



# ESG

Environmental, Social and Governance

## CODE OF CONDUCT

2024





## Table of Contents

- 1. Principles and guidelines ..... 2
- 2. Scope of the Code of Conduct..... 2
- 3. Environmental standards..... 2
- 4. Human rights and social standards ..... 3
- 5. Compliance and integrity ..... 5
- 6. Implementation of the Code of Conduct..... 6

## 1. Principles and guidelines

As an investor, owner, and/or operator, AURELIUS recognizes the vital importance of combining business success with ESG factors, both to achieve environmental and social change and to safeguard the long-term success of its investment activities. Therefore, AURELIUS incorporates ESG factors into all its business activities on an ongoing basis and embeds sustainability aspects into its core business and its key processes.

AURELIUS is aware of its ecological and social responsibility and is committed to the ten principles of the UN Global Compact, the world's largest initiative for sustainable corporate governance. The United Nations Global Compact calls on business enterprises to align their strategies and business activities with globally applicable human rights, labour rights and environmental protection and to combat all forms of corruption. Additionally, AURELIUS is a signatory of the globally recognized voluntary framework of the UN Principles for Responsible Investment (PRI). The UN PRI are endorsed by a United Nations-supported network of investors that advocates for the application of environmental, social and governance (ESG) criteria in making investment decisions.

## 2. Scope of the Code of Conduct

The following provisions are binding for all employees of AURELIUS and its subsidiaries. Compliance with the requirements of this Code of Conduct does not exempt employees from fulfilling other requirements arising from the laws and other legal provisions applicable to them. AURELIUS implements a Supplier Code of Conduct where applicable.

## 3. Environmental standards

### a. Compliance with environmental standards

It must be ensured that all applicable national environmental standards and international conventions on environmental standards are complied with. AURELIUS complies with the applicable regulations on operational and product-related environmental protection. The environmental impact of resource and energy consumption, emissions of greenhouse gases and air pollutants, water consumption, discharges into soil and water, and waste must be avoided or continuously reduced, and the preservation of biodiversity and the circular economy must be promoted.

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AURELIUS complies with local laws regarding the generation, storage, disposal and recycling of waste, waste gases and waste water.

### **b. Compliance with regulations when handling hazardous substances**

AURELIUS ensures that hazardous persistent organic substances and chemicals are procured, stored, used and disposed of safely. Applicable substance restrictions and product safety requirements must be complied with.

The manufacture of products containing mercury and the use of mercury and mercury compounds in manufacturing processes is prohibited. Persistent organic pollutants or chemicals that are banned at national or international level are neither produced nor used.

### **c. Greenhouse gas emissions**

AURELIUS strives to find cost-effective solutions to improve energy efficiency and minimize energy consumption and greenhouse gas emissions. The aim is to reduce greenhouse gas emissions as far as possible through avoidance and reduction strategies.

### **d. Pollution**

Harmful emissions to air, water or soil must be avoided or reduced as far as possible. Unavoidable waste should be properly recycled.

### **e. Conflict minerals**

AURELIUS ensures that no products are used that contain conflict minerals that directly or indirectly finance armed groups or cause human rights violations, as described in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG).

### **f. Negative effects from production processes**

The protection of the environment, the lives and health of employees and local residents must be guaranteed at all times. AURELIUS will ensure that there are no risks to the public that could result from its production processes and products.

## **4. Human rights and social standards**

### **a. Compliance with human rights and social standards**

AURELIUS complies with all applicable national human rights standards, labour protection regulations and international conventions on human rights and social standards. In particular, AURELIUS is committed to the principles of the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the core labour standards of the ILO.

## **b. Prohibition of forced and child labour**

AURELIUS ensures that it protects internationally recognized human rights in its activities and towards its employees and does not directly or indirectly use forced labour (including modern slavery and human trafficking) and child labour of any kind or products manufactured using such labour. The minimum age for employment must be higher than the age at which compulsory education ends according to the law of the place of work. Forced labour includes any work or service that is demanded of a person under threat of punishment (physical, psychological, financial or otherwise) and for which he or she has not voluntarily made himself or herself available. All forms of slavery, slavery-like practices, servitude or other forms of oppression or exploitation in the working environment, such as extreme economic or sexual exploitation and humiliation, are also prohibited. All employees must be granted the right to terminate their employment relationship in compliance with the contractually agreed or statutory notice periods. Withholding employees' identity documents is prohibited.

