

Supplier Code of Conduct

**for all suppliers of the
CORIUS Group GmbH
and the associated subsidiaries**

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1 Introduction

The CORIUS Group strives to establish and maintain the highest standards in all aspects of its business operations. Our commitment to ethical behavior, sustainability and social responsibility is reflected not only in our own business practices, but also in the expectations we place on our suppliers. This Code of Conduct for Suppliers of the CORIUS Group (hereinafter: Supplier Code of Conduct) serves as a fundamental guideline for all business partners and suppliers with whom we work. It sets out the principles and requirements that we consider to be the basis for successful and trusting cooperation.

Our aim is to ensure that all our suppliers adhere to the same high ethical standards as we do. This includes compliance with legal regulations, the protection of human rights, fair working conditions, environmental protection and the responsible use of resources. We firmly believe that integrity and transparency form the basis for long-term business relationships.

The following content is based on national laws and regulations such as the Supply Chain Duty of Care Act (LkSG), as well as international conventions such as the UN Civil Pact and the UN Social Pact, the Guidelines on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, as well as the international labor standards of the International Labor Organization (ILO). Specific legal regulations or other contractual agreements with higher requirements always take precedence.

By implementing this Supplier Code of Conduct, we want to encourage our business partners not only to respect these principles, but also to actively integrate them into their own business processes and present them to their subcontractors. This is the only way we can jointly ensure a sustainable and ethical value chain. We would like to thank our suppliers for their willingness to fulfill these and legal and industry standards and look forward to a successful collaboration in line with these principles.

This Supplier Code of Conduct is continuously reviewed and updated as necessary, with suppliers always being informed of changes and provided with the revised version.

The following requirements come into force when a joint contract is signed. The primary aim is to work together to further improve our suppliers' performance in the event of deviations from the Supplier Code of Conduct. However, in extreme cases, a serious breach of our Supplier Code of Conduct may lead us to terminate the business relationship, including all relevant supply contracts.

2 Requirements for suppliers

The CORIUS Group is committed to the highest levels of integrity and responsibility in all areas of its business activities. Our commitment to sustainable responsibility is not only reflected in our own business practices, but is also promoted along our entire value chain. Our suppliers play a crucial role here and we expect them to adhere to the same high standards as we do. This Code therefore includes the most important requirements for sustainable cooperation, which are based, among other things, on Section 2 of the German Supply Chain Duty of Care Act (LkSG). The CORIUS Group is always available to advise on optimizations and is open to exciting joint projects.

2.1 Social responsibility

Human rights violations

Any form of human rights violation will not be tolerated. Our suppliers must commit to respecting and promoting human rights in all their business practices. Likewise, participation in human rights violations must be prevented.

Prohibition of child labor

Any form of child labor is strictly rejected. Our suppliers are obliged to ensure that no child labor takes place in their companies in accordance with the international standards of the International Labor Organization. According to this, the age should not be less than the age at which compulsory education ends according to the law of the place of employment and in any case not less than 15 years. If children are found at work, suppliers must document the measures to be taken to remedy the situation and enable the children to attend school. Young employees under the age of 18 may not be deployed for work that is harmful to the health, safety or morals of children. Special protective regulations must be observed.

Prohibition of forced labor and slavery

All forms of forced labor and slavery must also be prevented. This includes not only direct employment relationships, but also indirect employment via subcontractors. Suppliers must ensure that a worker is only employed voluntarily and not under duress or threat of punishment. All employees must have the opportunity to terminate the employment relationship at any time. Any practice that amounts to human trafficking or exploitation is strictly prohibited.

Fair working conditions

Creating and maintaining good working conditions is the basis of good corporate governance. Our suppliers must ensure a safe and healthy working environment and continuously take measures to minimize work-related hazards. This includes preventive protective measures against abuse, violence and harassment in the workplace. It also includes the provision of training and equipment necessary to prevent occupational accidents and work-related illnesses. Work and break times must comply with applicable laws or industry standards. Appropriate measures must be taken to prevent excessive physical or mental fatigue.

Freedom of association and freedom of association

The right of employees to form and join organizations of their choice, to bargain collectively and to strike must be respected. Any form of discrimination or reprisals against employees who make use of these rights is prohibited. Suppliers shall promote open and respectful communication with their employees and ensure that their rights are fully respected.

