

Supplier Code of Conduct of Hänsel Processing GmbH

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"Sustainability and responsibility are a defining element of our corporate mission statement and an integral part of our business strategy."

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I. Preamble

Hänsel Processing GmbH is committed to ecologically and socially responsible corporate governance. We take responsibility for our decisions, our actions, our products and our services. We expect the same conduct and sense of responsibility from our suppliers. We also expect our own employees to observe the principles of ecological, social and ethical conduct and to integrate them into the corporate culture. We strive to continuously improve our business activities as well as our products and services in line with sustainability.

We can only meet our responsibility together with our business partners. We therefore expect our suppliers to also assume this responsibility and to implement this obligation in the upstream supply chain. In doing so, we must accept that not all suppliers can immediately and/or fully comply with our Code of Conduct. This applies in particular to suppliers in the supply chain that are based in countries where compliance with individual requirements, such as freedom of association, is not permitted by law. Notwithstanding this, we work to ensure that the respective statutory minimum standards are observed. We do not rule out terminating a business relationship as a measure of last resort.

This Supplier Code of Conduct is based on national laws and regulations, such as the German Supply Chain Due Diligence Act (LkSG), as well as international conventions, including, by way of example, the United Nations Universal Declaration of Human Rights and the international labour standards of the International Labour Organization (ILO).

The Supplier Code of Conduct of Hänsel Processing GmbH sets out below the minimum requirements that must be met in order to comply with our standards. Due to the heterogeneity and complexity of the business models of Hänsel Processing GmbH, the individual business units of Hänsel Processing GmbH may impose further specific requirements on their suppliers.

II. Social Responsibility

Suppliers must respect the human rights of their employees, local communities and vulnerable persons and treat them with dignity and respect. They shall take appropriate precautions for the health and safety of their employees, customers, visitors, contractors and other persons who may be affected by their activities. This includes the following aspects:

II.1 Prohibition of Forced Labour

Hänsel Processing GmbH pursues a zero-tolerance policy towards any form of modern slavery, servitude or serfdom, forced or compulsory labour, and any form of human trafficking in its supply chain. All work must be voluntary and performed without threat of punishment. Employees must be able to terminate their work or employment relationship at any time. There must be no unacceptable treatment of workers, such as psychological

hardship, sexual or personal harassment, or humiliation. The commissioning or use of security forces must be refrained from if, during their deployment, persons are treated inhumanely or degradingly, injured, or if freedom of association is impaired.

II.2 Prohibition of Child Labour

Hänsel Processing GmbH does not tolerate child labour in its supply chain. All suppliers are required to prevent any form of child labour in their operational processes in accordance with the definitions set out in the core labour standards of the International Labour Organization. Where young workers are employed, they must not perform any work that is mentally, physically, socially or morally hazardous or that interferes with their schooling.

II.3 Working Hours, Wages and Other Benefits

The working hours of suppliers' employees should not exceed the maximum working hours stipulated by applicable laws and ILO standards. Overtime is performed on a voluntary basis. Suppliers respect their employees' right to rest and leisure in order to maintain a balance between professional and private life.

Remuneration must be paid regularly, on time and in full in accordance with the law. Wage deductions as disciplinary measures are not permitted. Remuneration and other benefits should be fair, market-appropriate and equal for all employees, and should enable employees and their families to maintain an adequate standard of living.

II.4 Freedom of Association

In accordance with local laws, suppliers must respect employees' right to freely associate, establish and join trade unions, appoint employee representatives, form a works council and actively participate in collective bargaining. Employees must not be discriminated against on the basis of establishing, joining or being a member of such an organization.

II.5 Prohibition of Discrimination

Equal treatment of all employees must be an essential principle of suppliers' corporate policy. Any form of discrimination is prohibited unless justified by the requirements of employment. This applies, for example, to disadvantages based on gender, age, ethnic origin, skin colour, disability, origin and worldview, religion, pregnancy or sexual orientation, or on any other criteria prohibited by applicable law.

II.6 Health Protection and Safety at Work

Suppliers are responsible for providing a safe and healthy working environment. By implementing appropriate occupational safety systems, the necessary preventive measures are taken against accidents and damage to health that may arise in connection with the work performed. Physically demanding activities and workplace conditions

as well as risks arising from the use of the infrastructure available at the workplace must be managed in such a way that employees are protected from hazards.

Safety information on identified workplace risks or hazardous substances — including components in intermediate products — must be made available to employees for information, training and protection against hazards.

The minimum requirements for a safe and healthy working environment include the provision of drinking water, adequate lighting, appropriate room temperature, good ventilation and sanitary facilities.

II.7 Preservation of Natural Resources

Suppliers must not unlawfully deprive people of land, forests or waters whose use secures their livelihood in violation of legitimate rights. Harmful soil changes, water and air pollution, noise emissions and excessive water consumption must be avoided if they damage people's health, significantly impair the natural basis for food production, or prevent people from accessing clean drinking water or proper sanitary facilities.

