Human Rights;

The International Labour Organisation's (ILO) Declaration of Fundamental Principles and Rights at Work; and The United Nations Global Compact.

The Ammega Human Rights Policy [here](#) covers:

- safe and healthy workplaces
- freedom of association
- elimination of forced labour, child labour and human trafficking
- workplaces free of discrimination, harassment and violence
- fair remuneration
- support for local communities
- land rights and water use
- employee guidance and reporting rules

When engaging with suppliers, customers, communities and any other group that might be affected by Ammega's actions, apply the same standards that you would apply to colleagues.

Apply a human rights filter to your decision-making, especially when considering new business processes, acquisitions or joint ventures.

Ensure that Ammega's suppliers comply with our Responsible Sourcing Policy, to be found [here](#).

Privacy

We follow the laws requiring us to protect information that can identify an individual, or which relates to an identifiable individual (personal data).

Our employees trust us with their personal data when they join Ammega. Customers and suppliers often do the same in the course of their business dealings with us.

We collect, use and process personal data only for the purposes we have been given access (and other legitimate business purposes) and we protect it from loss, misuse or disclosure.

We are aware that certain personal data is sensitive and requires extra protection and more care than standard personal data.

If part of your job requires you to access, transfer or use personal data, keep it secure by following Ammega's policies and the law.

If you are not sure whether you are working with personal data, ask the Chief Compliance Officer or the General Counsel.

Access only the limited amount of personal data that you need to do your job, and share it only with authorized people who also need it to do their jobs. Never share personal data with anyone outside Ammega.

Our Privacy Policy is available on the Ammega website.

Health & Safety

Ammega's employees are its greatest asset, and our foremost concern is for their safety and well-being. No corners can be cut on safety and there is no excuse for violating Health and Safety policies, procedures or laws.

The welfare of our customers and their employees is also of great importance to Ammega, so it stands to reason that product safety is a paramount matter. The information we provide about our products must be complete and accurate. Every effort, from the design stage through to final testing, must be made to reduce risk to the end-user of our products.

We monitor the performance of our products and assist customers in the prevention of hazards.

Ammega trains all employees to be aware of potential risks to their personal safety. Furthermore, Ammega implements projects to minimize risks to safety and we strive to eliminate factors, including chemical substances used in production, that could damage employees' health or endanger their safety.

You must strictly follow Ammega's operational and safety procedures. You must also take an active part in safeguarding your own health and safety and that of your colleagues.

The use of illegal drugs and the abuse of alcohol or legal drugs in the workplace is strictly forbidden. Ammega cannot permit employees to perform their duties under the influence of any substance that might prevent them from performing their job safely and effectively.

You must not possess or distribute any controlled substances during working hours or at the premises of Ammega.

Only approved security personnel or law enforcement officers are allowed to carry weapons on the premises of Ammega.

Beware of the risk of distracted driving

Check and comply with local legislation regarding the use of mobile devices when driving on Ammega business.

Ammega's policy on this matter is:

- you can answer or make urgent calls using a hands-free kit, if it is safe and reasonable to do so;
- never text, email, or access social media or other smartphone features; and
- never use a hand-held device while driving.

Environmental protection

Ensuring that our impact on global resources is not damaging is our responsibility, as we drive to make our industry, and our supply chain, more aware of the environmental outcomes of our business.

Ammega complies with laws for the protection of the environment. Ammega participates in regional, national and international initiatives to protect the environment and by focussing on the use of sustainable raw materials in our products.

Furthermore, Ammega:

- trains employees in our efforts to working sustainably
- considers the environmental impact of all activities and production processes
- uses natural resources responsibly and knowledgeably
- develops a constructive relationship with the general public and with environmental protection institutions, based on maximum transparency and trust
- implements effective management systems that maintain high standards of environmental protection.

Ammega insists that suppliers and all other business partners and stakeholders follow legal requirements and take active steps to reduce any negative environmental impact resulting from their processes, services and products. We encourage them to implement certifiable environmental management systems, supporting these efforts and monitoring their overall environmental performance.

Should any supplier or other stakeholder fail to adhere to previously agreed-upon standards, Ammega will consider appropriate actions, including demands for corrective measures or termination of the relationship.



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Preserve company secrets

Please be careful not to threaten Ammega's competitive advantage by disclosing our confidential information, or that of our business partners.

Watch what you say and where you say it! Discussing Ammega business with family or friends, or in public places, can risk disclosure of Ammega or third-party confidential information. Moreover, keep such information secret from colleagues who do not need it to do their jobs.

Any press releases, public announcements or contact with the media must be approved in advance by Ammega's external communication function. Any financial information in such communications must be approved in advance by the Chief Financial Officer and Chief Compliance Officer.

Understand that confidential information can be written, spoken or digital and includes, among other things:

- ideas, techniques, concepts, sketches, drawings, models, inventions, know-how, recipes;
- patent and patent applications, trade secrets;
- algorithms, software programmes, technical and engineering data, test data and test results, simulation results, information concerning research or experiments;
- design details and specifications, engineering; and financial information, prices and other purchasing information, manufacturing processes, customer lists, investors, employees, business and contractual relationships, business forecasts, sales, merchandising and marketing plans.

If you need to share confidential information with a business partner, make sure they first sign a non-disclosure agreement that has been approved by the legal function.

Remember that (to the extent permitted by law) Ammega owns any product that you develop or design in your work with us, such as ideas and inventions.

Don't forget that your duties to protect confidential information applies to work you did before you joined Ammega and will continue if and when you leave Ammega.

Take care of our physical assets

Ammega puts physical property and resources at your disposal to help you to do your job. Please protect them from damage, loss, misuse and theft.

Do not use Ammega's assets for private purposes or for anything illegal or unethical. Be aware that any information you create, share or download onto Ammega systems belongs to Ammega and we reserve the right to monitor system-use, to the extent permitted by law.

Use Ammega's money with responsibility and care. Make business decisions based on analysis of opportunities and risks and pay attention to the integrity of our business partners. Control costs.

Contact

Questions about this Code or the correct behaviour in specific cases should be directed to the Chief Compliance Officer or the General Counsel.

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