



CRONIMET
metals are our passion

Code of Conduct

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A. Foreword

Dear colleagues,

The credibility and success of our company are directly related to the personal integrity and honesty of all colleagues in the CRONIMET Holding Group (hereinafter referred to as CRONIMET). Not only our corporate values shall be decisive for the further success of CRONIMET and its competitiveness, but also the definition of standards for responsible and impeccable behaviour in business transactions. The content of the Code of Conduct aims at achieving a mode of behaviour in the workplace that is characterised by honesty and fairness in dealing with other colleagues as well as with customers, suppliers, competitors, authorities and the public. Only strict observance of these principles can prevent considerable legal and economic risks for our company and thus for all of us. In addition, we also protect the legitimate interests of all stakeholders (e.g. customers, suppliers, shareholders, colleagues) and take into account general social concerns such as the protection of people and the environment.

The management expects all colleagues working for the CRONIMET Group worldwide to familiarise themselves with the content of the Code of Conduct, to recognise it as binding principles and to behave accordingly.

Managers have a duty to behave like role models.

CRONIMET's integrity and good reputation depend on how we all conduct ourselves.

We thank you for your support!

Karlsruhe, December 2021

Management – CRONIMET Holding Group

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B. Contents

I. Supreme principle

CRONIMET complies with the law.

We will always comply with the applicable international, national and regional laws and regulations in the conduct of our business. Unlawful conduct, which may lead to serious reputational damage and may result in criminal prosecution, damages and/or loss of contracts, is never in the interest of our company.

We are aware that unlawful actions can have consequences not only under labour law but also under criminal law.

Furthermore, it is important to us that our business partners also follow these principles.

II. Handling and responsibilities

Social responsibility

We respect and support the observance of internationally recognised human rights, this applies in particular to respect for personal dignity, privacy and the rights of every individual.

We reject all forms of forced labour, modern slavery and human trafficking. Naturally we support and respect national and international laws and conventions for combating child labour.

Respectful treatment

The CRONIMET Group operates all over the world and employees colleagues with very different personal backgrounds. This diversity is one of CRONIMET's many success factors.

We treat each other with respect and do not tolerate harassment (this applies in particular to unwanted advances and assaults of a physical or verbal nature), abuse or discrimination on the basis of gender, skin colour, age, ethnic background, religion or sexual identity, etc.

Responsibilities

We are responsible for the completion of our work. We carry out the tasks assigned to us and the tasks we have taken on with the requisite care.

This applies in particular to tasks in business dealings with external parties (customers, suppliers, authorities, etc.). We have to check whether dealing with external parties falls within our remit and that any signatures to be provided are covered by the relevant policy. We are very aware that in such a case it is not just the formal requirements of a document or a process that we have to check. The content in particular requires careful examination. Signing a document or approving a process also implies our responsibility for the content.

“My signature, my responsibility”!

Managers must give accurate, complete and binding instructions to colleagues for the performance of tasks, especially with regard to compliance with laws.

It is the responsibility of managers to ensure that no violations of the law or rules occur within their area of responsibility.

Managers must ensure that compliance with laws and (internal) regulations is continuously monitored.

III. Bribery, corruption, gifts and other benefits

CRONIMET rejects corruption – we are committed to integrity in business dealings.

Corruption is unethical and unlawful and involves a high degree of risk for us and the reputation of our company.

Corruption distorts competition, increases costs, destroys the trust of customers and suppliers, jeopardises our competitiveness and ultimately our jobs. In most countries of the world, corruption is also prosecuted as a criminal offence, regardless of whether it takes place at home or abroad.

The local guidelines on benefits applicable within the CRONIMET Group clarify the current legal situation and provide us with clear rules of conduct for avoiding corruption.

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IV. Preservation of fair competition

CRONIMET believes in fair competition.

Antitrust laws are designed to promote competition within our industry and prohibit restrictive conduct. Actions that restrict competition or fair trade or otherwise dominate a market may violate antitrust laws. Such violations can result in serious criminal or civil penalties for the company or individual colleagues.

