

Sustainability in Purchasing

SIEB & MEYER has compiled binding regulations for its suppliers in a code of conduct. These regulations define important ethic, social and ecological standards the suppliers must comply with:

Ethics: We expect our suppliers to act ethically along with integrity.

Treatment of employees and sub-suppliers: We expect our suppliers to respect human rights and demand fair and respectful treatment of employees as well as sub-suppliers.

Health protection, REACH, safety, environmental protection and quality: We expect our suppliers to provide a safe and healthy working environment and to act ecologically responsible as well as gentle on resources.

Conflict minerals / conflict materials: We expect our suppliers not to obtain 3TG materials (tin, tantalum, tungsten, gold) from conflict-affected mines or smelters and not to supply refined raw materials, components or other goods with these materials.

Final clause

As far as possible, these basic principles are considered in the performance evaluation of each supplier.

Code of Conduct for Suppliers

1. Ethics

We are aware of our social responsibility. Therefore, we expect our suppliers to act ethically along with integrity.

INTEGRITY

We expect our suppliers to prohibit all forms of corruption, extortion, breach of trust and embezzlement – such methods must not be tolerated or even used by our suppliers. Furthermore, we expect our suppliers to neither offer nor take bribes or other illegal payments. In this context, we also demand that the suppliers do not offer personal benefits for the SIEB & MEYER employee with whom they have business relations.

FAIRNESS

We expect a fair behavior in competition of our suppliers that is in compliance with the existing laws and regulations.

PROTECTION OF CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY RIGHTS

Our suppliers are to use and protect confidential information in an appropriate manner. In addition, they must ensure proper security of sensitive data and the existing intellectual property rights.

2. Treatment of employees

We expect our suppliers to respect human rights in their companies and demand fair and respectful treatment of their employees.

FAIR TREATMENT

We expect a fair treatment of our suppliers' employees – without any sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse of employees or the threat of any such treatment.

WORKING HOURS AND WAGES

We expect our suppliers to comply with the applicable laws and regulations on working hours and wages of the employees. The wage level must ensure an adequate standard of living for all employees. Furthermore, we expect our suppliers to pay the wages punctually.

PREVENTION OF CHILD LABOR

We expect our suppliers to prevent any form of child labor in their companies.

FREE CHOICE OF EMPLOYMENT

Our suppliers are not to tolerate any form of forced labor in their companies.

NON-DISCRIMINATION RULE

We expect the equal treatment of all employees to be an essential aspect of our suppliers' company policies. No employee is to be discriminated, favored or ostracized based on ethnic or racial origin, skin color, nationality, descent, religion, social background, gender, age, physiques or appearance, sexual orientation, union membership, political affiliation, state of health or possible parenthood.

3. Health protection, REACH, safety, environmental protection and quality

We expect our suppliers to provide a safe and healthy working environment and to act ecologically responsible as well as gentle on resources. Our suppliers are to take efforts to ensure quality in their business processes.

QUALITY REQUIREMENTS

We expect our suppliers to fulfill the generally accepted or contractually agreed quality requirements for goods and services. Beside functioning or performing as guaranteed, the product or service must be safe for the intended purpose.

REGULATIONS ON HEALTH PROTECTION, SAFETY, ENVIRONMENTAL PROTECTION AND QUALITY

We expect our suppliers to comply with all applicable regulations regarding quality, health protection, safety and environmental protection. All required permits, licenses and registrations must be available and maintained. Our suppliers are to fulfill their operating and reporting obligations.

REGISTRATION, EVALUATION, AUTHORISATION AND RESTRICTION OF CHEMICALS (REACH REGULATION)

We expect our suppliers to strictly comply with the duty to supply information according to Article 33 of the REACH Regulation, if their products and/or components delivered to SIEB & MEYER contain SVHCs (substances of very high concern) of the respective current ECHA candidate list (<https://echa.europa.eu/candidate-list-table>), which exceed the limit of 0.1%.

PRODUCT SAFETY

Our suppliers must provide safety data sheets for their products including all required information on safety on demand.

HEALTH AND SAFETY AT WORK

We expect our suppliers to protect their employees from danger and risk associated with the infrastructure provided at the individual workplace. To reduce health and safety risks at work, our suppliers are to inspect the workplaces regularly, ensure safe work flows, arrange for maintenance/repairs and provide all technical protective measures required.

PROCESS STABILITY

We expect our suppliers to use systems for the control and maintenance of their work processes according to the applicable safety standards.

EMERGENCY PREPAREDNESS, RISK INFORMATION

We expect our suppliers to make information on the safety of workplaces available, if risks were discovered. Furthermore, the suppliers must train their employees regarding these risks to ensure adequate protection. Our suppliers are to take efforts to identify probable and possible emergency situations at the workplaces.

WASTE AND EMISSIONS

We expect our suppliers to establish systems ensuring safety for handling, transport, storage and recycling of solid, gaseous and liquid waste. Any actions that may have negative effects on human health or the environment are to be handled and checked in an appropriate manner before the mentioned substances are released. Our suppliers are to establish systems that prevent or minimize unintentional release of harmful substances.

RESOURCES AND CLIMATE PROTECTION

We expect our suppliers to use natural resources (e.g. water, energy sources, raw materials) economically. Negative effects on the environment and the climate are to be minimized or eliminated at the point of origin or by means of specific methods, such as modifications in the production process, material exchanges, conservation and recycling.

4. Conflict minerals / conflict materials**3TG MATERIAL**

We expect our suppliers not to knowingly obtain any 3TG from conflict areas and/or supply it to us. Conflict minerals are considered to be tin, tantalum, tungsten and gold (also known as "3TG"), which are derivatives of tin stone, columbite-tantalite and tungsten.

DODD-FRANK ACT

The Dodd-Frank Act provisions are intended to advance the humanitarian goal of ending the violent conflict in the D.R. Congo and neighboring countries that has been financed in part by the mining and trade of conflict minerals.

We expect our suppliers to be aware of violence and human rights violations in the mining of certain minerals from regions designated as "conflict areas". The Dodd-Frank Act includes regulations implementing the "conflict minerals" disclosure requirement.

We also expect our suppliers to be aware of the importance and significance of these rules and regulations and to act accordingly. To ensure compliance with the Dodd-Frank Act, we ask our suppliers to conduct traceable due diligence on their supply chains.

5. Final clause

Our suppliers are to run their businesses according to all applicable laws, regulations, contractual agreements and generally accepted standards.

Furthermore, our suppliers are to communicate the basic principles embodied in this code of conduct to their supply chain and take efforts to improve the sustainability performances continuously.

Date: May 2025