

# CODE OF CONDUCT

## For SUPPLIERS of the CRONIMET Holding Group

### Preamble

The CRONIMET Holding Group is committed to entrepreneurial, socially and ecologically responsible corporate management. We act in accordance with the law, we rely on fair competition, reject corruption and comply with cross-border trade regulations. We also observe ethical guidelines based on the principles of the United Nations (UN) Global Compact, the International Labor Organisation (ILO) Conventions, the Universal Declaration of Human Rights of the UN, the UN Conventions on the Rights of the Child, OECD Guidelines for International Business.

We expect our Suppliers to be willing and committed - also on behalf of their subsidiaries - to respect and obey the CRONIMET Code of Conduct for Supplier (hereinafter "Code of Conduct"). The Suppliers undertake to comply with the following principles and requirements of the Code of Conduct of the CRONIMET Holding Group worldwide and / or locally and to require the same from their suppliers.

### Corporate Responsibility

All business dealings and decisions must be made in accordance with the applicable legal systems of the countries in which the Supplier operates.

#### I. Corruption (bribery, corruption, gifts and other benefits)

The Supplier undertakes to strictly separate the interests of the employees involved on both sides in dealing with business partners (e.g. customers, suppliers) and state institutions. Actions and (purchase) decisions are made free of extraneous considerations and personal interests. The applicable anti-corruption criminal law must be observed. Among other things, the following should be noted:

- › Offering, giving, promising, demanding or accepting or making a promise of a grant, whether in the form of money, or granting any other benefit (in kind, monetary, such as payments and loans, including the granting of small gifts through a extended period of time), on or from third parties, is strictly prohibited. This is generally not the case with gifts (but not cash or vouchers) of minor value and invitations that are within the framework of customary hospitality, custom and courtesy;
- › This prohibition includes facilitation payments;
- › This prohibition is valid worldwide;
- › The ban applies to all its employees, legal representatives and agents; and
- › covers business with third parties, including public officials (such as civil servants or public employees) and corporations, individuals, employees of other companies, agents or any other person.

#### II. Maintaining fair competition (antitrust law)

The Supplier respects the fair competition against its competitors. Therefore, the Supplier shall comply with applicable laws protecting and promoting competition, including applicable antitrust laws and other competition laws. In dealing with competitors, these rules prohibit, in particular, collusion and other activities that affect prices or conditions, allocate sales territories or customers, or unduly hinder free and open competition.

#### III. Responsible sourcing / Anti - Money Laundering

The Supplier selects his suppliers with care and commits them to comply with this or an equivalent Code of Conduct. In particular, the supplier shall ensure that materials do not contain so-called conflict minerals (see XI) and that the delivered materials are not illegal obtained goods (stolen goods).

The Supplier does not collaborate with groups/enterprises, which can be attributed to organized crime.

The Supplier shall not participate in any money laundering activities and maintains reasonable systems to detect and encounter money laundering.

#### IV. Handling of confidential information

The Supplier respects and protects the intellectual property rights of CRONIMET Holding Group and other third parties.

The Supplier uses the intellectual property rights of CRONIMET Holding Group only with prior written consent and solely for the purpose of business activities in collaboration with them.

### Social responsibility

#### V. Human rights

The Supplier respects and supports compliance with internationally recognized human rights.

#### VI. No forced labor

The Supplier shall refrain from and strictly condemn all forms of forced labor. This applies in particular to child labor. The supplier undertakes to take action against any form of human trafficking, modern slavery, forced labor or child labor in any part of its supplier's business.

#### VII. Discrimination

The Supplier undertakes to oppose any form of discrimination within the framework of the applicable legal system. This refers in particular to discrimination against employees based on sex, race, disability, ethnic or cultural origin, religion or belief, age or sexual orientation.

#### VIII. Working conditions

The Supplier shall pay all employees in accordance with the collective bargaining rules applicable, in the respective legal systems, including minimum wage, overtime and the statutory social benefits.

#### IX. Freedom of association

The Supplier must also respect workers' rights to freedom of association and to free participation in trade unions, employee representation and participation in works councils in accordance with local legislation.

#### X. Health and safety of employees

The Supplier guarantees occupational health and safety at the workplace in accordance with national regulations.

#### XI. Handling metals and minerals from conflict and high-risk areas

For metals and minerals from conflict and high-risk areas tin, tungsten, tantalum and gold as well as for other raw materials such as cobalt, CRONIMET has established processes in accordance with the Organisation for Economic Cooperation and Development (OECD) Guiding Principles, in accordance with EU Regulation 2017/821 and taking into account the Dodd-Frank Act for due diligence to promote responsible supply chains for metals and minerals from conflict and high-risk areas and expects the same from his supplier. Smelters and refiners without adequate audited due diligence processes are excluded from CRONIMET.

### Ecological responsibility

#### XII. Environmental protection

The Supplier observes environmental protection with regard to legal standards and international standards. Environmental impacts are to be minimized and the continuous improvement of environmental protection is sought.

## Reports of possible misconduct

It is important to uncover, deal with and remedy illegal or non-compliant behavior within CRONIMET. Therefore, CRONIMET has installed the web-based whistleblowing system "Fairplay Supporter", which enables all stakeholders to report possible misconduct within CRONIMET securely, confidentially and anonymously.

You can find information about our whistleblower system on our website, [www.cronimet.de](http://www.cronimet.de), under the heading Responsibility. Via [Fairplay Supporter](#) you can go directly to the whistleblower system.

## Notice and consent

We have obtained the Code of Conduct for CRONIMET Suppliers, as of 12 July 2022, and hereby agree to comply with the principles and requirements of this Code of Conduct, in addition to our obligations under the CRONIMET Supply Agreements.

## Contact for further questions

- > CRONIMET Holding GmbH  
Südbeckenstr. 22  
76189 Karlsruhe  
Germany
- > Compliance Department  
[Compliance@cronimet.de](mailto:Compliance@cronimet.de)
- > CRONIMET Purchasing  
[Purchasing@cronimet.de](mailto:Purchasing@cronimet.de)

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