



## **Code of Conduct**

This Code of Conduct sets out the key principles and fundamental values to which we are committed in our day-to-day dealings with employees, customers, suppliers, society and the environment as part of our global business activities.

With respect to, we are responsible for creating and maintaining a corporate culture in which compliance with the legal principles and ethical principles listed below is upheld in the best possible way.

H.C. Carbon GmbH expects its employees, suppliers and subcontractors to take appropriate measures to ensure compliance with the following principles and requirements ('expectations') in all their business activities and supply chains:

### **General expectations: Compliance with international laws and regulations**

- Compliance with all applicable laws, regulations, and standards in the countries where suppliers / employees operate.
- Compliance with the principles of the United Nations Global Compact, the United Nations International Bill of Human Rights, the International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights and the International Labour Organization (ILO).
- Compliance with United Nations (UN) and the Organisation for Economic Co-operation and Development (OECD) conventions to combat corruption and relevant anti-corruption laws, including those relating to foreign bribery.

### **Human rights expectations, including workers' rights**

- We do not hire employees who are not of the minimum legal age for employment.
- Discrimination: Ensuring a working environment free from discrimination of any kind. No employee shall be disadvantaged, advantaged, or harassed based on such characteristics as gender, skin colour, religion, nationality, political or other beliefs, ethnic origin, disability, age, sexual orientation and gender identity or other characteristics.
- Forced labour: Rejection of any form of forced or compulsory labour, slavery, or human trafficking. Employees must be free to leave their employer at their own discretion, subject to the legal notice periods.
- Freedom of association: Respect employees' rights to form employee representative bodies and to strike and bargain collectively.
- Remuneration and working hours: Compliance with applicable national legislation on working hours, remuneration, minimum wage, and social benefits. If there are no national legal regulations on working hours, the international standards of the ILO apply.



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- External personnel: Where suppliers use external personnel, e.g. security personnel, the applicable national law in contractual and employment relationships shall be respected, regardless of the type of contract (e.g. employment contract or temporary work). External personnel should be sensitised and monitored through appropriate measures, in particular in relation to human rights risks such as health and safety at work, inhumane treatment and injury to life and limb.
- Workplace health and safety: Identifying, assessing, and reducing actual and potential accident and health hazards, recording and investigating incidents, training and instructing employees in a form they can understand, providing appropriate work and protective equipment, and appropriate emergency preparedness and defence measures.
- Expression of opinion, personal rights and privacy: Protect employees' right to freedom of expression, personal rights and privacy.
- Conflict minerals and high-risk raw materials: Fulfil the due diligence obligation to promote responsible raw material supply chains to protect human rights in conflict regions. Minerals, in particular tin, tantalum, tungsten, gold, their ores and metals alloyed with conflict minerals, must be procured without conflict. In case a product contains one or more of the so-called conflict minerals or high-risk raw materials, such as cobalt, the supplier must be able to ensure transparency about the origin of the material in the supply chain up to the smelter on request. Smelters without an adequate and audited due diligence process should be excluded.
- Do not cause harmful changes to the soil, water pollution, air pollution, harmful noise emissions or excessive water consumption which could significantly affect the natural basis for food preservation and production. Or impede a person's access to clean water, impede or destroy a person's access to sanitary facilities, or affect a person's health.
- Prohibition of illegal appropriation of land, forests and waters whose use provides a person's livelihood.

### **Environmental expectations, including climate protection**

- Using resources such as energy, water and raw materials efficiently and responsibly to protect biodiversity.
- Promotion of the reuse of raw materials.
- No violation of environmental obligations using mercury and mercury compounds in products / manufacturing processes and the treatment of mercury waste. As in the use and disposal of persistent organic pollutants, as in the collection, storage and disposal of the resulting waste or in the transboundary movement of hazardous waste and its disposal.



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### **Business integrity expectations**

- **Outlawing corruption:** Rejection of any form of corruption, theft, embezzlement, fraud or extortion. Zero tolerance of illegal payments or giving other advantages to a person, company or public official in order to influence decision-making.
- **Prohibition of bribery:** Rejection of any form of bribery. It is prohibited to give or accept bribes, kickbacks or other illegal payments inducements, favors or other benefits or gratuities of value for the realization of business opportunities, to expedite or facilitate an official act (facilitation or commission) or in any connection with the business activities of H.C. Carbon GmbH.
- **Invitations and gifts:** No attempts to influence business contacts, customers or public officials through invitations or gifts. No requests for improper benefits from H.C. Carbon employees. Invitations and gifts to H.C. Carbon employees or related parties are permitted only if the occasion and scope are appropriate, i.e. they are of lowest value and can be considered as an expression of generally recognised local business practice.
- **Conflicts of interest:** Decisions relating to business activities with H.C. Carbon are made exclusively based on objective criteria. Conflicts of interest with private interests or other economic or other activities, including those of relatives or other related persons or organisations, should be avoided right from the start.
- **Antitrust and competition law:** Fair competition, no participation in agreements that violate antitrust law, no abuse of market dominance and no participation in other anticompetitive business practices.
- **Data protection and information security:** Compliance with all applicable data protection laws, complete protection of personal data and no processing of personal data without legal permission, adequate management of the provider's information systems containing H.C. Carbon GmbH confidential information and their appropriate technical protection against unauthorised access.
- **Money laundering and terrorist financing:** Compliance with applicable legal obligations to prevent money laundering and terrorist financing, neither direct nor indirect involvement in such activities.
- **Foreign trade law:** Compliance with applicable international and national regulations of foreign trade law, in particular the export control and embargo regulations and the lack of maintenance of legally inadmissible commercial activities with sanctioned persons, companies or organisations.



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To ensure that our expectations are met, H.C. Carbon reserves the right to verify compliance with our expectations through appropriate and effective measures such as audits, questionnaires, etc..

In the event of suspected non-compliance with our expectations (e.g. due to negative media reports or other indications), we want our supplier to inform us immediately of its findings and provide information in response to our enquiries. We also want our supplier to identify the underlying causes of non-compliance with our expectations and to take immediate remedial action.

In case of suspicion of non-compliance with our expectations (for example, due to negative media reports or other indications), we want our supplier to immediately inform us of its findings and provide information in response to our questions.

If the supplier demonstrably fails to meet our expectations contained in this Supplier Code of Conduct or does not make efforts and implement improvement measures or take remedial measures within a reasonable period set by H.C. Carbon, H.C. Carbon reserves the right to terminate individual or all contractual relationships.

### **Reporting suspected misconduct**

Possible violations of laws can be reported through generally known reporting centres, also anonymously.

Possible violations of the Code of Conduct can be reported via [info@hc-carbon.de](mailto:info@hc-carbon.de).