

Code of Conduct for Business Partners - Code of Conduct -

between

Betz-Chrom GmbH

Am Haag 11

82166 Gräfelfing

and

company

Foreword

In the spirit of a trusting partnership, our customers receive highly qualified technical advice tailored to their needs. We combine our many years of experience in surface technology with an innovative and open-minded corporate culture. Our quality awareness, our occupational health and safety management and our measures to protect the environment and save energy are tested and certified in accordance with ISO standards. As a punctual partner with high quality standards, we always aim to find the best process solution for our customers.

Betz-Chrom GmbH (hereinafter referred to as "**Betz-Chrom**") has committed itself, as part of its corporate policy and the strategic orientation of the company, to consistently pursuing the vision of 'green electroplating' and - where possible - implementing it professionally. In all our activities, we always endeavour to harmonise economy and ecology, to assume climate policy and social responsibility, to sustainably promote the well-being of our employees and, where possible, to support the 17 sustainability goals of the United Nations (<https://unric.org/de/17ziele/>).

We attach great importance to legally compliant behaviour, both to protect the company and its employees and to protect third parties. We are expressly committed to the fundamental values of integrity, sustainability, transparency and responsibility in business transactions and see it as our duty to comply with national and international principles and standards in the areas of human rights, labour standards, environmental protection and anti-corruption.

We are a responsible company and expect the same behaviour from all those with whom we do business. This Code of Conduct defines the requirements and expectations we have of you as our business partner and forms the basis for a successful business relationship. To ensure compliance with these requirements and expectations, we aim to work closely with you. At the same time, we expect you to pass on these requirements in the supply chain wherever possible and have them confirmed by you.

Scope of application

This Code of Conduct applies to suppliers who provide Betz-Chrom with goods, materials or services. This Code of Conduct establishes a minimum standard which Betz-Chrom expects you to comply with. This means that you, as a

business partner of Betz-Chrom, must comply with the basic principles and values of this Code of Conduct and act responsibly in your business dealings.

Legal compliance

As our business partner, you must comply with the laws and regulations of the applicable legal system.

Respect for human rights and social standards

As our business partner, you respect the dignity and personal rights of individuals and all stakeholders with whom you are associated through activities, business relationships or products. You support and respect the globally applicable regulations for the protection of human rights as fundamental and universally applicable requirements. In doing so, you can be guided by the international standards of the United Nations and the conventions of the International Labour Organization. Specifically, you undertake to

- create a respectful and unprejudiced working environment free from discrimination, intimidation and harassment,
- not harass, discriminate or disadvantage anyone on the basis of their ethnic, national or social origin, skin colour, gender, religion or ideology, political views, age, disability or sexual orientation, or tolerate such behaviour,
- refrain from exploiting children and young people and not employ any staff who have not reached a minimum age of 15 years,
- do not use forced or compulsory labour and do not accept or promote any form of modern slavery,
- respect the personal dignity, privacy and personal rights of each individual and prohibit corporal punishment and physical, sexual or psychological abuse and harassment,
- enable the formation of and participation in employee representative bodies/trade unions and uphold employees' right to freedom of association,
- maintain a legally binding reporting system through which employees or third parties can report violations of laws, human rights violations or other unacceptable behaviour without the threat of retaliation.

Safety, health and fair working conditions

We expect you to

- comply with the statutory minimum wages in the respective labour markets and the applicable labour regulations/laws, in particular with regard to working hours,
- provide your employees with adequate working facilities; this applies in particular to fire protection, adequate lighting and ventilation and emergency medical care,
- assume responsibility for a safe and healthy working environment; potential accidents or damage to health must be prevented by taking appropriate measures;

We consider it sensible to set up an occupational safety management system; all employees must be regularly informed and trained in occupational safety and health protection.

Environmental protection and sustainability

We expect you to assume ecological responsibility towards the community and future generations and to act in a resource-conserving manner. You are committed to the sustainable protection of people and nature, are aware of your responsibility towards the environment and strive to minimise environmental pollution and continuously improve environmental and climate protection. In doing so, you observe the legal norms and international standards for environmental and climate protection.

