

ASTA

CODE OF CONDUCT

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INDEX

1	COMPLIANCE WITH LAWS AND SOCIAL NORMS	5
2	RESPECT AND INTEGRITY, NON-DISCRIMINATION	5
3	FAIR COMPETITION	5
4	ANTI-MONEY LAUNDERING	6
5	FIGHT AGAINST CORRUPTION	6
6	CONFLICT OF INTEREST	7
7	CORPORATE INFORMATION / SECRECY	7
8	INSIDER INFORMATION	8
9	EMPLOYMENT	8
10	WORKING HOURS AND REMUNERATION	9
11	HUMAN RIGHTS	9
12	ENVIRONMENT	10
13	RESPONSIBLE SOURCING	11
14	RESPONSIBLE SOURCING REGARDING HUMAN RIGHTS	11
15	CONFLICT-AFFECTED AND HIGH-RISK AREAS	12
16	HEALTH AND SAFETY	12
17	DATA PROTECTION AND DATA SAFETY	12
18	REPORT OF MISCONDUCT	13
19	PROHIBITION ON POLITICAL CONTRIBUTIONS	14
20	EMPLOYEE POLITICAL AND CIVIC ACTIVITY	15

INTRODUCTION

ASTA Energy Solutions AG (“ASTA”) and its subsidiaries (altogether the “ASTA Group”) is a worldwide operating group providing high tech copper solutions for the energy infrastructure. ASTA pursues responsible corporate management guided by the principles of integrity, honesty, sustainability and transparency.

The ASTA Group consists of all companies in which ASTA has a direct or indirect shareholding of a minimum of 50% or in which ASTA exercises control in a different way.

Due to its international activities, ASTA is subject to various social, political and legal obligations they must comply with. Violations of those, in particular violations of the laws or regulations, can cause considerable financial detriment to ASTA’s business and lasting damage to the ASTA Group.

As one of the market and technology leading firms, ASTA pursues a long-term, sustainable, comprehensive growth and value creation strategy. ASTA achieves its goals, among other things, due to high personal commitment, strong team spirit, open communication, relentless focus on quality innovation and ultimate customer orientation.

In relations with ASTA’s directors, employees, customers, suppliers and other business partners, ASTA feels bound by fundamental values and commitments, which are summarized in this Code of Conduct. This Code of Conduct provides both a framework and a guideline for sustainable responsible behavior within the ASTA Group.

The morally, ethically and legally sound behavior of all employees is critical for ASTA and forms the core of ASTA’s corporate culture and DNA. The Code of Conduct applies to all employees of ASTA and it is required that every employee adheres to the standards of conduct set forth herein.

Any violation of this Code of Conduct will have disciplinary consequences. In addition, infringements can also have consequences for the person concerned in terms of criminal and civil law.

Any person associated with ASTA, who works for or on behalf of the ASTA Group, including contractors, consultants, agency personnel and business partners is requested to comply with this Code of Conduct, regardless of the jurisdiction they operate in (without prejudice to stricter requirements that need to be complied with under local law).

A shared belief, at all levels, in the principles and rules of the Code of Conduct of ASTA Group, which is based on the principles of the International Bill of Human Rights and the EU Convention on Human Rights, the ETI (Ethical Trading Initiative) Base Code, as well as the ASI (Aluminium Stewardship Initiative) Standard, will not only serve to reinforce the ties that bind the Group together but will also have a positive impact on the way ASTA is perceived and judged by the communities in which it operates.

RESPONSIBILITY FOR IMPLEMENTATION

We expect every employee to feel personally responsible for the adherence to this Code of Conduct. Any employee can seek advice and assistance from his or her immediate superior, the Human Resource Department or the Compliance Officers in case of questions related to this Code of Conduct.

Confidentiality will be maintained to the greatest extent possible. Retaliation against any employee who in good faith reports a concern to the company about illegal or unethical conduct will not be tolerated and will be countered with disciplinary measures.

Board of Directors

Karl Schäcke, CEO

Daniela Klauser, CFO

1 COMPLIANCE WITH LAWS AND SOCIAL NORMS

ASTA complies with all applicable laws and regulations of the countries in which it does business and respects their social norms.

