

# Code of Conduct

for Business Partners

# Successful & Responsible



Uhlmann Group combines successful business management with responsible conduct in order to be an outstanding partner for its customers and to have a sustainable future. In a globalized, increasingly complex world, this is becoming more and more challenging. That's why Uhlmann believes it is essential for both the Group and its business partners to commit to legally-compliant, ethical conduct and ecological and social responsibility. The principles in this Code of Conduct form an important part of our supplier selection and evaluation process. Uhlmann Group expects its suppliers to implement these standards throughout their supply chain on a legally binding basis.

In its business transactions, Uhlmann Group attaches particular importance to continuous compliance with the principles of the UN Global Compact (Davos, 01/99, available at [www.unglobalcompact.org](http://www.unglobalcompact.org)), specifically respect for the protection of human dignity and human

rights, the abolition of child labor, the elimination of forced labor, the elimination of discrimination, the upholding of the freedom of association and relevant national standards on remuneration, working hours, health protection, environmental protection and combatting corruption. The business relationship between Uhlmann and its business partners must always be shaped by the Group's stated goal to uphold these principles at all times and to act in accordance with these principles.

To this end, Uhlmann Group is publishing this Code of Conduct for its business partners to reinforce a shared understanding of how these principles are to be implemented in everyday working life.

Business partners must comply with all laws and requirements relevant to them in their business relationship with Uhlmann Group.



## Human Rights and Working Conditions

Uhlmann Group does not tolerate any human rights violations and abides by the UN Universal Declaration of Human Rights. Business partners must comply with national and international regulations on the protection of human rights and ensure that both they and their suppliers do not participate in any form of human rights violations.



## Free Choice of Workplace

Forced labor and any form of modern slavery and human trafficking are prohibited. Working relationships are established entirely voluntarily and can only be terminated in compliance with statutory or agreed notice periods. Uhlmann Group expects its business partners to not tolerate any form of discrimination or harassment.



## Working Hours, Salaries, and Other Benefits

Business partners must offer adequate pay and working hours in accordance with the national laws and regulations that apply to business relationships with Uhlmann Group. If security staff are engaged or used, business partners must ensure that the security staff are sufficiently briefed and monitored and comply with legal requirements. Business partners must always comply with the applicable laws or relevant ILO conventions as a minimum.



## Freedom of Association

Business partners must respect the freedom of association and the right to form interest groups to represent common purposes and goals. Business partners must not tolerate or participate in unlawful evictions or unlawful deprivation of land, forests or waters.



## Occupational Health and Safety

By beginning or continuing business relationships with Uhlmann Group, business partners confirm they implement, as a minimum, all applicable statutory requirements on occupational health and safety appropriately.

In addition, business partners confirm they ensure occupational health and safety in accordance with internationally recognized standards, for example ISO 45001 or the ILO conventions. This includes the identification of potential hazards and stressors along with suitable prevention measures. In addition, business partners must pursue a policy of continuous improvement in occupational health and safety.

In particular, business partners must use safety programs to control and maintain working processes in accordance with applicable safety standards. The programs must be adapted to the workplace and relevant process risks. Business partners must communicate and disclose risks inherent in processes and products to Uhlmann and monitor them appropriately in order to ensure the protection of any third parties affected or potentially affected. They must analyze serious incidents and communicate them to Uhlmann without delay. If there are hazardous systems and processes, business partners must carry out specific risk assessments regularly and take effective measures without delay to prevent incidents, e.g., chemical leaks, fire, or explosions.



## Product Safety

Business partners must comply with product safety regulations, label their products properly and communicate any requirements for handling products to Uhlmann. If necessary, they must give Uhlmann Group the applicable documentation and all required safety information on all hazardous substances. This includes product information, safety data sheets, confirmations of reports and approvals, applications and exposure scenarios. Business partners must proactively, transparently, and unconditionally share information on the health, safety and environmental aspects of their products with all parties involved.



## Environmental and Climate Protection

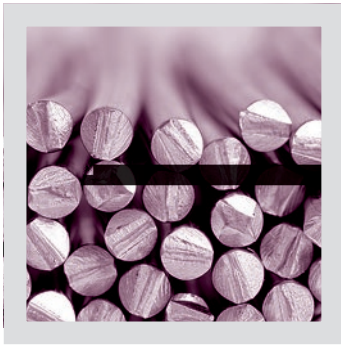
Uhlmann Group expects its business partners to apply adequate environmental management and to identify all environmental factors in their area of responsibility. This includes an expectation that business partners will reduce their environmental impact in their own production processes by taking preventative measures in a spirit of continuous improvement, as well as taking into consideration environmental factors in the supply chain and raw material procurement.

