

ALCAR GROUP

CODE OF CONDUCT FOR BUSINESS PARTNERS



ALCAR

YOUR WHEEL PARTNER



ALCAR GROUP AT A GLANCE

ALCAR is an internationally operating industrial and trading group with a strategic product focus on:

- Steel and aluminium wheels
- Tire pressure monitoring systems
- Tires and complete wheels

The ALCAR Group is the market leader in the European passenger car aftermarket for aluminium and steel wheels. Its core business includes both production and national & international wholesale. The companies within the ALCAR Group are characterized by a strong customer and market orientation, offering innovative designs, high-quality production, and service-oriented logistics.

Headquarter

Hirtenberg, located in the south of Vienna / Austria

Production

Aluminium wheels in Neuenrade (DE)

Steel wheels in Lugano (CH)

Distribution network

17 ALCAR companies and 20 importers in 35 countries

Main customers

The tire and automotive accessories retail sector,
vehicle importers, and car dealerships

Employees

approx. 800

1. PREAMBLE

Global business activity also entails the responsibility to pay particular attention to the basic rules of human coexistence. We, at ALCAR Holding GmbH and affiliated companies (hereinafter referred to as "ALCAR") derive our requirements for responsible corporate governance from our corporate values as well as from regulatory requirements, external initiatives and international guidelines to which we are committed. These requirements are integrated into our sustainability strategy and our group-wide guidelines.

The foundations of our pledge are the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights (UNGPs), the UN Global Compact Principles, the ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work and its Follow-up, the OECD Guidelines for multinational enterprises and the OECD Due Diligence Guidance for Responsible Business Conduct.

2. SCOPE

This Code of Conduct defines ALCAR's principles and requirements for its business partners. Its purpose is to ensure that the business practices of our partners align with ALCAR's values, as well as with applicable laws and regulations.

3. COMPLIANCE & RESPONSIBLE CORPORATE GOVERNANCE

3.1. COMPLIANCE WITH LAWS & DUE DILIGENCE OBLIGATIONS

The business partners agree to comply with all applicable national laws and international regulations.

They will implement due diligence processes to identify, prevent, and minimize risks of human rights violations and environmental impacts in their supply chains.

3.2. PROHIBITION OF CORRUPTION

ALCAR does not tolerate any form of bribery, corruption, or other unfair trade practices.

The business partners must comply with applicable laws and regulations against corruption and bribery, including those related to foreign bribery. They must reject all forms of corruption, bribery, theft, embezzlement, or extortion. Illegal payments, particularly payments or other benefits intended to influence a decision in violation of applicable laws, are not tolerated. Business partners are required to adhere to legal provisions regarding compliance and anti-corruption.

3.3. FAIR COMPETITION

Compliance with transparent and fair behaviour on the market is essential for ALCAR.

Therefore, illegal practices such as price fixing, market sharing, and bid rigging will not be tolerated. Agreements and concerted practices with third parties, especially competitors, that restrict competition in effect or purpose are prohibited and will not be tolerated by ALCAR. In addition to adhering to all competition law provisions, we expect our business partners to fully comply with all economic sanctions and export controls.

3.4. PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

ALCAR and its business partners strictly adhere to all applicable laws to prevent money laundering and terrorist financing and refrain from any such activities.

3.5. AVOIDANCE OF CONFLICTS OF INTEREST

The business partners are expected to disclose all conflicts of interest that could potentially influence the business relationship with ALCAR or give the appearance of such an influence.

3.6. EXPORT CONTROLS AND SANCTIONS

The business partners ensure compliance with applicable laws regarding the import and export of goods, services, and information, as well as all relevant embargoes and sanctions.

3.7. PROTECTION OF INFORMATION AND DATA

The business partners commit to adequately protecting all information owned by ALCAR and all intellectual property of ALCAR. Specifically, business partners must ensure the confidentiality of ALCAR's information.

Additionally, business partners must adhere to all applicable intellectual property laws, including patents, trademarks, and copyrights. They must respect the intellectual property of third parties and avoid any infringements of intellectual property rights, such as plagiarism.

Any processing of personal data of ALCAR's employees, customers, and business partners (e.g., collection, use, and storage) must be conducted in accordance with applicable data protection laws.

4. SOCIAL RESPONSIBILITY

4.1. RESPECT FOR HUMAN RIGHTS AND LABOUR CONDITIONS

ALCAR fully recognizes international human rights standards and expects the same from its business partners. The business partners undertake to respect and comply with human rights as fundamental values, based on the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, and the principles of the UN Global Compact.

Furthermore, ALCAR ensures that fair labour practices are upheld. These include fair pay, non-discrimination, prevention of child or forced labour, and freedom of association for employees. Consistent with the UN Global Compact, promoting equal opportunities and treatment—regardless of skin colour, nationality, social or ethnic origin, disabilities, sexual orientation, political or religious beliefs, marital status, gender, or age—is also a prerequisite.

4.2. PROHIBITION OF CHILD AND FORCED LABOUR

The business partners must ensure that they do not engage in any form of child labour, forced labour, modern slavery, or human trafficking. They must comply with all relevant national laws and international agreements specifying a minimum age for employees.

Forced and compulsory labour includes any work or services coerced from individuals under threat of punishment. This encompasses practices such as withholding identity cards and passports, restricting movement, and subjecting individuals to debt bondage.

