ASTA

CODE OF CONDUCT

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ASTA

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INTRODUCTION

ASTA Energy Solutions AG ("ASTA") and its subsidiaries (together, the "ASTA Group") is a globally operating group providing high-tech copper solutions for energy infrastructure. ASTA pursues responsible corporate governance, guided by the principles of integrity, honesty, sustainability and transparency.

The ASTA Group consists of all companies in which ASTA has a direct or indirect shareholding of at least 50% or in which ASTA otherwise exercises control.

Due to its international activities, ASTA is subject to various social, political and legal obligations that must be complied with. Violations of these obligations, in particular violations of laws or regulations, can cause considerable financial damage to ASTA's business and lasting damage to the ASTA Group.

As one of the leading market and technology companies, ASTA pursues a long-term, comprehensive and sustainable growth and value creation strategy. ASTA achieves its goals, among other things, due to high personal commitment, strong team spirit, open communication, relentless focus on quality innovation and maximum customer orientation.

In relations with ASTA's directors, employees, customers, suppliers and other business partners, the company feels bound by fundamental values and commitments, which are summarized in this Code of Conduct. This Code of Conduct provides both a framework and a guideline for responsible and sustainable behavior within the ASTA Group.

The moral, ethical and legally correct behavior of all employees is critical to ASTA and forms the core of ASTA's corporate culture and DNA. The Code of Conduct applies to all ASTA employees and each employee is required to adhere to the standards of conduct set out here.

Any violation of this Code of Conduct will have disciplinary consequences. In addition, infringements may also have consequences for the person involved in terms of criminal and civil law.

Anyone associated with ASTA, working for or on behalf of the ASTA Group, including contractors, consultants, agency staff and business partners, is required to comply with this Code of Conduct, regardless of the jurisdiction in which they operate (without prejudice to more stringent requirements that need to be met in accordance with local legislation).

A shared belief, at all levels, in the principles and rules of the ASTA Group Code of Conduct, which is based on the principles of the International Declaration of Human Rights and the European Convention on Human Rights, the ETI (Ethical Trading Initiative) Base Code, as well as the ASI (Aluminum Stewardship Initiative) Standard, will not only serve to strengthen the ties that bind the Group together, but will also have a positive impact on the way ASTA is perceived and judged by the communities in which it operates.

RESPONSIBILITY FOR IMPLEMENTATION

We expect each employee to feel personally responsible for adhering to this Code of Conduct. Any employee may seek advice and assistance from their immediate superior, the Human Resources Department or the Compliance area in the event of any questions relating to this Code of Conduct.

Confidentiality will be maintained to the greatest extent possible. Retaliation against any employee who, in good faith, reports a concern to the company about illegal or unethical conduct will not be tolerated and will be countered with disciplinary measures.

1 COMPLIANCE WITH LAWS AND SOCIAL NORMS

ASTA complies with all applicable laws and regulations of the countries in which it does business and respects their social norms. Special attention is paid to Law 12846/2013 - Brazil's Anti- Corruption Law.

2 NON-DISCRIMINATION, RESPECT AND INTEGRITY

ASTA is committed to defending human rights within its sphere of influence and rejects any form of forced labor in its companies and in the companies of its business partners. ASTA rejects child labor, regardless of local legislation, throughout the Group and in the companies of its business partners.

ASTA guarantees equal opportunities and treatment, regardless of ethnicity, skin color, gender, disability, marital status, religion, ideology, age, faith, nationality, sexual orientation, social origin or political conviction. ASTA prohibits any kind of harassment or abusive behavior. Employees and job applicants are evaluated according to the principle of non-discrimination.

The personal rights of each employee are protected. Respect and mutual consideration are important prerequisites for cooperation within the ASTA Group.

3 FAIR COMPETITION

Rules to protect fair competition are an essential part of a free market economy. ASTA is committed to dealing fairly with its business partners, as well as with third parties, and supports free and undistorted competition in compliance with competition and antitrust laws.