2 RESPECT AND INTEGRITY, NON-DISCRIMINATION

ASTA commits itself to upholding human rights within its sphere of influence and rejects any form of forced labor in its companies and the companies of its business partners. ASTA rejects child labor, irrespective of local legislation, throughout the Group and in the companies of its business partners.

ASTA guarantees equal opportunity and equal treatment, irrespective of ethnicity, skin color, gender, disability, family status, religion, ideology, age, faith, nationality, sexual orientation, social background or political conviction. ASTA prohibits any kind of sexual or non-sexual harassment or abusive behavior. Employees and job applicants are assessed following the principle of non-discrimination.

The personal rights of each employee are protected. Respect and mutual consideration are important prerequisites for cooperation within the ASTA Group.

3 FAIR COMPETITION

Rules to protect fair competition are an essential part of a free market economy. ASTA is committed to dealing fairly with its business partners as well as with third parties and supports free and undistorted competition in compliance with the competition and antitrust laws.

Any form of agreement with competitors and collusive practices aiming at or resulting in a restriction or avoidance of competition is prohibited.

No confidential information such as prices and sales terms, costs, production capacities, inventories or similar confidential information may be disclosed, accepted or exchanged that permits conclusion about current or future market conditions.

4 ANTI-MONEY LAUNDERING

ASTA's objective is to maintain business relationships only with business partners whose business activities comply with legal requirements and whose financial resources are of legitimate origin. ASTA does not support money laundering.

All employees must adhere to anti-money laundering laws. Employees are also required to comply with applicable rules on recording and accounting for cash and other transactions and contracts.

Should employees of the ASTA Group find themselves in circumstances that are dubious under anti-trust legislation, negotiations shall be discontinued immediately and the Compliance Officer shall be informed.

5 FIGHT AGAINST CORRUPTION

ASTA has a zero-tolerance policy towards bribery, fraud, theft and other forms of corruption.

ASTA commits itself to refusing gifts or donations that could trigger a conflict of interest. Neither bribes nor other illegal payments and donations may be accepted, offered or made.

Exceptions to this rule are solely gifts of nominal value and hospitality within the limits of ordinary business practice. All other presents shall be refused or returned.

ASTA suppliers' compliance with anti-corruption practices are important to ASTA and shall be assessed.

6 CONFLICT OF INTEREST

Employees may encounter situations in which their personal or economic interests come or may come into conflict with the interests of ASTA. ASTA expects its employees to act exclusively in the interest of the Group. Should there be a conflict of interest, ASTA requires its employees to deal with it transparently.

All employees must ensure that their interests do not interfere with their obligations to the ASTA Group or its customers and business partners.

Every employee is required to fully disclose any actual or potential conflicts of interest, and – if necessary – to seek specific approval for course of action.

Every member of the Board of Directors and of the Group Management Board has to disclose all conflicts of interest or functions or activities that could potentially lead to a conflict situation with the ASTA Group. The members of the Board of Directors and of the Group Management Board shall refrain from exercising their voting rights in matters concerning their interests or the interests of natural or legal persons related to them.

7 CORPORATE INFORMATION / SECRECY

The commercial and technical know-how of ASTA is crucial for the long-term success of the Group. Therefore, all employees must ensure that any of ASTA's know-how that is not publicly available is kept strictly confidential and that no unauthorized third parties gain access to company data, know-how and confidential information.

In the event the disclosure of certain confidential know-how becomes necessary in the course of a business relationship, employees need to ensure that the third party is bound by a confidentiality agreement before any confidential information is disclosed.

In the event ASTA receives confidential information from its customers or business partners, employees must apply the confidentiality standards outlined in the respective confidentiality agreement.

8 INSIDER INFORMATION

People having insider knowledge are prohibited from trading the relevant securities under the applicable legal requirement.

ASTA ensures that insider information is only made accessible to authorized individuals. None of ASTA's employees provides such information to family members or other individuals.

Use of insider information is subject to criminal sanctions and will result in disciplinary consequences. Passing on insider information to other persons internally or externally is strictly prohibited and can have legal consequences.

