



## Code of Conduct of Südkupfer Bröckl Handels-GmbH & Co. KG

### 1. Basic principles; Commitment

Integrity and sustainability represent essential components of our approach to business. We adhere to the rule of law, we embrace health & safety, human rights and workers' rights, and we work towards environmental friendliness. We apply the same requirements to our business partners. They follow international conventions such as the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the labour standards of the International Labour Organisation (ILO), the United Nations Guiding Principles on Business and Human Rights (UNGPs), and the German Supply Chain Due Diligence Act (SCDDA).

This Code of Conduct is applicable to ourselves – Südkupfer Bröckl Handels-GmbH & Co. KG, Benzstraße 1, 72649 Wolfschlugen - and to our business partners.

We expect our business partners to stick to the obligations contained in this Code of Conduct, especially the objectives & requirements regarding human rights and the environment. These constitute the basis for any commercial business conducted with our business partners.

If our business partners include their associated companies or third parties in the context of our business relationship – or if they pass orders to them – then they have to ensure that the requirements & obligations of this Code of Conduct are also fulfilled by such associated companies or third parties.

Furthermore, our business partners need to make sure that the requirements and duties of caution in terms of human rights and the environment are fulfilled within the supply chain constituted by their own business partners, with the objective of preventing or minimising risks in terms of human rights and the Environment.

### 2. Compliance with the rule of law

For us, compliance with the rule of law and other regulations is a matter of course.

Our business partners must also comply with all applicable rules, laws and regulations in the countries in which they operate, and must establish suitable precautions to make certain that such laws, rules and regulations are fulfilled. This relates in particular to the following areas:

#### 2.1. Competition law and cartel law

We operate in compliance with competition law and cartel law in force at any time, and we do not participate in any agreements to fix prices or conditions, any agreements to allocate markets or customers, or any other tendering agreements relating to any market.

We require that our business partners' business practices should be consistent with competition law and cartel law at any time together with any other legal regulations concerning monopolies, policies to curtail fair trading and competition or any unfair business practices, including how we should relate to customers and competitors. No agreements will be made, and no actions will be taken, which could have any inadmissible influence on competition. This includes, amongst other areas: price-fixing agreements, agreements to fix conditions, agreements to allocate markets or customers, or other tendering agreements relating to any market.

#### 2.2. Corruption

We do not tolerate either corruption or bribery. No benefits which are provided with the objective of influencing business decisions or securing a particular, illicit advantage, will be given, offered or accepted. Nor do we expect any such benefits. Relations with Government officials must be characterised by legitimacy and respect.

Furthermore, our business partners comply with national and international anticorruption and antibribery laws and regulations applicable at any time in this country and in any other countries. Our business partners reject all forms of corruption, bribery or coercion and they likewise reject illegal payments made with the objective of influencing decision-making processes, irrespective of whether or not such initiatives constitute an infringement of applicable laws. In particular, they do not offer, extend or accept any financial bribes, financial inducements, kickback payments or any other illegal payments or incentives, favours or other benefits which may influence business activities or business agreements. Nor do they indulge in any malpractice concerning undue influence on Government officials.

### **2.3. Money-laundering**

All applicable regulations intended to prevent money-laundering must be upheld both by ourselves and by our business partners.

### **2.4. Export controls**

All applicable import and export controls must be upheld both by ourselves and by our business partners. This also includes sanctions, embargoes and other laws, regulations, directives and procedures for monitoring the transfer or the dispatch of goods, technologies and payments.

## **3. Conflicts of interest**

Business decisions must not be influenced by individuals' personal or direct financial interests. We expect employees to act in their employers' interests. We avoid conflicts of interest and we declare them if it is not possible to avoid them or if we become aware of any conflict of interest. And we require our business partners to embrace the same procedure.

## **4. Protection of information and intellectual property; Data protection**

We adhere to currently applicable data protection laws, and we act accordingly. We respect intellectual property and we protect confidential information. We adhere to the currently-applicable laws instituted to protect commercial secrets, and we treat our business partners' confidential information in the same way.

Our business partners also ensure that the strictest policy of nondisclosure will be applied in relation to confidential commercial information or commercial secrets coming to their notice in connection with their commercial business with ourselves (hereinafter called "Confidential Information") and that such information will not be used in any inadmissible manner, nor disclosed to any third parties.

Our business partners furthermore protect and secure our intellectual property – completely irrespective of whether or not it is registered – as being confidential information. Our business partners comply with all data-protection laws in place at any time.

## **5. Human rights**

We practise and we value adherence to internationally recognised human rights and we respect each individual's personal dignity, right to privacy and other personal rights; we embrace the right for freedom of opinion and free expression of opinion; we do not tolerate any physical or mental repression, discrimination, sexual or personal abuse or discrimination. And we ensure that our employees are given healthy, fair working conditions.

Furthermore, our business partners must ensure that internationally recognised human rights are fulfilled within the supply chain and that sound and fair working conditions are provided. In this context, our business partners must treat all individuals with fairness and respect and must abide by internationally recognised human rights as established in the General Declaration of Human Rights and in the central industrial standards upheld by ILO, the International Labour Organisation. National and international laws must be adhered to. This includes, in particular:

### **5.1. Prohibition of child labour**

Children must not be made to suffer anything detrimental to their development, health and safety. Consequently they must not be employed at any stage of commercial business and the supply chain below the threshold of 15 years of age unless there is a deviation from this rule within the legal system in the place of employment, in accordance with Article 2, paragraph 4 – together with Articles 4 through 8 – of Section 138 of the ILO Convention. A threshold of 18 years of age is applicable with regard to the worst forms of child labour. These include, for example, instances of work which are inherently likely – due to the nature of the work or due to the circumstances in which it has to be done – to be injurious to health and safety, and they also include all forms of slavery or any practices amounting to slavery. (ILO Convention, Section 138 and Section 182).

