

# Code of conduct

NM0004E1 Nov. 2024

## non ferrum GmbH

### **Introduction**

non ferrum GmbH is a globally active company that has committed itself to sustainable action. It is our goal to achieve the highest possible level of social, ethical and environmental sustainability. We urge our suppliers to strictly adhere to the ethical, social responsibility, health, safety and environmental principles of this Code of Conduct.

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### **Compliance**

non ferrum GmbH undertakes to comply with all legal, regulatory or licensing regulations of the countries in which it operates.

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### **Assumption**

This Code also applies to all contract suppliers and business partners who are expected to transfer these requirements to their own supply chain.

By complying with the non ferrum GmbH Code of Conduct, every supplier accepts to be evaluated or audited by non ferrum GmbH or a third party commissioned by non ferrum GmbH.

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### **Note**

Suppliers can raise concerns or questions by sending an email to the following email address:

[nonferrum@nonferrum.at](mailto:nonferrum@nonferrum.at)

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### **Ethics**

#### *Fair competition*

non ferrum GmbH always complies with all applicable laws, rules and regulations. No anti-competitive agreements or agreements will be made. We are committed to promoting and ensuring fair competition.

#### *Integrity, bribery, taking advantage*

Any kind of corruption or bribery is to be rejected. non ferrum GmbH undertakes to take action against any kind of corruption, including extortion and bribery. We ensure that employees, subcontractors or agents do not accept bribes, improper donations or other benefits to others. non ferrum GmbH pursues a zero-tolerance policy.

#### *Confidentiality*

non ferrum GmbH ensures that information provided confidentially by others is protected. This includes market information, commercial data, patents and other intellectual property. We ensure that confidential information of others is properly secured, used, and deleted.

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## **Social Responsibility**

### *Human rights*

non ferrum GmbH is committed to upholding human rights. All forms of slavery and human trafficking are rejected. All employment relationships are voluntary and can be terminated at any time within the agreed terms and conditions of employment.

### *Working conditions*

When it comes to the remuneration of the workforce, non ferrum GmbH complies with all applicable laws. The salary must at least cover basic needs.

The working hours are organized according to the applicable laws and extra hours are remunerated at the agreed rates.

We also respect the right of workers to freedom of association, as well as membership in trade unions or the like, according to the applicable rules. If this right is restricted by local laws, alternative, legally compliant options for employee representation are to be promoted.

In addition, the treatment of the workforce is fair and respectful and must be communicated openly with the company management without fear of discrimination. Physical punishment of employees is strictly prohibited.

### *Child labour*

Child labor is strictly prohibited. non ferrum GmbH is required to comply with the regulations of the ILO with regard to child labour.

### *Discrimination*

Any kind of discrimination is prohibited. This applies, for example, to discrimination based on gender, race, caste, skin color, disability, political opinion, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

### *Privacy*

Personal data of employees and data of suppliers and customers will be treated by non ferrum GmbH in accordance with the data protection regulations applicable to this data. non ferrum GmbH will limit data access to those persons who absolutely need the information, protect it from unauthorized access by third parties and store the data only for as long as this is required by law.

### *Conflict minerals*

non ferrum GmbH avoids the use of conflict minerals wherever possible. For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials of mineral origin, such as cobalt, the company establishes processes in accordance with the OECD Due Diligence Guidelines to promote responsible supply chains for minerals from conflict-affected and high-risk areas, and expects its supplier to do the same.

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## **Health, safety and environment**

### *Occupational health and safety*

The working environment is designed to be safe. non ferrum GmbH is responsible for ensuring that employees are protected from dangers as far as is reasonably practicable.

non ferrum GmbH has a health and safety organization in place to comply with guidelines and regulations and to ensure the health of its employees and visitors to its site.

#### *Hazard information and training*

Employees are regularly trained internally about hazards and how they can be minimized. Safety information on hazardous substances should be accessible to employees. Visitors to the site should familiarise themselves with the hazards that exist and take the necessary precautions during any site visit.

#### *Process Safety, Maintenance and Contingency Plans*

The process reliability of non ferrum GmbH is ensured for all chemical processes. Regular maintenance programs have been established for plants for the production, storage and transport of chemicals to ensure that they are in good working order. Relevant emergency situations have been identified, assessed and emergency plans have been implemented and communicated with employees.

#### *Ecological awareness*

non ferrum GmbH deals with ecological challenges responsibly and with foresight. All relevant laws and regulations are complied with. non ferrum GmbH is aware of the potential impact of its actions on the environment, evaluates them and is constantly striving to improve them when and where possible. All ecologically relevant resources, such as water and energy, are handled conscientiously and follow industry best practise.

#### *Wastewater, Waste and Emissions*

non ferrum GmbH monitors wastewater for pollutants. If necessary, the wastewater is subjected to a purifying treatment before discharge or disposal.

The disposal of waste, especially chemicals or other materials that may pose a hazard when released into the environment, is strictly monitored and disposed of responsibly. Wherever appropriate, material flows are fed into a recycling process or energy recovery. Gaseous emissions must be minimized, monitored for pollutants and, if necessary, subjected to a cleaning treatment.

Legal requirements on wastewater, waste and emissions are complied with by non ferrum GmbH.

#### *Climate protection and resource-saving production*

non ferrum GmbH is committed to climate protection and operates resource-saving manufacturing processes. To this end, we evaluate our energy and material use. We strive to continuously improve energy and material efficiency.

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### **Sustainable procurement**

non ferrum GmbH ensures sustainable procurement. To this end, principles, measures and guidelines contained in this Code of Conduct are implemented in the company's own supply chain with appropriate measures. If there is a suspicion of violations, we demand the disclosure of the supply chains.

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