

Supplier Code of Conduct

Preamble

Sustainability is an integral part of the strategy of Barmag Group (Barmag). For us, it is more than a concept. It is a living principle. Through our actions and measures, our own operations and processes contribute to a healthier planet. Our solutions and services improve and maximize the performance, function, design and sustainability of our products and manufacturing processes of our customers. Furthermore, we take care in terms of social sustainability. We do not only offer good working conditions for our employees all over the world but also differentiate ourselves through responsible and reliable relations with our business partners, such as suppliers. Our Supplier Code of Conduct (Supplier Code) is based on our concept of sustainability, which is also reflected in some important principles:

- Sustainability is an integral part of our strategy;
- We have clear positions with respect to several sustainability matters;
- Our Barmag Code of Conduct describes our essential rules and bases upon a set of profound values. Our Code and policies clearly express our human-rights related expectation towards our employees, members of the management and suppliers.
- For more information on Supplier Requirements please visit our supplier section on our homepage.

Those principles show Barmag's commitment to and responsibility for the implementation of ethical, social and sustainable standards. Our Supplier Code shall ensure that our relationship with suppliers reflects and supports the same high ethical and sustainable standards. It shall create a common understanding of how to implement our principles in the supplier's business. The principles of our Supplier Code are an integral part of our supplier selection and evaluation process.

We expect our suppliers to support these standards in their own operations and to adequately address them along their supply chains. We further expect you to have an ongoing dialogue with us to foster the support of our standards.

1. Human Rights and Social Standards

1.1 Human Rights

The supplier shall commit to support the protection and preservation of fundamental human rights, as affirmed by the Universal Declaration of Human Rights. Suppliers must treat their employees with dignity, fairness and respect and commit to a safe work environment that is free from and provides for protection against human trafficking, slavery and forced labor.

1.2 Mutual Respect, no Discrimination, Diversity and Inclusion

The supplier shall foster a diverse and inclusive work environment. You shall treat all employees equally and comply with all applicable non-discrimination laws. No one shall be discriminated on grounds of race, color, national, ethnic or social origin, religion or belief, sex, age, physical or mental disability, medical condition, ancestry, alienage or citizenship status, marital status, political opinion, creed, genetic information, height or weight, sexual orientation, gender, gender identity, gender expression, transgender status or any other characteristic protected by law. Suppliers shall not tolerate any behaviors or actions that are violent, intimidating, hostile, degrading, humiliating or offensive and amount to discrimination, harassment, or violence. This includes that suppliers do not discriminate in hiring and employment practices and provide equal employment opportunities. Any job-related decision, such as pay, benefits, or promotion, shall be based only on the ability to perform the job. The obligation also includes - where applicable - the effective protection of migrant workers from all forms of discrimination and the provision of appropriate support services taking their special status into account.

1.3 Fair Labour Conditions

Suppliers shall respect applicable employment and labor laws. Working and resting hours, maximum consecutive days of work and annual leave shall comply with applicable laws. Suppliers shall pay statutory minimum wages. If no statutory minimum wage exists in the country of operation, you must pay wages that enable your employees to meet at least their basic needs, and opportunities to improve their skills and capabilities. In addition to payment for regular hours of work, workers must be paid for overtime at such a premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly payment rate. Compensation must be paid

regularly, on time and in full, and must be in accordance with applicable national laws on compensation. Suppliers shall further advocate for equal pay for work of equal value.

1.4 Child Labour

Suppliers shall not use child labour or support child labour in their supply chains. This means that the supplier shall not use employees younger than 15 years, or the minimum working age defined by the International Labour Organization (ILO), whichever is higher. All employees under the age of 18 must be protected from performing work that is likely to be hazardous or that may be harmful to their health, physical, mental, social, spiritual, or moral development¹.

1.5 Freedom of Association

Suppliers shall respect the employees' rights of freedom of association, including forming or joining or not joining any association of their choice. You shall allow your employees to communicate openly with the management regarding working conditions without taking any retaliation measures. You shall further respect trade unions' rights to operate freely and in accordance with the local laws, including the right to strike and collective bargaining. Suppliers must have mechanisms for resolving industrial disputes, including employee grievances, and ensure effective communication with employees and their representatives.

1.6 Protection from extensive use of violence and torture

When contracting or requesting usage of private or public security personnel to protect a company project or site, suppliers shall apply reasonable and effective measures to minimize the risks of violating human rights, including torture and other inhumane treatment, and the freedom of association.

