

Brechmann-Guss

Code of Conduct for Suppliers
and Business Partners

SUSTAINABLE SUPPLY CHAIN

Code of Conduct for Suppliers and Business Partners

FOREWORD

Ethical conduct in terms of economic, ecological and social responsibility, as well as compliance with legal regulations, are very important to us. That is why we at Brechmann-Guss have established binding guidelines for ethical conduct in our Code of Conduct for employees.

The principles apply to all employees of our company, regardless of their hierarchical level or function.

To ensure the long-term success of our company and that of our customers, we rely on long-term and trusting relationships with our suppliers and business partners. We therefore also expect them to comply fully with applicable laws and to adhere to internationally recognised environmental, social and corporate governance standards (ESG standards). They should also make every effort to ensure that their suppliers, subcontractors, and other service providers comply with laws and ESG standards.

The following requirements specify our expectations regarding the attitude and conduct of suppliers and business partners in their business activities.

The principles set out in the Code are based on various international conventions and standards:

- Principles of the United Nations Global Compact (UN)
- Agreements of the International Labour Organisation (ILO)
- SA8000 (standard for socially responsible business management)
- Guidelines that prescribe rules for the use or disclosure of the use of specific materials in products, including the Dodd-Frank Act on conflict minerals, the REACH and RoHS requirements, etc.
- Brechmann-Guss Code of Conduct

Frank Brechmann
Management

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ENVIRONMENT

Environmental legislation

We expect our business partners to comply with all applicable laws and regulations for the protection of the environment.

Climate protection measures

Business partners shall take appropriate measures to support decarbonisation along the entire value chain. Particular focus should be placed on reducing GHG emissions in the business partners' own operations and in their supply chain. This should be achieved through continuous energy efficiency programmes and the increased use of carbon-neutral energy sources for the manufacture of materials and components and for the provision of services.

Upon request, business partners who supply products to Brechmann-Guss must provide information on CO₂ emissions (Scope 1, 2 and 3) in tonnes at product level so that Brechmann-Guss can improve the environmental performance of its products.

Efficient use of resources

We expect business partners to make efforts to use energy, water and raw materials efficiently and to increase their use of renewable resources to minimise harmful effects on the environment and health.

Prevention and reduction of environmental pollution

Business partners use or develop processes that are suitable for avoiding waste or recycling, as well as for the safe and environmentally sound disposal of residual waste, chemicals, and wastewater. In doing so, agreements, in particular the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, must be strictly observed.

Our business partners have a system in place to ensure that their business activities do not adversely affect water and soil quality. Emissions into the air, including noise and odours, must be reduced, polluting emissions must be controlled and, as far as possible, treated before being released into the environment.

Business partners implement concepts for the economical use of water at their sites and along their supply chains, with priority given to implementation in regions affected by water stress or scarcity. The right to access water is always respected. Business partners have facilities for responsible water treatment and wastewater discharge.

Business partners shall make reasonable efforts to ensure that, in accordance with applicable law and international regulations, there is no illegal biodiversity loss, including illegal deforestation and conversion, in their supply chains.

Harmful substances, raw materials

Substances whose presence or release poses a risk to humans and the environment or hinders the recycling process must be avoided. Products delivered to Brechmann-Guss must in all cases comply with applicable legal provisions, e.g. REACH, RoHS, the Stockholm Convention (persistent organic pollutants (POPs)) or the Minamata Convention (mercury). Upon request, the business partner must provide legally required or agreed information, e.g. an EU declaration of conformity.

Business partners shall use a hazardous substance management system that ensures safe use and transport as well as safe storage, reprocessing, reuse and disposal.

In smelters and refineries of tin, tungsten, tantalum and gold ("3TGs" or "conflict minerals"), business partners may only use raw materials that meet the requirements of the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" and have been verified by the Responsible Mineral Initiative (RMI) or similar organisations. Suppliers who supply Brechmann-Guss with tin are obliged to declare in writing upon delivery that the tin has been sourced in a conflict-free manner in accordance with the Dodd-Frank Act.