9 EMPLOYMENT

ASTA places great emphasis on apprenticeship and knowledge transfer. ASTA creates an environment, which provides personal and professional prospects for its employees, in which exceptional performance and results can be achieved and are also rewarded.

ASTA does not support discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any employee based on gender, race, national or social origin, caste, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age or any other condition that could give rise to discrimination. ASTA invests in the skills and competence of its employees. ASTA's goal is to promote the economic well-being of the enterprise and the long-term employment and personal development of all its staff through training and other development measures.

ASTA respects the right to freedom of association and collective bargaining and strives for long-term, constructive exchange with the employees' representatives.

10 WORKING HOURS AND REMUNERATION

ASTA adheres to the applicable national laws with regard to working hours and supports its employees in achieving a healthy work-life balance. ASTA's wages, salaries, benefits and compensation are in line with the applicable national law and respective labor agreements.

The remuneration system reflects the legal requirements, prevailing standards within the industry and local conditions, and includes premiums and bonuses for individuals or groups as a reward for particular commendable achievements.

11 HUMAN RIGHTS

ASTA is committed to respect Human Rights and to observe UN Guiding Principles on Business and Human Rights. ASTA seeks to identify, prevent, mitigate and account for how Group companies address its actual and potential impacts on Human Rights. If ASTA as a company identifies as having caused or contributed to adverse human rights impacts, ASTA will cooperate in their remediation through legitimate processes.

In all instances, the Management Board and managers, and also every employee must obey applicable national law, as well as the principles of the International Bill of Human Rights, and the EU Convention on Human Rights, and above all act ethically.

ASTA commits itself to respect and support international human rights and to treat its staff fairly and with respect. In addition, all requirements of the local rules and regulations about the work environment are fulfilled. Above all, ASTA commits to providing a safe working environment: accidents and injuries at work must be prevented. ASTA commits to respect freedom of

assembly, and the right to collective bargaining of its staff and do not discriminate against unions or union staff.

Any kind of compulsory/forced labor or work linked with any kind of punishment is forbidden. No staff can be forced to surrender articles of value or personal documents to the employer apart from personal documentation required to be submitted per law.

ASTA does not tolerate any form of child labor, human trafficking or any form of modern slavery. ASTA shares the opinion that every child must be protected against commercial exploitation, as well as any kind of work that is hazardous or may affect education, health or personal development.

With regard to women's rights, ASTA respects international standards, including the UN Convention on the elimination of all Forms of Discrimination Against Women (CEDAW). ASTA also seeks to identify and mitigate the differentiated and disproportionate impact of activities on women and gender non-binary persons.

ASTA also respects the legal and customary rights and interests of local communities in their land and livelihoods and their use of natural resources.

12 ENVIRONMENT

As a quality-leading company in energy industry, ASTA strives for an ecologically clean living environment. Therefore, ASTA is actively involved in environmentally safe and resource-friendly production, conscientious handling of valuable resources. Technologically innovative design features as well as the recyclability of its products are very important to ASTA.

ASTA is aware of its responsibility to protect the environment and is committed to complying with applicable environmental laws and regulations, treatment and disposition processes to ensure that the methods by which goods are produced and wastes are treated and disposed of, do not unreasonably harm the environment.

ASTA has opted for foresight and precaution, the use of environmentally friendly technologies, and the continuous, systematic enhancement of the environmental efficiency of its company. ASTA ensures that the employees are made aware of applicable environmental laws and regulations and ensures that the operations comply with applicable requirements concerning the generation, storage, treatment and disposition of hazardous waste.

13 RESPONSIBLE SOURCING

ASTA is committed and determined to source all its raw materials from responsible sources whenever possible taking into account social and environmental considerations. The Group's suppliers are asked to follow ASTA's Code of Conduct, which includes the Group's principles of sustainable sourcing. ASTA will introduce an evaluation system for its suppliers: all of the Group's suppliers shall be asked to fill out questionnaires, in which a substantial part of the questionnaire is related to environmental and social aspects as well as human rights, among other things. Based on the received answers, ASTA shall evaluate the suppliers' compliance with the Group's values and principles in these areas.

Priority is given to suppliers who cherish and follow sustainable principles in their business operations. Detailed and careful selection of suppliers ensures continuity and long-term efficiency throughout ASTA's supply chain.

