

ESCHA Code of Conduct (CoC) for suppliers

1 Introduction | Preamble

ESCHA GmbH & Co. KG (hereinafter referred to as ESCHA) is committed to ecologically and socially responsible corporate management. We expect the same behavior from all our suppliers and assume that the principles of ecological, social and ethical behavior are observed and integrated into the corporate culture.

We also strive to continuously optimize our business activities and our products in terms of sustainability and ask our suppliers to contribute to this in the sense of a holistic approach.

For future cooperation, the contracting parties agree to the validity of the following regulations for a joint code of conduct. This agreement shall form the basis for all future deliveries. The contracting parties undertake to comply with the principles and requirements of the Code of Conduct and to endeavor to contractually oblige their subcontractors to comply with the standards and regulations set out in this document. This agreement comes into force upon signing. A breach of this Code of Conduct may ultimately be cause and reason to terminate the business relationship, including all associated supply contracts.

The Code of Conduct is based on national laws and regulations, such as the Supply Chain Due Diligence Act (LkSG), as well as international conventions, such as the United Nations Universal Declaration of Human Rights, the Guidelines on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights and the international labor standards of the International Labor Organization (ILO).

2 Requirements for suppliers

2.1 Social responsibility

Exclusion of forced labor

No forced labor, slave labor or comparable work may be used. All work must be voluntary and without threat of punishment. Employees must be able to terminate their work or employment relationship at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment and humiliation. The hiring or use of security personnel must be prohibited if persons are treated in an inhumane or degrading manner or are injured during their deployment or if freedom of association is impaired.

Ban on child labor

Child labor may not be used at any stage of the process chain. Suppliers are requested to comply with the recommendation from the ILO conventions on the minimum age for the employment of children. Accordingly, the age should not be less than the age at which compulsory schooling ends according to the law of the place of employment, and in any case not less than 15 years. If children are found at work, the

supplier must document the measures to be taken to remedy the situation and enable the children to attend school. Employees under the age of 18 must not be employed for work that is harmful to the health, safety or morals of children. Special protective regulations must be observed and complied with..

Fair remuneration

The remuneration for regular working hours and overtime must correspond to the national statutory minimum wage. The remuneration for overtime must always exceed the remuneration for regular hours. Employees must be granted all legally prescribed benefits. Deductions from wages as a punitive measure are not permitted. The supplier must ensure that employees receive clear, detailed and regular written information on the composition of their remuneration (payroll).

Fair working hours

Working hours must comply with applicable laws and industry standards. Overtime is only permitted if it is voluntary and does not exceed 12 hours per week, while employees must be granted at least one day off after six consecutive working days. The weekly working time may not regularly exceed 48 hours.

Freedom of association

The right of employees to form and join organizations of their choice, to engage in collective bargaining and to strike must be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative possibilities for independent and free association of employees for the purpose of collective bargaining must be provided. Employees must not be discriminated against on the basis of founding, joining or being a member of such an organization. Employee representatives must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

Prohibition of discrimination

Unequal treatment of employees in any form is not permitted unless it is justified by the requirements of employment. This applies, for example, to discrimination based on gender, national, ethnic or social origin, skin color, disability or health status, political convictions, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

Occupational health and safety

The supplier is responsible for a safe and healthy working environment. The necessary precautionary measures against accidents and damage to health that may arise in connection with the work shall be taken by setting up and applying appropriate occupational safety systems. Appropriate measures must be taken to prevent excessive physical or mental fatigue. In addition, The supplier is responsible for a safe and healthy working environment. The necessary precautionary measures against accidents and damage to health that may arise in connection with the work shall be taken by setting up and applying appropriate occupational safety systems. Appropriate measures must be taken to prevent excessive physical or mental fatigue. In addition, employees are regularly informed and trained on applicable health and safety standards

and safety measures. Employees are provided with access to sufficient quantities of drinking water and access to clean sanitary facilities.

Preserving the natural foundations of life

The supplier may not, in violation of legitimate rights, withdraw land, forests or waters whose use secures the livelihood of people. The supplier must refrain from harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this harms the health of people, significantly impairs the natural basis for food production or prevents people from having access to safe drinking water or sanitary facilities.

Complaints mechanisms

The supplier must pass on information received from ESCHA GmbH & Co. KG regarding accessibility, responsibility and the implementation of a complaint's procedure in a suitable manner to its employees. The complaints procedure must be accessible to employees while maintaining confidentiality of identity and effective protection against discrimination. If no notice is given, the supplier itself is responsible for setting up an effective grievance mechanism at company level for individuals and communities that may be affected by negative impacts.