Business partners must establish systems to exclude raw materials obtained from deep-sea mining from their supply chains.

HUMAN AND LABOUR RIGHTS

Prohibition of child labour

Business partners must comply with the minimum age requirements applicable in their companies and their supply chain. Under no circumstances may the minimum age be lower than that specified in the ILO Convention on Minimum Age (No. 138) of 1973.

Protection against abuse

Business partners must not punish employees in any way, either physically or psychologically. This applies in particular if employees report company practices in good faith that violate national, international or internal regulations.

Remuneration

Business partners must pay their employees appropriate remuneration. Appropriate remuneration is at least the minimum wage established under applicable law and is otherwise determined in accordance with the law of the place of employment. Where possible, this remuneration should cover at least the basic needs of employees and enable them and their families to enjoy an adequate

standard of living (living wage). Remuneration must be paid to employees directly, in full and on time.

The business partner shall grant its employees the social benefits to which they are entitled by law or contract.

Occupational safety, fire safety and health protection

Business partners are obliged to comply with the applicable fire, occupational health and safety regulations at their locations. Suppliers are expected to establish guidelines and procedures for occupational safety, fire protection and health protection and to disclose these to their employees so that accidents and occupational illnesses can be avoided. Occupational safety measures must not entail any costs for employees.

Working hours

Brechmann-Guss expects its suppliers to ensure that working hours comply with applicable national, state and local laws or the national requirements of the respective economic sector. In any case, working hours must comply with ILO standards for working hours. Employees are entitled to regular annual leave.

Working and living conditions

Business partners shall provide their employees with toilets and access to clean drinking water. All facilities for the consumption and preparation of food and for the storage of food must comply with the applicable minimum hygiene requirements. If the nature of the work requires the provision of accommodation for employees, sufficient space, cleanliness, and safety must be ensured. Access to this accommodation must not be unreasonably restricted.

No adverse impact on land, water, and air

Business partners shall ensure that they do not cause any harmful changes to the soil, water pollution, air pollution, harmful noise emissions or excessive water consumption that could significantly impair the natural basis for food and drinking water or the health of any person.

No forced eviction

We expect our business partners to refrain from any form of unlawful eviction and unlawful deprivation of land, forests, and water in the acquisition, development or other use of land, forests, and water.

Human rights activists

Business partners must not tolerate or participate in any form of threats, intimidation, or attacks against human rights or environmental activists. They guarantee access to their complaint channels without the threat or imposition of retaliatory measures.

Freedom of association

Business partners shall respect the right of employees to freedom of association within the framework of the applicable rights and laws. Members of employee organisations or trade unions shall not be given preferential treatment or be disadvantaged.

Equal treatment and non-discrimination

Business partners must ensure that any form of discrimination, intimidation, harassment or unjustified disadvantage towards their employees and in the working environment is prohibited. For example, unequal treatment based on ethnic or social origin, skin colour, gender, gender identity or gender expression, sexual orientation, nationality, immigration status, veteran or military status, language, religion or other beliefs, physical or mental limitations, health status, age, marital status, pregnancy or parenthood, trade union membership or political views – insofar as these are based on democratic principles and tolerance towards those who think differently – or other characteristics protected by law, unless this is justified by the terms and conditions of employment. Unequal treatment includes the payment of unequal remuneration for work of equal value.

Use of security personnel

Our business partners shall ensure that contracted private or public security forces work in accordance with fundamental human rights. Security forces must respect the protection of health, life and limb, as well as the right to freedom of association and freedom of expression, and refrain from any form of torture or inhuman or degrading treatment. Business partners shall ensure that they do not contribute, either directly or indirectly, to the support of private or public security forces that unlawfully exercise control over mining sites, transport routes and upstream actors in the supply chain.

