

Supplier Code of Conduct

1. Preamble

ENERTRAG is committed to environmentally and socially responsible corporate governance. We expect the same behaviour from all our suppliers. We also expect our employees to observe the principles of ecological, social and ethical behaviour and to integrate them into the corporate culture. Furthermore, we strive to continuously optimise our business activities and our products (or services) in terms of sustainability, and ask our suppliers to contribute to this in the spirit of a holistic approach.

ENERTRAG is a value-based company. It is important to us that our core values are also reflected in our cooperation with our contractual partners. We, therefore, agree that the following provisions of a joint Code of Conduct shall apply to future cooperation. The contracting parties undertake to comply with the principles and requirements of the Code of Conduct and to support them. The supplier undertakes to present this Code of Conduct to its subcontractors and to endeavour to contractually oblige them to comply with the standards and regulations listed herein.

One of our core values is "togetherness". We, therefore, also see this Code of Conduct as an invitation to exchange ideas on the topics mentioned and to work together to make our economic activities more sustainable.

The Code of Conduct is based on national laws and regulations such as the Supply Chain Due Diligence Act (LkSG), to which we are subject. We also refer to international agreements such as the UN Civil Covenant and the UN Social Covenant, the United Nations guidelines on "Business and Human Rights" and the international labour standards of the International Labour Organisation (ILO).

2. Requirements for suppliers

Just as compliance with all applicable laws and regulations in the countries in which we operate is a matter of course for us, we also expect the same from our business partners. In case of doubt, local legislation applies.

(1) Social responsibility

a. Exclusion of forced labour

No forced labour, slave labour or similar forms of labour may be used. All work must be voluntary and carried out without threat of punishment. Employees must be able to terminate their employment or working relationship at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological abuse, sexual harassment and humiliation. The commissioning or use of security forces shall be refrained from if persons are treated in an inhumane or degrading manner or injured during the operation, or if freedom of association is impaired.

b. Prohibition of child labour

Child labour must not be used at any stage of production. Suppliers are required to comply with the recommendation set out in the ILO conventions on the minimum age for the employment of children. Accordingly, the age shall not be less than the age at which compulsory schooling ends under the law of the place of employment. If children are found working, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school. Young workers under the age of 18 may not be employed in work that is harmful to the health, safety or decency of life for children. Special protective regulations must be observed.

c. Fair remuneration

Employees are entitled to reasonable remuneration in accordance with the law of the place of employment. Remuneration for regular working hours and overtime must be in line with the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. Employees shall be granted all benefits required by law. Wage deductions as punitive measures are not permitted. The supplier shall ensure that employees receive clear, detailed and regular written information about the composition of their remuneration.

d. Fair working hours

Working hours must comply with applicable laws or industry standards. Overtime is only permitted if it is performed on a voluntary basis. Appropriate measures must be taken to prevent excessive physical and mental fatigue, in particular, through appropriate work organisation in terms of working hours and rest periods.

e. Freedom of association

The right of employees to form and join organisations of their choice, to bargain collectively and to strike must be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative means of independent and free association of workers for the purpose of collective bargaining must be provided. Employees may not be discriminated against on the basis of founding, joining or being a member of such an organisation. Employee representatives shall be granted free access to their colleagues' workplaces to ensure that they can exercise their rights in a lawful and peaceful manner.

f. Non-discrimination

Any form of unequal treatment of employees is prohibited unless it is justified by the requirements of the job. This applies, for example, to discrimination based on gender, national, ethnic or social origin, skin colour, disability, health status, political opinion, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

g. Health protection; safety at work

The supplier is responsible for providing a safe and healthy working environment. By establishing and applying appropriate occupational safety systems, necessary precautions are taken against accidents and damage to health that may arise in connection with the activity. In addition, employees are regularly informed and trained on applicable health and safety standards and measures. Employees are provided with access to sufficient drinking water and clean sanitary facilities.

h. Preservation of natural resources

The supplier must not, in violation of legitimate rights, deprive people of land, forests or water, the use of which secures their livelihoods. He shall refrain from causing harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this damages human health, significantly impairs the natural basis for food production or prevents people from accessing clean drinking water or sanitary facilities.

i. Dealing with conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the company is establishing processes in accordance with the guidelines of the Organisation for Economic Cooperation and Development (OECD) for fulfilling its duty of care to promote responsible supply chains for minerals from conflict and high-risk areas, and expects the same from its suppliers. Smelters and refiners without appropriate, audited due diligence processes should be avoided.

