

Business Ethics Policy AAGES GROUP

At AAGES Group, our firm commitment to ethical conduct forms the foundation of our corporate identity and guides every aspect of our business operations. Recognizing the profound impact our decisions and actions have on our employees, customers, partners, and the communities in which we operate, we are dedicated to upholding the highest standards of integrity, accountability, and respect. This Business Ethics Policy embodies our pledge to engage in practices that comply with legal requirements and reflect our dedication to ethical responsibility. Through this policy, we aim to nurture a culture of transparency and trust, ensuring that our corporate actions are always aligned with our core values and the broader interests of society.

Company Values: Respectful, Reliable, Cooperative, and Passionate

Incorporating essential elements such as anti-corruption, data protection, financial integrity, fair competition, and intellectual property rights, this policy serves as a comprehensive guide for our employees and stakeholders. It underscores our collective responsibility to maintain ethical standards in every endeavor, fostering an environment where ethical considerations are at the forefront of decision-making processes. By embedding principles such as whistleblowing protection, anti-money laundering, and the avoidance of conflicts of interest into our corporate ethos, we not only safeguard our reputation but also contribute to a more just and responsible global business landscape.

This introduction sets the stage for a detailed exploration of our ethical commitments and the practical steps we take to live up to them, reinforcing AAGES Group's ethical responsibility.

Core Principles and Standards

1. Integrity and Compliance

- **Anti-Corruption and Anti-Money Laundering:** We strictly prohibit any form of corruption and money laundering. All employees are expected to conduct business dealings transparently and ethically, adhering to all laws aimed at combating corruption and money laundering globally.
- **Fair Competition and Anti-Trust:** We commit to fair competition, respecting anti-trust laws and regulations. Our practices are designed to promote healthy competition and innovation, avoiding any conduct that unfairly restricts trade or harms consumer interests.

- Conflicts of Interest: Employees must avoid situations where personal interests could conflict with the interests of AAGES Group. Any potential conflicts should be disclosed and managed according to our policies.

2. Responsibility and Transparency

- Financial Responsibility: We maintain the highest standards of accuracy and transparency in our financial records, ensuring all transactions are properly recorded and reported in accordance with applicable laws and standards. Since we are listed on the stock exchange, the Annual Reports and detailed financial situations are publicly available.
- Disclosure of Information: We are committed to the timely and accurate disclosure of information relevant to our stakeholders, ensuring transparency and accountability in our operations.
- Whistleblowing and Protection Against Retaliation: We provide secure channels for employees and stakeholders to report unethical or illegal conduct without fear of retaliation. Protecting the identity and rights of whistleblowers is paramount to our ethical stance. See *Grievance Mechanism*.

We encourage the reporting of any ethical concerns or breaches without fear of retribution. It is our collective responsibility to maintain the integrity of our operations, and we commit to addressing any issues with seriousness and discretion.

Please consult the Grievance Mechanism available online here:
<https://www.aages.ro/contact/>

3. Protection and Security

- Data Protection and Data Security: We prioritize the protection of personal and sensitive data, adhering to stringent data security practices to prevent unauthorized access, disclosure, or misuse of information.
- Intellectual Property: We respect intellectual property rights and are committed to protecting our own intellectual assets as well as those of others. All forms of intellectual property infringement are strictly prohibited.

4. Global Compliance

- Export Controls and Economic Sanctions: We comply with all applicable export control laws and economic sanctions, ensuring our products and services are not used for unauthorized purposes.
- Counterfeit Parts: We rigorously avoid the use, supply, or acceptance of counterfeit parts in our operations, ensuring the integrity and safety of our products.

Implementation and Enforcement

- Training and Awareness: Regular training programs will be conducted to ensure employees are aware of their ethical responsibilities and related policies as the Code of Conduct.
- Monitoring and Auditing: Continuous monitoring and periodic internal auditing will be carried out to ensure compliance with this policy.
- Disciplinary Action: Violations of this policy will result in disciplinary action, up to and including termination of employment and legal action, where applicable – see Internal Regulation of Order available for employees.

Review and Update

This policy will be regularly reviewed and updated to reflect changes in laws, industry standards, and best practices. Amendments will be communicated to all employees to ensure continued compliance and ethical conduct.

Guiding Principles

- Integrity and Honesty: We are committed to engaging in business with unwavering integrity and honesty, ensuring all our communications and representations are truthful and accurate.
- Legal Compliance: We strictly adhere to the legal and regulatory frameworks governing our operations, both locally and internationally.
- Respect for All: We treat everyone with dignity, fairness, and respect, valuing diversity and fostering an inclusive environment.
- Safeguarding Confidentiality: We diligently protect sensitive information entrusted to us, respecting the privacy and confidentiality of our stakeholders.
- Avoiding Conflicts of Interest: We proactively avoid situations that may conflict with the interests of our company or stakeholders, openly disclosing any potential conflicts.
- Fair Practices: Our business practices are rooted in fairness and ethical competition, eschewing any form of manipulation or unfair advantage.
- Asset Protection: We are guardians of our company's assets, ensuring they are used responsibly and not for personal gain.
- Social Responsibility: We are committed to being responsible corporate citizens, contributing positively to our communities and minimizing our environmental footprint.

The Business Ethics Policy of the AAGES Group stands as a clear declaration of our steadfast dedication to ethical practices in all areas of our business. Through the adoption of these fundamental principles, we strive to cultivate an environment characterized by integrity, accountability, and excellence, thereby establishing ethical norms that resonate with our core values and meet the expectations of our stakeholders.