We are aware that we must not talk to competitors about

- Prices
- Market shares
- Capacity limitations
- The allocation of markets
- The allocation of customers
- Price fixing
- Margins
- Costs

In this way, we can prevent violations of antitrust regulations.

Before we take any actions that may have antitrust consequences, we are happy to contact the Compliance Department.

We will also not use any other illegal methods, such as threats, theft, bribery or electronic means to obtain information that is not publicly available.

V. Anti-money laundering

Money laundering is the process of concealing the nature and source of money associated with criminal activities such as terrorism, drug trafficking, bribery, etc. by introducing and integrating “dirty money” into normal commercial trade. The aim of money laundering is to ensure that the actual origin of the money can no longer be identified.

We only do business with reputable business partners who are involved in legitimate business activities and whose funds come from legitimate economic activities. We report suspicious payments or other transactions that could involve money laundering to the Compliance Department.

The CRONIMET Group does not engage in any type of business with individuals or groups associated with organised crime.

VI. Financial reporting

We comply with the financial reporting and accounting requirements set out in the laws and other legal provisions of the location where we do business. In this regard, we, as responsible colleagues, are required to prepare accurate financial statements regarding the results of operations, financial position and cash flows of the Company, to file the financial statements for the relevant reporting period in a timely manner, and to certify within the framework of appropriate declarations, the adequacy and accuracy of the financial statements for the relevant reporting period. In addition, we ensure that all material transactions and relationships that may have a current or future material effect on the financial position of the company are disclosed in a timely manner.

VII. International trade

CRONIMET complies with the regulations applicable to cross-border trade.

We pay particular attention to existing import and export restrictions, including currently applicable international sanctions, the obtaining of necessary permits and the payment of established duties and taxes.

VIII. Product and occupational safety/environmental protection

CRONIMET prevents hazards for people and the environment.

We place the highest demands on the quality and safety of our products and services. We monitor the quality of our products and services in order to support our business partners in avoiding hazards.

We ensure a safe working environment. We comply with the applicable safety regulations.

We ensure that the decisions we make on behalf of the company reflect the company's commitment to safety and health protection. We familiarise ourselves with the safety and health protection programmes relevant to our work. Our goal is to provide an injury-free and healthy working environment that benefits all colleagues, suppliers, customers and the public. We inform our managers immediately if safety risks occur that we cannot eliminate ourselves.

In our business activities we will seek to maximise our environmental friendliness and strive to minimise the impact of our actions on the environment wherever we operate. Our environmental protection, health protection and safety programme reflects this commitment. We verify that the decisions we make on behalf of the company represent/reflect the company's commitment to

X. Trade secrets and company property

We protect CRONIMET's intellectual and material property and treat operating resources with care and in accordance with their purpose.

As part of the employment relationship, we may have access to trade secrets and confidential information pertaining to the company. CRONIMET is so successful because it has extensive knowledge provided by us which, among other things, qualifies as a trade secret and must be protected. Trade secrets include knowledge of applied technology, formulations or blends, formulas, but also sources of goods, price conditions and price formulas, customer lists, business and strategic plans, financial plans and financial information, process and workflow documentation (QM) and much more. Confidential information also includes technologies, ideas, product plans and data on colleagues, including information on salary, expertise and the preferences of colleagues.

Trade secrets and confidential information must be protected from possible disclosure to unauthorised persons. Furthermore, they may only be used for business purposes and may not be forwarded to third parties (including family members and friends) without appropriate authorisation. This obligation also applies after termination of the employment relationship.

We handle CRONIMET's assets responsibly. We avoid unnecessary costs. We make business decisions on the basis of commercially comprehensible analyses of opportunities and risks.

Publications and presentations by colleagues that affect the interests of CRONIMET always require the prior agreement of management.

XI. Data protection

We handle personal data confidentially.

We attach great importance to data protection and the confidentiality of the information entrusted to us. When collecting, storing, processing or transmitting personal data (e.g. name, address, telephone number, date of birth, health information) relating to colleagues, customers or other third parties, we take the utmost care and maintain strict confidentiality and comply with applicable laws and regulations. We are also committed to appropriate data and IT security measures.

