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## 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, 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 substances: We expect our suppliers to refrain from sourcing any 3TG-material (tin, tantalum, tungsten, gold) from conflict-affected mines or smelters and that they supply refined raw materials, components or other goods.

### Final clause

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



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## 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, 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.

#### **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 are 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.



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**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 / CONFLIKT SUBSTANCES****3TG MATERIAL**

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

**DODD-FRANK ACT**

The provisions of the Dodd-Frank Act are intended to advance the humanitarian goal of ending the violent conflict in the D.R. Congo and neighboring countries that has partly been financed 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 provisions implementing the "conflict minerals" disclosure requirement.

We further expect our suppliers to be fully 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: January 2021