Dealing with conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt and mica, the supplier establishes processes in accordance with the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and expects its suppliers to do the same. Smelters and refineries without appropriate, audited due diligence processes should be avoided.

2.2 Ecological responsibility

Treatment and discharge of industrial wastewater

Wastewater from operational procedures, production processes and sanitary facilities must be typified, monitored, checked and, if necessary, treated before discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

Dealing with emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be typified, routinely monitored, verified and treated as necessary prior to release. The supplier is also responsible for

monitoring its emission control systems and is required to find cost-effective solutions to minimize any emissions.

Handling waste and hazardous substances

The supplier shall follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. The prohibitions on the export of hazardous waste in the Basel Convention of March 22, 1989, as amended, shall be observed. Chemicals or other materials that pose a risk if released into the environment shall be identified and managed in a manner that ensures their safe handling, transportation, storage, use, recycling or reuse and disposal. Mercury shall be used in accordance with the prohibitions of the Minaimata Convention of October 10, 2013 and persistent organic pollutants shall be used in accordance with the Stockholm Convention of May 23, 2001, as amended.

Reduce consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of all types of waste, including water and energy, must be reduced or avoided. This is done either directly at the point of origin or through procedures and measures, e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, by making savings, by recycling or by reusing materials.

Dealing with energy consumption/efficiency

Energy consumption must be monitored and documented. Economic solutions must be found to improve energy efficiency and minimize energy consumption.

2.3 Ethical business conduct and compliance

Fair competition

The standards of fair business, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which prohibit agreements and other activities that influence prices or conditions when dealing with competitors. These regulations also prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to determine their own prices and other resale conditions.

Confidentiality | Data protection

The Supplier undertakes to meet the reasonable expectations of its client, suppliers, customers, consumers and employees with regard to the protection of confidential and personal data. Supplier shall comply with data protection and information security laws and governmental regulations when collecting, storing,

processing, transmitting and sharing personal information. Our suppliers can rely on ESCHA to protect all confidential and personal data in a similar manner.

Intellectual property

Intellectual property rights must be respected; technology and know-how must be transferred in such a way that intellectual property rights and customer information are protected.

Integrity | Bribery and avoidance of conflicts of interest

The highest standards of integrity must be applied to all business activities. The Supplier shall have a zero tolerance policy against all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards shall be implemented to ensure compliance with anti-corruption laws.

3 Implementation of the requirements

With regard to supply chains, we expect our suppliers to identify risks within these and to take appropriate measures. In the event of suspected violations and to safeguard supply chains with increased risks, the supplier will inform ESCHA promptly and, if necessary, regularly about the violations and risks identified and the measures taken.

ESCHA reserves the right to check compliance with the standards and regulations listed in this document systematically and on an ad hoc basis using a self-assessment questionnaire and risk-based audits at the Supplier's production sites. The Supplier agrees that ESCHA may carry out such audits regularly or on specific occasions to check compliance with the Code at the Supplier's production sites during normal business hours and after reasonable advance notice by persons appointed by the Supplier. The Supplier may object to individual audit measures if these would violate mandatory data protection regulations or if there are concerns regarding the protection of know-how or trade secrets. If a breach of the provisions of this Code of Conduct is identified, ESCHA shall inform the Supplier of this immediately in writing and set it a reasonable grace period to bring its conduct into line with these provisions.

If a remedy is not possible in the foreseeable future, the Supplier must notify ESCHA immediately and, together with ESCHA, draw up a plan with a timetable for ending or minimizing the breach. If the grace period expires without result, or if the implementation of the measures contained in the plan does not bring about a remedy after the expiry of the timetable, and no milder means are available, ESCHA may break off the business relationship and terminate all contracts. A statutory right to extraordinary termination without setting a grace period, in particular in the case of breaches that are deemed to be very serious, remains unaffected, as does the right to compensation.

4 Acknowledgement and consent of the supplier

By signing this document, the supplier undertakes to act responsibly and to comply with the principles/requirements listed. The supplier undertakes to communicate the content of this code to

employees, agents and subcontractors in a comprehensible manner and to take all necessary precautions for the implementation of the requirements.

Company:

Signatory person:

Function of the signatory:

Place, date, signature: