

# CODE OF CONDUCT FOR SUPPLIERS

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**The Wolftank Group's business model is based on sustainable growth and compliance with environmental, social and economic principles and values, which are an integral part of its corporate culture.**

**Within this model, careful management of the supply chain is an essential element and for this reason, Wolftank Group has developed the following Code of Conduct for Suppliers.**

## **1 Purpose**

This Code of Conduct for Suppliers sets out the principles and considerations for entities or persons ("suppliers") supplying goods or services to or on behalf of Wolftank Group. For the purposes of this document, the term "supplier" includes independent contractors and subcontractors who provide services to Wolftank Group.

The principles of this Code are consistent with the Wolftank Group's Code of Ethics and the corporate policies that can be found on: [wolftankgroup.com/sustainability/corporate-policies-and-code-of-ethics/](https://wolftankgroup.com/sustainability/corporate-policies-and-code-of-ethics/).

Wolftank Group does not tolerate illegal or unethical behaviour by its suppliers, contractors and partners and the company selects its suppliers through a fair procurement process. This Code of Conduct describes the minimum standards required and complements the terms and conditions of suppliers' purchasing contracts with Wolftank Group. This Code of Conduct does not relieve the supplier of its financial responsibility and search for best practices in business conduct.

## **2 Principles**

### **2.1 Compliance with applicable legislation**

Wolftank Group's suppliers must comply with the applicable laws of the countries in which they operate and must avoid any conduct that, even if it does not violate the law, may damage Wolftank Group's reputation and have adverse consequences for the company or its environment.

When faced with competing demands, the supplier shall seek alternatives that allow it to respect internationally recognised human rights.

Regarding Export Controls and Economic Sanctions, Wolftank does not conduct activities nor assist any other party in violating applicable economic sanctions or export control laws and regulations.

Suppliers should ensure they conduct their business in compliance with all lawful international sanctions' regimes and export control laws and regulations and avoid doing anything that would position themselves or Wolftank in violation of applicable economic sanctions and export controls. Suppliers must fully comply with all lawful sanctions' regimes affecting their business, implement effective internal controls to minimize the risk of any non-compliance with relevant sanction regimes, including training and support for their employees and contract workers.

## 2.2 Human rights and labour standards

Each supplier shall respect the principles of the Universal Declaration of Human Rights and the conventions that develop it, as well as the recommendations of the International Labour Organisation concerning the rights of workers in the performance of their activities.

In particular, the supplier shall promote and respect, inter alia, the following principles:

- Take reasonable measures and make good faith efforts to avoid involvement in human rights abuses or human rights-related illegalities.
- Incorporate equal opportunity and non-discrimination criteria, including in selection, promotion, access to training and all other human resource management practices based on professional merit and objective assessment.
- Prohibit any form of discrimination based on, inter alia, ethnic or cultural origin, gender, sexual orientation, disability, nationality, religion, age, social origin or ideology.
- Prohibit the use of child labour and comply with all international, national and local laws, regulations and declarations regarding the minimum age for employment.
- Prohibit the use of forced or compulsory labour in any form.
- Respect the freedom of association and the right to collective bargaining.
- Provide safe and hygienic working conditions and comply with relevant occupational health and safety regulations.
- Pay decent wages in relation to the legal minimum wage.
- Do not allow excessive working hours and promote a healthy work-life balance.
- Not subject their employees to physical or verbal abuse or any other form of intimidation.
- Prevent harsh or inhumane treatment in employment practices.
- Respect the protection of personal data.

## 2.3 Professional standards

Wolftank Group expects suppliers to:

- Aim for the highest possible professional standards. In particular, to maintain a respectful and dignified relationship with everyone the supplier engages with, this includes its own suppliers, customers, and employees, as well as customers and employees of Wolftank Group. The supplier's engagement should be free of harassment, abuse of any kind, harsh and inhumane treatment.

- Comply with local laws and regulations.
- Supplier shall comply with export controls and economic sanctions: laws and regulations that may restrict, prohibit, and require reporting of transactions involving the movement of tangible and intangible items across borders or, in some cases, between persons of different nationalities. Supplier is committed to promoting national security, foreign policy and multilateral non-proliferation.

## 2.4 Health and security

- Provide a safe and healthy working environment, taking proactive action to prevent and minimize injury and ill health of their workers.
- Understand and eliminate hazards and risks to occupational health and safety.
- Continually work to improve the management of occupational health and safety.
- Provide the appropriate Personal Protective Equipment (PPE) aligned with the level of risk exposure of their activities.
- Provide training to their staff about the risks they are exposed to and on how to conduct their activities in a safer way to avoid accidents and illness.
- Comply with all applicable occupational health and safety laws and regulations.

Where suppliers' activities include chemicals or other materials that pose a health risk to humans, we expect suppliers to abide by the following requirements in addition to those listed above:

- Ensure an appropriate health and safety management system is in place.
- Be proactive in identifying, reducing, or avoiding risks to people.
- Chemicals or other materials that pose a risk to humans must be identified and handled in such a way that handling, use, storage, and disposal are carried out safely.
- Ensure they have emergency and contingency plans in place in the case of accidents and incidents.