Minorities, vulnerable groups and indigenous peoples

Business partners are obliged to avoid potentially harmful impacts on the health and safety and livelihoods of local communities and indigenous peoples through appropriate measures.

CONDUCT IN THE BUSINESS ENVIRONMENT

Legal requirements

Brechmann-Guss's business partners undertake to comply with all applicable laws and regulations.

Prohibition of corruption

Business partners reject any form of corruption. They ensure that their employees, subcontractors, and representatives do not grant, offer or accept bribes, kickbacks, improper donations or other improper payments or benefits from customers, public officials or other third parties. This also includes any inappropriate benefits granted directly or indirectly in the form of gifts, entertainment, or invitations with the aim of unduly influencing third parties.

When dealing with governments, authorities and public institutions, business partners consistently comply with the legal requirements. When participating in a public tender, they comply with the legal requirements and the rules of free and fair competition.

Fair competition

Brechmann-Guss expects its business partners to comply with all international and national laws and regulations designed to ensure fair and free competition. Above all, they must not enter into any anti-competitive agreements or arrangements with competitors, suppliers, customers or other third parties, nor abuse any potential dominant market position.

Product safety

Business partners shall comply with all applicable legal regulations and requirements regarding product safety, regarding the safety, labelling and packaging of products and the use of hazardous substances and materials. Business partners are obliged to clearly communicate information on safe use.

Conflicts of interest

Business partners shall make their decisions solely based upon objective criteria. Decisions must not be influenced by private, business or other conflicts of interest.

Import and export controls

Business partners must comply with all applicable laws governing the import and export of goods, services, and information. Moreover, the applicable sanctions lists must be considered.

Prohibition of money laundering

Business partners shall only conduct business with third parties whose integrity they are convinced of. They must ensure compliance with the applicable legal provisions against money laundering in their business operations.

No support for armed groups

Business partners shall ensure that their business activities do not contribute directly or indirectly to the financing or support of non-state armed groups.

Intellectual property

Business partners respect intellectual property rights and protect relevant data.

Protection of confidential information

Business partners shall ensure that applicable laws and regulations on the protection of confidential information are complied with, and that sensitive data (trade secrets and personal data) is collected, processed, stored and deleted in an appropriate and lawful manner.

Cyber

Business partners must comply with applicable laws and regulations on cybersecurity and take proactive measures to protect networks, computers, programmes, and data from damage and unauthorised access.

Use of artificial intelligence

Business partners shall ensure that all developments involving artificial intelligence (AI) are subject to applicable laws and regulations. AI systems shall always be designed to be transparent, reliable, and non-discriminatory. AI applications shall be controlled by humans.

RESPONSIBLE SUPPLY CHAINS

Transparency

Upon request, business partners must provide all necessary information for an initial assessment in a self-assessment that is accurate and comprehensive. They must ensure that the principles set out in the Code are also implemented by their suppliers.

Responsible sourcing of raw materials

Brechmann-Guss's business partners support activities that ensure responsible sourcing of raw materials. The procurement and use of raw materials obtained illegally or through ethically reprehensible or unreasonable measures must be avoided.

Business partners must comply with their due diligence obligations in accordance with the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" regarding relevant raw materials.

IMPLEMENTATION

Brechmann-Guss expects its business partners to inform it immediately of any situations or events that contravene the principles of the Code.

In the event of an actual or imminent breach of the sustainability requirements by business partners, we reserve the right to take appropriate measures immediately to prevent or end the breach or to minimise its extent.

DO YOU HAVE ANY QUESTIONS?

Compliance Organisation

We assist you:

compliance@brechmann-guss.de

Whistleblower system

An ombudsman, also known as a confidential advisor, is available as an external point of contact for the confidential and, if desired, anonymous submission of reports. The ombudsman reviews each report for plausibility. If a report is substantiated, he forwards it to Brechmann-Guss after consulting the whistleblower and monitors the process.

<https://www.brechmann-guss.de/contact/ombudsman>

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