


	<b>Code of conduct for suppliers</b> Code of conduct	<b>ALMEX</b> 
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# Code of conduct for suppliers

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## Code of conduct

Status: 10/05/2024

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### Revision history

Reason for alterations:	In chapter	Document version	Date	Name
<b>Completed</b>			<b>29/06/2018</b>	<b>VRE/TD/ SWI</b>
Checked for up-to-dateness			25/03/2024	VRE/JB/ SYG
Text adjustments	1,2	1	02/04/2024	FERU
Addition LkSG Act on Corporate Due Diligence in Supply Chain	2	1.1	10/05/2024	SYG

## 1. PREAMBLE

Almex GmbH shall adhere to the highest ethical and social principles following this code of conduct for suppliers. ALMEX expects all of its suppliers and their own suppliers to recognise this code of conduct and also adhere to it. We expect suppliers to adhere to all applicable laws including all anti-corruption laws applicable worldwide; encourage diversity and corporate social responsibility; fulfil environmental, health and safety standards, respect human rights, support a sustainable and transparent supply chain, including responsible procurement of raw materials, and use the necessary management systems in order to maintain this code.

If the supplier should refrain from adhering to the guidelines in this code then this may lead to a termination of business relations.

## 2. EMPLOYEES AND HUMAN RIGHTS

- ❖ The supplier must treat his employees, partners and workers with dignity and respect.
- ❖ The supplier may not participate in people trafficking, slavery, child labour or any form of involuntary work.
- ❖ The supplier may neither permit nor practice unlawful discrimination or harassment at the work place. ALMEX tolerates no behaviour which interferes in a harassing, disrupting or restricting manner with another person's ability to work.
- ❖ The supplier's employees, partner and workers may neither possess, use, distribute or sell drugs on the premises of ALMEX nor carry out their work under the influence of alcohol or drugs.

### 2.1 Supply Chain Due Diligence Act (LkSG)

We would like to point out that the Supply Chain Due Diligence Act is part of our CoC and ask our suppliers to comply with this, in particular Section 2 Paragraph 2, with the details in the legal text on the following subject areas:


1. the ban on employing a child
2. the ban on the worst forms of child labor
3. the prohibition of employing people in forced labor
4. the prohibition of all forms of slavery
5. the prohibition of disregarding the occupational health and safety obligations applicable under the law of the place of employment
6. the ban on disregarding freedom of association
7. the prohibition of unequal treatment
8. the prohibition of withholding an appropriate wage
9. the prohibition of causing harmful soil changes, water pollution, air pollution, harmful noise emissions or excessive water consumption
10. the prohibition of unlawful forced eviction and the prohibition of unlawful deprivation of land, forests and waters
11. the prohibition of commissioning or using private or public security forces to protect the corporate project if rights are violated when using security forces due to a lack of training or control on the part of the company
12. the prohibition of any act or omission that goes beyond numbers 1 to 11 and which is directly likely to have a particularly serious impact on a protected legal position and whose illegality is obvious when all the relevant circumstances are intelligently assessed

### 3. ENVIRONMENT, HEALTH AND SAFETY

- ◆▶▶ The supplier must carry out his work with the aim of reducing waste, preventing pollution, promoting recycling and preserving resources.
- ◆▶▶ The supplier must provide all employees, partners and workers with safe and healthy working conditions including, among other things, emergency care, occupational hygiene and machine safety.
- ◆▶▶ The supplier must adhere to all applicable environmental, health and safety laws.

### 4. CONFLICTING MINERALS

- ◆▶▶ The following are classified as conflict materials: coltan (tantalum ore), cassiterite (tin ore), gold, wolframite (tungsten ore) or their derivatives (tantalum, tin, tungsten and gold).
- ◆▶▶ ALMEX aims to remove conflict materials from its supply chain, which are indirectly or directly funded or favoured by armed groups in the Democratic Republic of Congo or an adjacent country. ALMEX expects its supplier to share this objective.
- ◆▶▶ ALMEX carries out due diligence of its supply chain when required in order to increase transparency and identify countries as well as melting plants and refineries, from which conflict materials are possibly being used in its products. The supplier must cooperate in the due diligence procedures of ALMEX and, upon request, provide comprehensive and detailed information. The supplier is required to, when necessary, carry out similar due diligence procedures on his own supply chain.

