

# SUPPLIER CODE OF CONDUCT

## CASTOLIN EUTECTIC SUPPLIER CODE OF CONDUCT

### I. OVERVIEW

The Castolin Eutectic Supplier Code of Conduct (the “Code”) helps to ensure that Castolin Eutectic does business with reputable business associates committed to Castolin Eutectic’s ethical standards and business practices. The Code applies to people and companies (“Suppliers”) that do business with Castolin Eutectic.

Castolin Eutectic expects its Suppliers to act in a manner compatible with standards that contribute to Castolin Eutectic’s outstanding reputation as well as with the Ten Principles of the UN Global Compact (<https://www.unglobalcompact.org/what-is-gc/mission/principles>).

Castolin Eutectic expects that its global Suppliers conform to the following:

### II. CODE OF CONDUCT

#### 1. General Principle

Castolin Eutectic Suppliers must operate in full compliance with applicable laws and regulations of the countries in which they operate, and in compliance with this Code.

#### 2. Respecting Human Rights

Suppliers shall comply with applicable labor laws including those applying to child labor, slavery, human trafficking, and forced labor and employ only those employees who meet the definition of those laws. Suppliers shall employ only workers who meet the applicable minimum legal age requirement for their location. In the absence of local law, Suppliers shall not employ children under the age of 15, except as set forth in the next sentence. If local minimum age law is set below 15 years of age, but is in accordance with developing country exceptions under the International Labor Organization (ILO) Convention 138, the lower age will apply.

#### 3. Compensation and Working Hours

Suppliers shall comply with applicable wage and hour labor laws including those related to minimum wages, overtime hours and legally mandated benefits.

#### 4. Discrimination

Suppliers shall not tolerate unlawful discrimination in the workplace. Suppliers shall comply with applicable local laws concerning discrimination in hiring and employment practices.



## **5. Environment**

Suppliers shall consider the impact their operations have on the environment and reduce that impact where practicable to protect the environment. Suppliers shall comply with applicable environmental laws and regulations in the countries in which they operate.

## **7. Freedom of Association**

Suppliers shall recognize and respect rights of workers to join organizations of their own choosing or to refrain from joining organizations. Suppliers shall respect the rights of workers to bargain collectively through representatives of their own choosing where a union has been chosen in accordance with applicable laws and regulations.

## **8. Gifts and Gratuities**

Suppliers shall not offer, pay, or accept kickbacks, bribes or other improper payments or benefits prohibited by law. Additionally, Castolin Eutectic strictly prohibits Suppliers from offering to, or accepting from, Castolin Eutectic representatives any gifts or gratuities when involved in contract negotiations. Only provide and accept gifts and entertainment that are reasonable complements to business relationships. Cash gifts or gratuities, regardless of amount, are strictly prohibited. Any Supplier that violates this policy risks immediate loss of all existing and future Castolin Eutectic business.

## **9. Health and Safety**

Suppliers shall provide a reasonably safe working environment supportive of accident prevention and minimizing exposure to health risks. Suppliers shall comply with all applicable safety and health laws and regulations in the countries in which they operate.

## **10. Responsible Sourcing**

Castolin Eutectic's expects suppliers and vendors of raw materials, parts, and components to comply with all applicable laws, including laws aimed at providing conflict-free minerals. Suppliers shall cooperate with Castolin Eutectic in determining the country of origin and the source (including the applicable smelter) and chain of custody of those elements.

## **III. COMPLIANCE VERIFICATION**

Castolin Eutectic may occasionally request information or access for purposes of verifying compliance by Supplier. In the event Castolin Eutectic provides such a request and is not reasonably satisfied with the Supplier's response, Castolin Eutectic may, in its sole discretion, decline to make further purchases under any agreement between Castolin Eutectic and Supplier.

## **IV. APPLICATION TO SUBCONTRACTORS**

Supplier shall cause its subcontractors to comply with the provisions of this Code as if it were Supplier itself.

## **V. EVENT OF VIOLATION**

Suppliers shall take necessary corrective actions to promptly remedy identified noncompliance with this Code. Castolin Eutectic reserves the right to terminate its business relationship with any Supplier who is unwilling or unable to comply with this Code.

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## VI. NON-COMPLIANCE REPORTING

Violations of the Castolin Eutectic Supplier Code of Conduct may be confidentially reported, including anonymously, through the Integrity Helpline <http://castolin.ethicspoint.com/>

### Miscellaneous

If and to the extent that individual provisions of this Supplier Code of Conduct are not in line with applicable mandatory local laws, such mandatory local laws shall prevail.

### Approval and Validity

This Supplier Code of Conduct is approved by the following signatures and shall become effective the day it is signed.

It is binding for all Supplier, Consultants, and Service Providers in a business relationship with any legal entity belonging to the Castolin Eutectic Group and may be amended by Castolin Eutectic at any time.

Kriftel, July 14th 2021

Patrick Fetzer

Global Chief Executive Officer

Bert G. Jansen

Global Chief Human Resources Officer