Anti-discrimination

The CORIUS Group is committed to fairness and equal opportunities and rejects all forms of discrimination. Our suppliers must also ensure that all employees are treated equally regardless of gender, race, skin color, religion, sexual orientation, national origin, age, disability or other protected characteristics. Any form of unequal treatment and discrimination is strictly prohibited unless it is justified by the requirements of employment. The promotion of an inclusive working environment in which everyone has the same opportunities is of the utmost importance to us.

Appropriate remuneration

Our suppliers are required to pay their employees appropriate wages that at least correspond to the statutory minimum wage or the minimum wage customary in the industry. In addition, wages should be set in such a way that they meet the basic needs of employees and their families and enable them to lead a decent life.

The CORIUS Group expects its suppliers to have transparent wage structures and to pay their employees fairly and punctually. Wage deductions as punitive measures are not permitted. The supplier must ensure that employees receive clear, detailed and regular written information about the composition of their remuneration.

Preservation of natural resources

Our suppliers should take measures to prevent environmental pollution, including harmful soil changes, water pollution, air pollution, harmful noise emissions and excessive water consumption. It is their duty to use natural resources responsibly and continuously look for ways to minimize their environmental impact.

Prohibition of forced evictions

Our suppliers must not carry out forced evictions or use land rights unlawfully. Any appropriation of land must be fair and lawful, taking into account the rights of affected communities and individuals. Forced evictions without a legal basis or adequate compensation are strictly prohibited.

2.2 Ecological responsibility

Welcoming measures to reduce greenhouse gas (GHG) emissions

The CORIUS Group supports and welcomes all measures taken by its suppliers to reduce greenhouse gas emissions. We expect our suppliers to continuously look for ways to minimize their CO₂ emissions and other climate-relevant gases. This can be achieved by using energy-efficient technologies, switching to renewable energies or optimizing production processes, among other things.

Energy

The energy consumption of our suppliers is to be optimized and the use of renewable energies promoted. Measures to increase energy efficiency are expected to be implemented, including the use of modern, energy-saving technologies. Energy consumption should be monitored and documented. Economic solutions must be found to improve energy efficiency and minimize energy consumption.

Efficient use of resources

The CORIUS Group attaches great importance to the efficient use of resources. The use and consumption of resources during production and the generation of all types of waste, including water and energy, should expressly be reduced or avoided. This is done either directly at the point of origin or through new processes and measures, e.g. by changing production and maintenance processes and procedures within the company, by using alternative materials, by making savings, by recycling or by reusing materials in order to reduce the use of primary resources.

Optimizing the environmental compatibility of goods and services

Our suppliers are required to continuously improve the environmental compatibility of their products and services. This includes reducing negative environmental impacts along the entire life cycle of a product, from the procurement of raw materials to production and disposal. We expect our suppliers to avoid critical ingredients and instead promote ecological innovations and develop environmentally friendly alternatives.

Waste management: avoidance, recycling, disposal

Effective waste management is of central importance to the CORIUS Group. Our suppliers should urgently develop and implement strategies to avoid waste. Where waste is unavoidable, recycling and reuse should be prioritized. Our suppliers are required to reduce the amount of waste and continuously optimize waste management.

The bans on the import and export of hazardous waste in the Basel Convention of March 22, 1989, as amended, must be observed. Chemicals or other materials that pose a risk if released into the environment must be identified and handled in such a way that safety is ensured when handling, transporting, storing, using, recycling or reusing and disposing of these substances. Mercury and mercury-containing products shall be used in accordance with the prohibitions of the Minimata Convention of October 10, 2013 and persistent organic pollutants (POPs) in accordance with the Stockholm Convention of May 23, 2001, as amended.

Water

The CORIUS Group attaches great importance to the protection and sustainable use of water resources. Our suppliers are encouraged to take measures to minimize their water consumption and ensure that water is used efficiently and responsibly. This can include the implementation of water saving technologies and procedures, the prevention of water pollution and compliance with all relevant laws and regulations.

2.3 Ethical responsibility

Risk management

An effective risk management system should identify, assess and minimize all risks related to business processes, environment, health and safety and social aspects. Suppliers should conduct regular risk analyses and take appropriate risk mitigation measures to ensure smooth and safe business operations.

Anti-corruption

Integrity and lawful behavior have top priority, especially with regard to combating bribery, fraud and corruption. No form of this will be tolerated. The CORI-US Group upholds these values both in its own business activities and in its relationships with business partners.

Prevention of money laundering

Our suppliers must comply with all relevant laws and regulations to prevent money laundering. They are required to implement measures to ensure that none of their activities contribute to money laundering or the financing of terrorism. Suppliers must be vigilant against suspicious transactions and report them to the relevant authorities if necessary. Only funds from legal sources are accepted.

Data protection & confidentiality

The CORIUS Group attaches great importance to the protection of personal data and confidential information. Our suppliers must ensure that they comply with all applicable data protection laws and regulations, in particular the GDPR. Confidential information must be kept secure and only used for legitimate business purposes. Any unauthorized disclosure or use of confidential data is strictly prohibited. Intellectual property rights must be respected; technology and know-how must be transferred in such a way that intellectual property rights are protected.

Proper accounting and reporting

Our suppliers are obliged to disclose relevant information transparently and truthfully. All business transactions must be documented correctly, transparently and completely in accordance with the applicable accounting regulations. False or misleading accounting and reporting is strictly prohibited. Suppliers must ensure that their financial reports and other relevant records (such as sustainability reporting) are accurate and verifiable at all times.

Avoidance of conflicts of interest

All decisions and actions should be made in the best interests of the company and not for personal gain to avoid conflicts of interest. Suppliers should implement mechanisms to avoid conflicts of interest.

Raising concerns

The CORIUS Group promotes a culture of open communication and transparency. Our suppliers should provide mechanisms that enable their employees and other stakeholders to report concerns or breaches of regulations in a safe and confidential manner. Reprisals against individuals who raise concerns in good faith are strictly prohibited.

Fairness in competition

Our suppliers should explicitly comply with all relevant antitrust and competition laws and ensure that their business practices are fair and transparent. Any form of price fixing, market manipulation, unfair competition or other anti-competitive practices is prohibited. The CORIUS Group expects its suppliers to respect and promote free and fair competition.

Animal welfare

Suppliers should explicitly ensure that animals in their supply chain are treated with respect and humanity. This includes avoiding unnecessary suffering, providing species-appropriate living conditions and complying with relevant animal welfare laws and regulations. We support the implementation of ethical and sustainable practices that contribute to animal welfare.

3 Implementation of the requirements

We expect suppliers to identify risks within the supply chain and to take appropriate measures. The CORIUS Group is informed immediately of any suspected violations or increased risks in the supply chain.

If required, we check compliance with the regulations listed in the Supplier Code of Conduct by means of self-assessment questionnaires and, if necessary, audits at production sites. Suppliers agree that we may carry out corresponding audits at our expense once a year or for a specific reason. If necessary, suppliers may object audit measures if these would violate mandatory internal data protection rules.

Suppliers must inform their employees of our publicly accessible complaints procedure. This must be accessible to all employees while maintaining confidentiality, identity and effective protection against discrimination.

If a violation of the provisions of this Supplier Code of Conduct is detected, we will notify the supplier immediately in writing and set a reasonable grace period to bring the behavior into compliance with the listed regulations. If a remedy is not possible within a foreseeable period of time, suppliers must report this immediately. In this case, a concept with a timetable for ending or minimizing the violation shall be jointly drawn up and implemented. CORIUS has the right to temporarily suspend the business relationship in the meantime. If the grace period expires fruitlessly or the implementation of the measures contained in the concept does not remedy the situation after expiry of the timetable and no milder means are available, CORIUS may break off the business relationship and terminate all contracts. A statutory right to extraordinary termination without setting a grace period and the right to compensation, especially in case of intentional and very serious breaches, shall remain unaffected.

4 Acknowledgement and agreement

Suppliers assure that they have read and understood the Supplier Code of Conduct, which is available on the CORIUS Group website. Suppliers undertake to act responsibly and to comply with the regulations listed. Furthermore, the supplier shall communicate the content of this Code of Conduct to its employees, agents and subcontractors in a way that is understandable to them and shall take all necessary precautions to implement the requirements.

Suppliers recognize that the above provisions are a crucial element in the selection and evaluation of business partners. In the event of a breach, the CORIUS Group will be inform you immediately.