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## 5. CORRUPTION PREVENTION

- ◆>> The supplier may neither indirectly nor directly make payments in the form of valuables to natural or legal persons, government officials, government authorities or other third parties in order to
  - ◆>> obtain or keep business or influence operations or a decision in an improper way or
  - ◆>> obtain an improper business advantage.
- ◆>> The supplier shall avoid corrupt practices and follow all applicable laws on corruption prevention, in particular the American Foreign Corrupt Practices Act ("FCPA").
- ◆>> The supplier shall ensure that all invoices and other financial statements submitted to ALMEX are accurate and transparent. The supplier may not describe incorrectly, falsify or try to obscure, conceal or in any other way disguise transactions or payment requests.

## 6. CONFLICTS OF INTEREST


- ◆>> A conflict of interest arises when personal interests or actions are in conflict with or seem to be in conflict with the legitimate concerns of ALMEX or the supplier in their capacity as organisations.
- ◆>> The supplier must disclose to ALMEX all apparent or actual conflicts of interest with regard to his relationship with ALMEX. Should the ALMEX management authorise an apparent or actual conflict of interest, then this approval decision must be held in writing.

## 7. GIFTS AND HOSPITALITY

- ◆◆ Occasionally ALMEX employees may accept gifts, basic hospitality or other courtesies during business operations. However there must be a feasible business purpose.
- ◆◆ The following situations do not constitute a feasible business purpose and are expressly prohibited:
  - Providing gifts, hospitality or preferential treatment with the aim of wishing to influence the objectivity of decisions made by an ALMEX employee, partner or worker,
  - Offers of gifts, hospitality or preferential treatment while participating in an ongoing purchase or contractual decision with ALMEX (e.g. requests for information, prices, proposals, services),
  - Gifts of money including gift vouchers,
  - Offers of extravagant or generous leisure outings, trips or accommodation.
- ◆◆ ALMEX employees may not demand gifts, hospitality or other gratuities from suppliers.
- ◆◆ The supplier may not offer ALMEX employees any products, services or financial investments for sale whose terms are not available to all ALMEX employees.
- ◆◆ Suppliers may not offer any gifts, hospitality or trips in ALMEX' name in connection with obtaining or retaining business for ALMEX.

## 8. DATA PROTECTION

- ◆◆ When processing personal data of people with whom it does business, including customers, consumers and employees, the supplier must adhere to applicable data protection laws and regulations.
- ◆◆ In particular, the supplier may only process the minimum amount of data required to fulfil its obligations to ALMEX and then exclusively for the purposes defined in its agreement with ALMEX. The supplier must keep the personal data confidential and secure at all times.

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## 9. ACCURACY OF BUSINESS DOCUMENTS

- ◆>> The supplier shall keep accurate accounts and records describing actual and proper business transactions and payments. It is strictly prohibited to compile forged, inaccurate, incomplete or misleading documents.
- ◆>> All accounting documents and records must comply with the generally recognised accounting principles.
- ◆>> Records must be legible and comprehensible.

## 10. COMPETITION, INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

- ◆>> The supplier must adhere to all applicable competition and antitrust laws.
- ◆>> Confidential information must only be exchanged following a written and signed confidentiality agreement between ALMEX and the supplier. Every exchange of confidential information must be limited to the purpose of fulfilling contractual performance requirements.
- ◆>> The supplier may not forward or disclose to third parties intellectual property or other protected information from ALMEX, which become known to him (including information coming from the supplier and information on products, customers, pricing, costs, expertise, strategies, programmes, procedures and practices).

## 11. TRADE, IMPORT AND EXPORT

- ◆>> The supplier must follow the letter and spirit of the applicable import, export, customs, sanction, embargo, boycott and other trade laws.

## 12. CONTACTS AT ALMEX

The supplier may contact his appointed procurement manager at ALMEX or the ALMEX management in order to receive further information or report a possible breach of this code.

Thank you very much!