XII. Documentation and retention of business transactions/business records

We document essential business transactions in a comprehensible and timely manner.

Accurate and reliable records are of paramount importance to the company when it comes to complying with legal, financial, regulatory and business obligations. We ensure that all records are accurate. These include, but are not limited to, financial statements, financial reports, invoices and correspondence.

We never conceal, alter or disguise the actual meaning and purpose of a transaction!

Many of our business areas are subject to specific retention obligations and periods. The company specifies the archiving obligations to be observed in each regulation.

XIII. Copyright compliance

Works protected by copyright include circulars, articles in magazines, books, video tapes, drawings, musical recordings and software. The same applies to images, photographs, pictograms or logos from the Internet. These works are protected by copyright, even if they do not bear a copyright notice. If we wish to reproduce such works for distribution at our place of work or use them for CRONIMET for other purposes, we shall ensure in advance that we have the appropriate permission from the copyright holder.

Computer software is subject to licence agreements that normally prohibit unauthorised use or copying. We never make unauthorised copies of software for which the company has been granted a licence. We also never load unlicensed software onto the company's computers.

If we have any questions about copyright protection, the Legal Department or the Corporate Communications Department are happy to advise us.

XIV. Corporate identity – trademarks, logos, colour scheme

The CRONIMET trademarks, logos and colour design must be used in accordance with the CRONIMET Corporate Identity Policy. If we become aware that CRONIMET trademarks, the CRONIMET logo or the company-specific colour scheme is being used by persons or companies who are not authorized to do so, we will inform the Compliance Department or the Legal Department.

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XV. Enquiries from supervisory and other authorities

All enquiries from federal, state or municipal officials/authorities are immediately forwarded to the management, the Legal or the Compliance Department. The same applies to any request for information from law enforcement bodies (e.g. police, bailiffs, public prosecutor's office, tax office, customs authorities).

XVI. Reporting - How to report compliance violations to us

We would like to be informed about illegal, criminal and company-damaging actions in our company in order to be able to clarify and stop such behaviour.

While concerns about workplace conduct can often be resolved through constructive dialogue among the affected parties or with contact persons on site, it is recommended that certain issues - particularly those involving illegal business practices - be raised outside the local working environment. Colleagues who raise actual or suspected misconduct in good faith will not suffer any disadvantage as a result.

Contact persons in the immediate working environment

We can contact persons in our immediate working environment to ask questions about the Code of Conduct or to report violations of the Code.

These are, for example:

- The Board of Management
- The managers
- The internal staff, legal or – where available – employee representatives.

Compliance Department

The Compliance Department advises and answers any questions we may have about the Code of Conduct or other regulations of the CRONIMET Group.

If we have concerns about a particular mode of behaviour/a procedure and cannot or do not wish to raise them locally, we are happy to contact the Compliance Department. When dealing with information, the greatest possible confidentiality and consideration of data protection regulations are observed.

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Whistleblower system on the intranet

We can also inform the Compliance Department about breaches of the rules via our web-based whistleblower system “Fairplay Supporter”. This system is available in several languages and allows a confidential, anonymous and encrypted dialogue with the CRONIMET Compliance Department.

The whistleblower portal is used exclusively to report violations of laws, policies, processes or our Code of Conduct.

Link to our whistleblower system: [LINK](#)

XVII. Scope of application and implementation

a) Scope of application

We expect our managers, members of the executive bodies and colleagues to comply with this Code of Conduct. We familiarise ourselves with the content of the Code of Conduct because it forms the basis for our daily work.

b) Control

Human experience shows that organisational principles are only successful if they are accompanied by appropriate measures. These are to be carried out in the form of appropriate checks for plausibility and consistency.

c) Sanctions

In the event of violations of our Code of Conduct or of legal regulations, the necessary organisational, disciplinary and legal measures must be taken to adequately counteract the identified violations, irrespective of criminal law consequences. Depending on the severity of the violation, this may also mean the person in question losing their job.

Karlsruhe in December 2021

Management – CRONIMET Holding Group