2. Health, Safety and Environmental Protection

Suppliers must take reasonable precautions for the health and safety of their employees, business partners, and other people who may be affected by their activities. In addition, they should act in an ecologically responsible and resource-saving manner. This includes the following aspects:

2.1 Health and safety at work

¹ ILO [Convention C138 - Minimum Age Convention, 1973 \(No. 138\)](#) and [Convention C182 - Worst Forms of Child Labour Convention, 1999 \(No. 182\)](#)

The supplier shall provide a safe and hygienic work environment, including the working place and equipment. Employees must always have access to adequate and clean sanitary facilities. If residential facilities are provided to employees, the same standards apply.

The supplier shall have health and safety policies and promote occupational health and safety practices to prevent accidents and injuries. This includes protection of the employees from fire, accidents and toxic, chemical, or biological substances. Lighting, heating, and ventilation systems must be adequate. The supplier shall also ensure that employee's performance and safety is not impaired by alcohol, controlled substances, or drugs.

Suppliers shall have an appropriate work organization with respect to working and resting hours, to avoid excessive physical and mental exhaustion of your employees. You shall train and instruct your employees adequately.

2.2 Environmental

The supplier shall comply with applicable environmental laws and standards and have an effective environmental policy. This includes (i) integrating principles of sustainability into business decisions; (ii) responsible use of natural resources; (iii) measures for cleaner production and prevention of pollution; and (iv) developing products, materials and technologies in a sustainable manner. Suppliers should further, wherever possible, support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies by implementing sound life-cycle practices. Suppliers shall strive to implement energy-efficient technologies to continuously improve energy efficiency and reduce CO2 emissions.

Suppliers shall particularly ensure compliance with:

- The prohibition (i) on the production and use of mercury in products and production and (ii) of improper treatment of mercury waste under the Minamata Convention²;

² [Homepage | Minamata Convention on Mercury](#)

- The prohibition of non-environmentally sound management, production and use of persistent organic pollutants (POPs) under the Stockholm Convention³;
- the ban on export and import of hazardous waste and other waste under the Basel Convention and the Regulation on (Hazardous) Waste⁴.

Suppliers shall respect and protect the environment as a natural basis for life and its fundamental importance as a supply base for humans in the respective regions. You must minimize environmental risks, like the pollution of water, air and soil, excessive water consumption and noise emissions, particularly where such risks damage the health of people, significantly impair the natural bases for food production or prevent people from having access to proper drinking water and sanitary facilities. This also includes unlawful eviction and the unlawful taking of land, forests and waters whose use provides a person 's livelihood.

2.3 Process Security

Suppliers must use facilities and risk-based safety programs to control and maintain their work processes in accordance with applicable safety standards.

2.4 Product Safety

The quality and safety of our products and services are the basis of our business activities. We therefore expect our suppliers to also ensure highest quality and safety of their products and services. Your products and services shall meet national and international legal requirements, as well as generally recognized and contractually agreed quality requirements and standards to meet our and our customers' needs, perform as warranted and be safe for their intended use. Suppliers shall immediately address critical issues that may negatively affect the quality of products and services.

Suppliers shall provide all necessary information, including product information, safety data sheets, and information on hazardous substances. Suppliers shall proactively share up-to-date information about environmental, health and safety matters of their products. Suppliers shall cooperate with Barmag to meet requirements of the downstream supply chain with respect to the suppliers' products or services.

In addition, suppliers shall regularly monitor the legal developments regarding the use of chemicals and substances to ensure continuity of supply. Suppliers shall support efforts to eradicate the use of any conflict minerals, hazardous and chemical substances. In case that the material 'chain of custody' supplied is "indeterminable" or otherwise unknown, the supplier is expected to either attain the appropriate certifications or phase out that source of mineral / substance.

3. Appropriate Business Practices

Suppliers must act with integrity and behave fairly in competition. Suppliers shall comply with applicable laws through appropriate management and governance structures and promote continuous improvement of the expectations of this Supplier Code.

3.1 Business Integrity

We expect suppliers to conduct business in a transparent, honest, and ethical manner. This means:

- (i) We do not tolerate bribery or corrupt practices. You must implement a system to prevent bribery and corruption with reasonable measures. It is not allowed to provide, promise or offer benefits to a Barmag employee or representative that would be deemed illegal or unethical. Gifts, entertainment and hospitality to a Barmag employee or representative must be reasonable and socially adequate and should not be given to influence the decision of a Barmag employee or representative in relation to you or another person. This also applies to sponsoring activities.
- (ii) We further expect you to not engage in money laundering and terrorism financing and to have procedures to prevent, identify and report any dealings with illegal funds or other money laundering activities in any way.
- (iii) You must follow fair competition practices to earn our business and not indulge in any anti-competitive or unfair trade practices, including collusion, price fixing or restriction of supply, in any form.