14 RESPONSIBLE SOURCING REGARDING HUMAN RIGHTS

Suppliers are chosen not only based on quality, safety and cost but also based on their anti-corruption practices, responsible sourcing, and human rights practice, which includes working conditions and respect for human rights, conflict-affected and high-risk areas, environmental practices, safety standards and protection of intellectual property. ASTA will only enter into a

business relationship with suppliers who commit themselves to abide by and follow human rights.

15 CONFLICT-AFFECTED AND HIGH-RISK AREAS

ASTA sources the majority of its raw materials from well-known suppliers within the European Union, which minimizes risk in social and environmental legislation and ensures a high level of enforcement in the country of production. ASTA covers these areas in its due diligence and its questionnaires.

16 HEALTH AND SAFETY

ASTA is committed to its responsibility for the safety and health of its employees.

ASTA ensures a healthy and safe work environment with appropriate measures to constantly assess and decrease risks and prevent accidents. ASTA provides periodical training to make its employees more security-conscious and to give them practical skills in dealing with sources of danger.

Continuous evaluation and training are installed and allow us to optimize the workplace safety performance on an ongoing basis.

17 DATA PROTECTION AND DATA SAFETY

ASTA acts with care and diligence when receiving, processing and storing information (e.g. financial data, technical data, operational data, customer information, file notes, etc.). In this respect, ASTA adheres to data security standards and procedures as customary in the market

to prevent the unauthorized access, amendment or destruction of such information. Any applicable data protection laws need to be complied with.

The IT department ensures that employees only have access to data and confidential information that they need for the fulfillment of their duties and that access to such data is restricted by appropriate technical means. These access restrictions are checked and adjusted at least once a year. Regular checks are also to be carried out whenever an employee is leaving the company.

18 REPORT OF MISCONDUCT

Stakeholders such as employees, customers, suppliers, shareholders and partners of ASTA Group may become aware of violations of this Code of Conduct, other internal guidelines, or laws or regulations. The stakeholders are encouraged and free to report any such misconduct identified by them through the following means:

- Report misconduct via the anonymous online reporting tool on the company website:

Whistle Report

- Report to the ASTA Group Management:

Dr. Karl Schäcke, Chief Executive Officer, E-Mail: karl.schaecke@astagroup.com

Daniela Klauser, Chief Financial Officer, E-Mail: daniela.klauser@astagroup.com

Additionally, employees of ASTA may also use the following reporting channels:

- Report to the management of the respective Group company
- Report to the direct superior
- Report to the competent HR department of the respective ASTA Group company

All reports received shall be carefully investigated and, upon request, treated confidentially in accordance with the applicable “Whistleblower Regulation”. No one who, in good faith, reports misconduct shall be subject to retaliation or shall suffer intimidation, harassment, discrimination or adverse employment consequences because of such report. Moreover, an employee who retaliates against someone who has reported a concern in good faith is subject to disciplinary actions up to and including dismissal or termination of employment.

To promote open and honest communication, it is expressly noted that stakeholders reporting violations of laws or regulations, this Code of Conduct or other internal guidelines and rules shall not suffer any adverse consequences as a result of such reporting. This shall also apply to other persons contributing material information to the investigation of misconduct.

ASTA Group expressly reserves the right to take disciplinary action against employees who intentionally or through gross negligence make false accusations.

ASTA will follow all legal prohibitions for retaliation and will grant employees the right to speak about misconduct. In any case, ASTA will make an effort to preserve legality and business ethics.

19 PROHIBITION ON POLITICAL CONTRIBUTIONS

To avoid the appearance of impropriety or to prevent conflicts of interest, ASTA prohibits corporate political contributions (both monetary and in-kind) to political candidates, political parties, or party committees on behalf of ASTA.

20 EMPLOYEE POLITICAL AND CIVIC ACTIVITY

The company's employees have the right to participate in the political process by making personal contributions from personal funds, subject to applicable legal limits and by this Code. Employees will not be reimbursed by the company directly or through salary increases for personal contributions or expenses.

Employees may voluntarily participate in campaign activities but must do so on their own behalf and not as a company representative.