



Code of Conduct

Foreword

As an internationally operating family business with a long tradition AST enjoys an excellent reputation in the public, at their business partners and employees. It is our main priority to uphold this reputation. Therefore we attach great importance in a high standard of legal, ethically unimpeachable conduct and transparent and traceable business practices.

The basic rules and principles governing our behavior now and in the future have been brought together in this Code of Conduct. It provides an orientation framework and applies equally to everyone managers and every employee. It sets a standard for ourselves and at the same time represents a promise that we will act responsibly both externally in our dealings with business partners as well as internally in our interactions with colleagues.

Misconduct by individuals can cause immense harm to all of us. So please read this code of conduct carefully and let us use it to guide our day-to-day conduct.



Dirk Strohmann
CEO

Jörg Strohmann
CEO

1. Conduct in business

Compliance with the law

Compliance with law, rules and regulations is for us an essential basic principle of responsible business conduct. We adhere to legal prohibitions and requirements at all times, even if this involves short-term business disadvantages or difficulties for the company or individuals. Where national laws are more restrictive than the rules applying at AST, the national laws take precedence.

Avoiding conflicts of interest

At AST business decisions are made exclusively in the best interests of the company. Any conflicts of interest with personal matters or other business or non-business activities, including those of relatives or other related parties should be avoided. Should such conflicts nevertheless occur, they must be resolved in accordance with the law and company policies. Conflicts must be dealt with openly and transparently.

Fair competition

We are convinced of the quality of our products, our innovative strength, our integrity and the efficiency of our employees. We confess the rules of the market economy and a fair, open nationally and internationally competition. We also expect this from our business partners and competitors. We pursue our corporate goals exclusively to the principle of high-quality performance and we renounce any business cooperation, assignments or other advantages that could only be obtained by violation of the relevant rules of competition. We ensure compliance with the principles of competition in all our activities, this means in particular to reject market relevant agreements, agreements with competitors regarding prices, capacities and renouncing competition as well as renounce boycott of suppliers or costumers, the submission of bogus offers and the allocation of customers and areas. We don't tolerate any form of corruption and we resolutely reject any type of bribery. The management, executives and employees of AST are prohibited to offer, promise or to grant advantages to business partners and their employees or representatives, public officials, politicians or members of the stated groups of

persons in return for preferential treatment in case of purchasing goods, services or official acts no matter whether an entitlement to benefits exists in a particular case or not.

Preventing money laundering

AST fulfills its legal obligations to prevent money laundering and does not participate in money laundering activities. In cases of doubt, all employees are required to report unusual financial transactions, especially those involving cash, which could give grounds to suspect money laundering, to the responsible finance, legal or compliance department for review.

2. Conduct towards colleagues and employees

Equal treatment and non-discrimination

A culture of equal opportunities and mutual trust and respect is of great importance to us. We promote equal opportunities and prevent discrimination in the recruitment, promotion, training and development of employees. We treat all employees equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religion or world view.

Human and labor rights

We respect internationally recognized human rights and support their observance. We reject all forms of forced and child labor. We recognize the right of all employees to form unions and employee representative bodies on a democratic basis within the framework of national legislation. The right to appropriate compensation is recognized for all employees. Pay and other benefits shall at least comply with the respective national or local legal standards or the standards in the national economic sectors/industries and regions.

Cooperation with labor representatives

For AST trusting and close cooperation with employee representatives is a key component and established cornerstone of corporate policy. Mutual trust and cooperative relations are

based on an open and constructive dialogue characterized by mutual respect.

Occupational health and safety

The safety and health of our employees are a corporate objective of equal standing with the quality of our products and our commercial success.

Occupational safety and health protection are an integral part of all business processes and are included from the outset – starting in the planning phase – in all technical, economic and social considerations.

All employees shall promote safety and health in their work environment and comply with the health and safety regulations. All managers are obligated to instruct and support their employees in meeting this responsibility. The same safety standards as for AST employees shall apply to employees of subcontractors. This is taken into account in selecting and working with subcontractors.