### **5.2. Prohibition of forced labour**

The obligation to prevent forced labour and any form of slavery including modern slavery and other forms of the exercise of domination or suppression, together with human trafficking within the supply chain. (ILO Convention, Section 29 and Section 105).

### **5.3. Prohibition of discrimination**

Unequal treatment or discrimination of any form on the basis of age, skin colour, gender, sexual orientation, ethnic attachment, origin, disability, health status, religion, world view, political opinion, racial prejudice or any other prejudice must be combated. Failure to practise equal pay also constitutes unequal treatment. (ILO Convention, Section 111).

### **5.4. Right for freedom of assembly and collective negotiations**

The right of workers to form unions and workers' delegations and to hold membership of such unions and delegations – where not restricted by any local regulations – must be ensured. Workers who stand up for the right to have improved working conditions must not be threatened with any disadvantages. The right to strike must be respected. (ILO Convention, Section 87 and Section 98).

### **5.5. Fairness with regard to work done, and remuneration**

It is forbidden to withhold reasonable wage payment. We expect our business partners to pay at least the applicable legal minimum wage and to make certain that the same wage is paid for the same type of work. Working hours must comply at least with applicable laws. The ILO Convention must be adhered to concerning the minimum standard for providing limits on working hours and concerning rest periods.

### **5.6. Health and safety at work**

Our business partners must uphold health and safety at work – together with fire prevention at the workplace – at least to the extent laid down by the rules of law. This includes:

- providing and maintaining working facilities, workplaces and working equipment;
- providing protective equipment so as to prevent attack from chemical, physical or biological substances;
- instituting measures to prevent excessive physical and mental fatigue; and
- adequate training and instruction for employees.

Where safety employees are retained, human rights and industrial rights must be adhered to.

Denial of access to drinking water, sanitation facilities and effects detrimental to the means of food production – due to harmful effects on the soil, the pollution of the atmosphere and of water resources, disproportionate consumption of water or harmful water emissions – and any instances of damage to persons' health, illegal forced clearances and instances of depriving people of the essentials for life – are forbidden.

## **6. Environment**

In order to minimise any negative repercussions on the Environment, and to achieve continuous improvement in our drives for environmental and climate protection, we operate in accordance with the corresponding regulations.

Our business partners must make certain that their business processes are likewise managed such as to protect people and the Environment. The correspondingly applicable environmental laws and the provisions governing their activity in all countries must be adhered to. In this connection it is stipulated that our business partners should practise sustainable use of resources by reducing the level of their consumption. Our business partners should also work towards a sparing treatment of natural resources at every stage of commercial business, and should make every effort to minimise environmental pollution in their processes for recovery of resources and production, together with the respective products. The principle of energy-efficient operation must be upheld. Our business partners must avoid using environmentally harmful substances and materials, and must towards more environmentally friendly solutions. As required by applicable legal regulations, environmentally harmful substances must be registered, must be declared and their utilisation must be approved. Our business partners must adhere to the prohibitions concerning the handling of mercury or persistent harmful organic substances in accordance with the Minimat Convention, the Stockholm Convention and the POP regulations. It is essential to adhere to the Prohibition of environmentally harmful handling, accumulation, storage and disposal of waste and also to adhere to the prohibitions regarding the importing and exporting of hazardous waste as per the Basle Convention.

## **7. Supply chain; conflict minerals**

We require that our business partners apply procedures compliant with the duty of care throughout the supply chain, and that they should take care to ensure that all applicable laws concerning the duty of caution along the supply chain are adhered to – and this includes the delegation/passing-on of obligations – in order to prevent or to minimise risks that human rights and environmental damage obligations may be infringed. This also entails introducing appropriate reporting channels and systems for the processing of any complaints.

Our business partners must also introduce such systems with regard to minerals and must make certain that they are aware of the corresponding rules of law. We require our business partners to ensure that they avoid, in their supply chain, any minerals originating from smelting operations from conflict areas. Minerals are deemed to be compromised by conflict if any armed, non-governmental groups are directly or indirectly supported by the recovery, transportation and trade in such minerals, or in the handling and processing of them, or their export. On request, information must be given concerning the smelting operations or the refineries for minerals used by our business partners or by their respective subcontractors.

## **8. Product integrity**

We require that our business partners should adhere to currently applicable product safety laws, regulations and rules, especially the applicable laws concerning product safety and the marking and packing of products, together with the use of hazardous substances and minerals. Our business partners must make certain that all products and services that are supplied will fulfil product compliance and safety criteria, and that they can be used safely for their intended purpose.



## **9. Investigation, remedies and sanctions**

We reserve the right to investigate for adherence to the requirements of this Code of Conduct. In the event of a specific issue, we may also conduct an on-site investigation, by prior appointment. In the event of an infringement, our business partners will resolve the issue promptly and at their own expense. We reserve the right to charge compensation. Contracts may be cancelled and trading relationships may be terminated once warnings have been given concerning culpable infringements making it unreasonable for us to be bound by contract.

## **10. Reservation of the right to apply adaptations**

We expressly reserve the right to adapt our Code of Conduct in the light of changes in risk assessments.