## 2.5 Environment

- Comply with all applicable environmental laws and regulations.
- Promote decarbonization and work towards a global energy transition.
- Protect natural ecosystems and biodiversity and not contribute to the changing, deforestation, or damage of natural woodland and other natural ecosystems. Respect and take care of nature, including maintaining water, air and land quality as well as avoiding noise emissions.
- Minimize the negative environmental impacts of their operations, products and supply chains, including but not limited to air pollution, greenhouse gas emissions, water discharge, hazardous waste disposal, and poisonous substances.
- Not to engage in land theft, respecting the rights and the prohibition of illegal eviction of land, forests and waters when they are acquired, constructed or otherwise used, including land, forests and waters that serve a person's livelihood.
- Obtain for materials from sustainable and local sources wherever possible.
- Use resources efficiently, apply energy-efficient and environmentally friendly technologies and reduce waste, as well as emissions to air, water, and soil; give preference to reusable, recycled and recyclable materials.

- Aim to source renewable energy to power their operations and activities and use electric vehicles rather than combustion engine vehicles where possible.
- The supplier undertakes to implement measures to reduce its direct and indirect CO<sub>2</sub>e emissions (including in its upstream value chain). We expect our suppliers to ensure transparency with regard to their own emissions as well as those of the upstream supply chains, and to set reduction targets, including targets that apply to their supply chain.

Where suppliers' activities include chemicals, all type of waste or other materials that pose a risk to the environment, we expect suppliers to abide by the following requirements in addition to those listed above:

- Ensure an appropriate environmental, health, and safety management system is in place.
- Be proactive in identifying, reducing, or avoiding risks to the environment and people.
- Chemicals, all type of waste or other materials that pose a risk to the environment must be identified and handled in such a way that handling, use, storage, and disposal are carried out safely.

With respect to raw materials, Wolftank Group is committed to responsible procurement. The company promotes clear guidelines for their sustainable extraction, avoiding the use of raw materials that may be associated with possible non-compliance with environmental and social standards (such as human rights, health, etc.).

- For the following raw materials: tin, tungsten, tantalum and gold (so-called 3TG) from Conflict-Affected and High-Risk Areas (CAHRAs), the supplier will conduct specific due diligence procedures in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas, and we expect the supplier to exclude smelters or refiners of these commodities that do not have an adequate and audited due diligence process in place.
- In addition to the 3TGs, we also focus on other raw materials/process materials with identified environmental and human rights risks in their extraction and processing.
- In the case of critical raw materials, the Wolftank Group intends to use only raw materials that comply with international standards.
- The Wolftank Group expects the supplier, when using critical raw materials or critical process materials in the manufacture of its products, to implement processes and activities to identify, prevent, minimize or eliminate these risks.
- The supplier shall obtain raw materials from audited sources.
- The supplier shall ensure transparency and traceability within its own supplier network, ensuring that extraction, production, transport, trade, processing and export comply with international regulations.

## 2.6 Anti-corruption

- Promote transparency in the way you do business.
- Do not engage in any form of corruption, including extortion and bribery.

- Keep up to date with the payment of the various taxes required by law.
- Comply with audit and accounting obligations in accordance with applicable law.
- Comply with anti-money laundering legislation.
- Implement control measures to prevent crime within the company.
- Respect the principles of confidentiality of the information to which they have access as a result of their relationship with Wolftank Group, in the exercise of their professional activities.

## 2.7 Protection of intellectual property / company assets

Wolftank Group assets comprise intellectual property, designs, patent rights, copyright, trademarks and/or service marks, logos, and other distinctive brand features, business strategies, financial data, and other confidential information, as well as physical assets (hereafter: “intellectual property and company assets”).

- Suppliers do not acquire any rights over Wolftank Group’s intellectual property and company assets.
- Suppliers are obliged to protect and respect Wolftank Group’s intellectual property and company assets.
- Any use of Wolftank Group’s intellectual property and company assets by the Supplier requires prior authorization from Wolftank Group.
- Suppliers shall not contest or challenge or take any action inconsistent with or that may damage or impair ownership of the intellectual property and company assets of Wolftank Group.
- Suppliers shall not apply or register as a trademark any of Wolftank Group’s trademarks.

## 3 Commitment and acceptance

By accepting and signing this Code of Conduct for Suppliers, each supplier agrees to:

- Comply with this Code for as long as they remain a Wolftank Group supplier.
- Participate in any verification activities of this Code that may be established by Wolftank Group.
- Implement corrective actions, if any, as a result of any verification activity conducted by Wolftank Group.
- Review the verification activities carried out by Wolftank Group in your organisation.
- Communicate to Wolftank Group any information they consider relevant to the requirements set out in this Code.

The sustainability requirements of this Code are binding on the signatory (first tier supplier) to share these standards along the supply chain.

Wolftank Group will ensure the continued application of these principles by suppliers and may request audits to verify the level of compliance.

Failure by the supplier to comply with the contents of this Code may have various consequences in the contractual relationship with Wolftank Group.

Depending on the severity of the non-compliance, these may range from a simple warning to disqualification as a supplier, without prejudice to any other legal or administrative measures that may be applicable.

Communication and good faith are encouraged in the relationship between the Wolftank Group and the supplier, whereby the supplier may at any time communicate with the Wolftank Group and inform the Wolftank Group of any breach of the conduct set out in this Code and of its intention to remedy it.

Name, role and organization:

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Date & signature:

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