Business partners must appropriately implement all statutory environmental protection requirements relevant to their business relationships with Uhlmann as well as internationally recognized standards pertaining to corporate environmental protection, such as ISO 14001.

Uhlmann expects business partners to continually take measures aimed at reducing their environmental impact, including – but not limited to:

- ▶ Reducing greenhouse gas emissions produced in their own business operations and throughout their value chain
- ▶ Collecting, computing and analyzing relevant greenhouse gas data in accordance with international standards and providing the data on request
- ▶ Increasing energy efficiency and the use of renewable energy
- ▶ Improving air quality and emission management
- ▶ Supporting waste reduction, including through reuse and recycling and by providing sustainable materials
- ▶ Improving water quality and consumption management
- ▶ Avoiding noise emissions
- ▶ Avoiding harmful soil changes
- ▶ Handling chemicals used in operations and products responsibly.

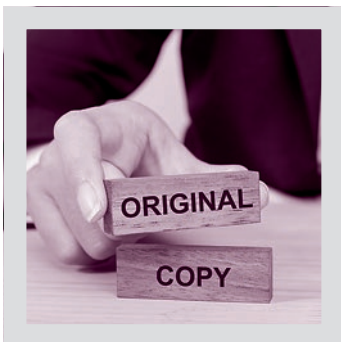




## Responsible and Transparent Procurement of Raw Materials/Conflict Minerals

The trade and mining of certain raw materials, such as tin, tungsten, tantalum, and gold is increasingly associated with human rights violations and environmental damage.

In relation to relevant raw materials, business partners must meet their duties of due diligence and, within their business relationships with Uhlmann Group, comply with all applicable regulations on conflict minerals, such as Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act or Regulation (EU) 2017/821. To identify and minimize sustainability risks, Uhlmann expects its business partners to introduce and maintain processes for upholding duties of due diligence and to provide the required information along the entire supply chain.



## Measures to Combat Counterfeiting

Business partners must take appropriate measures in their supply chain to protect their products. They must also ensure the integrity of deliveries to Uhlmann Group – from the place of origin to the destination, and introduce all required and appropriate measures in their area of responsibility to ensure neither Uhlmann products nor their workable components or raw materials, nor the related knowledge, can be accessed by counterfeiters, smugglers, thieves, or other unauthorized third parties or even leave the legitimate supply chain.

Business partners must immediately review their relationship with a third party if they discover that they may unintentionally be involved in the manufacture or sale of counterfeit products due to the third party's activities, e.g., the export of certain products that are deemed counterfeits in the destination country.

Uhlmann Group expects its business partners to support the investigation and prosecution of activities connected with counterfeit products unreservedly and comprehensively at all times.



## Prohibition of Corruption

In the sphere of influence of its business activities, Uhlmann Group does not tolerate any illegal or inappropriate conduct by or on behalf of business partners aimed at influencing decisions. This applies both to business partners and to officials and authorities. In particular, Uhlmann and its business partners must strictly combat all forms of active and passive corruption, bribery, and undue advantages.

Uhlmann therefore expects its business partners to strictly comply with all anti-corruption laws in particular and to not tolerate any illegal influence, in particular corrupt action, in business transactions or over officials (including PEPs) and to strictly combat such action.



## Avoiding Conflicts of Interest

Uhlmann Group and its business partners ensure that their employees only make business decisions on the basis of objective considerations. Uhlmann expects its business partners to ensure that employees or third parties it engages keep their private interests strictly separate from their business interests, and that individuals with a possible conflict of interests are not involved in relevant decision-making.

Business partners must make every effort to avoid even the appearance of arbitrary considerations and will inform Uhlmann Group of any potential conflicts of interest without delay.



## Fair Competition

Business partners must ensure fair competition and comply with competition and anti-trust laws. In particular, they are not permitted to enter into agreements or share information with competitors, or to act in any other way that improperly restricts or impedes the free market.

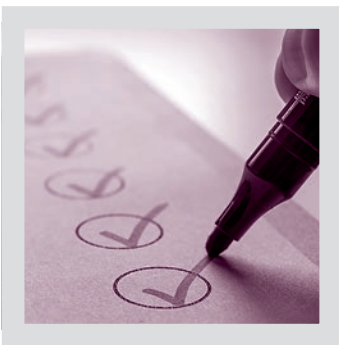




## Confidentiality and Protection of Information and Data

Sharing and handling information or data that requires protection is an integral part of any collaboration with Uhlmann Group business partners. For that reason, Uhlmann expects its business partners to take particular care in this regard and to apply appropriate technical and organizational measures to protect information.

