



CODE OF ETHICS AND CONDUCT
of the
Alupress Group

Table of contents

1.	Preamble	3
2.	General principles	4
2.1.	Legal obligations	4
2.2.	Communication	5
2.3.	Data protection, information security, intellectual property	5
2.4.	Avoidance of conflicts of interests and ancillary work	6
2.5.	Business principles – Compliance	6
2.6.	Confidentiality	6
2.7.	Community and social commitment	6
2.8.	Health and safety at work	7
2.9.	Sustainability and environmental protection	7
2.9.1	Conflict minerals	7
2.9.2	Circular economy	7
2.9.3	Waste materials and hazardous substances	7
2.10.	Compliance with rules of competition law	8
2.11.	Bribery and corruption	8
2.11.1	Responsible handling of gifts	8
2.11.2	Donations and sponsoring	8
2.12.	Rejection of illegal employment practices	9
2.13.	Equal opportunities and equality	9
2.14.	Artificial intelligence	9
2.15.	Transparency of business relationships at international level	9
3.	Conduct guidelines	9
3.1.	Towards customers	9
3.2.	Towards employees	10
3.3.	Respect and honesty towards superiors, colleagues and employees	10
3.4.	Towards suppliers and subcontractors	11
3.5.	Towards supervisory authorities, governmental authorities and ministries	11
3.6.	Towards the public administration, public bodies or public offices	11
3.7.	Towards financial institutions	11
3.8.	Towards the media	11
3.9.	Transparency of business transactions, correct accounting and invoicing	11
3.9.1	Money laundering	12
4.	Implementation and oversight of the Code of Ethics	12
4.1.	Specific measures to convey the content of the Code of Ethics	12
4.2.	Dual-control principle and separation of roles	12
4.3.	Disciplinary measures	13
5.	Whistleblowing – Reporting of violations – Counsellors – Ombudsmen	13
6.	Change history	14

1. Preamble

The Alupress Group provides system solutions involving die casting and complex aluminum fabrication, primarily for the automotive industry. It has plants in Italy (Alupress AG, Alupress Tooling GmbH), Germany (Alupress GmbH, Alupress Berlin GmbH), and the USA (Alupress LLC).

The companies of the Alupress Group share the ambition of creating high added value for their customers, of being a preferred employer for their staff, and having a solid reputation in society. A high degree of integrity and professionalism is necessary in order to achieve this. Success in our sectors depends on the trust of all of our customers, our employees, and our suppliers, as well as all those who provide services for us. Other stakeholders include governmental and supervisory authorities, competitors, the media, and society as a whole.

It is therefore essential that we ensure that all business activities comply with the statutory requirements and meet the highest standards in terms of quality, safety, sustainability and environmental protection, ethical conduct and respect for human rights.

This Code of Ethics sets out the key principles and minimum requirements that govern all business relationships concerning companies within the Alupress Group. On this basis, we strive to establish and further develop responsible and sustainable partnerships. The Code of Ethics applies to all executives and employees, as well as to business partners such as suppliers, service providers and consultants.

We continually strive to adapt the Code of Ethics to changes in the social and regulatory environment, as well as to our basic ethical values. We, the executives of the Alupress Group, personally endorse the values described in this Code. We undertake to create optimal conditions for enabling employees and suppliers to comply with the Code of Ethics in their daily work.

By adhering to these principles, we can ensure that our business relationships are based on compliance with the law, sustainability, ethical conduct and respect for human rights.

The managing director and executives of
Alupress AG

Brixen, 20.02.2026

2. General principles

We expect all executives, employees, and business partners to comply with all laws and other relevant provisions applicable both at home and abroad when taking all business-related decisions and actions. The Board of Directors and the Supervisory Board, as well as management and executives, must set an example as regards ethical conduct. Ethical conduct in the workplace essentially means honesty and fairness in dealing with employees, customers, suppliers, competitors, authorities, and the public. The integrity and good reputation of our companies are vitally important to their success.

2.1. Legal obligations

Alupress complies with all laws, rules, and other relevant provisions applicable both at home and abroad. The company rejects any form of corruption, forced labor, child labor, or discrimination based on race, nationality, gender, sexual orientation, religion, political orientation, disability, or age.