Any form of agreement with competitors and collusive practices aimed at or resulting in a restriction or evasion of competition is prohibited. No confidential information, such as prices and terms of sale, costs, production capacities, inventories or similar confidential information, may be disclosed, accepted or exchanged that would allow conclusions to be drawn about current or future market conditions.

4 COMBATING MONEY LAUNDERING

ASTA's objective is to maintain business relations only with business partners whose business activities comply with legal requirements and whose financial resources are of legitimate origin. ASTA does not support money laundering.

All employees must adhere to anti-money laundering laws. Employees are also required to comply with applicable rules on recording and accounting for cash transactions and other contracts.

If ASTA Group employees find themselves in circumstances that are questionable under antitrust law, negotiations must be stopped immediately and the Compliance area must be informed.

5 FIGHTING CORRUPTION

ASTA has a zero tolerance policy towards bribery, fraud, theft and other forms of corruption.

ASTA undertakes to refuse gifts or donations that could trigger a conflict of interest. Neither bribes nor other illegal payments or donations may be accepted, offered or made.

Exceptions to this rule are only gifts of nominal value and hospitality within the bounds of common business practice. All other gifts must be refused or returned.

The compliance of ASTA's suppliers with anti-corruption practices is important to ASTA and will be assessed.

6 CONFLICT OF INTEREST

Employees may encounter situations in which their personal or economic interests conflict or may conflict with ASTA's interests. ASTA expects its employees to act solely in the interests of the Group. If there is a conflict of interest, ASTA requires its employees to deal with it transparently.

All employees must ensure that their interests do not interfere with their obligations to the ASTA Group or its customers and business partners.

Each employee is obliged to fully disclose any actual or potential conflicts of interest and, if necessary, seek specific approval for the course of action.

Each member of the Board of Directors and the Group Executive Board must disclose all conflicts of interest or functions or activities that could potentially lead to a conflict situation with the ASTA Group. Members of the Board of Directors and the Group Executive Board must refrain from exercising their voting rights in matters involving their interests or the interests of individuals or legal entities related to them.

7 CONFIDENTIALITY OF INFORMATION

ASTA's commercial and technical knowledge is crucial to the Group's long-term success. Therefore, all employees must ensure that any ASTA knowledge that is not publicly available is kept strictly confidential and that no unauthorized third party has access to company data, knowledge and confidential information.

If the disclosure of certain confidential knowledge becomes necessary in the course of a business relationship, employees need to ensure that the third party is bound by a confidentiality agreement before any confidential information is disclosed.

In the event that ASTA receives confidential information from its clients or business partners, employees must apply the confidentiality standards described in the respective confidentiality agreememt.

8 INTERNAL INFORMATION

Insiders are prohibited from trading in the relevant securities under applicable legal requirements.

ASTA ensures that privileged information is accessible only to authorized individuals. No ASTA employee provides such information to family members or other persons.

The use of inside information is subject to criminal sanctions and will result in disciplinary consequences. Passing on inside information to other people, either internally or externally, is strictly prohibited and may have legal consequences.

9 EMPLOYABILITY

ASTA does not support discrimination in the hiring, salary, promotion, training, advancement opportunities or dismissal of any employee on the basis of gender, race, national or social origin, caste, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age or any other condition that may give rise to discrimination. ASTA invests in the skills and competencies of its employees. ASTA's objective is to promote the economic well-being of the company and the long-term employment and personal development of all its employees through training and other development measures.

The hiring of people who are related to active employees is considered, as long as they compete on an equal footing with other candidates. In this case, direct hierarchical relationships between relatives are not permitted.

ASTA respects the right to freedom of association and collective bargaining and seeks constructive, long-term exchanges with employee representatives.

10 FAIR REMUNERATION

ASTA adheres to applicable national laws regarding working hours and supports its employees in achieving a healthy work-life balance. ASTA's salaries, benefits and compensation are in accordance with applicable national legislation and the respective labor agreements.

