GROHMANN

Business Partner Code of Conduct
for Gusstechnik Schopfheim GmbH & Co. KG

Gusstechnik Schopfheim GmbH & Co. KG sustainability requirements for relationships with business partners and suppliers

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FOREWORD

The following defines the requirements and expectations of Gusstechnik Schopfheim GmbH & Co. KG regarding the conduct of business partners and suppliers. These requirements are viewed as the basis for a successfully structured relationship between Gusstechnik Schopfheim and its business partners and suppliers.

COOPERATION

Working together in a spirit of partnership and a long-term, stable business relationship are the foundations for success and mutual benefit.
In line with the principles of sustainability, we are aware of the responsibility we bear for the economic, ecological and social impacts of our business. We expect this same awareness from our business partners, in particular in relation to human rights, occupational health and safety, environmental protection and anti-corruption policies.

SCOPE OF APPLICATION

The following sustainability requirements apply to all business relationships between Gusstechnik Schopfheim GmbH & Co. KG and its business partners, to the extent applicable.
Business partners shall also commit, in an appropriate form, to ensuring that their own business partners comply with these requirements throughout the supply chain.

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REQUIREMENTS

1. ENVIRONMENTAL PROTECTION

The following standards and regulations are mandatory for suppliers:
Business partners must comply with all relevant environmental legislation and regulations in all territories in which they operate.
Objectives and improvement programmes should consider the following points:

- Water quality and usage
- Air quality
- Sustainable resource management:
  - Waste reduction
  - Responsible management of chemicals
  - Minimising of emissions
- Decarbonisation/reduction of CO_2
  - Reduction in energy consumption
  - Use of technology to reduce CO_2 emissions
  - Use of renewable energies

We recommend adopting the international standard ISO 14001 in this respect.

2. HUMAN RIGHTS AND EMPLOYMENT RIGHTS

Our business partners shall agree to respect the rights of employees and other persons impacted by the company's business and to treat people in accordance with international community guidelines.

No slavery and no human trafficking
Business partners shall not knowingly have dealings with forced, compulsory labour, or any form of modern slavery or human trafficking. Bonded labour or non-voluntary prison work shall not be used.
Employment relationships shall be voluntary and employees shall be able to terminate them of their own volition subject to reasonable notice.

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No child labour and protection for young employees

Child labour is prohibited. The minimum employment age shall be observed in accordance with national regulations. Where no national regulations apply, ILO (International Labor Organization) Convention No. 138 applies accordingly. This stipulates that no child below the age of 15 may be employed, whether directly or indirectly, except where the exemptions under Articles 6 and 7 of ILO C138 apply.

Business partners must ensure that young people under the age of 18 do not work overtime or at night, and are protected against working in conditions that are potentially detrimental to their health, safety, morals or development.

No discrimination and no harassment

Business partners shall reject any form of discrimination and harassment. Business partners may not discriminate against employees on grounds of ethnic origin, race, gender, religion, nationality, sexual orientation, social origin, age, physical or mental disability, marital status, pregnancy, membership of a trade union or political affiliation, provided these are based on democratic principles and tolerance towards those who hold different views. Employees shall always be selected, recruited and promoted based on their qualifications and skills.

Business partners shall commit to providing a work environment that is free from harassment. They should promote a social environment that shows respect for the individual. Business partners should ensure that employees are not subject to inhumane physical or psychological treatment, corporal punishment or threats.

Remuneration and benefits

Remuneration and benefits paid or provided for a normal working week shall be at least equivalent to the applicable guaranteed legal minimum.

Working hours

Business partners shall guarantee that working hours are at least equivalent to the applicable national legal requirements or the minimum standards in the relevant national economic sectors.

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Occupational health and safety; fire safety

Business partners must comply with national occupational health and safety and fire safety legislation. All occupational health and safety protection schemes must be available to employees free of charge. A process must also be in place to allow for constant reduction in work-related health hazards and continuous improvement of occupational health and safety and fire safety.

To this end, business partners must, in particular:

- Inform employees about any hazards identified, as well as about the relevant preventive and corrective actions to minimise risk.
- Carry out adequate checks to prevent work-related health problems, to avoid accidents at work, and for first aid, management of chemicals and employee fire safety.
- Provide suitable protective equipment and protective clothing free of charge.
- Install suitable fire safety equipment, such as fire alarms and extinguishers.
- Constantly monitor and check work-related health hazards and the consequent protective measures.
- Label all chemicals used in accordance with the Globally Harmonized System of Classification and Labelling for Chemicals (GHS), or CLP in European countries. Chemicals must be handled in accordance with national regulations.
- Have appropriate emergency plans, fire protection equipment and first aid materials available for medical first aid in the event of accidents, and arrange suitable transport to allow casualties to access proper care.
- Ensure an appropriate number of emergency exits, escape routes and assembly points, which are marked with adequate signage.