In particular, you are committed to

- careful use of resources (including raw materials, water and energy),
- promoting renewable energies and increasing energy efficiency,
- avoiding waste and emissions (including greenhouse gases),
- use of environmentally friendly materials and responsible behaviour with chemicals,

- improving water and air quality.

You must comply with all applicable environmental laws, regulations and industry standards and strive for continuous improvement. You should endeavour to introduce and apply an environmental management system in accordance with or based on ISO 14001 or an equivalent system.

You are committed to economic, ecological and social responsibility, both when it comes to products and services and when it comes to their production and the associated processes, services and the supply chain.

The use of minerals, raw materials and other natural resources that are cultivated or extracted in conflict or high-risk areas is strictly prohibited.

You undertake to comply with the regulations on prohibited and declarable substances, e.g. RoHS and REACH, and to provide evidence of this on request.

Prevention of corruption and money laundering

You stand for transparency and openness in business dealings and reject all forms of bribery and corruption or even attempts to do so. You ensure that no bribes, kickbacks, unauthorised donations or other unauthorised payments or benefits are granted, offered or accepted to employees, customers, public officials or other third parties. You do not directly or indirectly offer unauthorised benefits in the form of gifts, hospitality or invitations to improperly influence customers, public officials or other third parties. Nor do you request or accept such benefits. You ensure that consultancy/intermediary fees are only paid for services actually rendered and are commensurate with the service provided. You ensure that neither incoming or outgoing payments nor other transfers of assets violate the relevant regulations against money laundering and terrorist financing and comply with anti-corruption laws in the countries in which business cooperation takes place.

Fair competition and business information

You observe the principles of fair and open competition and comply with the applicable antitrust laws. In this respect, you do not enter into any unauthorised agreements of any kind with competitors on prices, terms and conditions, market sharing, non-competition and do not exploit any dominant market position that may exist. Agreements also include informal discussions and informal arrangements that have as their object or effect any of the above-mentioned restrictions of competition.

Foreign trade and export control

You observe the applicable regulations and restrictions on international trade in goods, services and information, including the export and import regulations of the countries concerned. This applies in particular to countries that are excluded from trade due to a trade embargo. You must ensure through suitable processes that transactions and activities with third parties as well as with Betz-Chrom do not violate export control and sanctions law and that any necessary evidence and information can be provided immediately. Applicable tax laws and customs regulations must be complied with.

Product integrity, product safety and conformity

You set high quality and safety standards for the products supplied. You ensure compliance with the relevant legal provisions, in particular with regard to

- product safety,
- labelling and packaging of products,
- the use of hazardous substances and materials,
- product liability and warranty.

You take into account the state of the best available knowledge and technology as well as the justified safety expectations of end users over the entire life cycle.

Data protection, confidentiality and protection of the rights of third parties

You comply with all relevant laws on the protection of personal data of employees, customers, suppliers and other third parties. You respect the property rights of Betz-Chrom and third parties (patents, copyright and trademark law) and ensure that trade and business secrets are protected. Confidential information will only be passed on to third parties with our express consent. Data processed in IT systems is protected to the best of our ability.

Reporting misbehaviour of any kind

We actively counter inappropriate behaviour. Both employees and external third parties are always encouraged to speak out freely and without fear of reprisals. Reprisals against employees who raise concerns in good faith about misconduct within the company are prohibited. This also applies to third parties who contact us. The following contact details are available to employees and third parties:

Betz-Chrom GmbH
Compliance Officer
Am Haag 11
82166 Gräfelfing
compliance@betz-chrom.de
www.betz-chrom.de

Supply chain and information

You shall use reasonable efforts to promote this Code of Conduct among your own suppliers, subcontractors and business partners and shall not tolerate any violations of the principles contained in this Code of Conduct. Suspicious behaviour must be reported immediately to the management of Betz-Chrom.

Compliance with this Code of Conduct

We reserve the right, if necessary, to check compliance with the requirements after prior notice and in the presence of one of your representatives during regular business hours and in accordance with applicable law.

In the event of a repeated or serious breach of the principles contained in this Code of Conduct, Betz-Chrom is entitled to cancel existing contracts with you for good cause and to terminate the business relationship.

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