The remuneration system reflects legal requirements, prevailing industry standards and local conditions, and includes awards and bonuses for individuals or groups as a reward for particularly commendable achievements.

11 HUMAN RIGHTSASTA

ASTA is committed to respecting human rights and observing the UN Guiding Principles on Business and Human Rights. ASTA seeks to identify, prevent, mitigate and account for how Group companies address their actual and potential impacts on human rights. If ASTA, as a company, identifies that it has caused or contributed to adverse human rights impacts, ASTA will cooperate in their remediation through legitimate processes.

In all instances, the Board of Directors and managers, as well as all employees, must comply with applicable national laws, as well as the principles of the International Declaration of Human Rights and the European Convention on Human Rights, and above all, act ethically.

ASTA is committed to respecting and supporting international human rights and to treating its employees fairly and with respect. In addition, all requirements of local rules and regulations on the working environment are met. Above all, ASTA is committed to providing a safe working environment: accidents and injuries at work must be prevented. ASTA is committed to respecting its employees' freedom of association and right to collective bargaining and does not discriminate against trade unions or unionized employees.

Any kind of compulsory/forced labor or labor linked to any kind of punishment is prohibited. No employee may be forced to hand over valuables or personal documents to the employer, except for personal documentation required by law.

ASTA does not tolerate any form of child labor, human trafficking or any form of modern slavery. ASTA shares the view that every child should be protected against commercial exploitation, as well as any kind of work that is dangerous or could affect education, health or personal development.

With regard to women's rights, ASTA respects international standards, including the UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW). ASTA also seeks to identify and mitigate the differential and disproportionate impact of activities on women and people of non-binary genders.

ASTA also respects the legal and customary rights and interests of local communities in their lands and livelihoods and in the use of natural resources.

12 ENVIRONMENT

As a quality leader in the energy industry, ASTA strives for an ecologically sustainable living environment. Therefore, ASTA is actively involved in environmentally safe and resource-friendly production, conscious handling of valuable resources. Technologically innovative design features, as well as the recyclability of its products, are very important to ASTA.

ASTA is aware of its responsibility to protect the environment and is committed to complying with applicable environmental laws and regulations, treatment and disposal processes to ensure that the methods by which goods are produced and waste is treated and disposed of do not harm the environment.

ASTA has opted for foresight and precaution, the use of environmentally friendly technologies and the continuous and systematic improvement of its company's environmental efficiency. ASTA ensures that employees are aware of applicable environmental laws and regulations and ensures

that operations comply with applicable requirements regarding the generation, storage, treatment and disposal of hazardous waste.

13 RESPONSIBLE PURCHASING

ASTA is committed and determined to obtain all its raw materials from responsible sources wherever possible, taking into account social and environmental aspects. The Group's suppliers are required to follow ASTA's Code of Conduct, which includes the Group's sustainable procurement principles. ASTA will introduce an evaluation system for its suppliers: all the Group's suppliers will be asked to fill in questionnaires, in which a substantial part of the questionnaire is related to environmental and social

aspects, as well as human rights, among other things. Based on the answers received, ASTA will assess the suppliers' compliance with the Group's values and principles in these areas.

Priority is given to suppliers who value and follow sustainable principles in their business operations. The detailed and careful selection of suppliers ensures long-term continuity and efficiency throughout ASTA's supply chain.

ASTA suppliers and partners will be asked to commit to a Code of Conduct specific to the business relationship.

14 RESPONSIBLE PURCHASING AND HUMAN RIGHTS

Suppliers are chosen not only on the basis of quality, safety and cost, but also on the basis of their anti-corruption, responsible sourcing and human rights practices, which include working conditions and respect for human rights, conflict-affected and high-risk areas, environmental practices, safety standards and protection of intellectual property. ASTA will only enter into a business relationship with suppliers who commit to respecting and following human rights.