(2) Environmental responsibility

a. Treatment and discharge of industrial wastewater

Wastewater from operational processes, manufacturing processes and sanitary facilities must be classified, monitored, checked and, if necessary, treated before discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

b. Dealing with air emissions

General emissions from operational processes (air and noise emissions) and greenhouse gas emissions must be categorised, routinely monitored, checked and, if necessary, treated before they are released. The supplier also has the task of monitoring its exhaust gas purification systems, and is required to find economical solutions to minimise all emissions.

c. Handling waste and hazardous substances

The supplier follows a systematic approach to identify, manage, reduce and responsibly dispose of or recycle solid waste. The prohibitions on the export of hazardous waste contained in the Basel Convention of 22 March 1989, as amended, must be observed. Chemicals or other materials that pose a hazard when released into the environment must be identified and handled in such a way that safety is ensured during handling, transport, storage, use, recycling or reuse, and disposal.

Mercury must be used in accordance with the prohibitions of the Minamata Convention of 10 October 2013 and persistent organic pollutants in accordance with the Stockholm Convention of 23 May 2001, as amended.

d. Reducing consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, must be reduced or avoided. This is done either directly at the point of origin or through processes and measures such as changing production and maintenance processes or company procedures, using alternative materials, making savings, recycling or reusing materials.

e. Dealing with energy consumption/efficiency

Energy consumption must be monitored and documented. Cost-effective solutions must be found to improve energy efficiency and minimise energy consumption.

(3) Ethical business conduct

a. Fair competition

The standards of fair business practices, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which prohibit agreements and other activities that influence prices or conditions when dealing with competitors. Furthermore, these regulations prohibit agreements between customers and suppliers that restrict customers' freedom to determine their prices and other conditions autonomously when reselling.

b. Confidentiality/Data protection

The supplier undertakes to meet the reasonable expectations of its client, suppliers, customers, consumers and employees with regard to the protection of private information. When collecting, storing, processing, transmitting and disclosing personal data, the supplier must comply with the provisions of the European Union's General Data

Protection Regulation (GDPR), as well as the applicable laws on data protection and information security and the official regulations.

c. 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.

d. Integrity/bribery, accepting benefits

All business activities must be based on the highest standards of integrity. The supplier must pursue a zero-tolerance policy towards all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards must be applied to ensure compliance with anti-corruption laws.

3. Compliance check

We expect our suppliers to identify risks within their supply chains and take appropriate measures. In the event of suspected violations and in order to safeguard supply chains with increased risks, the supplier shall inform us promptly and, if necessary, regularly about the identified violations and risks, as well as the measures taken.

ENERTRAG reserves the right to verify compliance with the standards and regulations set out in this document by means of a self-assessment questionnaire and risk-based audits at suppliers' production sites. The supplier agrees that we may, at our expense, conduct such audits once a year or for specific reasons to verify compliance with the Code at the supplier's business premises during normal business hours after giving reasonable notice by persons appointed by us. The supplier may object to individual audit measures if these would violate mandatory data protection regulations.

4. Acknowledgement and agreement by the supplier

By signing this document, the supplier undertakes to act responsibly and to comply with the principles/requirements listed. The supplier also undertakes to communicate the content of this Code in a comprehensible manner to its employees, agents and subcontractors and to take all necessary measures to implement the requirements.

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Place, date

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Signature