



TYROLIT Code of Conduct for Suppliers

The companies of the TYROLIT group ("TYROLIT") are committed to the highest standards of ethical, environmentally and socially responsible business conduct and to the practice of business in accordance with all applicable laws, rules and regulations. This Code of Conduct for Suppliers defines the basic principles for supplier conduct when working with TYROLIT. TYROLIT is committed to these principles and expects the same from its suppliers. We also expect that our suppliers apply a similar code of conduct in relation to their own suppliers and sub-contractors.

HUMAN RIGHTS & LABOUR

No child labour: You pledge to work against any form of child labour. You shall not employ children below the minimum working age or mandatory school age in the respective country. Suppliers shall not employ any workers under the age of 18 to perform any work that is defined in national law as hazardous.

Appropriate Wages and Working Hours: You comply with all applicable laws on working hours and overtime, as well as all applicable laws on wages and benefits. If the wage is not sufficient to cover the usual cost of living while allowing the worker to accumulate a minimum amount of savings, you are obligated to increase the worker's pay to reach a sufficient level for this. All legally mandated benefits are to be provided to employees. Wage deductions as a punitive measure are not permitted.

No forced labour: Forced labour, including bonded or involuntary prison labour, must not occur. This includes withholding payment or benefits, or retaining identity documents or other personal effects of value. Work should be voluntary on the basis of a recognised employment relationship established through national law. All workers shall be provided with a written, understandable and legally binding labour contract.

Respect Freedom of Association and Collective Bargaining: You uphold the freedom of association and the right to collective bargaining in accordance with applicable laws.

No Harassment and Discrimination: You pledge to treat all your employees equally, fairly and with respect, regardless of race, religion, ethnic or social origin, disability, sexual orientation, gender, age, skin colour, pregnancy, union membership or party membership. The personal dignity, privacy and personal rights of every individual shall be respected.

Whistleblower Protection: As a TYROLIT supplier, you are responsible for establishing an effective whistleblowing system at the company level. You enable your employees to raise legal or ethical issues or concerns without fear of retaliation.

RAW MATERIAL SOURCING

For the conflict minerals tin, tungsten, tantalum and gold, as well as for cobalt, your company establishes processes in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas and in particular its Annex II.

You commit to ensuring the identity of all organizations involved in the supply chain (from the raw material to the final product delivered to TYROLIT). Smelters and refineries without adequate audited due diligence processes shall be avoided. Furthermore, to ensure the documentation of the origin of all Conflict Minerals and Cobalt, records shall be retained.

ENVIRONMENT, HEALTH & SAFETY

Minimize Waste, Wastewater & Emissions: TYROLIT expects suppliers to minimize the environmental impact of their operations. You will comply with all applicable environmental laws and will have systems in place to manage waste, air emissions and wastewater discharges. Before discharge or disposal, wastewater from operations, production processes and sanitary facilities shall be classified, monitored, tested and treated if need be. In addition, measures should be introduced to reduce the generation of wastewater.



TYROLIT Code of Conduct for Suppliers

Protect Health & Safety: You provide safe and healthy working conditions for all workers in accordance with applicable law and other relevant industry and building standards, including, but not limited to, protection against fire, accidents and toxic substances. The employees are also informed regularly about the applicable health protection and safety norms and measures, and receive training about them. The employees are provided access to adequate quantities of drinking water and to clean sanitary facilities.

Improve Energy Efficiency: You hereby commit to monitor and document the energy efficiency of your operations. You strive to improve energy efficiency and minimize energy consumption. Through this and through the use of renewable energies, greenhouse gas emissions should be reduced.

ETHICS & LEGAL REQUIREMENTS

Compliance with Laws: You pledge to comply with all applicable laws, rules and regulations in the countries where you operate.

No Bribery, Corruption and Conflicts of Interest: You commit yourself to countering bribery and corruption. You will not engage in any form of bribery and will avoid any interaction with TYROLIT employees that may prevent employees from acting in the best interest of TYROLIT.

Fair Competition: You comply with all applicable laws regarding fair competition and antitrust.

Personal Data: You comply with all applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed or shared.

Trade Secrets and Intellectual Property: You hereby ensure to protect TYROLIT's confidential data. You further agree to respect all intellectual property rights.

Trade Compliance: Your transactions with TYROLIT must at all times be in strict conformity with all relevant economic sanctions and export control laws and regulations.

No Money Laundering: You commit yourself to keeping accurate records of all business related to TYROLIT.

MONITORING & ENFORCEMENT

TYROLIT reserves the right to conduct audits or assessments of the supplier's operations relevant for the TYROLIT Code of Conduct for Suppliers, including but not limited to the supplier's facilities. If TYROLIT realizes that you are not meeting the requirements and expectations set out in this Code of Conduct for Suppliers, TYROLIT may offer guidance specifying which issues need to be corrected or improved. You will remedy such breach within an acceptable time frame. Nonetheless, TYROLIT reserves the right to immediately terminate the co-operation in case of serious violations of the terms of this Code of Conduct.

By signing, you confirm that you comply with the principles of this Code of Conduct for Suppliers.

Company

Signature

Place, Date

Name, Function