

Business Partners Code of Conduct

Dear Valued Partner,

MOLDTECS expects all its Business Partners to engage in responsible supply chain practices and to comply with this Code of Conduct (this “Code”). The provisions of this Code are in addition to the provisions of any legal agreement or contract between a Business Partner and MOLDTECS or any of its subsidiaries or affiliates.

The Business Partners Code of Conduct communicates the basic principles of cooperation to all business partners and bindingly regulates these. We strongly believe that transparency and ethical behavior are key components of a successful business relationship and encourage all our partners to adopt similar principles.

These principles are in line with national and international laws, conventions, and guidelines such as the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the conventions of the International Labour Organization.

MOLDTECS respects the law in its business operations and expects all its Business Partners including their subcontractors, third party labor agencies and any contract and seasonal workers, to do the same by complying with all laws. We require our business partners to provide us with crucial adequate information regarding their Compliance Management System and the nature of any breach for evaluation purposes. Failure to provide this information may lead to the termination of the business relationship or MOLDTECS may decide not to enter a business relationship at all.

To continue the business relationship with MOLDTECS, specific measures may be required to mitigate the impact of such violations on the business relationship.

INTEGRITY

Everyone who works for and does business with MOLDTECS, is expected to act with integrity, make the right decisions and take the right actions in compliance with applicable laws and regulations in the countries and jurisdictions in which they operate. Each Business Partner must be able to demonstrate compliance with this Code upon MOLDTECS request and take action to correct any non-compliance. MOLDTECS, its subsidiaries and affiliates reserve the right to audit any Business Partner’s compliance with this Code and to terminate any agreement or arrangement with any Business Partner who cannot or will not demonstrate compliance with this Code.

Tax laws, accounting and financial reporting: MOLDTECS is committed to upholding the highest standards of ethics and integrity in all aspects of our business, including but not limited to, taxes, accounting, and financial reporting. Business Partners are expected to be aware of their legal obligation to comply with tax and custom duties. Every responsible employee must therefore ensure that all taxes and duties are determined, recorded, declared if necessary and paid to the relevant tax authorities completely, correctly and on time. Further, Business Partners shall be committed to accurate accounting, record keeping and to maintaining a system of internal controls. In addition, financial reporting and the businesses shall be conducted with integrity and transparency. Applicable national and international accounting standards shall be maintained.

Competition and Antitrust Laws: Business Partners shall be committed to fair competition in all business relationships. No agreements that restrict competition or are relevant under antitrust law (e.g. on prices or markets) are made in the course of our business activities. Business Partners shall comply with applicable competition and antitrust laws and avoid unlawful restrictions on competition in our dealings with competitors, customers, or suppliers. Furthermore, Business Partner shall ensure that employees who are particularly confronted with these issues as a result of their work (e.g. in sales or purchasing) must familiarize themselves in detail with the applicable competition and antitrust laws.

Anti-Corruption, Anti-Bribery, Conflicts of Interest: Business Partners shall comply with all anti-corruption and anti-bribery laws. This means, no Business Partner can offer or accept any bribe, kickback, favor, or anything of value; engage in any extortion or embezzlement; or use any improper influence when dealing with government officials or in any business arrangements to obtain an improper advantage. In addition, Business Partners are prohibited from providing or offering gifts to MOLDTECS employees that could inappropriately influence MOLDTECS business decisions or gain an unfair advantage.

Prevention of money laundering and terrorist financing: All Business Partners shall comply with the applicable regulations on the prevention of money laundering and terrorist financing. Money laundering occurs when funds, assets or substitute items for such assets derived from criminal acts are brought into the legal economic cycle. Terrorist financing occurs when funds or other assets are provided to support terrorist goals or associations.

Non-Retaliation: All Business Partners shall prohibit retaliation against employees who report a compliance or ethical issue learned during the work performed for MOLDTECS or who cooperate in good faith with the investigation of a complaint.

Product Compliance: MOLDTECS holds itself to high standards of legal and ethical conduct and is committed to making high quality products that promote safety and comply with applicable laws, regulations, and standards. MOLDTECS holds its business partners to the same high standards and expects them to also deliver fully compliant products of the same high level of quality and safety. MOLDTECS does not tolerate any illegal or unethical conduct by its business partners with respect to the sourcing, manufacturing, sale and distribution of their products.

Export control and sanctioned parties: Certain goods, services and information are subject to restrictions on export to or import from certain countries. In the context of international business transactions, we expect from our Business Partners to fully comply with all export control regulations, and, in the case of cross-border transactions, to carefully check whether any export control restrictions apply to goods, services or information. In addition, countries, or potential business partners (companies and individuals) could be on embargo or sanctions lists.