15 AREAS AFFECTED BY HIGH-RISK CONFLICTS

ASTA obtains the majority of its raw materials from suppliers who have been homogenized in advance, according to clear criteria and in compliance with the laws and regulations in force in the national and international context. This minimizes the risks related to social and environmental legislation and guarantees a high level of compliance in the country of production. ASTA manages and monitors this issue through due diligence and questionnaires.

16 HEALTH AND SAFETY

ASTA is committed to its responsibility for the health and safety of its employees. ASTA ensures a healthy and safe working environment with appropriate measures to constantly assess and reduce risks and prevent accidents. ASTA offers periodic training to make its employees more aware of

safety and to provide practical skills in handling sources of danger. Ongoing evaluations and training are implemented, making it possible to optimize safety performance in the workplace on an ongoing basis.

17 INFORMATION SECURITY AND DATA PROTECTION

ASTA acts with care and diligence when receiving, processing and storing information (e.g. financial data, technical data, operational data, customer information, file notes, etc.). In this regard, ASTA adheres to industry-standard data security standards and procedures to prevent unauthorized access, alteration or destruction of this information. Any applicable data protection laws must be complied with, in particular the LGPD - 13709/2018.

The IT department ensures that employees only have access to the confidential data and information necessary to carry out their duties and that access to this data is restricted by appropriate technical means. These access restrictions are checked and adjusted at least once a year. Regular checks should also be carried out whenever an employee leaves the company.

18 REPORTS OF MISCONDUCT

Stakeholders, such as employees, customers, suppliers, shareholders and partners of the ASTA Group, may become aware of violations of this Code of Conduct, other internal guidelines or laws and regulations. Stakeholders are encouraged and free to report any misconduct identified through the following means:

- Report misconduct via the anonymous online reporting tool on the company's website: https://www.0800brasil.com.br/app/index.php?c=bcdb07bf9070ee968500fd91757 6eeed
- Report to ASTA Group Management:
- Dr. Karl Schäcke, Executive Director, E-Mail: karl.schaecke@asta.at
- Daniela Klauser, Financial Director, E-Mail: daniela.klauser@asta.at ASTA employees can also use the following reporting channels:
- Report to the management of the respective Group company
- Report to direct superior
- Report to the relevant HR department of the respective ASTA Group company

All reports received will be carefully investigated and, upon request, treated confidentially in accordance with the applicable "Whistleblower Policy". No one who, in good faith, reports misconduct will be subject to retaliation or suffer intimidation, harassment, discrimination or adverse employment consequences because of such a report. In addition, an employee who retaliates against someone who has reported a concern in good faith will be subject to disciplinary action, including dismissal or termination of employment.

To promote open and honest communication, it is expressly noted that stakeholders who report violations of laws or regulations, this Code of Conduct or other internal guidelines and

suffer any adverse consequences as a result of such a report. This also applies to other persons who contribute information relevant to the investigation of misconduct.

The ASTA Group expressly reserves the right to take disciplinary action against employees who intentionally or through gross negligence make false accusations.

ASTA will follow all legal prohibitions on retaliation and guarantee employees the right to speak up about misconduct. In any case, ASTA will strive to preserve legality and business ethics.

19 BAN ON POLITICAL CONTRIBUTIONS

To avoid the appearance of misconduct or prevent conflicts of interest, ASTA prohibits corporate political contributions (both monetary and in-kind) to political candidates, political parties or party committees on ASTA's behalf.

20 CIVIL AND POLITICAL ACTIVITIES OF EMPLOYEES

Company employees have the right to participate in the political process by making personal contributions from their own funds, subject to the applicable legal limits and this Code. Employees will not be reimbursed by the company, directly or indirectly, through salary increases, for personal contributions or expenses.

Employees can participate voluntarily in campaign activities, but they must do so in their own name and not as representatives of the company.