3. Conduct within the Society

Sustainability and protection of environment and climate

For us, sustainability, environmental and climate protection and resource efficiency are key corporate objectives. When developing new products and services and when operating production equipment, we ensure that all environmental and climate impacts are kept to a minimum and our products make a positive contribution to environmental and climate protection for our customers. Every employee bears responsibility for conserving natural resources and helping protect the environment and climate through their individual behavior.

Donations

We regard ourselves as an active corporate citizen and demonstrate our commitment in a variety of ways. Donations and other forms of corporate citizenship are carried out solely in the interests of the company. We make no financial contributions, in particular donations or sponsorships, to political

parties in our home country or abroad, organizations related or similar to parties, individual office incumbents or candidates for political offices.

Political lobbying

Our political lobbying is centralized, open and transparent. We comply with the legal requirements on lobbying and avoid at all costs unfairly influencing government policy and legislation.

Behavior in public and communications

We respect the right to free speech and the protection of personal rights and privacy. All employees should be aware that in their private lives they can also be seen as part and representative of AST and are therefore called upon to safeguard the company's standing and reputation in the way they act and conduct themselves in public, above all towards the media. When expressing a personal opinion we take care not to allow our personal opinion to be linked to our function/work at AST.

4. Handling of information

Reporting

AST is built on strong values: Reliability and honesty, credibility and integrity. We therefore attach great importance to being open and truthful in our reporting and communications on the company's business transactions to employees, customers, business partners, the general public and government institutions. Every employee shall ensure that both internal and external reports, records and other documents of the company comply with the applicable legal rules and standards and are therefore complete and correct at all times and issued in good time and in accordance with system requirements.

Confidential company information/ inside information

We take the necessary steps to suitably protect confidential information and business documents from access and inspection by unauthorized

colleagues and other third parties. Employees of the company who possess concrete information about facts and circumstances not known to the public which, if it were made public, would be suitable to significantly influence the stock market price of financial instruments of AST, shall not buy or sell shares or other financial instruments of AST on the basis of this inside information or pass on this information regardless of whether the disclosure is made deliberately or in gross disregard of the required duty of care.

Data protection and information security

The protection of personal data in particular of employees, customers and suppliers, is of particular importance to AST. We collect and process personal data only when this is absolutely necessary to perform work-related tasks or when required by law. Personal data may be collected or processed only with the consent of the person concerned and where permitted by law.

5. Protection of company property

We use the company's property and resources correctly and carefully and protect them from loss, theft and misuse. Our company's intellectual property represents a competitive advantage for AST and is therefore a valuable asset which we protect against all unauthorized access by third parties. We use the company's tangible and intangible assets exclusively for business purposes and not for personal reasons except where expressly permitted. Our employees bear joint responsibility with their supervisors for ensuring that business trips are always appropriate in nature and scale to the purpose of the trip and are efficiently planned and carried out taking time and cost aspects into account.

6. Implementation and contacts

AST shall actively promote communication of the company policies and agreements on which the Code of Conduct is based. The company shall ensure that they are implemented and that no employee is disadvantaged by complying with the policies/agreements. In their special capacity as

role models, our managers have a particular responsibility to ensure that their actions measure up to the Code of Conduct. They are the first point of contact for questions on understanding the rules and must ensure that all employees know and understand the Code of Conduct. As part of their management duties they shall prevent unacceptable conduct and take suitable measures to avoid infringements of rules in their area of responsibility. Good and trusting relations between employees and managers are reflected in honest and open communication and mutual support.

For further questions relating to the Code of Conduct or information about possible infringements of the law or company policies regarding corruption or anti-competitive behavior all employees as well as third parties (customers, suppliers, etc.) can also contact our central e-mail address info@ast-kunststoffkanister.de.

All information will be treated in strict confidence.