Every member of the Board of Directors and the Supervisory Board, management, every executive, and every individual employee will thus be responsible for:

- complying with laws and rules, as well as the internal guidelines of Alupress, including the values and principles contained in the Code of Ethics;
- knowing the values and rules of the game of Alupress and the guidelines, manuals, and established business practices in their relevant area of responsibility and applying these conscientiously to the best of their abilities;
- complying with laws, guidelines, and rules concerning occupational safety and environmental protection;
- complying with the requirements of our certified management systems (quality, health and safety at work, environment and energy, equality and equal opportunities);
- playing an active part in the team and making the best possible contribution to achieving common goals;
- contributing to a work environment that fosters trust, esteem, motivation, and respect;
- acting at all times in good faith, responsibly, with appropriate care and expertise, and without misrepresenting facts;
- acting objectively, without however at the same time disregarding their personal judgment;
- protecting the assets (both tangible and intangible) and resources of the companies and promoting their efficient use; and
- taking suitable organizational precautions – including monitoring their compliance – that will exclude any liability for Alupress; no employee may make unreasonable use of the assets and operating resources of Alupress, nor make them available to third parties.

2.2. Communication

The information that we provide, in particular, to authorities or the public at home and abroad must in all substantial aspects be complete, fair, accurate, objective, timely, and comprehensible. In terms of implementation, we undertake to act in accordance with the laws and rules applicable to our companies.

Communication is based on the following principles:

- we communicate openly, transparently, and proactively.
- we have clearly defined individuals authorized to speak to the media.
- we will not as a rule provide any information about customer relationships, about matters concerning individual employees, about competitors, or about ongoing investigations.
- we will not comment on rumors.

2.3. Data protection, information security, intellectual property

Data protection: in order to guarantee the protection of personal data, Alupress undertakes to comply with the regulations concerning data protection when handling personal data and, in particular, to comply with the principles of transparency, permissibility, quality guarantee, and accuracy of data. In addition, Alupress undertakes to refrain from disclosing personal data to third parties without the consent of the relevant individual.

Alupress undertakes to protect the privacy of all those who come into contact with the company. Information in this respect may not be disclosed or disseminated to third parties without the consent of the relevant individual. In addition, the company undertakes to comply with the statutory provisions governing data protection.

IT security: Alupress has introduced strict security measures and policies to protect its IT systems that comply with all relevant laws and regulations relating to IT security, including data protection laws, cyber security regulations and industry-specific regulations.

Comprehensive contingency plans have been drawn up and are regularly tested to ensure that IT systems can be restored in the event of disruption.

Regular training sessions and awareness-raising campaigns for IT security ensure that staff recognize potential risks at an early stage, consistently comply with security-related guidelines and internalize the need to handle digital systems and data responsibly.

intellectual property: Intellectual property is a key component of our business activities and Alupress protects it with the utmost care. We expect our business partners to respect the rights of third parties and not to use or reproduce any copyright-protected materials, designs, trademarks, patents, trade secrets or other protected information belonging to Alupress or to its business partners without appropriate authorization.

2.4. Avoidance of conflicts of interests and ancillary work

A conflict of interest arises when personal or business interests may interfere with the fulfilment of professional duties. The executives, employees and business partners of Alupress are obliged to maintain a high standard of integrity and avoid situations that could lead to such conflicts. Potential conflicts of interest within the Alupress supply chain must be disclosed to Alupress in order to jointly avoid risks to the business relationship.

Employees must give written notice of ancillary work at and investments in business partners and/or competitors and obtain the approval of management. This duty of notification does not apply to the acquisition of exchange-traded securities or pure asset investments of an insignificant amount. Every member of the Board of Directors and the Supervisor Board, management, every executive, and every employee must avoid or, as the case may be, report conflicts of interest involving personal or family-related economic activities that concern their responsibilities within the internal structure or body of which they are a member.

2.5. Business principles – Compliance

Our goal is to operate our business in a profitable manner, maintaining a strong financial basis and keeping our risks at a reasonable level. Making a profit must never provide a justification for failing to comply with laws or for violating conduct standards.

