

CODE OF CONDUCT FOR BUSINESS PARTNERS

Diehl Metall Stiftung & Co. KG

Heinrich-Diehl-Straße 9 90552 Röthenbach a.d. Pegnitz Germany Stephan Hanel Head of Metal Management Tel. +49 911 5704-151

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PREAMBLE

Diehl Metall Stiftung & Co. KG and all employees are aware of their social responsibility – an aspect that is also of particular importance in the procurement process and along the supply chain.

It is expected that all our business partners display an equal sense of responsibility for their own actions in order not to violate the following fair, sustainable and ethical principles.

Against this background, we have defined a Code of Conduct which forms the basis of all business relations with Diehl Metall Stiftung & Co. KG.

PROCESSES

Corruption

Business partners may not engage in any form of bribery. Bribes may neither be offered, granted nor accepted. It is prohibited to directly or indirectly offer, promise, grant or accept inappropriate material benefits or other advantages for the purpose of winning contracts or obtaining unlawful privileges.

Antitrust Law

Business partners must comply with the applicable antitrust and competition laws in order to guarantee fair competition.

Transparent Business Relations

Relations between business partners and other partners – e.g. suppliers and customers as well as government agencies and their employees, etc. – as well as their own employees must be characterized by transparency.

Money Laundering

Business partners must comply with the laws on the prevention of money laundering.

Avoiding Conflicts of Interest

The employees of the business partners must avoid any situation that could lead to a conflict between personal interests and the interests of the company. A conflict of interest may arise when an employee takes actions or pursues interests that may make it difficult for him to perform his duties objectively and effectively as well as to observe his professional responsibilities.





EMPLOYEES

Human Rights

Business partners must respect and comply with internationally recognized human rights.

Forced Labor

Business partners must prohibit all forms of forced labor, slavery and human trafficking. This includes forced prison labor, serfdom and the like (according to the ILO Conventions 29 and 105).

Child Labor

Business partners must prohibit all forms of child labor. Unless a higher age limit is specified by law, no person of school age or under 15 years old (exceptions according to the agreements under ILO Convention No. 138) may be employed.

Health Protection

Business partners must guarantee that all employees are provided with working conditions that take into account occupational health and safety requirements, with locally applicable legal regulations constituting the binding minimum requirements. They must take appropriate measures to prevent occupational accidents and work-related illnesses.

Non-discrimination

Business partners should not accept any form of harassment or discrimination, in particular due to ethnic or cultural origin, gender, sexual orientation, age, disability, religion or party / trade union membership.

Working Hours and Remuneration

Business partners must adapt working hours to the legal regulations or to those customary in the industry. Wages and salaries, including compensation for overtime and special benefits, must be in line with the level specified in the pertinent local laws and regulations.



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SUSTAINABILITY

Minimizing Environmental Impacts

Business partners must optimize processes and procedures with regard to environmental aspects and carry them out in such a way that environmental impacts are minimized. Raw materials should be used as sparingly as possible to protect resources.

Compliance with Applicable Legal Provisions

Business partners must comply with applicable environmental protection laws and other pertinent regulations and standards. They are obliged to comply with the REACH Regulation of the EC (Regulation (EC) 1907/2006 of 18.12.2006), the CLP Regulation of the EC (Regulation (EC) No. 1272/2008 of 16.12.2008), and the RoHS Directive of the EC (Directive 2002/95/EC of 27.01.2003) in their valid versions.

Applicable to suppliers of tin, tantalum, tungsten and gold in the form of virgin metals:

Business partners must comply with all applicable legal regulations regarding conflict minerals, for example the Dodd-Frank Act under U.S. Federal Law and the (EU) 2017/821 Regulation. When supplying one or more conflict minerals or the corresponding ores, the business partner is expected, upon request, to ensure transparency across their supply chain right through to the smelter.

IMPLEMENTATION ALONG THE SUPPLY CHAIN

Monitoring Implementation

Business partners shall ensure that this Code of Conduct is observed within their company. Upon request, they shall provide Diehl Metall Stiftung & Co. KG with all information to prove this. In case of a suspected violation of these principles, Diehl may demand corrective measures and, if necessary, terminate the cooperation.

Enforcement by the Business Partners

Business partners shall ensure that the contents of this Code of Conduct are also enforced along their own supply chain.

