

Code of Conduct for Komax Suppliers

Introduction

For Komax, mutual responsibilities in regards to acting honorably and treating each other with respect as well as social responsibility are all important business principles. In addition, Komax is committed to high standards of integrity and sustainability.

This Code of Conduct shall ensure that Komax Suppliers act according to internal guidelines (Komax Code of Conduct), contractual obligations to Komax and external guidelines (internationally recognized norms on human rights, working conditions, the environment and integrity) as well as all applicable laws and regulations.

This Code of Conduct applies to all Komax Suppliers worldwide. The different points of this Code of Conduct apply to all employees of the Supplier irrespective of their position or their relationship. For this reason, this Code of Conduct also applies to employees who are employed without a contract or on a temporary or part-time basis. It is up to the Supplier to ensure that their vendors comply with the guidelines of this Code of Conduct.

Compliance with this Code of Conduct is a compulsory part of every part of the business relationship between Komax and Komax Suppliers.

This Code of Conduct is based on:

- The Komax Code of Conduct (www.komaxgroup.com/en/Investors/Corporate-Governance/Code-of-conduct/)
- The general declaration of Human Rights of the United Nations
- The UN convention on the rights of children
- The fundamental conventions and international working norms of ILO (International Labour Organisation)
- The principles of the United Nations Global Compact
- The Conflict Minerals Dodd-Frank Wall Street Reform and Consumer Protection Act (www.responsiblemineralsinitiative.org/conflict-minerals-reporting-template/)
- The RoHS 3 standards (Restriction of Hazardous Substances), Directive (EU) 2015/863 (www.eur-lex.europa.eu)
- The REACH regulation (EC) No 1907/2006 (Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)) (www.eur-lex.europa.eu)

Obligations of Komax Suppliers and/or third party intermediaries are as follows:

Legal compliance

- to comply in full with regional, national and international laws which affect the business activities of the Komax Supplier.

Prohibition of corruption and bribery

- to tolerate no form of and not to engage directly or indirectly in any form of corruption or bribery and not to grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage. Komax has a 'zero tolerance' policy when it comes to unethical business behavior.

Fair competition, anti-trust laws and intellectual property rights

- to act in accordance with national and international competition laws and not to participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors;
- to respect the intellectual property rights of others.

Conflicts of interest

- to avoid all conflicts of interest that may adversely influence business relationships.

Respect for the basic human rights of employee

- to promote equal opportunities for and treatment of its employees irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age;
- to respect the personal dignity, privacy and rights of each individual;
- to refuse to employ or make anyone work against his will;
- to refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;
- to prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
- to provide fair remuneration and to guarantee the applicable national statutory minimum wage;
- to comply with the maximum number of working hours laid down in the applicable laws;
- to recognize, as far as legally possible, the right of free association of employees and to neither favor nor discriminate against members of employee organizations or trade unions.

Prohibition of child labor

- to employ no workers under the age of 16 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14.

Health and safety of employees

- to take responsibility for the health and safety of its employees;
- to control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;
- to provide training and ensure that employees are educated in health and safety issues;
- to set up or use a reasonable occupational health and safety management system.

Environmental protection

- to act in accordance with the applicable statutory and international standards regarding environmental protection;
- to minimize environmental pollution and make continuous improvements in environmental protection;
- to set up or use a reasonable environmental management system;
- to respect the REACH and RoHS standards set forth in the newest edition available.

Supply chain

- to use reasonable efforts to promote among its vendors compliance with this Code of Conduct;
- to comply with the principles of non-discrimination with regard to vendor selection and treatment;
- to take reasonable efforts to avoid in its products the use of raw materials which directly or indirectly finance armed groups who violate human rights.

Conflict Minerals

- to commit to keep the supply chain free from conflict minerals which are covered by laws and regulations concerning the sourcing of minerals from conflict areas;
- to not use conflict minerals originating in the Democratic Republic Congo (DCR) and its adjoining countries.

Use and monitoring

The norms and guidelines included in this Code of Conduct must be accessible to all employees of the Suppliers. At the request of the Komax Supplier, Komax will make this Code of Conduct available in the corresponding national language.

At the request of Komax, the Komax Supplier must complete corresponding records to prove compliance with the requirements of this Code of Conduct, and they must make these available at all times. Komax will audit the Komax Supplier and evaluate their compliance with this Code of Conduct. This compliance can occur via sustainability issue of the risk analysis as well as through inspections on location. An audit will be completed on location if Komax views this as being necessary. The regularity and intensity of such audits depend on the scale and type of the effected business relationship, the performance and the risk profile in terms of the topics that are stated in this Code of Conduct.

Non-fulfilment

Any instance of non-fulfilment of the regulations stated in this Code of Conduct by the Komax Supplier will be viewed as being a gross infringement of the agreements. In the event of the Komax Supplier refraining to correct this non-fulfilment, Komax will end cooperation with immediate effect.



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