

Code of Conduct

Sustainability Policy for Suppliers

The basic principles listed in the United Nations Global Compact form the basis for the actions of B&T Exact GmbH

Following globally recognised guidelines and principles, this document sets out the basic principles and standards the B&T Exact Group expects of its suppliers for production-related and non-production-related goods and services. These include, in particular, a commitment to environmental and social responsibility and to the ten principles of the United Nations Global Compact as well as respect for internationally recognised human rights and labour and social standards.

To support implementation jointly with our business partners, we have established a sustainability policy that requires our suppliers of goods and services to similarly uphold and respect universal human rights and laws, and to demand the same from their own suppliers.

Conflict minerals policy

B&T Exact sets the standard for itself and its suppliers that all of its products are free of "conflict minerals" obtained from sources that directly or indirectly finance international conflicts or from mining activities in conflict or high-risk areas.

While B&T Exact does not source these minerals directly, the company is aware that conflict minerals may be present in the supply chain. With this in mind, B&T Exact has made it a priority to source these minerals responsibly by incorporating the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas into its processes.

We expect our suppliers to introduce codes of conduct for themselves and their employees that include requirements of ethical and sustainable behaviour for themselves and their employees. It is the supplier's responsibility to promote and instil compliance with the principles listed below in their own supply chain to the best of their ability. B&T EXACT expects its suppliers to comply with the following principles:

Social sustainability

- **Respect for human rights**
Suppliers are expected to respect and promote compliance with internationally recognised human rights. In all business activities within their sphere of influence, suppliers are expected to work towards ensuring that they themselves, their business partners and their suppliers do not commit or participate in human rights violations.
- **Prohibition of forced labour**
Any form of forced or compulsory labour is prohibited. Suppliers must not force workers to hand over their identity card, passport or work permit as a condition of employment.
- **Prohibition of child labour**
No child labour shall be used at any stage of production or processing. Suppliers are required as a minimum to comply with the ILO conventions on the minimum age for admission to employment and on the prohibition of child labour. Children must not be inhibited in their development. Their health and safety must not be impaired.
- **Fairness with regard to wages, working hours and social benefits**
Remuneration and social benefits must comply with the basic principles regarding minimum wages (this must be confirmed by the supplier),

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applicable overtime regulations and statutory social benefits.
Working hours and time off must as a minimum comply with applicable laws, industry standards or the relevant ILO conventions, whichever is stricter.

- **Equal opportunities / Non-discrimination**
Suppliers are obliged to ensure equal opportunities in employment and to refrain from any form of discrimination. There must be no discrimination against employees, for example on the grounds of ethnic origin, nationality, skin colour, religion, ideology, political and trade union activity, gender, sexual orientation, age, disability, illness or pregnancy.
- **Freedom of association and the right to collective bargaining**
Businesses are expected to uphold freedom of association and the effective recognition of the right to collective bargaining. It must be ensured that workers are able to discuss working conditions openly with management without fear of disadvantage. The right of workers to group together, join a trade union, appoint representation and be elected to a trade union must be respected.
- **Occupational health and safety**
As an employer, the supplier shall ensure health and safety protection at the workplace as a minimum within the framework of the applicable national provisions and support continuous development to improve the working environment.

Business ethics & compliance

- **Compliance with laws**
The highest level of integrity is expected in all business activities and relationships. Suppliers are expected to refrain from any form of fraud or embezzlement, insolvency offences, corruption, granting of advantages, bribery or venality. The supplier is obliged to comply with all laws and regulations applicable to it and the business relationship with B&T EXACT.
- **Fair competition**
Laws that protect and promote competition, in particular anti-trust laws, must be complied with. Companies must respect fair competition and abide by the prohibition of collusion with competitors and other measures that impede the free market.
- **Prohibition of corruption and bribery**
No form of corruption shall be tolerated. It is prohibited in particular to bribe, pay kickbacks or use blackmail to exert influence on representatives of business partners, the political arena, public administration, the judiciary or the general public.
The supplier expressly undertakes to comply with the anti-corruption clauses of the International Chamber of Commerce (ICC) and the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" as amended in 2022.
The Supplier warrants that it will not tolerate or participate in any form of corruption, bribery, unfair advantage or other unethical business practices. It further undertakes to take appropriate due diligence measures along its supply chain, in particular with regard to the origin and trade of minerals, and to ensure that all parties along the chain comply with the relevant guidelines. In the event of violations, the client reserves the right to terminate the contract without notice and, if necessary, to take legal action.
- **Protection of business secrets**
B&T Exact expects its suppliers to respect the confidentiality of information entrusted to them by B&T Exact, its customers or other suppliers. Confidential information may only be used and disclosed in a manner authorised by B&T Exact. Confidential information is defined as any business information relating to B&T Exact, its customers or suppliers that is not in the public domain.

