

Code of conduct for business partners

1. Introduction/Preamble

KG Deutsche Gasrußwerke GmbH & Co (hereinafter referred to as the "**company**") is committed to ecologically and socially responsible corporate governance. We expect the same behavior from all our business partners. We also expect our employees to observe the principles of ecological, social and ethical behavior and to integrate them into the corporate structure. We also strive to continuously optimize our business activities and our products in terms of sustainability and ask our business partners to contribute to this in the sense of a holistic approach.

For our cooperation, we expect our business partners to comply with the following principles. Our contractual partners must undertake to comply with the principles and requirements of the Code of Conduct and to endeavor to contractually oblige their subcontractors to comply with the standards and regulations set out in this document.

The Code of Conduct is based on national laws and regulations such as the Supply Chain Due Diligence Act (LkSG) as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights and the International Labor Standards of the International Labor Organization.

2. Requirements for business partners

2.1 Social responsibility

- **Exclusion from forced labor**

No forced labor, slave labor or comparable work may be used. All work must be voluntary and without threat of punishment. Employees must be able to terminate their work or employment relationship at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment and humiliation. The hiring or use of security personnel must be prohibited if persons are treated in an inhumane

or degrading manner or are injured during their deployment or if freedom of association is impaired.

- **Ban on child labor**

Child labor may not be used in any phase of production. Business partners are requested to adhere to the recommendation from the ILO conventions (ILO = International Labor Organization) on the minimum age for the employment of children. Accordingly, 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, the business partner must document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers must be protected. Children under the age of 18 must not be employed for work that is harmful to their health, safety or morals. Special protective regulations must be observed.

- **Fair remuneration**

Remuneration for regular working hours and overtime must correspond to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. Employees must be granted all legally prescribed benefits. Deductions from wages as a punitive measure are not permitted. The business partner must ensure that employees receive clear, detailed and regular written information on the composition of their remuneration.

- **No Fee Policy**

Potential employees must not be misled about the nature of the work, and employees must not be charged recruitment fees or unreasonable transportation costs. Employees' identification documents must not be confiscated, destroyed, concealed or denied access to them. Employees may not be obliged to use accommodation provided without a business reason.

- **Fair working hours**

Working hours must comply with applicable laws or industry standards.

- **Freedom of association**

The right of employees to form and join organizations of their choice, to conduct collective bargaining and to strike must be respected. Employee representatives must be protected from discrimination. Employees must not be discriminated against on the basis of founding, joining or being a member of such an organization. Employee representatives must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

- **Prohibition of discrimination**

Discrimination Unequal treatment of employees in any form is not permitted unless it is justified by the requirements of employment. This applies, for example, to discrimination based on gender, race, caste, national, ethnic or social origin, skin color, disability, health status, political conviction, origin/belief, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

- **Health protection, safety in the workplace**

The business partner is responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the work. Employees are given access to sufficient quantities of drinking water and access to clean sanitary facilities.

- **Preserving the natural foundations of life**

The business partner may not, in violation of legitimate rights, withdraw land, forests or waters whose use secures the livelihood of people. The business partner must refrain from harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this harms the health of people, significantly impairs the natural basis for food production or prevents people from having access to safe drinking water or sanitary facilities.

- **Dealing with conflict minerals**

For the conflict minerals tin, tungsten, tantalum and gold as well as for other raw materials such as cobalt, the company establishes processes in accordance with the Organization for Economic Cooperation and

Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and expects its business partners to do the same.

- **Complaints mechanisms**

The business partner must pass on information received from KG Deutsche Gasrußwerke GmbH & Co. regarding accessibility, responsibility and the implementation of a complaints procedure to its employees in an appropriate manner. The complaints procedure must be accessible to disadvantaged parties. If no information is provided, the business partner itself is responsible for setting up an effective grievance mechanism at company level for individuals and communities that may be affected by negative impacts.

2.2 Ecological responsibility

- **Handling waste and hazardous substances**

The prohibitions on the 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 when 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 shall be used in accordance with the prohibitions of the Minimata Convention of October 10, 2013 and persistent organic pollutants shall be used in accordance with the Stockholm Convention of May 23, 2001, as amended.

- **Reduce consumption of raw materials and natural resources**

The use and consumption of resources during production and the generation of all types of waste, including water and energy, must be reduced as far as possible.

- **Dealing with energy consumption/efficiency**

Economical solutions must be found to improve energy efficiency and minimize energy consumption.

2.3 Ethical business conduct

- **Fair competition**

The standards of fair business, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which in particular prohibit agreements and other activities that influence prices or conditions when dealing with competitors.

- **Confidentiality/data protection**

The business partner is obliged to meet the reasonable expectations of its client, suppliers, customers, consumers and employees with regard to the protection of private information. The business partner shall comply with data protection and information security laws and governmental regulations when collecting, storing, processing, transmitting and disclosing personal information.

- **Intellectual property**

Intellectual property rights must be respected; technology and know-how must be transferred in such a way that intellectual property rights and customer information are protected.

- **Integrity/bribery, taking advantage**

The highest standards of integrity must be applied to all business activities. The business partner must pursue a zero-tolerance policy with regard to the prohibition of all forms of bribery, corruption, extortion and embezzlement.

3. Implementation of the requirements

With regard to supply chains, we expect our business partners to identify risks within these chains and to take appropriate measures. In the event of suspected violations and to safeguard supply chains with increased risks, the business partner will inform the company promptly and, if necessary, regularly about the violations and risks identified and the measures taken.

The company checks compliance with the standards and regulations listed in this document using a self-assessment questionnaire. Depending on the risk assessment, the company may request certification regarding compliance with the human rights and environmental standards required by law.

If a breach of the provisions of this Code of Conduct is identified, the company shall notify the business partner immediately in writing within one month and set him a reasonable grace period to bring his conduct into line with these provisions. If a remedy is not possible in the foreseeable future, the business partner must report this immediately and, together with the company, draw up a concept with a timetable for ending or minimizing the violation. If such a breach has occurred culpably, the grace period expires without result or the implementation of the measures contained in the plan does not remedy the situation after the expiry of the timetable and continuation of the contract until ordinary termination is unreasonable for the company and no milder means are available, the company shall terminate the business relationship.