

## **Modern Slavery Act statement apt Group 2023**

This statement is made pursuant to the Modern Slavery Act 2015 and sets out what steps apt Group has taken in the financial year ending 31 December 2022 to ensure that slavery and human trafficking are not taking place within any part of our business or within our supply chains.

### **Structure and Business**

The apt Group is one of the leading company groups in the European aluminum industry. The Group's headquarters is apt Holding GmbH in Monheim am Rhein. With our apt Extrusions divisions (in Monheim (D) and Roermond (NL) as well as our apt Products divisions (in Cheb (CZ) and Eckental (D)), we develop and produce technologically sophisticated extruded profiles and mechanically processed products from aluminum, which we deliver to notable customers from the construction, transport, automotive and industry sectors. In doing so, we cover the complete value-added chain with our production processes, from raw material to end product. In 2022, the apt Group's total sales reached 380 million euros.

At apt, our paramount focus is on people – our approximately 1,000 employees constitute our most valuable asset. Consequently, prioritizing individuals is at the core of our values, and the adherence to human rights stands as a fundamental element of our conscientious corporate governance. We are unwaveringly dedicated to guaranteeing the respect and upholding of human rights within our operations and by our suppliers.

### **Policies**

We are dedicated to upholding our social obligations, encompassing the safeguarding of human rights, the protection of employees' rights and their representatives, environmental conservation, promotion of fair competition, and the combatting of corruption.

Our Code of Conduct delineates our corporate duties along with the principles and values guiding the conduct of all our employees. This encompasses, but is not confined to:

- Treating everyone with equity and respect, extending to our employees, customers, and business associates, including suppliers.
- Operating with honesty and transparency, prioritizing the safeguarding of human rights.
- Adherence to legal regulations, encompassing fundamental labor rights, particularly the right to freedom of association and the elimination of discrimination throughout employment.

## **Migrant Workers**

We recognize the vulnerability of migrant workers, in various industries, to exploitation and human rights abuses. Therefore, within our commitment to combat modern slavery and human trafficking, we specifically address the risks associated with the employment of migrant workers.

Our policies and procedures ensure that all workers, regardless of their nationality or immigration status, are treated fairly and with dignity. We ensure that recruitment agencies and labor providers are thoroughly vetted to prevent any engagement in exploitative practices, such as debt bondage or retaining passports.

By actively promoting the rights and well-being of migrant workers, we strive to create a safe and inclusive work environment for all individuals involved in our business activities.

## **Employee Training**

Training is carried out on both Group level and local level with a selection of subjects from integrity in general to compliance in procurement.

## **Supply Chain and Due Diligence**

Suppliers within the group are mandated to adhere to a sustainability clause as part of the supplier code of conduct.

Regular Human Rights Compliance Assessments are conducted by various entities within the apt Group to verify the alignment of all business aspects with ethical practices and international human rights standards. The assessments aim to ensure that employees receive fair and transparent treatment, encompassing compliance with the Working Time Directive and adherence to Minimum Wage regulations.

## **Whistleblowing Mechanism**

In order to enhance transparency and accountability, the apt Group has implemented a whistleblowing mechanism that allows employees, suppliers, and other stakeholders to report any concerns related to modern slavery and human trafficking. This mechanism ensures that individuals feel safe and protected when reporting any potential violations, and it encourages the timely identification and resolution of issues.

### **Monitoring and Evaluation**

The apt Group recognizes the importance of ongoing monitoring and evaluation to ensure the effectiveness of its efforts in preventing modern slavery and human trafficking. Regular reviews of our policies, procedures, and supplier relationships are conducted to identify areas for improvement.

### **Transparency and Communication**

The apt Group is committed to maintaining transparency and communicating its efforts to prevent modern slavery and human trafficking. This includes providing relevant information to stakeholders, such as customers, investors, and the public. Our Modern Slavery Act statement, published on our corporate website, serves as a comprehensive overview of our actions, progress, and challenges in addressing these issues. We actively engage with stakeholders to address inquiries and share updates on our continuous improvement initiatives.

### **Remediation and Corrective Actions**

In the event that any instances of modern slavery or human trafficking are identified within our operations or supply chain, the apt Group is dedicated to taking prompt and effective remediation and corrective actions. This may involve working closely with affected individuals, collaborating with relevant authorities, and, when necessary, terminating relationships with suppliers who do not comply with our ethical standards.

### **Conclusion**

The apt Group is steadfast in its commitment to preventing modern slavery and human trafficking in all aspects of its business operations and supply chain. Through a comprehensive set of policies, employee training, supply chain due diligence, a whistleblowing mechanism, monitoring and evaluation, and collaboration with stakeholders, we aim to create a work environment and supply chain that uphold the highest standards of ethical conduct and respect for human rights.

Our focus for 2024 is to continue to build upon our robust compliance culture and maintain high standards. We shall continue to work closely with our suppliers to ensure we are sourcing our products in a responsible manner. We fully expect our suppliers to operate in full compliance with all applicable laws.

## Approval

This statement is approved by the Management Board of the apt Group and will be reviewed and updated annually to reflect our ongoing commitment and efforts to combat modern slavery and human trafficking.

November 2023



Michael Zint

CEO