

Unser Verhaltenskodex

Our Code of Conduct



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Dear Colleagues,

The trust that our customers and the public place in ALBA is our greatest asset. It is a trust that we have earned over the years, but we also have to earn this trust again each and every day. Only if we all act sincerely and responsibly can we protect and consolidate this respect over the long term. In this way, we lay the foundations for our continued business success and the safeguarding of our jobs.

The basis of our actions is provided by our Code of Conduct (Verhaltenskodex). As a shared guideline, it designates the minimum standards regarding the way in which we relate to each other at ALBA, but also with business partners and the public. In this respect, the Code of Conduct follows a simple and fundamental principle: all of us – whether we are employees, managers or members of the board of directors – are required to act appropriately and properly in our daily work.

This includes, first and foremost, knowing the legal requirements, and complying with them. Unlawful conduct is not only incompatible with our values. They also damage our reputation as a company – and therefore, all of us. Moreover, they can have serious legal consequences. This is where the Code of Conduct provides guidance.

It is binding for all of us. However, its objective extends far beyond being a list of instructions. The Code of Conduct conveys the values to which ALBA is explicitly committed. It also encourages us to use our own powers of judgement and to seek advice when needed.

We want to work together on the basis of respect, cooperation and teamwork. By placing our Code of Conduct at the heart of everything we do, we encourage a culture of ethically responsible behaviour. This also includes an atmosphere of openness that enables us to address issues without fear of reprisals. This applies to infringements of the Code of Conduct in particular. Anyone who discovers an infringement of this kind can always turn to a person of trust.

Ensuring the success of ALBA over the long term is a task that we are all working on. By making the right decisions in your daily work, you can make a significant contribution to this. On this note, thank you very much for all of your efforts.

A handwritten signature in blue ink, appearing to read "Eric Schweitzer". The signature is fluid and cursive, written in a professional style.

Dr Eric Schweitzer
CEO ALBA Group & ALBA Europe Holding

Green Coal
Technology



ALBA   Interserch

ALBA e Interserch hanno realizzato un'esperienza interattiva per il visitatore, che gli permette di scoprire il processo di produzione del carbone verde e di vedere i prodotti finali.

Il visitatore può scoprire il processo di produzione del carbone verde e vedere i prodotti finali.



Our values.

Customer focus

The satisfaction of our customers is at the heart of our commercial thought and our actions.

Reliability

Punctuality, reliability and compliance with deadlines are always our top priorities.

Knowledge and competence

Professional competence and high quality standards are the mainstays of our entrepreneurial activities.

Sustainability

We actively assume ecological and social responsibility.

Fairness

We treat each other and our business partners with respect and fairness.

Acting with awareness

We act flexibly and make decisions in good time and carefully and stand by them with commitment.

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ALBA
Arbeitskleidung
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B CT 6107

Our collaboration.

We focus on respect.

At ALBA, we respect, protect and encourage human rights worldwide and guarantee free personal development. Our actions are characterised by tolerance. We treat all people equally, regardless of their gender, age, skin colour, culture, ethnic origin, religious affiliation, world view, sexual identity or a possible disability. Diversity enriches our lives and work. Our culture is characterised by equal opportunities, trust and mutual respect. Colleagues in management positions set the best example here.

For each and every one of us, this means that we ...

- address suspected violations of human rights,
- do not accept jokes or remarks of a discriminatory nature,
- act with respect for human rights and tolerance.

We recognise the right to freedom of association and union and are committed to the abolition of forced and child labour.

The protection of minors is particularly close to our hearts. We ensure that the age of minimum employment is not lower than the age at which compulsory education ends. In addition, all domestic and international regulations on the protection of minors are strictly applied at ALBA.

We protect the environment – and each other.

Our daily work focuses on environmental protection and sustainability, as well as the safety and health of all our colleagues.

Together, we develop innovative solutions to conserve natural resources and promote sustainable development. We also align our business processes with sustainability. We keep raw materials in circulation and each individual makes a point of preventing waste and contributing to environmental protection. In this way, we come a little closer to achieving our vision of a “world without waste” every day.

ALBA makes an active contribution to maintaining the health of all those in the company with a wide range of prevention and support services. Occupational health and safety are also top priorities. Each individual is obliged to observe the applicable safety regulations. Colleagues in leadership positions will be pleased to provide information and support.

We also plan and operate our facilities in strict compliance with the safety regulations. In this way, we reduce the risk of accidents and ensure trouble-free operations. The same high standards also apply to our subcontractors.

For each and every one of us, this means that we ...

- follow the rules and procedures on environmental protection and occupational health and safety,
- always carry out tasks in a safe way and ask questions if we are unsure,
- obtain the necessary environmental permits.



Our business activities.

We avoid conflicts of interest.

We always make business decisions in the best interests of our company. Under certain circumstances, however, it is possible that conflicts of interest may arise. At this point, caution is required. After all, personal interests or relationships must not play a role in business decisions. The best approach is to avoid such conflicts of interest at the outset. If this is not possible, we discuss them openly with our superiors.

Voluntary work we do in our free time, although generally welcome, can also be associated with conflicts of interest. The same applies to secondary occupations, political commitments, work on supervisory boards and advisory boards or financial investments. Before entering into an activity of this kind, an assessment is necessary together with the superior.

When can conflicts of interest arise, for example?

- Staffing decisions
- Business relationships with third parties
- Private contracting of suppliers or other business partners
- Taking up secondary employment

We take social responsibility.