Freedom of association

The fundamental right of all employees to form and join trade unions and employee representative bodies shall be recognised.

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3. Financial accountability

Business partners shall comply strictly with the legal framework for proper bookkeeping and financial reporting. Transparency, accurate accounting and precise records are imperative in this respect. Financial statements must be prepared in accordance with national and international accounting standards.

4. Transparent handling and protection of information

Disclosure of information

Information must be disclosed according to the applicable regulations.

Protection of confidential information

Business partners shall use and protect any information appropriately. Furthermore, data shall be processed according to type. Business partners shall ensure that data subject to protection is collected, processed, kept secure and deleted properly. Business partners shall oblige their employees to respect commercial confidentiality. Confidential information may not be published, shared with third parties or made available in any other form without consent.

Personal data belonging to employees, customers and business partners shall be processed (including collection, storage, merging, use and sharing) in accordance with the applicable statutory provisions covering data protection.

5. Transparent business relationships

Avoidance of conflicts of interest

Business partners shall make all decisions based solely on factual criteria, and not be influenced by personal or financial interests or relationships.

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Anti-corruption

Gusstechnik Schopfheim GmbH & Co. KG requires its business partners to reject and prevent any form of corruption.

This also covers so-called "facilitation payments" (payments to speed up routine official administrative processes). Business partners shall ensure that their employees, subcontractors or agents do not give, offer or accept any bribes, kickbacks, improper donations or other improper payments or benefits to or from customers, government officials or other third parties.

6. Fair market conduct

Free competition

Business partners shall respect free and fair competition. Gusstechnik Schopfheim GmbH & Co. KG therefore requires its business partners to comply with applicable competition and antitrust regulations. In particular, they shall not enter into any anti-competitive agreements with competitors, suppliers, customers or other third parties and shall not abuse any dominant market position they may enjoy. Business partners shall ensure that no information is exchanged that is sensitive under competition law, nor conduct themselves in any way that unlawfully restricts or might restrict competition.

Import and export controls, economic sanctions

Suppliers shall comply strictly with all applicable regulations and legislation covering the import and export of goods, services and information as well as payment transactions. Existing sanctions and embargoes within the legal and regulatory framework shall be observed in the course of business.

Money laundering

Business partners shall ensure compliance with the applicable legal provisions against money laundering.

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7. Due diligence to encourage responsible raw material supply chains

Our suppliers are required to exercise due diligence with regard to certain raw materials – in particular tin, tantalum, tungsten, gold, cobalt and mica.
This includes implementing measures designed to identify risks – such as in relation to financing, whether directly or indirectly, armed conflicts and serious human rights violations including child labour or forced labour and slavery – and taking suitable measures to avoid these risks.
This also includes an obligation for suppliers to work continuously on maintaining transparency in the upstream supply chain right up to mining of raw materials.
The due diligence requirements are an extension of the sustainability requirements set out above regarding environmental protection, human rights and employment rights of employees, transparent business relationships and fair market conduct, which are integral parts of conducting due diligence.

8. Integration of sustainability requirements throughout the organisation

Gusstechnik Schopfheim GmbH & Co. KG expects business partners to integrate the values pertaining to these sustainability requirements into day-to-day business through structured and competent management. Management must identify and evaluate statutory and other requirements, and provide training to employees to ensure compliance with the applicable requirements.

Corporate policy

It is recommended that business partners draw up a corporate policy (e.g. a Code of Conduct) that commits them to social, ethical and environmental standards.

Documentation

Business partners must, to the extent required by law, keep appropriate documentation and records to ensure compliance with requirements. This also includes archiving necessary permits and licences.

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Training

Business partners should devise training programmes to improve policy setting, process implementation and communication of expectations to their employees. Business partners should continuously assess their employees and encourage them to act in accordance with the guidelines.

Responsibility

It is recommended that business partners appoint a sustainability officer or similar. This officer should develop and implement sustainability objectives and measures within the company and ensure compliance with a code of conduct.

Dealing with lapses

It is expected that business partner employees should be able to express themselves accordingly in the event of any non-compliance with the requirements defined here. Employees reporting such situations should not have to fear any consequences. It is recommended that a complaints procedure be set up.

9. Requirements for your own subcontractors/service providers

The requirements and obligations in these guidelines must be passed on to your own subcontractors and service providers.

10. Contractual obligations

In cases where separate contractual obligations that differ from these principles have been agreed with business partners, those shall take precedence.

Schopfheim, January 2025

Wolfgang Bieber
Chief Executive

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