

Agathon Code of Conduct

for suppliers and business partners with an intermediary function

PREAMBLE

The Agathon Code of Conduct defines due diligence obligations regarding responsibility for people and the environment for suppliers and intermediary business partners. These must be complied with in cooperation with Agathon.

The supplier undertakes to comply with internationally recognized human rights and environmental due diligence obligations and to provide appropriate support to Agathon in fulfilling statutory due diligence obligations along the supply chain, in particular in accordance with the German Supply Chain Due Diligence Act (LkSG).

The supplier and/or intermediary business partner agrees to the following and confirms that it has an appropriate risk management system in place:

1. Legal and social responsibility

- Compliance with laws and official regulations of the respective applicable legal system, in particular applicable export control and customs regulations as well as national and international competition regulations, is ensured.
- Contracts, standards, regulations, certification, and data protection provisions are observed.
- Ownership of intellectual property and assets is respected.
- Confidential information is kept secret.
- We understand social responsibility to mean performing our respective activities properly and correctly, recognizing each other's expectations, and conducting our business in a sustainable and socially responsible manner. No one shall come to harm as a result of our activities. This includes taking appropriate measures to avoid using raw materials that originate from conflict and/or high-risk areas and which contribute to corruption, human rights abuses, funding of armed groups, or other negative impacts.

2. Human rights/conflict minerals/labor and business practices

2.1 Prohibition of forced and child labor

- Internationally recognized human and labor rights are observed. We comply with the United Nations Universal Declaration of Human Rights ([UDHR](#)), the core labor conventions developed by the International Labor Organization ([ILO](#)), and the UN Guiding Principles on Business and Human Rights ([OHCHR](#)). No exploitation involving slavery, servitude, forced or compulsory labor, or human trafficking takes place.



- The supplier undertakes to comply with internationally recognized human rights and environmental due diligence obligations and to provide appropriate support to Agathon in fulfilling statutory due diligence obligations along the supply chain, in particular in accordance with the German Supply Chain Due Diligence Act (LkSG).
- No workers under the age of 15 are employed. Only in countries that fall under the exception for developing countries in ILO Convention No. 138 may the minimum age be reduced to 14 years.
- No one under the age of 18 is employed in work involving risks.

2.2 Due diligence and transparency regarding minerals and metals from conflict areas

- Full traceability and transparency for supplied products is guaranteed and disclosed.
 - Requirements such as the OECD Guidelines on Due Diligence for Responsible Supply Chains for Minerals from Conflict and High-Risk Areas ([OECD](#)) and the guidelines on compliance with Section 1502 of the Dodd-Frank Act are complied with ([Dodd-Frank-Acts](#)).
- Only smelting plants that are recognized as conflict-free under established industry regulations are used for metal smelting.

2.3 Health and safety of employees

- Working conditions that comply with legal and international standards regarding occupational health and safety are ensured.
- An appropriate health and safety management system is in place and employees are sufficiently trained in health and safety at all times.

2.4 Respect for employees—no discrimination

- Employees are treated with respect.
- Employees are treated equally regardless of gender, age, skin color, race, nationality, ethnicity, political affiliation, social origin, disability, sexual orientation, membership or activity in an employee organization, ideological or religious conviction.
- Physical or psychological hardship, sexual harassment, discrimination, or other harmful behavior toward employees is not tolerated.

2.5 Working hours, remuneration, and fringe benefits

- The applicable working time regulations are observed.
- Appropriate remuneration is paid, taking into account the applicable provisions on remuneration and fringe benefits, especially in the case of cross-border activities.
- Employees have the right to form or be active in trade unions or employee organizations; they will be neither favored nor disadvantaged for doing so.

2.6 Fair business practices

- No form of corruption and bribery, or direct or indirect participation in such schemes, will be tolerated.



- No money laundering or terrorist financing is carried out or supported either directly or indirectly.
- Cartels or price and market agreements will not be tolerated.
- Personal data will be processed confidentially and responsibly and will only be used for legitimate purposes.

3. Environmental protection

- We are committed to operating in an environmentally compatible and sustainable manner and to avoiding substances and materials that are harmful to people and nature right from the manufacturing and supply chain.
- We observe the applicable legal and official norms and regulations as well as the international standards with regard to the environment.
- We have an appropriate environmental management system in place or are establishing one without delay.

4. Other obligations

- The supplier ensures that an effective internal or external grievance mechanism is in place through which employees as well as external third parties can report indications of human rights or environmental risks or violations
- The grievance mechanism ensures, to the extent legally permissible, the confidentiality of the reporting person's identity and protection against disadvantage or retaliation
- We are committed to documenting and immediately reporting any violations of this Code of Conduct to Agathon. The contact point is: procurement@agathon.ch
- We make reasonable efforts to achieve and monitor the principles of this Code of Conduct. This also applies to our suppliers and the selection of their selection
- If the supplier identifies human rights or environmental violations or risks, it undertakes to investigate them without delay, implement appropriate remedial measures, and inform Agathon of significant actions taken and progress made
- We will comply with Agathon's requests for information regarding compliance with the principles of this Code of Conduct without delay and in the form requested. This includes site visits as well as access to data and documents

Place/date:

Legally valid name of the supplier and signature/s

