

# Supplier Code of Conduct

## 1. Scope

norelem Normelemente GmbH & Co. KG (hereinafter "norelem") has formulated a general code of conduct for itself and its subsidiaries, which includes principles and requirements that formulate the demands we make on ourselves and, just as equally on our business partners. Business partners of norelem are encouraged to comply with these principles and requirements on our responsibility to people and the environment.

## 2. Interaction with employees

norelem expects its business partners to comply with the basic rights of employees according to the respective applicable laws. Furthermore, norelem expects the recognition of the Universal Declaration of Human Rights of the United Nations, the principles of the UN Global Compact and the International Labour Organisation (ILO), taking into account the applicable country-specific laws.

## 3. Child labour

norelem expects its business partners to prohibit and refrain from any kind of child labour within their companies.

## 4. Discrimination

norelem expects its business partners to treat all of their employees fairly and to safely exclude discrimination from all processes, hiring, promotion, transfer, training and further education. We expect from every business partner that they do not discriminate against anyone on the basis of gender, skin colour, age, nationality, religion, social origin, disability or sexual orientation.

## 5. Forced labour

Any form of forced labour is prohibited. This also applies to enforced prison labour. norelem rejects any form of forced labour and expects the same from its business partners.

## 6. Right to organize

We expect our business partners to grant their employees freedom of association and the right to form interest representation groups. Laws and regulations must be complied with. It must be ensured that employees have the right to represent their interests.

## 7. Wages, salaries and working hours

norelem expects its business partners to comply with the respective applicable laws on minimum wages and working hours. We expect that the employees of our business partners receive a wage or salary that complies with the applicable legislations.

## 8. Health and safety in the workplace

norelem expects its business partners to comply with the applicable legal provisions on occupational health and safety. We expect that our business partners have taken appropriate measures to protect their employees from workplace hazards and have implemented precautionary measures.

## **9. Environmental protection**

norelem is continuously working to improve environmental protection and therefore also expects its suppliers to treat the environment in a responsible and sustainable manner. In particular, this obliges the business partner to comply with all relevant and valid laws and regulations. In addition, the business partner is expected to use energy and raw materials as sparingly as possible and to reduce environmental pollution.

## **10. Ban on corruption and bribery**

Any form of corruption and/or bribery is prohibited. This applies to both active and passive bribery. Corruption is prohibited by international agreements, e.g. the principles of the UN Global Compact and the UN conventions against corruption, as well as by national laws. norelem does not tolerate any form of bribery or business conduct among its employees or business partners that could give the impression of improper influence or interference. HKW and its business partners will not allow themselves to be promised advantages that constitute an unlawful act within the meaning of the applicable anti-corruption laws. norelem also expects its business partners not to tolerate any unlawful inducements in their dealings with authorities and their representatives at home and abroad. We also ensure that our employees behave with integrity.

## **11. Money laundering**

norelem expects its business partners to comply with the legal provisions on money laundering, not to participate in such activities and to support the international effort to combat money laundering.

## **12. Invitations and gifts**

When allocating grants, donations, sponsorships etc. we take strict care to avoid any appearance of impropriety or dishonesty. norelem also expects this from its business partners. Invitations and gifts must be appropriate and must not be misused to influence.

## **13. Conflict of interests and competition**

norelem expects its business partners to behave fairly in competition and to comply with the applicable rules of competition law. In addition, business partners are expected to make their decisions on an informed basis. Conflicts of interest of any kind are to be avoided from the outset.

## **14. Confidential handling of information**

Confidential information, personal data, data provided in the form of drawings, parts lists, protocols must be safeguarded by our business partners and protected from access by third parties. norelem expects that the legal provisions on data protection be observed, and that personal data is only collected, processed and used in compliance with the applicable data protection regulations. Business partners may only use data for the agreed purpose and in an appropriate manner. They undertake not to pass on confidential data and trade secrets to third parties or to use them for their own purposes.

## **15. Import & Export control**

norelem expects its business partners to comply with all applicable export controls, sanctions, customs laws and regulations, including all applicable trade restrictions, embargoes and other restrictions on the import and export of goods, services and information. In particular, suppliers should undertake to ensure that themselves, their economic beneficiaries, representatives and any subcontractors used by them are not listed as sanctioned companies and/or persons on any of the sanction lists applicable at any given time.

**16. Conflict minerals**

Business partners must undertake to comply with the respective applicable laws and regulations on conflict minerals. If products manufactured and/or supplied by the suppliers contain tin, tantalum, tungsten or their ores or gold, this must be reported to norelem immediately and without being requested.

**17. Grievance mechanisms**

Business partners are responsible for establishing an effective grievance mechanism for its employees in accordance with applicable laws.

**18. Supply chain implementation**

norelem expects its business partners to promote compliance with this code of conduct among their suppliers in turn.

**19. Violations**

Business partners are obliged to report any detected or suspected violations of regulations, laws or this code to a recognized contact person at norelem. All information will be carefully checked and treated confidentially.

**We hereby confirm that we acknowledge, respect and will act in accordance with the values of the above supplier codex.**

Company name: \_\_\_\_\_

Location: \_\_\_\_\_

Date/Stamp/  
Signature: \_\_\_\_\_

Function of the  
signatory: \_\_\_\_\_