



CODE OF CONDUCT

for Suppliers¹ of the CRONIMET Holding Group

Preamble

The CRONIMET Holding Group is committed to its social, ecological and corporate responsibility and to respecting the internationally recognized human and environmental rights.

We act in accordance with the law, 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 Labour Organization (ILO) Conventions, the Universal Declaration of Human Rights of the UN, the UN Convention on the Rights of the Child, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for International Business.

We expect our Suppliers to be willing to commit to respecting and obeying the CRONIMET Code of Conduct for Suppliers (hereinafter “Code of Conduct”) so that, together, we can discharge our corporate, social and ecological responsibility along our supply and value chains.

The Suppliers undertake to comply with the following principles and requirements worldwide. We expect our direct suppliers to ensure that their suppliers and service providers also comply with the requirements contained in this Code of Conduct.

Social responsibility

I. Human rights

The Supplier is committed to complying with internationally recognized human rights and guidelines, including, in particular, the Universal Declaration of Human Rights of the UN, the UN Guiding Principles on Business and Human Rights, the UN Convention on the Rights of the Child, the UN Convention on the Elimination of All Forms of Discrimination Against Women, the core labour standards of the International Labour Organization (“ILO”) or the ILO Declaration on Fundamental Rights and Principles at Work.

II. No forced labour or child labour

The Supplier shall refrain from and strictly condemn all forms of slavery, forced labour and child labour. The Supplier undertakes to take action against any form of human trafficking, modern slavery, forced labour or child labour in its own business and in the business operations of its suppliers.

III. 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, skin colour, race, disability, ethnic or cultural origin, homeland, religion or belief, age, language or sexual orientation. The Supplier shall promote equal opportunities and is committed to a fair, trusting and safe working environment.

IV. Working conditions

The Supplier shall pay all employees in accordance with the statutory provisions or provisions of collective bargaining agreements that are applicable in the respective legal systems, including minimum wage, overtime

¹ This Code of Conduct applies to all suppliers who deliver materials, products and/or services to a CRONIMET company.

and the statutory social benefits. The remuneration for the services provided must be paid in full and must not be unlawfully withheld.

V. Freedom of association

In accordance with local legislation, the Supplier shall ensure that the workers' rights to freedom of association, to free participation in trade unions, employee representation and participation in works councils and to collective bargaining are respected without interference, discrimination, reprisals or harassment.

VI. Health and safety of employees

The Supplier shall guarantee occupational health and safety at the workplace in accordance with the applicable national and regional regulations. In particular, employees must be protected as far as possible from work-related dangers in the form of accidents, hazardous substances and excessive physical and mental stress. The overriding goal shall be to avoid or minimize accidents at work, downtimes and work-related illnesses.

VII. Handling metals and minerals from conflict-affected and high-risk areas

For metals and minerals from conflict-affected and high-risk areas (especially tin, tungsten, tantalum and gold as well as for other raw materials such as cobalt), CRONIMET has established processes for complying with the requirements and recommendations in (i) the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, (ii) EU Regulation 2017/821 laying down supply chain due diligence obligations, (iii) Section 1502 of the US Dodd-Frank Act (if the supply chains in question have a connection to the USA) and (iv) 'the Voluntary Principles on Security and Human Rights'. The supply chain policy published on the CRONIMET website contains the corresponding framework and requirements.

The Supplier undertakes to establish equivalent processes, to exercise effective due diligence and to promote responsible supply chains for minerals from conflict-affected and high-risk areas. CRONIMET rules out using smelters and refiners without adequate audited due diligence processes. The Supplier must provide complete, truthful and verifiable information on the origin of metals and minerals.

Ecological responsibility

VIII. Protection of the environment and climate

The Supplier shall observe environmental protection in compliance with legal standards and local and international standards. Impacts on the environment and climate must be minimized and the continuous improvement of environmental and climate protection shall be sought. Protecting the environment means, in particular, using natural resources responsibly and constantly reducing the consumption of energy and water. Wherever possible, the Supplier should choose renewable sources of energy and monitor and minimize waste and emissions in the water, air and soil.

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.

IX. Corruption (bribery, corruption, gifts and other benefits)

The Supplier undertakes to strictly separate the interests of the employees, legal representatives and agents involved on both sides when dealing with business partners (e.g. customers, suppliers) and state institutions (e.g. civil servants or public service employees). Actions and (purchase) decisions shall be taken free of extraneous considerations and personal interests. The applicable corruption criminal law must be observed. Among other things, the following should be noted:

- › Offering, giving promising or demanding, or accepting or obtaining a promise of a grant, whether in the form of money or the granting of another benefit (in cash or in kind, e.g. payments and loans, including the granting of small gifts over an extended period of time), to or from third parties, is strictly prohibited. This

is generally not the case with gifts (with the exception of cash and gifts equivalent to cash) of a low value and invitations that fall within the scope of customary hospitality, custom and courtesy.

- › This prohibition includes facilitation payments.
- › This prohibition is valid worldwide.

X. Maintaining fair competition (antitrust law)

The Supplier shall respect 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. When 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.

XI. Responsible sourcing / anti-money laundering

The Supplier shall select its suppliers and service providers with care. In particular, the Supplier shall ensure that materials do not contain so-called conflict minerals (see VII) and that the delivered materials are not illegally obtained goods (stolen goods).

The Supplier shall not collaborate with groups/enterprises that can be linked to organized crime.

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

XII. Handling of confidential information

The Supplier shall respect and protect the intellectual property rights of the CRONIMET Holding Group and other third parties.

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

Due diligence

CRONIMET expects the Supplier to establish a process for complying with its human rights and environment-related due diligence obligations that is appropriate to its size and its circumstances. This purpose of this process shall be to identify, prevent, reduce and/or remove human rights and environment-related risks and/or rights violations.

At the same time, the Supplier undertakes to provide CRONIMET with appropriate support as it discharges its due diligence obligations, provided that there are no legal restrictions standing in the way of the support measures. When requested by CRONIMET, the Supplier shall disclose how it deals with the potential and existing detrimental impact of its own activities and those of its suppliers on human and environmental rights. It may do this by submitting self-disclosures, or providing certificates, supporting documents or reports. In this context, CRONIMET reserves the right to perform a supplier audit.

If risks exist with respect to compliance with the requirements of this Code of Conduct, in particular risks that relate to the internationally recognized human and environmental rights, we expect the Supplier to take preventative measures to prevent rights violations from occurring. If risks or violations have already occurred, we expect effective mitigating and remedial action to be taken in an appropriate form. If there is a particularly serious violation that cannot be countered with appropriate measures, we reserve the right to suspend or – as a last resort – end the business relationship.

Reports of possible misconduct

It is important to uncover, deal with and remedy illegal or non-compliant behaviour within CRONIMET.

Therefore, CRONIMET has installed the web-based whistleblower 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, under the heading "Responsibility". Via [Fairplay Supporter](#) you can go directly to the whistleblower system.

Reports and complaints concerning human rights that relate to CRONIMET or other parties along the supply chain can – as well as being reported by the whistleblower system – be addressed to the human rights committee of the CRONIMET Holding Group (humanrights@cronimet.de).

In addition, Suppliers can also contact their CRONIMET trader.

Notice and consent

We have obtained the Code of Conduct for CRONIMET Suppliers, as of 1 October 2024, 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

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