



TYROLIT Code of Conduct for Suppliers

The companies of the TYROLIT group ("TYROLIT") are committed to the highest standards of ethical business conduct and to the practice of business in accordance with all applicable laws, rules and regulations. This Code of Conduct for Suppliers defines the basic principles for supplier conduct when working with TYROLIT. TYROLIT is committed to these principles and expects the same from its suppliers. We also expect that our suppliers apply a similar code of conduct in relation to their own suppliers and sub-contractors.

HUMAN RIGHTS & LABOUR

No child labour: You pledge to work against any form of child labour. You shall not employ children below the minimum working age or mandatory school age in the respective country. Suppliers shall not employ any workers under the age of 18 to perform any work that is defined in national law as hazardous.

Appropriate Wages and Working Hours: You comply with all applicable laws on working hours and overtime, as well as all applicable laws on wages and benefits.

No forced labour: Forced labour, including bonded or involuntary prison labour, must not occur. This includes withholding payment or benefits, or retaining identity documents or other personal effects of value. Work should be voluntary on the basis of a recognised employment relationship established through national law. All workers shall be provided with a written, understandable and legally binding labour contract.

Respect Freedom of Association and Collective Bargaining: You uphold the freedom of association and the right to collective bargaining in accordance with applicable laws.

No Harassment and Discrimination: You pledge to treat all your employees equally, fairly and with respect, regardless of race, religion, nationality, disability, sexual orientation, gender, age, union membership or party membership. You enable your employees to report concerns or potentially unlawful practices at the workplace.

CONFLICT MINERALS

You do not source "**Conflict Minerals**" from the Democratic Republic of Congo and adjoining countries ("**Covered Countries**") in a manner which directly or indirectly finances or benefits armed groups in the Covered Countries. You will establish the identity of all organisations which participate in the supply chain from origin to delivery to TYROLIT. Records shall be retained to ensure the origin of all Conflict Minerals can be documented.

"**Conflict Minerals**" means columbite-tantalite (coltan), cassiterite, gold, wolframite and their derivatives tantalum, tin and tungsten and any other mineral or its derivatives which the U.S. Secretary of State determines to be financing conflict in the "Covered Countries".

ENVIRONMENT, HEALTH & SAFETY

Protect Health & Safety: You provide safe and healthy working conditions for all workers in accordance with applicable law and other relevant industry and building standards, including, but not limited to, protection against fire, accidents and toxic substances.

Minimize Waste & Emissions: TYROLIT expects suppliers to minimize the environmental impact of their operations. You will comply with all applicable environmental laws and will have systems in place to manage waste, air emissions and wastewater discharges.

Improve Energy Efficiency: You pledge to constantly aim at improving energy efficiency in all production operations.



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ETHICS & LEGAL REQUIREMENTS

Compliance with Laws: You pledge to comply with all applicable laws, rules and regulations in the countries where you operate.

No Bribery, Corruption and Conflicts of Interest: You commit yourself to countering bribery and corruption. You will not engage in any form of bribery and will avoid any interaction with TYROLIT employees that may prevent employees from acting in the best interest of TYROLIT.

Fair Competition: You comply with all applicable laws regarding fair competition and antitrust.

Protect Information: You will protect TYROLIT's confidential information and act to prevent its misuse, theft or improper disclosure thereof and will comply with all applicable data privacy laws.

Trade Compliance: Your transactions with TYROLIT must at all times be in strict conformity with all relevant economic sanctions and export control laws and regulations.

No Money Laundering: You commit yourself to keeping accurate records of all business related to TYROLIT.

Whistleblower Protection: You will provide your employees with avenues for raising legal or ethical issues or concerns without fear of retaliation.

MONITORING & ENFORCEMENT

TYROLIT reserves the right to conduct audits or assessments of the supplier's operations relevant for the TYROLIT Code of Conduct for Suppliers, including but not limited to the supplier's facilities. If TYROLIT realizes that you are not meeting the requirements and expectations set out in this Code of Conduct for Suppliers, TYROLIT may offer guidance specifying which issues need to be corrected or improved. You will remedy such breach within an acceptable time frame. Nonetheless, TYROLIT reserves the right to immediately terminate the co-operation in case of serious violations of the terms of this Code of Conduct.

By signing, you confirm that you comply with the principles of this Code of Conduct for Suppliers.

Company

Signature

Place, Date

Name, Function