In particular, confidential and personal information and data must be protected in such a way that it cannot be accessed by unauthorized third parties and can only be processed by business partners for the intended purpose. Information and data can only be retained for as long as is strictly necessary. If third parties have authorized access to information and data, they must be obligated to protect the information and data.



## Systems, Documents, and Evaluation/ Risk Management and Assessment

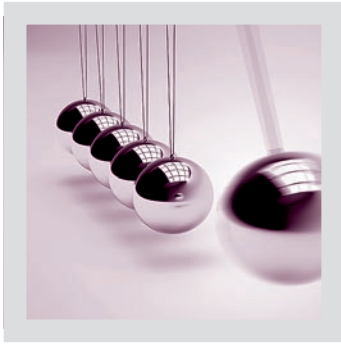
Business partners must develop, implement, apply, and maintain management systems and controls in connection with the content of this Code of Conduct. They must always have the necessary documents available in order to prove compliance with the principles of this Code of Conduct and be able to present these to Uhlmann Group at any time.

Business partners must maintain all appropriate tools – with reference to all applicable statutory requirements – to regularly identify, assess, and manage risks in all areas covered by this Code of Conduct for Business Partners.

Business partners must demonstrate their commitment to continuous improvement by setting performance targets, executing implementation plans, and taking the required measures to eliminate irregularities that are identified during internal and/or external audits, inspections, and management assessments.

Business partners must develop, carry out, and maintain suitable training measures to give their managers and employees an appropriate understanding of the principles in this Code of Conduct that are relevant to them, as well as an understanding of the applicable laws, provisions, and generally recognized standards.

Business partners must grant Uhlmann Group the right to evaluate adherence to this Code of Conduct at any time, including but not limited to the sustainability performance, with reasonable advance notice, including on the business partners' premises, in order to analyze and evaluate the business partners' compliance with the principles of this Code of Conduct. At Uhlmann's discretion, this evaluation will be undertaken either directly by Uhlmann or by a qualified third party, e.g., in the form of an evaluation or audit.



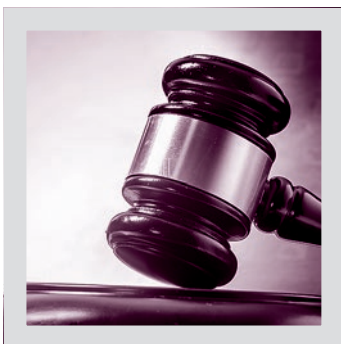
## Implementation in the Supply Chain

Uhlmann Group expects its business partners to adhere to the principles of this document and to pass them on to the suppliers and business partners in their supply chains who are involved in business with Uhlmann, to impose corresponding obligations on their suppliers and business partners and ensure their compliance with these principles, and to agree to potentially monitor compliance with these principles. The term "supply chain" used in this document relates as a rule to all products and services of a company, and therefore to all steps domestically and abroad that are required to manufacture the products and provide the services.



## Handling Reported Breaches

Uhlmann Group strives to prevent any form of unlawful or even criminal conduct within its sphere of influence. Uhlmann expects its employees and business partners to report any potential misconduct immediately. Uhlmann expects its business partners to also have implemented a process for reporting misconduct in their sphere of influence and to notify Uhlmann without delay of any breaches of applicable laws or the content of this document. This will help to investigate and clarify individual and structural misconduct as quickly as possible, prevent further misconduct, and will also form the basis for constructive discussions to improve standards in the supply chain.



## Consequences in the Event of Breaches

Business partners must consistently work towards and ensure that their own business partners, in particular their direct and indirect suppliers, uphold the obligations, principles, and requirements of this Code of Conduct within the business relationships that concern Uhlmann Group. Any serious or repeated breach of this Code of Conduct by a business partner or its business partner, in particular by its direct or indirect suppliers, will result in Uhlmann being unable to continue with the business relationship. In this event, Uhlmann Group has the right to terminate every contractual relationship with the relevant business partner for good cause without notice at any time. This right will lapse if Uhlmann Group does not assert this right within fourteen (14) days of the date on which Uhlmann became aware of all of the facts and circumstances pertaining to the reason for the termination. This will only be the case once the relevant business partner or an expert has confirmed the breach or an authority or court announces a final decision concerning the breach.

# UHLMANN GROUP



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