## **c. Anti-discrimination**

Any form of discrimination against employees and applicants must be avoided and actively prevented. In particular, no one may be discriminated against on the basis of skin colour, gender, age, religion or ideology, social origin, health, ethnic origin, nationality, membership of workers' organizations, political membership or political opinion or sexual identity. This applies in particular to the recruitment of employees and to their training, promotion and remuneration.

## **d. Fair working conditions**

AURELIUS complies with the statutory regulations to ensure fair working conditions, including those relating to remuneration, working hours and the protection of privacy. Overtime must be voluntary. Sufficient breaks and rest periods in accordance with laws, industry standards or collective agreements must be observed. The terms and conditions of employment, including working hours and remuneration, must be known to each employee, usually in the form of a written employment contract.

## **e. Fair compensation**

Employees must be paid on time and in accordance with applicable wage laws, including minimum wages, overtime and other required benefits.

## **f. Collective bargaining, freedom of association**

AURELIUS supports and respects the right to freedom of association and collective bargaining in accordance with applicable laws and regulations.

### **g. Health and safety**

The health and safety obligations applicable to the place of work must be complied with at all times. AURELIUS shall ensure that appropriate systems are in place in each work area to identify, assess, prevent and address potential risks to the health and safety of employees. Effective measures must be taken to prevent accidents at work or work-related health hazards.

### **h. No compulsory eviction**

AURELIUS does not carry out unlawful evictions, i.e. it does not unlawfully seize land, forests or bodies of water.

### **i. Use of security forces**

AURELIUS does not deploy private or public security forces to protect a business project if, due to a lack of instructions or control by AURELIUS, the life and limb of employees is endangered or freedom of assembly is restricted.

## **5. Compliance and integrity**

### **a. Adherence to compliance and integrity**

AURELIUS regards business integrity as the basis of business relationships. AURELIUS knows and complies with the relevant laws, regulatory requirements, industry standards and internal regulations to prevent white-collar crime and criminal offenses.

### **b. Confidential information**

AURELIUS ensures that confidential information and data is stored carefully, is not disclosed or made accessible to unauthorized persons and is used exclusively for the agreed business purposes.

### **c. Data protection**

AURELIUS is committed to protecting the personal and confidential data of employees and customers. Data will only be stored where absolutely necessary or required by law.

### **d. Conflicts of interest**

Employees of AURELIUS who are affected by a potential or actual conflict of interest in their activities within the company are obliged to disclose and resolve this conflict immediately. Decisions must therefore be made solely based on objective considerations. Personal interests should not guide decisions.

### **e. Anti-corruption and bribery**

Any behaviour by employees that could give the impression of improperly influencing business decisions is prohibited. AURELIUS requires its employees to refrain from giving or accepting any form of benefit for the purpose of exerting influence. Donations or grants to public officials, government officials or representatives of such persons are also strictly prohibited.

### **f. Money laundering**

Legal obligations to combat money laundering and terrorist financing must be complied with. Activities related to money laundering or terrorist financing are prohibited.

### **g. Fair competition**

AURELIUS conducts its business in accordance with fair competition and in compliance with applicable antitrust and competition laws. AURELIUS adheres to fair business practices, including accurate and truthful advertising.

### **h. Insider information**

The law prohibits the use of insider information when trading in securities or other tradable financial instruments and the disclosure of insider information to third parties for such purposes. If AURELIUS becomes aware of such information, it will treat it in accordance with insider trading regulations. Insider information is specific information about circumstances which are not known to the public and which, if made public, could significantly influence the price of securities or similar financial instruments. Examples of such circumstances may include falling and rising profits, large orders, plans to merge or acquire a company, significant new products or changes in company management.

## **6. Implementation of the Code of Conduct**

### **a. Compliance with the Code of Conduct**

It must be ensured that the standards of this Code of Conduct are adhered to. In order to put the principles of this Code of Conduct into practice, AURELIUS makes it accessible to all employees through appropriate channels. Stricter regulations than those described in this Code of Conduct may exist in individual countries, business areas or markets. In such cases, the stricter rules apply.

### **b. Management system**

AURELIUS has implemented a management system to ensure, review and continuously develop the requirements arising from these principles.

### **c. Reporting of grievances**

AURELIUS' employees are encouraged to report violations of the Code of Conduct. Significant compliance violations, in particular illegal business practices, can be reported by all employees via the established, accessible complaints channels. To report possible violations of the Code of Conduct, please use our complaints procedures.