

Kolmek's Supplier Code of Conduct

Kolmek's is proud to be a trusted business partner and will therefore establish and conduct business relationships only with ethical and reliable suppliers and business partners. Kolmek's expects its suppliers and service providers and other business partners to conduct their business in compliance with the same legal, ethical, human rights, environmental, and employee-related principles that Kolmek's requires from its own employees based on its internal Code of Conduct.

This supplier Code of Conduct ("Code") defines the basic legal, environmental and social corporate responsibility requirements placed on the suppliers and third-party intermediaries of Kolmek's Group ("Supplier"). Kolmek's expects its suppliers to comply with these requirements in their dealings with Kolmek's, their own employees and suppliers, as well as third parties including government officials.

1. Compliance

1.1 Legal Compliance

The Supplier shall comply with all applicable national and international laws and regulations, including the applicable sanctions, export control and customs laws and regulations.

1.2 Compliance with this Code

The Supplier shall take all necessary actions to ensure compliance with this Code without undue delay. The Supplier shall ensure that its suppliers, subcontractors, consultants and partners also comply with this Code. The Supplier is solely responsible for the costs of complying with the Code.

1.3 Cyber Security

The Supplier shall ensure the cybersecurity of its operations by identifying and managing risks and implementing appropriate administrative, technical, and physical controls based on regular security risk assessments. These measures must ensure the security of devices, software, hardware, ICT systems, and networks operated, owned, or licensed by Kolmek's, as well as any users accessing such systems, and shall include maintaining security measures continuously up to date. The Supplier shall protect the integrity and security of its systems and handle all confidential and sensitive information entrusted to it with due care. Upon becoming aware of any actively exploited vulnerability or security incident affecting its systems, the Supplier shall promptly notify Kolmek's, provide all necessary information to enable investigation, take steps to mitigate or remediate the effects, and actively cooperate with Kolmek's throughout the investigation and resolution process.

2. Human Rights and Fair Labour Practices

Kolmek's treats its employees with respect and dignity and expects the same from its employees, subcontractors, suppliers and customers. The Supplier shall comply with all internationally recognized principles and frameworks, regulations and laws regarding human rights fair labour practices, including the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the International Convention on Human Rights and the ILO Declaration on Fundamental Principles and Rights at

Work. The Supplier shall act with due diligence to use its best efforts to identify, prevent and mitigate any human rights risks and/or violations including but not limited to use of child labour or forced labour. The Supplier shall ensure that it has appropriate due diligence processes and policies in place regarding the above.

2.1 Prohibition of Child Labour

Kolmeks respects children's right to development and education and has zero tolerance to child labour. Therefore, the Supplier, their suppliers or their contractors shall not use workers under the age of 15, children younger than the legal minimum age for work, or children younger than the age of completing compulsory school. If the legal minimum age for work and/or the age of completing compulsory school is above 15, the higher of these two ages will apply as the minimum required age for workers.

Children between the age of 15 and 18 are only allowed to be employed by the Supplier provided that the work complies with local laws and the International Labour Organisation (ILO) Minimum Age Convention.

Any children under the age of 18 must not be employed in hazardous work, must not work night shifts and are entitled to more breaks than adults.

Hazardous work is defined as work which, by its nature or the circumstances, is likely to harm the health, safety, or morals of individuals.

2.2 Prohibition of Forced Labour

Kolmeks has zero tolerance to forced labour. The Code strictly prohibits forced or involuntary labour by the Supplier, by their suppliers or by their contractors. This includes human trafficking, forced prison work, slavery, work on a forced contract, and other forms of work, which are against one's will or choice. Additionally, Kolmeks does not tolerate employment, which confines the employee in unreasonable debt bondage, for example, through fee-charging employment agencies.

2.3 Non-discrimination and Treatment of Employees

The Supplier shall promote equal opportunities and treatment of all employees. Kolmeks does not conduct business with suppliers who practice discrimination at work based on nationality, ethnicity, race, skin colour, religion, political affiliation, social background, marital status, age, health, disabilities, gender, or sexual identity and orientation. The Supplier's employees must not be exposed to any physical punishment, threats of violence or physical, sexual, psychological, or verbal harassment or maltreatment in the workplace or in work-related situations.