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➤ **Conflicts of interest**

Our suppliers shall avoid situations in which personal interests, even if only in appearance, conflict with us as a company, with customer or with business partners. Business decisions must not be guided by private interests and relationships. Potential conflicts must therefore be identified as early as possible. If, however, such conflicts become apparent, please consult the relevant supervisor or the responsible human resources manager.

Sustainability in environmental protection – Commitment to the environment

We expect our suppliers to fulfil their environmental social responsibility and to reduce environmental impacts as far as possible, e.g. with regard to

- Emissions to air and water
- Waste disposal
- Hazardous substances

Resources must be used sustainably, e.g. through

- The use of renewable energies
- Careful use of water
- Minimising the use of resources by recycling materials

We expect our suppliers

- To use and conserve (natural) resources responsibly in the manufacture of their products as well as in their day-to-day work, e.g. with regard to
 - o Energy consumption
 - o Emission of greenhouse gases
 - o Water consumption
 - o Pollution of groundwater and air
 - o Avoidance of unnecessary waste
- Separation and correct disposal of waste
- When using chemicals, to adhere to the relevant guidelines for use and disposal
- To ensure the greatest possible energy efficiency in the development of their products
- Right from the planning and conception phase, to do whatever possible to preserve a clean and unpolluted environment and continuously reduce the number of hazardous substances used

In case of doubts about the fulfilment of the above-mentioned obligations and in order to avoid improper conduct, we expect our suppliers to have an appropriate whistle-blowing concept to protect against reprisals and to safeguard against conflicts of interest. The company shall set up a corresponding unit for this.

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Policy for the responsible procurement of raw materials

Responsible procurement of raw materials

The suppliers of B&T Exact GmbH shall support activities that ensure the responsible procurement of raw materials. The procurement and use of raw materials that have been obtained illegally or through ethically reprehensible or unreasonable measures must be avoided.

The supplier undertakes not to source raw materials from any of the 160 mining companies listed in the Transition Minerals Tracker of the Business & Human Rights Resource Centre that violate human rights and commit environmental offences.

The use of raw materials, such as conflict materials, which are subject to embargoes or other import restrictions, must be excluded.

Suppliers are therefore obliged to identify these raw materials in manufactured products throughout the supply chain and to disclose the origin of the raw materials they use:

- Conflict Minerals Reporting Template ([CMRT](#))
- [Non-Konformität Kobe, Mitsubishi & Toray](#)
- IMDS Entry within the scope of initial sampling

Avoidance of hazardous substances

Substances which, if released, pose a risk to humans and the environment must be avoided. Suppliers shall maintain an appropriate hazardous substance management system that ensures the safe use and transport, as well as safe storage, recycling, reuse and disposal of these substances.

Environmentally friendly products

When developing products and services, the suppliers of B&T Exact GmbH shall ensure economical use of energy and natural resources. The products should as far as possible be suitable for reuse, recycling or safe disposal.

Suppliers shall continuously check the ingredients of the products they supply against the current REACH list and shall notify B&T, without prompting, using a form which B&T will be happy to provide on request, as soon as any products supplied conflict with this.

The supplier must substitute materials or purchased parts that do not comply with the RoHS specifications in consultation with B&T Exact GmbH. If required, the supplier shall issue an EU declaration of conformity regarding compliance with the RoHS Directive.

The products delivered to B&T Exact GmbH do not contain any substances of concern that fall under the **current** [REACH- regulation](#).

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Subcontractors

The suppliers of B&T Exact GmbH undertake to ensure by means of suitable contractual arrangements with their sub-suppliers that the latter comply with the regulations contained in this guideline.

AGREEMENT WITH THE B&T Exact CODE OF CONDUCT

We acknowledge the B&T Exact Code of Conduct by ensuring compliance with the expectations and requirements contained therein in our and all of our affiliated companies.

We shall encourage our suppliers to do likewise.

We hereby acknowledge the B&T Supplier Code of Conduct and/or confirm that we shall comply with the above principles and requirements of the B&T Exact Code of Conduct by applying our own equivalent code of conduct* within our company.

Place/Date

Signature and stamp of the Supplier