Before entering a business transaction, we ensure that sanctions are not violated in the execution of the transaction. Our business partners must strictly follow applicable trade regulations and adhere to the rules and regulations governing import and export controls, as well as any applicable sanctions and embargoes. Transactions with sanctioned individuals and countries or goods and services regulated under export control law can have serious consequences for the Business Partners and responsible employees.

Confidentiality and Data Security: Business Partners shall safeguard our information by keeping it secure (whether in paper, electronic or other media), limiting access and avoiding discussion or revealing such information in public places, even after our business relationship ends.

Furthermore, MOLDTECS suppliers shall protect the tangible and intangible assets and intellectual property of MOLDTECS and respect these of third parties. We reject any form of extortion, fraud, theft, embezzlement or product counterfeiting, regardless of whether company assets (e.g. work equipment, IT equipment) or third-party assets are involved. The private use of company property is only permitted if this is provided for by individual law, collective law or company regulations or company practice.

HUMAN RIGHTS

Without exception, MOLDTECS requires each of its Business Partners to conduct their business and operations in a way that respects human rights by treating their own workers, and those working for their suppliers, with dignity and promoting fair employment practices and provide equal employment opportunity to all qualified employees and applicants.

This includes providing fair and competitive wages, prohibiting any type of harassment, bullying and discrimination with respect to age, physical appearance, gender, ethnic origin, nationality, religion, medical condition, disability, marital status, sexual orientation, political or philosophical beliefs, union membership or any other characteristic protected by law or regulation. Further this includes prohibiting use of child, forced, bonded, or indentured labor or prison labor and not engaging in trafficking of persons for any purpose.

Business Partners are expected to identify risks and actual adverse human rights impacts related to their activities and through their business relationships. They should take appropriate steps to reduce risk and ensure their operations do not cause or contribute to human rights abuses and to remedy any adverse impacts directly caused, or contributed to, by their activities or through business relationships.

Employment laws: Business Partners shall respect for and compliance with human rights as well as the protection of health and the environment are essential components of our corporate responsibility. We strictly reject any form of forced labour. We recognize the right of all employees to form trade unions and employee representatives on a democratic basis within the framework of national regulations.

Wages and Benefits: The right to adequate remuneration and legally regulated working hours is recognized for all employees. Remuneration and other benefits correspond at least to the respective national and local legal standards or the level of the national economic sectors and regions.

Business Partners shall provide employees with compensation that includes wages, overtime pay, premium pay and benefits that meet or exceed the legal minimum standards. Employees shall be paid equally for equal work without discrimination in a timely fashion and make no deductions from pay for disciplinary reasons.

Employment Status: Business Partners shall employ only workers who are legally authorized to work in their location and facility and are responsible for validating employees' eligibility to work through appropriate documentation.

Prohibition of Child labor, forced Labor and modern slavery: Business Partners must ensure that child labor is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed, and/or the minimum working age defined by the International Labour Organization (ILO), whichever is higher. MOLDTECS prohibits form of slave, forced, bonded, indentured, or involuntary labor, human trafficking or exploitation or import goods tainted by slavery or human trafficking.

Freedom of Association and Collective Bargaining: Business Partners shall recognize and respect the rights of employees to associate or not to associate with any group, as permitted by law and in accordance with all applicable laws and regulations.

Anti-Discrimination and Fair Treatment: Business Partners shall offer equal opportunities for all and prevent discrimination in the hiring of employees as well as in the promotion or granting of training and development measures. We expect our Business Partners to encourage a diverse workforce and treat employees with fairness, dignity, and respect. There will be no unlawful discrimination, harassment, or abuse of any kind. Employees must be treated equally, regardless of gender, age, skin colour, culture, ethnic origin including minorities and indigenous peoples, sexual identity, disability, religious affiliation, or world view. Everyone is required to always comply with these minimal standards of conduct.

Assignment of Private or Public Security Forces: When using private or public security forces to protect the safety of people, facilities, and legitimate interests in connection with MOLDTECS business activities, MOLDTECS also respects compliance with internationally recognized human rights and expects this from its business partners.

CORPORATE RESPONSIBILITY

Business Partners are expected to ensure a safe and respectful environment with a focus on environmentally responsible materials, products, and procedures.

Health and Safety: Business Partners shall provide employees with a safe, respectful, clean, and healthy work environment. All workers must be protected from performing work that is likely to be hazardous or that may be harmful to their health, physical, mental, social, spiritual, or moral development. Further, each employee’s right must be ensured to refuse unsafe work and report unsafe or unhealthy working conditions. Each Business Partner is responsible for integrating and maintaining comprehensive health and safety management practices and job-specific risk assessment, risk management and safety training into its business.

Each Business Partner shall be committed to meet or exceed applicable laws and industry standards in this area.