2.4 Working Hours and Salary

Kolmeks recognises the need for a good balance between working time and leisure time for all employees. The Supplier shall adhere to all applicable working-hours regulations in the countries where it operates. Unless the law states otherwise, the maximum working time at the Supplier's sites shall be 48 hours per week plus maximum 12 hours overtime work. All workers shall be allowed to have at least one day off in a period of seven days unless the national law/rules state otherwise.

The Supplier shall pay fair wages for labour. Salaries for work and overtime shall adhere to all applicable wage and compensation laws applicable in the countries where it operates. Any

deductions in salary must always be based on the requirements of the applicable legislation. In territories where requirements regarding minimum salary are defined, deductions in salary due to damages caused by an employee of the Supplier may never compromise minimum salary. In the event of cross-border personnel deployment, the Supplier shall adhere to all applicable legal requirements, especially regarding minimum wages.

2.5 Freedom of Association

The Supplier must not interfere with the worker's right to form and join unions or to bargain collectively. This means that the Supplier must recognise its employees' right to choose whether to associate with or establish any organisation including labour organisations or not. If trade unions are not allowed in a particular country of operation, or only state authorised organisations are allowed, the Supplier shall facilitate alternative measures to allow employees to access management to discuss work related matters.

2.6 Grievance Mechanism

The Supplier shall provide access to a protected and anonymous mechanism for its employees to report possible violations of this Code. The Supplier shall ensure that no one who has reported any possible violations of this Code in good faith is subjected to any retaliation, discrimination or harm, even if the report is later found to be unfounded. The Supplier shall investigate all reports promptly and cooperate in good faith with Kolmeks and any authorities in connection with such investigations.

The Supplier shall promptly inform Kolmeks of any reports concerning possible violations of this Code. If violations of this Code are identified, Kolmeks may require the Supplier to prepare an action plan and take corrective actions within a reasonable timeframe.

If the Supplier fails to take corrective actions, or the violations are material or repetitive, Kolmeks has the right to suspend or terminate the business relationship with the Supplier. In the event of serious violations (such as child labour, forced labour, corruption, environmental crime or breaches of laws and regulations relating to conflict minerals), Kolmeks may terminate the business relationship with immediate effect.

2.7 Right to Privacy

The Supplier shall respect its employees' right to privacy and all applicable privacy laws and regulations when they collect, process or retain personal data or implement employee-monitoring practices.

2.8 Health and Safety

Sound working conditions are a fundamental human right. The Supplier shall ensure a healthy and safe working environment, which complies with all applicable laws and regulations. The Supplier shall commit to prevention of the occurrence of any accidents to its employees, subcontractors or third parties.

As a minimum requirement:

- Facilities must comply with applicable laws and regulations regarding construction safety as well as fire protection and fire alarms.
- Facilities must provide appropriate light and ventilation.
- All machinery must be properly maintained and shielded.

- Workers must be provided with personal protection equipment and be instructed in its proper use.
- Workers must not be exposed to dangerous or hazardous work without being properly protected.

3. Fair Trade and Operating Practices

Kolmek's is committed to high ethical standards in all business practices and requires the same from all its suppliers.

3.1 Prohibition of Corruption and Bribery, Prevention of Money Laundering

Corruption and bribery are recognised as barriers to sustainable development and free trade. The Supplier shall refrain from engaging, directly or indirectly, in any corrupt or dishonest practices, such as bribery or any other form of corruption or money laundering activities. The Supplier shall not offer or accept directly or indirectly any kind of undue payment in any business transactions.

The Supplier must have appropriate processes in place to identify and monitor business partners (KYC) to ensure they comply with applicable laws and regulations including sanctions and import/export restrictions and anti-money laundering regulations, monitor transactions, and report suspicious activity.

3.2 Compliance with Sanctions

The Supplier must comply with all applicable laws and regulations regarding import/export controls, trade restrictions and economic sanctions. This includes, but is not limited to, avoiding transactions or commitments that may involve sanctioned entities, countries or individuals.