The business partners are prohibited from tolerating child labour within their own operations or at their direct suppliers under any circumstances. They must comply with at least Convention No. 138 of the International Labour Organization (ILO) concerning the minimum age for admission to employment, as well as ILO Convention No. 182 concerning the prohibition and immediate action for the elimination of the worst forms of child labour, adopted on 26 June 1973 and 17 June 1999 respectively.

4.3. PROHIBITION OF DISCRIMINATION

The business partners are prohibited from discriminating against employees or subjecting them to reprisals based on gender, age, ethnic origin or descent, nationality, race, disability, sexual orientation, religion, political views, or similar grounds. Additionally, any form of physical or psychological violence towards employees and stakeholders, as well as sexual harassment, must not be tolerated.

4.4. COMPLIANCE WITH FREEDOM OF ASSOCIATION

The business partners must respect the freedom of association, the right to collective bargaining, and the principles of equal opportunity in accordance with applicable laws and regulations.

4.5. COMPLIANCE WITH LEGAL REQUIREMENTS REGARDING REMUNERATION AND WORKING HOURS

The business partners must pay fair wages, adhere to maximum working hours as per local laws, and ensure a living wage in accordance with local conditions.

4.6. SAFETY IN THE WORKPLACE

ALCAR's business partners are expected to ensure the physical and mental well-being of their employees, which includes providing a safe and healthy working environment and adhering strictly to safety regulations. They must guarantee compliance with labour protection laws and adhere to health and safety specifications. Additionally, they are responsible for providing suitable occupational safety equipment and organizing occupational safety training courses for their employees. The business partners must ensure the organization of a safe working environment and promote employee health. In the event of any incidents contrary to safety measures, immediate countermeasures should be initiated.

5. ENVIRONMENTAL & CLIMATE PROTECTION

5.1. ENVIRONMENTAL PROTECTION IN THE WORKPLACE

ALCAR's business partners are required to comply with all relevant laws and expected to adhere to international environmental standards. They should use natural resources sparingly and responsibly, striving to minimize the negative impact of their business activities on the environment, climate, biodiversity, and water scarcity.

Additionally, business partners are expected to implement suitable management systems to mitigate environmental and safety risks while enhancing existing environmental and safety standards. Compliance with applicable legal provisions concerning product safety, integrity, handling of hazardous substances, goods, and waste, as well as product labelling and packaging, is mandatory. Products should not contain any features aimed at circumventing legal or regulatory requirements.

Furthermore, business partners are encouraged to promote the development and adoption of energy-efficient and environmentally friendly technologies. They should strive to minimize waste and emissions into the air, water, and soil, and utilize natural resources efficiently.

5.2. ANIMAL WELFARE

ALCAR and its business partners adhere to nationally and internationally applicable legal standards regarding animal welfare and protection. They also follow recognized frameworks that define ethical principles in this regard.

5.3. CONFLICT MINERALS

The business partners must take appropriate measures to prevent the use of raw materials in their products that directly or indirectly contribute to human rights violations, corruption, financing of armed groups, or similar detrimental effects. They undertake to comply with all applicable laws and regulations regarding conflict minerals and must be able to provide information on the origin and supply chain of conflict minerals.

6. REGULAR AUDITS

ALCAR reserves the right to conduct inquiries, audits, or other procedures to assess its business partners.

7. LEGAL CONSEQUENCES FOR BUSINESS PARTNER IN THE EVENT OF VIOLATIONS OF THE CODE OF CONDUCT

Violations of the standards outlined in this Code of Conduct for Business Partners, especially those concerning human rights, environmental protection, and legal obligations, must be promptly rectified.

Our Business Partners are required to promptly notify ALCAR to identify appropriate remedial actions for any identified risks or violations. They must adopt effective controls and measures to prevent their recurrence. Should Business Partners fail to adequately address the issue within a reasonable period, ALCAR reserves the right to terminate the business relationship for cause, without further notice, and without prejudice to any other legal or contractual rights.

8. RESPONSIBILITY FOR COMPLIANCE

We expect our business partners to commit to complying with our principles and to develop and implement appropriate and effective processes to address and prevent identified risks and violations, as well as to identify potential risks. The Code of Conduct does not preclude ALCAR and its business partners from establishing more detailed and stringent requirements, either contractually or individually through their respective internal governance documents.

9. WHISTLEBLOWER AND GRIEVANCE PROCEDURES

The business partners are expected to facilitate their employees and stakeholders in raising concerns or reporting potentially unlawful practices or violations of this Code of Conduct for business partners without fear of retaliation. They may establish their own whistleblowing system or participate in an industry-wide system.

Additionally, business partners are expected to inform their employees about ALCAR's whistleblower and grievance system, which can be accessed on the ALCAR website or by emailing human.rights@alcar-wheels.com.

BUSINESS PARTNER DECLARATION

We hereby confirm our shared commitment to respect, comply with, and apply the values outlined in this ALCAR Group Business Partner Code of Conduct.

Should any point of this Code of Conduct be unfillable now or in the future, we undertake to promptly inform ALCAR in writing.

Confirmation

Company name	
Address	
Name and position of the signer	
Do you have your own internal guidelines? (Code of Conduct of the company?)	
Date	
Stamp, Signature	

Please send the signed document within two weeks to:

E-Mail human.rights@alcar-wheels.com

Postal: ALCAR Wheels GmbH, Leobersdorferstraße 24, 2552 Hirtenberg



ALCAR Holding GmbH
Leobersdorferstraße 24
2552 Hirtenberg

www.alcar-wheels.com