We recognise our charitable and social responsibility as a company. We therefore make regular donations to charitable, cultural or scientific causes. These are voluntary contributions in cash or in kind which we identify as such and make in the interests of our company. ALBA only participates in sponsorship activities, which in contrast to donations, is rather transactional in nature, in exceptional cases.

We support the efforts of colleagues who engage in voluntary work or who are politically active. However, we never engage in such activities in the name of ALBA.

We do not tolerate corruption.

The legality of our business practices takes precedence over our economic success. In competition, we distinguish ourselves through quality and service – we do not tolerate corruption.

Corruption is the unlawful influencing of business partners by granting or accepting advantages that extend beyond normal business practices, in the context of customer care, for example. Corruption not only prevents fair competition and causes economic damage, it also damages our reputation. Corruption is also punishable in some cases. We protect ourselves and our business partners by dealing transparently with donations of all kinds.

For each and every one of us, this means that we ...

- act ethically, with integrity and transparency,
- do not accept or make any monetary gifts,
- report suspected cases of bribery as well as actual infringements,
- only choose our business partners according to objective criteria.

We fight money laundering.

Money laundering occurs when funds or other assets originating directly or indirectly from criminal offences are brought into the lawful economic cycle and their origin is thereby concealed.

At ALBA, we are committed to strict compliance with the applicable anti-money laundering laws. We apply measures to verify the identity and reliability of our business partners and to avert risks at an early stage. We also ensure that all business transactions are fully and properly reflected in our invoicing and accounting system. If we observe irregularities, we ensure that they are reviewed by the relevant finance, legal or compliance department.

We engage in fair competition.

We are committed to fair and legal competition according to the applicable competition and antitrust laws. Price and territorial agreements between companies run counter to this principle, and lead to a distortion of competition. The exchanging or announcement of information about intended price increases constitutes price coordination, which is illegal under competition law. Unfair methods of competition, such as misleading or harassing customers, also regularly lead to legal disputes, and can result in significant contractual penalties, administrative fines and civil liability claims.

Key areas that are off limits at a glance:

- Agreements on prices, market shares, capacities
- Division of regional markets or customers
- Price fixing
- Abuse of market power

We handle insider information confidentially.

During our work, we sometimes come across information that could influence the stock market price of the ALBA SE share if it became known. This knowledge is referred to as “insider information”. Its disclosure, or trading based on insider information, is illegal.

At ALBA, we protect our trade and business secrets and handle insider information which is relevant to the stock market price in a trustworthy and responsible way.

We only use knowledge of insider-relevant processes internally and do not pass it on to outsiders, including family members.





Our management of information and property.

We protect intellectual property,

Innovations are of great importance for the commercial success of a company. The rights to tangible and intangible assets such as trademarks, designs, copyrights or know-how are therefore under special protection.

We fully recognise the intellectual property of others and ensure that no one gains unauthorised access. No form of use, reproduction or distribution is permitted without the consent of the copyright holder. Should we gain access to sensitive information or information of third parties that requires protection, we undertake to maintain confidentiality. We also carefully protect our proprietary company know-how.

... personal data ...

The protection of personal data of our business partners, customers and colleagues is important to us.

Data protection is fundamental to a reliable business relationship and part of a trusting working relationship. We therefore comply with the relevant data protection regulations and implement them in our business processes.

We process all personal data confidentially. For this purpose, we take suitable technical and organizational measures in accordance with the current state of the art. Additionally, we regularly check compliance with data protection requirements and constantly adapt our data protection organization to changing legal requirements as well as the demands of our business partners and colleagues.

... and company property.

We use the tangible and intangible property of the company exclusively for company and not for personal purposes.

For each and every one of us, this means that we ...

- handle documents carefully and store them securely
- never disclose confidential information,
- do not use computers or the internet for private purposes.

We cooperate with public authorities and municipalities.

We are cooperative and transparent in our dealings with public authorities and municipalities. We provide information in a complete, punctual, open, accurate and understandable manner. At the same time, we inform at the internal level and involve our legal department when infringements of applicable law are investigated.

We report on a transparent and reliable basis.

Only through proper accounting and correct financial reporting is ALBA able to create and maintain public confidence.

We therefore prepare our accounting and financial reporting in a correct, punctual, complete and transparent way in accordance with the respective legal regulations and standards.

For each and every one of us, this means that we ...

- always prepare any records, such as travel expense claims, with the utmost care,
- comply with legal requirements and tax laws and regulations.

We report infringements.

Integrity and honesty are core components of our corporate culture. They allow us to deal with problems openly and transparently.

However, if infringements of laws, policies or this Code of Conduct occur, each of us is required to report them. Any available communication channel can be used for this purpose. Among others, our [whistleblower portal](#) is available, which allows for a completely anonymised procedure upon request. The reporting and reported persons, as well as the respective facts, are treated strictly confidentially at all times.

We protect whistleblowers.

We guarantee the greatest possible protection to persons who help to encourage proper behaviour at ALBA. Any pressure on whistleblowers – in the form of discrimination or other reprisals, for example – will not be tolerated. This applies regardless of the consequences resulting from the report or whether reported facts turn out to be untrue. If the reporting person is themselves involved in the offence, the self-disclosure can be positively taken into account. The investigations will be conducted with the utmost confidentiality.

No disadvantages may arise from reports made in good faith.

Reports made out of malice which are defamatory or clearly false, for example, constitute an abuse of the reporting procedure. These are punishable with disciplinary measures or may be prosecuted under criminal law.

For each and every one of us, this means that we ...

- familiarise ourselves with the Code of Conduct,
- act in good faith,
- report misconduct immediately.

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