3.2 Conflict of Interest

³ [Stockholm Convention - Home page](#)

⁴ [Basel Convention > The Convention > Overview & Regulation - 1013/2006 - EN - EUR-Lex](#)

We expect suppliers to work with us in a transparent way and to disclose any (potential) conflicts of interest. A conflict of interest arises when an individual has a personal interest which may influence the business decision. Examples are: Any owners, major shareholders, directors, or key employees of the supplier have personal relationships and/or business with any employee or member of corporate bodies of Barmag. This also applies in case of former employees or members who have left Barmag for less than one year. The same applies *vice versa*. Any disclosure of a conflict of interest shall include detailed information.

3.3 Protecting sensitive, confidential and proprietary Information

Suppliers are expected to ensure that all sensitive, confidential, and proprietary information in connection with products, services and contracts, as well as personal data are appropriately protected. This includes the protection of this information from unauthorized access, destruction, use, modification, and disclosure, through appropriate physical and electronic security procedures.

3.4 IT & Cybersecurity

We are committed to protecting our and the information systems (IT) systems of our business partners along the supply chain against cyber threats and to foster a secure digital environment. This commitment is not just a legal requirement but a joint responsibility in ensuring the integrity and resilience of our digital ecosystems. We thus expect our suppliers to comply with applicable IT and cybersecurity laws and to manage and mitigate risks to information systems by implementing appropriate IT cyber security programs. We further expect you to comply with our cybersecurity requirements. These requirements apply in particular to Operational Technology (OT) components, such as software, services, embedded computing technologies and IT. We encourage our suppliers to integrate common cybersecurity standards (e.g. ISO, NIST, IEC62443, CISA CPG) into their cybersecurity protocols as such measures not only ensure compliance with the laws but also enhance the effectiveness of cybersecurity measures and reduce the risk of cyber threats.

We further expect you to actively collaborate with and support us with respect to IT and cybersecurity to enhance your and our security posture. Suppliers must report to Barmag

any suspected or actual security incident immediately after becoming aware of it.

3.5 Trade Compliance

Suppliers must comply with national and international applicable export control, sanctions and embargo laws and cooperate with Barmag in determining applicable export control restrictions. Suppliers shall provide accurate and correct information about the supplier and its products and services to customs and other authorities.

3.6 Responsible Sourcing of Minerals and Metals

We expect our suppliers to responsibly manage the supply chain for all minerals, especially for so-called conflict minerals such as tin, tungsten, tantalum, gold, and cobalt. Suppliers shall comply with applicable laws and regulations and establish processes in accordance with the OECD Due Diligence Guidance to Promote Responsible Supply Chains for Minerals from Conflict and High-Risk Areas.

4. Governance

4.1 Risk management

Suppliers are expected to regularly analyze and manage risks in connection with their operations and supply chains, as well as products and services, including adverse human rights and environmental impacts. They should have appropriate risk management processes in place and take appropriate steps to avoid and reduce risks. Suppliers should ensure that their operations do not cause or contribute to human rights abuses and environmental rights violations. In case of risks or violations of those rights, suppliers shall remedy any adverse impacts directly caused, or contributed to, by their activities or through business relationships.

4.2 Information and cooperation obligation

Barmag may review your compliance with this Supplier Code. In case of concerns, we will work with you to overcome possible concerns and expect you to communicate openly and work collaboratively with us. If you become aware of significant incidents (violations and substantial suspicion) of non-compliance with this Supplier Code and the addressing of Barmag's standards along the supply chain, you shall immediately inform Barmag. This can be done via the responsible Barmag purchaser or below reporting channels. In case of non-compliance with this Supplier Code, the Supplier shall take necessary corrective

actions in a timely manner, as may directed by Barmag. We also reserve the right to (temporarily) suspend or terminate the agreement with the supplier in case of non-compliance. The supplier shall keep records to demonstrate compliance with this Supplier Code and provide Barmag with those records upon its request.

4.3 Access to Remedy

If someone at the supplier believes that this Supplier Code are not complied with, or that Barmag is not acting in accordance with its own Code of Conduct, we encourage such person to raise any concerns via our SpeakUp Line: <https://www.barmag.com/en/about-us/sustainability/barmag-speakup-platform/>

The Supplier shall inform its employees and suppliers of Barmag's reporting channels and request its suppliers to also inform their suppliers about Barmag's reporting channels. The supplier assures not to take any retaliation measures against the whistleblower in connection with the reporting of such information.