II.8 Grievance Mechanisms

Hänsel Processing GmbH has implemented a grievance procedure. Suppliers should inform their employees appropriately about the existence of this grievance procedure and provide them with unrestricted access to it. If no such notification is provided, the supplier itself is responsible at operational level for establishing an effective grievance mechanism for individuals and communities that may be affected by adverse impacts.

II.9 Handling of Conflict Minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the supplier shall establish processes in accordance with the guidance of the Organisation for Economic Co-operation and Development (OECD) on due diligence to promote responsible supply chains for minerals from conflict-affected and high-risk areas. Smelters and refineries without appropriate, audited due diligence processes should be avoided.

III. Climate and Environmental Protection

Suppliers should act in an environmentally responsible and resource-conserving manner. This includes the following aspects:

III.1 Responsible Use of Resources

Suppliers preserve and protect natural resources, e.g. energy sources, water, forests, soil and raw materials. They prevent the exploitation, destruction or neglect of natural resources. Suppliers also make economically reasonable efforts to minimise the generation of exhaust gases, wastewater, waste, noise and light pollution. Suppliers shall use their best efforts to ensure that their business activities do not affect natural resources in such a way that food production is significantly impaired, people have no access to clean drinking water, or people's health is damaged.

III.2 Energy Consumption and Renewable Energy

Suppliers make reasonable efforts to cover their demand for purchased energy from renewable energy sources wherever possible. They use their best efforts to increase the overall use of renewable energy from year to year. Suppliers make reasonable efforts to improve energy efficiency in their operational processes and reduce energy consumption with the help of suitable management systems.

III.3 Water Use

Suppliers make reasonable efforts to reduce water consumption in their own operational processes and in their value chain. Suppliers make reasonable efforts to monitor the use, quality and discharge of water at their sites. They use their best efforts to continuously improve water reuse, water treatment, reduction of water consumption and wastewater treatment.

III.4 Waste, Wastewater, Local Exhaust Emissions, Noise and Light Pollution

Pollution of soil, air and water, as well as noise and light pollution, should be avoided. Suppliers shall use their best efforts to ensure that the handling, storage, transport, reuse, recycling and disposal of all types of waste and wastewater are carried out safely and in compliance with regulations. Suppliers pay particular attention to the handling of substances containing mercury or persistent organic pollutants (POPs), as well as the handling of waste, exhaust gases and wastewater that may contain mercury or POPs. Suppliers treat these substances in accordance with the provisions of the Minamata Convention on Mercury and the Stockholm Convention on POPs.

Suppliers ensure that the management of waste from their operational processes complies with official regulations and the requirements of the Basel Convention, in particular when transporting or trading such waste across borders.

IV. Ethical Conduct

In order to assume social responsibility, all suppliers are expected to act ethically and with integrity and to comply with all applicable laws and regulations. The ethical requirements include the following aspects:

IV.1 Fair Competition

Suppliers conduct themselves fairly in competition and comply with all applicable antitrust laws.

IV.2 International Trade Controls

Suppliers must comply with the export control regulations applicable to their business and provide customs and other authorities with accurate and truthful information whenever required.

IV.3 Integrity, Acceptance of Benefits

Suppliers must apply the highest standards of integrity in all business activities. Suppliers must prohibit corruption, extortion, breach of trust, embezzlement and money laundering in any form and must neither practise nor tolerate them. Suppliers must not offer or accept bribes or other unlawful payments in business dealings with business partners or public officials. Suppliers must not offer gifts or other benefits for personal advantage to employees of Hänsel Processing GmbH that could be regarded as bribery.

IV.4 Data Protection

Suppliers undertake to meet the reasonable expectations of their clients, suppliers, customers, consumers and employees with regard to the protection of private information. Suppliers must comply with data protection and information security laws as well as official regulations when collecting, storing, processing, transmitting and disclosing personal information.

IV.5 Intellectual Property

Intellectual property rights must be respected. Technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information are protected.

V. Governance

Suppliers should introduce a governance structure that supports compliance with applicable laws and regulations in their companies and promotes continuous improvement with regard to the expectations set out in this Code of Conduct. Specifically, this includes:

V.1 Legal and Other Requirements

Suppliers must know and comply with all applicable international, national and local laws and regulations, contractual agreements and internationally recognised standards and conventions.

V.2 Communication of the Hänsel Processing GmbH Supplier Code of Conduct in the Supply Chain

Suppliers should, as far as possible, also implement the principles set out in this Code of Conduct in their upstream supply chain.

V.3 Commitment and Responsibility

Suppliers must comply with the principles set out in this Code of Conduct. Suppliers should integrate all applicable aspects of the Code of Conduct for their suppliers into their management systems.

V.4 Right to Evaluation and Control

Suppliers grant Hänsel Processing GmbH the right to evaluate and control their performance after reasonable prior notice in order to determine the supplier's compliance with the principles set out in this Code of Conduct. The evaluations and controls are carried out directly by Hänsel Processing GmbH or by a qualified external service provider, e.g. in the form of an assessment or audit.