2.6. Confidentiality

Business and trade secrets must be kept confidential. That also applies to other information that Alupress or its contract partners or customers may have an interest in keeping confidential. Such information may not be disclosed to unauthorized persons without the permission of the individual responsible for waiving confidentiality. This obligation will survive the ending of the employment relationship or other contractual relationship.

2.7. Community and social commitment

We encourage our employees, where appropriate, to demonstrate social commitment. We support select organizations and institutions that have humanitarian, social, charitable, educational, or cultural objectives.

2.8. Health and safety at work

In order to guarantee the physical and moral integrity of its employees, Alupress undertakes to comply with the legal provisions and internal guidelines concerning occupational safety. Regular training sessions are held on occupational safety to cement its importance among all employees.

2.9. Sustainability and environmental protection

Alupress is aware that its activities have an impact on the environment, and it undertakes to avoid environmental pollution. The technologies most suitable (for performing its various work activities) should be deployed in order to minimize any environmental impact. Alupress strives to optimize its energy use through suitable measures; it further undertakes to comply with the legal provisions and internal guidelines concerning environmental protection and energy, including continued compliance with the relevant ISO certificates.

2.9.1 Conflict minerals

In the case of conflict minerals such as tin, tungsten, tantalum and gold, as well as other critical raw materials from conflict zones and high-risk areas, Alupress's business partners must implement due diligence processes in accordance with the OECD guidelines. Furthermore, Alupress expects complete and accurate information on the value chain, including evidence that only smelters and refineries are used that meet the requirements of the RMAP (Responsible Minerals Assurance Process) of the Responsible Minerals Initiative.

2.9.2 Circular economy

As a processor of secondary alloys and thus a key part of the recycling practice, Alupress is committed to integrating the principles of the circular economy into its processes. Materials and products should as far as possible be used, reused or recycled in order to conserve resources and reduce waste. Employees and business partners share responsibility for using raw materials efficiently, promoting recyclable solutions and supporting transparent, sustainable materials cycles. In this way, we can strengthen the sustainable, environmentally conscious creation of value.

2.9.3 Waste materials and hazardous substances

The company is committed to the responsible management of waste and hazardous substances. All employees must sort waste correctly, store it safely and dispose of it in accordance with the applicable legal requirements. Hazardous substances must be handled with particular care, clearly labeled and used only in designated areas. The aim is to minimize risks to people and the environment and ensure safe, legally compliant operations.

Alupress expects all of its business partners to minimize the amount of waste generated and to dispose of it in accordance with the applicable legal requirements.

2.10. Compliance with rules of competition law

Alupress is committed to fair and open competition in worldwide markets. Our company, its employees or its agents must not engage in unlawful and/or criminal practices, such as agreements with other companies or concerted practices that have the object or effect of preventing, restricting or distorting competition. We do not employ any unfair commercial practices in our business dealings for competition purposes that are to the detriment of competitors or other market participants.

2.11. Bribery and corruption

Alupress maintains a strict zero-tolerance policy towards corruption, bribery, and any other form of undue influence.

No employee or agent of the company may, in connection with business transactions of any nature, grant impermissible benefits to business partners, their employees or agents, or to third parties nor, when doing business, ask for, obtain the promise of, or accept the same. Violations will as appropriate be punished with the termination of the employment or other contractual relationship.

2.11.1 Responsible handling of gifts

As a rule, it must be assumed that gifts are intended to influence decisions made by the recipient in favor of the gift-giver, irrespective of what is best for the company. Accepting gifts or perquisites will influence the recipient's objective decision-making ability. Therefore, as a rule, gifts may not be accepted, including gifts of small value. Travel, services, prizes, and rebates are also in principle to be considered to be gifts. The same standards applicable to gifts will apply to invitations and hospitality towards or from business partners.

Exceptions are permissible only if the appearance of influenceability can be ruled out and if applicable special rules are complied with, such as in dealing with the authorities. Every exception will require the approval of the individual's superior, who is obliged to correspondingly record this. In granting approval, the following must be observed:

The value of any promotional gift must be such that its acceptance does not place the recipient in a situation of binding dependence. Gifts must be selected according to the principle that any appearance of dishonesty or impropriety on the part of either the giver or recipient of the gift is to be avoided.

