

Code of Conduct for Suppliers

1 Introduction/Preamble

Magontec GmbH is committed to environmentally and socially responsible corporate management. We expect the same conduct from all of our suppliers. We also expect our employees to observe these principles of environmental, social and ethical conduct and integrate them into our corporate culture. Furthermore, we strive to continuously optimise our corporate activity and our products in the interests of sustainability and ask our suppliers to contribute to this in the interests of a holistic approach.

For future cooperation, the Contracting Partners agree on the validity of the following regulations for a joint Code of Conduct. This Agreement shall be the basis for all future deliveries. The Contracting Partners undertake to comply with the principles and requirements of this Code of Conduct. Suppliers are encouraged to contractually require their subcontractors to comply with the standards and regulations outlined in this document. This Agreement shall enter into force upon signature. A violation of this Code of Conduct may be grounds and cause for our Company to terminate the business relationship, including all related supply contracts.

This Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the International Labour Standards of the International Labour Organisation, and the United Nations Global Compact. We expect our suppliers to comply with all relevant laws, regulations and standards requirements.

2 Requirements for Suppliers

2.1 Social responsibility

- Exclusion of forced labour

No forced labour, slave labour or any such comparable labour may be used. All work must be voluntary and employees must be able to terminate their work or their employment at any time. In addition, there must be no unacceptable treatment of workers, such as psychological hardship or sexual/personal harassment.

- Prohibition of child labour

Child labour may not be used at any stage of production. Suppliers are required to adhere to the recommendation from the ILO conventions on the minimum age for employment of children. Accordingly, the age should not be less than the age at which compulsory education ends and in any case not under 15 years.

- Fair remuneration

Compensation paid to workers must comply with all applicable laws regarding compensation, including, for example, minimum wage and overtime laws. Payroll deductions as a penalty are not permitted. The basis on which workers are paid shall be made known to employees on an ongoing basis through a payroll statement.

- Fair working time

Work hours must comply with applicable laws or industry standards. Overtime is only permissible if it is provided on a voluntary basis.

- Freedom of association

The Supplier shall respect the right of workers to freedom of association, to join trade unions, to appeal to labour representation or to join works councils in accordance with local laws. Workers must be able to communicate openly with management without fear of reprisal or harassment.

- Prohibition of discrimination

Discrimination against employees in any form is not permitted. This applies, for example, to discrimination based on gender, race, caste, skin colour, disability, political opinion, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

- Health protection; safety at work

The Supplier 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 activity. In addition, employees are regularly informed and trained regarding applicable health and safety standards and measures. Employees are provided with access to drinking water in sufficient quantities, as well as access to clean sanitary facilities.

- Complaint mechanisms

The Supplier is responsible at the facility level for establishing an effective grievance mechanism for individuals and communities who may be affected by adverse impacts.

- 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 is establishing processes in line with the Organisation for Economic Cooperation and Development's (OECD) guiding due diligence principles for promoting responsible supply chains for minerals from conflict and high-risk areas, and expects the same from its Supplier. Smelters and refiners without adequate, audited due diligence processes should be avoided.

2.2 Ecological responsibility

- Treatment and discharge of industrial wastewater

Wastewater from operations, manufacturing processes, and sanitary facilities shall be standardised, monitored, inspected, and treated as necessary prior to discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

- Dealing with air emission

General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be standardised, routinely monitored, verified, and treated as needed prior to release. The Supplier is also responsible for monitoring its emission control systems and is required to find economical solutions to minimise any emissions.

- Handling waste and hazardous substances

The Supplier follows a systematic approach to identify, handle, reduce, and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a hazard when released into the environment shall be identified and handled in a manner that ensures safety during their handling, transport, storage, use, recycling or reuse, and disposal.

- Reduce consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, shall be reduced or avoided. This is done either directly at the point of origin or through processes and measures, for example by changing company production and maintenance processes or procedures, by using alternative materials, through savings, through recycling or with the aid of the reuse of materials.

- Dealing with energy consumption/efficiency

Energy consumption shall be monitored and documented. Economic solutions must be found to improve energy efficiency and minimise energy consumption.

2.3 Ethical business conduct

- Fair competition

The standards of fair business, fair advertising and fair competition shall 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. Furthermore, these regulations prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to determine their prices and other conditions autonomously when reselling.

- Confidentiality / data protection

The Supplier undertakes to meet the reasonable expectations of its client, suppliers, customers, consumers and employees with regard to the protection of private information. The Supplier shall comply with data protection and information security laws and

government regulations when collecting, storing, processing, transmitting and disclosing personal information.

- **Intellectual property**

Intellectual property rights shall be respected; transfers of technology and know-how shall be made in a manner that protects intellectual property rights and customer information.

- **Integrity/bribery, taking advantage**

The highest standards of integrity must be applied to all business activities. The Supplier shall have a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards shall be implemented to ensure compliance with anti-corruption laws.

- **Conflicts of interest**

The Supplier will maintain a corporate culture that avoids internal conflicts of interest.

2.4 Proper use of provided parts

We expect our suppliers to treat parts provided by us with care and diligence. This includes proper storage, as well as correct handling in production. Magontec GmbH must be notified immediately of any defects or losses of goods provided.

3 Actioning of Requirements

We expect our suppliers to identify risks within their supply chains and to take appropriate measures. In the event of suspected violations – and to safeguard supply chains with elevated risk – the company requires the disclosure of supply chains.

The company reserves the right to take appropriate measures against suppliers who do not meet these requirements, which may ultimately lead to the suspension or termination of a supply relationship.

4 Acknowledgement and Consent of the Supplier

By signing this document, the Supplier undertakes to act responsibly and to comply with the principles/requirements listed. The Supplier confirms that it will effectively communicate the contents of this Code to its employees, agents, subcontractors and suppliers and gives an assurance that all necessary arrangements will be properly implemented.