Decarbonization, emissions and renewable energies: Since MOLDTECS has committed to comply with the goals of the Paris Climate Protection agreement and aims to achieve CO2 neutrality across its entire supply chain, all Business Partners are expected to manage, measure, and minimize the environmental impact of their facilities and demonstrate continuous improvement in areas such as air emission, waste reduction, recovery and management, water use and disposal, energy usage, and greenhouse gas emissions. This includes promoting environmentally friendly transportation and reducing waste in their operations.

Water quality, consumption, and management:

MOLDTECS Business Partners' aim shall be to organize their water balance in such a way that the ecological balance is preserved and restored, the direct and indirect consumption of energy and resources is minimized and measures introduced or taken are as flexible and modifiable as possible and the possible consequences are reversible.

Biodiversity, land use and deforestation: MOLDTECS complies with the legal requirements regarding the protection of biodiversity and expects the same from its business partners. The protection of ecosystems, sustainable forestry and agriculture as well as the creation and safeguarding of protected areas are essential prerequisites for an intact environment. MOLDTECS promotes these goals through the responsible and careful use of resources and the minimization of emissions and waste. MOLDTECS also respects the rights of local communities to decent living conditions, education, employment, social activities, and the right to Free, Prior, and informed Consent (FPIC) to developments that affect them and the lands on which they live, with consideration for the presence of vulnerable groups.

Soil quality: MOLDTECS's Business Partners are expected to ensure that the materials and procedures used in its business activities do not adversely affect soil quality.

Animal welfare: without exceptions, we expect Business Partners to commit to the responsible treatment of living creatures and employees to comply with all legal standards on animal welfare.

Noise emissions: The reduction of noise emissions must start at the source. As with all workplace safety measures, the following sequence must be followed:

- T - technical measures (e.g. enclosure of the noise source)
- O - organizational measures (e.g. separation of simultaneous encounter of noise source and person)
- P - personal measures (personal protective equipment)

Chemical Compliance: Business Partners shall maintain programs to actively participate in and comply with the requirements of all applicable chemical-related laws, such as Europe's REACH and RoHS and the automobile industry's International Material Data System (IMDS).

Conflict Minerals: To facilitate an assessment of upstream supply chain compliance, Business Partners must be able to disclose supply chain mapping back to the primary origin associated with the products or services provided to MOLDTECS, its subsidiaries and affiliates for products which contain tin, tungsten, tantalum, gold, or any other critical material from conflict and high-risk areas (so-called "CAHRAs"). More specifically, suppliers are required to undertake reasonable due diligence in accordance with the OECD Due Diligence Guideline for Responsible Supply Chains of Minerals from Conflict affected and high-risk areas to assure that conflict minerals are being sourced from mines and smelters outside the Democratic Republic of the Congo ("DRC") or an adjoining country (collectively, the "Conflict Region") or, if sourced within the Conflict Region, from mines and smelters that have been certified by an independent third party as DRC conflict free. The contractual partner must reliably identify the source and origin of these minerals to ensure that the procurement of these materials does not directly or indirectly finance or otherwise support armed groups, directly or indirectly violate human rights, or harm the environment.

To the extent any Business Partner does not currently have this capability, each is required to disclose its future plans to do so and make disclosures to MOLDTECS upon request within a timely manner.



Political commitment: All employees can become politically and socially involved in their free time within the scope of the given opportunities. As an active member of society, MOLDTECS is also involved in various ways. Donations and other forms of social commitment are made exclusively in the interests of MOLDTECS. We attach great importance to political neutrality and therefore do not make any financial contributions such as donations or sponsoring measures with political objectives. This means that we do not make donations or comparable contributions to political parties, party-like organizations, individual elected officials, or candidates for political office in Germany or abroad.

Reporting: Suppliers shall create internal programs, processes, and procedures for handling reports of workplace grievances, including anonymous reports. Suppliers shall also promptly report actual or suspected violations of law or this Code to MOLDTECS. This includes actual or suspected violations by any employee or agent acting on behalf of either the supplier or MOLDTECS.

To report a concern anonymously, suppliers and their employees can contact MOLDTECS at <https://moldtecs.integrityline.com>.

BUSINESS PARTNER COMMITMENT

The Business Partner Code of Conduct will be part of the tendering process documentation and its adherence by the Business Partner / Supplier will be one of the mandatory criteria that will be assessed by MOLDTECS during the selection process.

Upon signature of this Business Partners Code of Conduct, the Business Partner / Supplier accepts that this document shall be a commitment to the principles set out herein for all existing Contracts (if any), and for all business and contractual relationship with MOLDTECS.

The Business Partner Code of Conduct represents a minimum standard of best practices. It shall be governed by the law of the Contract (if any). In the event there is no Contract, this document shall be governed by law.

By signing below, you agree that you have read this Code of Conduct and agree to abide by all its terms.

Company Name: _____

Company Representative Signature: _____

Company Representative Name (Printed): _____

Date: _____