



Code of Conduct

BMZ Germany GmbH

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BMZ Germany GmbH is committed to upholding its social responsibility as part of its existing business relationships. To this end, the company has defined its principles below, which are based on ethical standards, responsibility, and fairness for its contractual partners with regard to their accountability for people and the environment.

This Code of Conduct is based on the ten principles of "United Nations Global Compact," which pertain to human rights, labor standards, environmental protection, and more. It imposes demands on ourselves and our contractual partners. It is dynamic in nature and subject to change.

Our contractual partners undertake to:

- Support and respect the protection of international human rights.
- Ensure that they neither participate in nor are complicit in human rights violations.
- Respect freedom of association and effectively recognize the right to collective bargaining.
- Advocate for the abolition of all forms of forced labor, do not practice forced labor themselves, and do not support companies that rely on the use of forced labor.
- Promote the abolition of child labor, i.e., not to employ children under the age of 16 themselves and not to promote businesses that rely on the employment of children under the age of 16 (in countries covered by the developing country exception under ILO Convention 138, the minimum age may be reduced to 14).
- Abolish discrimination in employment and occupation and in supply chain selection, i.e., to ensure equal opportunities and equal treatment regardless of color, race, nationality, religion, social origin, disability, political opinion, gender, or sexual orientation and/or not to tolerate any discrimination in the form of speech or action.
- Advocate for adequate wages to cover living costs and not to accept wage cuts as a disciplinary measure.
- Comply with working hours based on the regulation of normal working hours and overtime in the respective country and guarantee at least one day off per week.
- Respect the freedom of association of employees and not to discriminate against or favor participating employees.

- Ensure the health and safety of employees, minimize risks, and prevent injuries and illnesses through precautionary measures, training, and an occupational health and safety management system.
- Protect the environment, comply with the relevant legal standards and regulations, minimize environmental impact, and continuously improve environmental protection.
- Take initiatives to sustainably raise awareness of environmental issues.
- Promote the advancement of environmentally friendly technologies and their development and distribution.
- Combat all forms of corruption, including extortion and bribery, meaning neither using such means themselves nor promoting companies in which such means are used.
- Use only conflict-free tin, tungsten, tantalum, and gold (also known as 3TG or “conflict minerals”) as well as mica and cobalt.
- Comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and recognize our responsibility to respect human rights and not contribute to conflict wherever violations may occur, which also includes the following:
 - o Serious abuses related to the extraction, transport, or trade of minerals
 - o Direct or indirect support to non-state armed groups
 - o Public or private security forces
 - o Bribery and fraudulent misrepresentation of mineral origin
 - o Money laundering
 - o Payment of taxes
 - o Fees and charges payable to governments
- Comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and recognize our responsibility to respect human rights and not contribute to conflict wherever violations may occur.
- In support of the activities of the *Responsible Minerals Initiative*, we use all the tools and resources created by this organization to promote our due diligence program for conflict minerals.

Each supplier involved must submit a completed CMRT (*Conflict Minerals Reporting Template*) for the raw materials gold, tin, tungsten, and tantalum, as well as an EMRT (*Extended Mineral Reporting Template*) for the raw materials mica and cobalt as proof of conflict-free raw materials.

The contracting party undertakes to include itself and its contractual partners in the Code of Conduct and to comply with the following laws and the obligations arising from them:

Corporate Due Diligence in Supply Chains Act

From 2024, the Corporate Due Diligence in Supply Chains Act will apply to BMZ Germany GmbH.

We require our suppliers to:

- Support the legally prescribed due diligence obligations for companies throughout the supply chain.
- Collaborate on supply chain risk analysis, e.g., by completing a questionnaire on environmental, human rights, and ethical issues.
- Collaborate on corrective actions to limit or eliminate identified risks and violations.

Regulation (EU) 2023/1542 (“Battery Regulation”)

Regulation (EU) 2023/1542 (“Battery Regulation”) entered into force on August 1, 2023. The regulation is part of the European Green Deal and is designed to be an important step towards a circular economy.

We expect our suppliers to support us in meeting the new requirements. Especially for suppliers of product-relevant parts and materials, this means that in the future they will have to provide information on the carbon footprint of these parts/materials. (Starting February 18, 2025)

Battery cell suppliers must also provide information on the percentage of recycled material in their cells. Initial information must be provided before August 18, 2028.

PFAS:

Per- and polyfluoroalkyl substances (PFAS), sometimes called “forever chemicals,” are a group of thousands of substances that are widely used in many industries. Due to the growing awareness of the associated health and environmental risks, PFAS are increasingly scrutinized worldwide.

We at BMZ Germany GmbH endeavor to produce PFAS-free products.

We therefore expect our suppliers to support us in our investigations along the supply chain.

We also expect our suppliers to provide a PFAS declaration of conformity.