2.11.2 Donations and sponsoring

Donations must comply with applicable laws, and are to be handled exclusively by the management. That also applies in particular to sponsoring in connection with social and cultural commitment, taking into account the principles contained in the company's mission statement. Alupress does not permit

any direct or indirect financial support of politically active parties, organizations, trade unions, or their representatives. In addition, Alupress does not support any political events or congresses.

2.12. Rejection of illegal employment practices

Compliance with all employment and social laws and rules is a matter of course throughout the entire company. All employees are instructed to demand compliance with this principle from suppliers and subcontractors and, as far as legally possible, to verify compliance. In the event of any violation, the engagement must be avoided or ended.

2.13. Equal opportunities and equality

Alupress will not tolerate discrimination on the grounds of gender, religion, skin color, age, origin, sexual orientation, political or trade union activities, or on the basis of any other characteristics protected by applicable law. Alupress expects its business partners to prevent all forms of discrimination and to ensure equal opportunities, including equal pay for equal work.

2.14. Artificial intelligence

Alupress complies with all specific AI standards as well as with the legal requirements governing the development and use of IT technologies. To this end, Alupress has defined internal guidelines for the responsible use of AI. We also expect our business partners to have clear guidelines for the responsible use of AI, including ethical principles, transparency, compliance with legal and regulatory requirements, high data quality and security, and appropriate monitoring and evaluation processes.

2.15. Transparency of business relationships at international level

With regard to business relationships at international level, Alupress undertakes to comply with applicable laws and rules in order to avoid the risk of trans-border offences. For this reason, Alupress undertakes to verify the trustworthiness of international partners, as well as the origin of their financial resources, to the extent that this is legally permissible.

3. Conduct guidelines

3.1. Towards customers

Our services are oriented toward the satisfaction of the legitimate requirements and expectations of customers. We meet the needs of the market by maintaining close contact with customers,

demonstrating professionalism, exhibiting a spirit of innovation, and providing value for money. We will openly communicate information and experiences to our customers and assure them of the requisite degree of confidentiality and discretion. Situations that could lead to conflicts of interests must be avoided in all negotiations with customers.

3.2. Towards employees

We rely on the capability and expertise of our employees in order to achieve our company goals. We promote the state of knowledge within the company through basic and advanced training, support the personal development of employees, and ensure suitable information and appropriate working conditions. All employees must actively keep themselves informed, align their own goals with those of the company, and give precedence to the company's interests.

Alupress is committed to protecting individual privacy and personal freedom.

The employer-employee relationship is based on the following principles:

- mutual recognition that compliance with ethical and legal standards when doing business is in the interest of the company and its employees;
- an environment that attracts well-qualified employees is beneficial and establishes a bond with our company;
- equal opportunity, regardless of race, nationality, gender, sexual orientation, religion, disability or age;
- a work environment without discrimination, harassment, or reprisals;
- an "open-door" policy that makes it possible for all employees to interface with management;
- a performance-oriented culture with a competitive remuneration system, as well as fair and objective appraisals conducted periodically in order to take account of the individual contribution made toward achievement of goals and team performance and towards compliance with the values and principles contained in the Code of Ethics.

3.3. Respect and honesty towards superiors, colleagues and employees

The quality of collaboration among superiors, colleagues, and employees is of vital importance to the company's success. Impeccable conduct in dealing with one another, characterized by demonstrating respect and openness to the other person and avoiding unfair types of conduct, not only ensures the communication and quality of the company's culture, but also decisively influences the public's view of the company. We underscore this through the obligation to comply with our mutually established values, rules of the game, and leadership principles.

3.4. Towards suppliers and subcontractors

We also rely on the experience and capacities of carefully selected suppliers and subcontractors in order to ensure the quality and affordability of our services. They must comply with the applicable laws and the guidelines set out in this Code of Ethics.

3.5. Towards supervisory authorities, governmental authorities and ministries

We strictly comply with the laws, rules, guidelines, standards, and customs of the countries in which we operate. Alupress employees, as well as external employees whose work can be associated with Alupress, must act in a reasonable, transparent, and comprehensible manner when dealing with all supervisory authorities, governmental authorities, and ministries. These dealings are reserved solely for the responsible positions and persons in conformity with approved programs and operating processes.

3.6. Towards the public administration, public bodies or public offices

In all dealings with the public administration, public bodies or public offices, all internal and external employees are strictly prohibited from influencing the decisions of the other party through inappropriate means, such as bribery.

3.7. Towards financial institutions

Financial institutions help to increase the value of the company by financing various company activities. When working with financial institutions, Alupress undertakes to provide these with all the requested information in order to ensure that the company's financial situation is depicted comprehensively and enable well-founded financing decisions to be made.

3.8. Towards the media

We value the role of the media, maintain a dialogue with journalists, and support them in their task of reporting objectively and transparently about our company.

3.9. Transparency of business transactions, correct accounting and invoicing

All business transactions must be fully documented in a complete, transparent, and flawless manner in conformity with the statutory rules and, in addition, those applicable within Alupress. Subsidiary ledgers and ancillary recordings are not kept. In addition, all employees charged with financial and cost accounting are obliged to keep transparent, source-related documentation in observance of the

principle of true-cost pricing. Special attention must be paid to truth, accuracy, and completeness when preparing documents relating to annual financial statements.

3.9.1 Money laundering

Money laundering refers to the process of channeling assets derived from illegal activities into the legitimate financial and economic system in order to conceal their origins. Alupress is firmly committed to combating money laundering and expects its business partners to take appropriate measures to ensure compliance with all relevant national and international laws.

4. Implementation and oversight of the Code of Ethics

The management and executives must ensure that the employees concerned comply with the relevant laws and provisions. These principles and, in particular, those contained in this Code of Ethics will be made known to all employees at the company through regularly provided information. Compliance with the principles is emphatically demanded. All Alupress employees are obliged to cooperate with controls in connection with their work and to provide the oversight bodies with the requested information.

4.1. Specific measures to convey the content of the Code of Ethics

Alupress has implemented the following measures in order to convey the contents of the Code of Ethics to all employees and thus ensure optimum compliance with the rules contained in the Code:

- the Code of Ethics is published on the intranet and internet;
- the Code of Ethics is adopted as a basis for concluding employment contracts and, if legally possible, made an integral part of them;
- the Code of Ethics is made known to all business partners and they will be obliged to comply with it.

4.2. Dual-control principle and separation of roles

The application of the dual-control principle and the separation of incompatible activities are suitable measures for the prevention of irregularities, particularly with regard to contractors and suppliers. As regards the separation of roles, particular attention must be paid to separating decision-making, execution, review, and reporting processes. In this respect, Alupress companies have in place a system that is regulated by the internal rules of procedure, under which various hierarchical levels are to be involved through approval responsibilities, irrespective of the size or relevance of the decision.

4.3. Disciplinary measures

In the event of violations of the conduct guidelines applicable within the company and specified in the Code of Ethics, or in the event of violations of statutory rules, disciplinary measures will be taken in accordance with the applicable provisions of employment law or contractual conditions.

5. Whistleblowing – Reporting of violations – Counsellors – Ombudsmen

Our reputation for integrity and fair dealing is our most important asset. In accordance with company policy, employees will report violations of laws, rules, guidelines, and the Code of Ethics so that suitable measures can be taken.

Every recipient is obliged to report, either in writing or verbally, any potential violations of the organizational model and the Code of Ethics of Alupress. Employees who make reports in good faith will be protected against any form of retribution or discrimination.

Reports can be submitted as follows:

- to the employee's superior
 - in writing to:

Alupress AG
attn. "Organismo di Vigilanza"
A.-Ammon-Str. 36
I-39042 Brixen

- via e-mail to the independent supervisory body whose dedicated e-mail address is as follows:
organismo_di_vigilanza@alupress.com

Reports may also be made anonymously. The policy for reporting breaches – the Whistleblowing Information Notice – is published on the Alupress website.

6. Change history