3.3 Fair Competition, Anti-Trust Laws and Intellectual Property Rights

The Supplier shall comply with national and international competition laws and shall not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors or any other anti-competitive practices. The Supplier shall respect the intellectual property rights of others and comply with all applicable intellectual property laws.

3.4 Conflicts of Interest

The Supplier shall avoid any conflicts of interest and disclose to Kolmek's all conflicts of interest that may influence business relationships including but not limited to its business relationship with Kolmek's.

3.5 Responsible Minerals Sourcing

The Supplier shall avoid the use of raw materials, which originate from conflict-affected and high-risk areas and contribute to human rights abuses, corruption, the financing of armed groups or armed conflicts or similar negative effects. The Supplier shall comply with all applicable laws and regulations regarding conflict minerals and responsible and ethical minerals sourcing and procurement.

The Supplier shall exercise due diligence and have all appropriate policies and processes in place to investigate and identify the source of any conflict minerals (tin, tantalum, tungsten, and gold, collectively referred to as "3TG") and any other minerals requested which are in the scope of the supply to Kolmek's, including but not limited to aluminium, cobalt, copper, lithium, mica and zinc.

The Supplier shall respond in a timely manner to Kolmek's requests for evidence of compliance with the above requirements including but not limited to requests regarding the origin of the abovementioned minerals as well as their procurement and supply chain. The Supplier shall be prepared to provide Kolmek's with evidence regarding its due diligence processes and policies related to minerals sourcing.

4. Environment

Environmental sustainability and considerations are an integral part of Kolmek's business practices. The Supplier shall act in accordance with the applicable national and international environmental laws and regulations and commit to reducing the negative environmental impact of its business conduct. Therefore, the Supplier shall ensure that any goods provided to Kolmek's comply with requirements of all applicable laws, regulations and/or conventions. In particular, the Supplier shall:

- Comply with the European Chemicals Agency's (ECHA) "List of Prohibited and Restricted Substances" and, where requested, declare any substances contained in the goods supplied to Kolmek's.
- Provide, where requested, full material disclosure or equivalent of materials and substances used in a product that may be regulated in the country of origin or its destination, in accordance with applicable legislation.
- Respond in a timely manner to Kolmek's requests for evidence of compliance with the above requirements.

The Supplier shall exercise due diligence and have an appropriate policies and processes in place to identify, prevent any mitigate any actual or potential negative impacts on the people and/or environment in its own operations and in its value chain.

4.1 Air Emissions

The Supplier shall ensure that air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are characterised, monitored, controlled, and treated as required by law prior to discharge.

4.2 Wastewater and Solid Waste

The Supplier shall ensure that wastewater and solid waste generated from operations, industrial processes and sanitation facilities are monitored, controlled, and treated as required by law prior to discharge or disposal.

4.3 Resource Reduction, Recycling and Reuse of Materials and Products

The Supplier shall actively strive to reduce material consumption and contribute to the recycling and reuse of materials and products to the extent possible.

4.4 Chemicals and Hazardous Materials

The Supplier shall ensure that chemicals and hazardous materials are handled, stored, and disposed in an environmentally safe way in accordance with the applicable laws and regulations.

5. Monitoring and Audits

The Supplier shall promptly provide Kolmek's with information on its compliance with this Code upon reasonable request by Kolmek's.

Kolmek's or an independent auditor acting on behalf of Kolmek's may conduct audits to ensure compliance with this Code. The Supplier shall cooperate with Kolmek's and/or such auditors in good faith and provide access to relevant documents, facilities, and personnel.

All audits are conducted with reasonable notice, during normal business hours, and in a manner that minimizes business disruption. Kolmek's and independent auditors shall respect the Supplier's confidential information and use the audit results only to verify compliance and for improvement purposes.

Supplier's Confirmation

I acknowledge that I have read and understand the Kolmek's Supplier Code of Conduct and I agree to comply with the requirements of the Code (fill in using block letters and company stamp):

Company name: _____

Factory name: _____

Address: _____

Signature: _____

Name: _____

Position: _____

Date: _____