

PLANSEE

one strong group

Supplier Code of Conduct



Introduction

The companies of the Plansee Group

- ▶ all **Plansee HPM** facilities
- ▶ all **CERATIZIT** Group facilities and
- ▶ all **Global Tungsten & Powder** facilities

are committed to the highest standards of ethical business conduct and to the practice of business in accordance with all applicable laws, rules, and regulations. This Supplier Code of Conduct (“Supplier Code of Conduct”) defines the basic principles for Supplier conduct when working with Plansee Group. This Code of Conduct applies to any Suppliers providing raw materials, goods, subcontracting operations or services. Plansee Group is committed to these principles and expects the same from its Suppliers and service providers. Plansee Group expects and wants with this Code of Conduct to ensure that all Plansee Group Suppliers (hereinafter, “you,” “Supplier”, “Plansee Group Supplier” or “partners”) exercise due diligence to ensure a socially and environmentally responsible supply chain as well as Suppliers being financially sound and corporate governance sound. By agreeing to Plansee Group’s Supplier Code of Conduct, you are committing to develop sustainable partnerships based on fairness, trust and respect.

Governance and allocation of responsibilities

The leadership of the respective Plansee Group purchasing departments, our Director of Global Procurement, Sandra Horninger and our Director of Global Raw Materials, Eric Rowe are responsible for the implementation of this Code of Conduct.

Contact

For any questions or remarks to this Supplier Code of Conduct and its implementation please contact the respective Plansee Group business contact.

The Executive Board of the Plansee Holding AG

June 2024



Mag. Karlheinz Wex



Mag. Ulrich Lausecker



Dr. Andreas Lackner



Mag. Andreas Schwenninger

Environmental

Lowering the environmental impact is absolutely fundamental for the Plansee Group, who expects its Suppliers to actively work towards a more sustainable way. International guidelines such as ISO14001 and REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) guidelines can be used to support the environmental management.

Climate Impact

► Greenhouse Gas emissions reporting

Plansee Group expects its Suppliers to control, measure and monitor their Greenhouse Gas (“GHG”) emissions from their operations and activities. Plansee Group highly recommends an external verification of emission tracking and suggest an alignment with the [Greenhouse Gas Protocol](https://www.ghgprotocol.org) (ghgprotocol.org) method to cover the different scopes of emissions and cover the Supplier’s multiple facilities.

► Reduction targets

Plansee Group expects Suppliers to minimize the environmental impact of their operations and activities. Plansee Group, in addition to the GHG reporting, encourages their partners to set goals and implement GHG emission reduction programs. Suppliers should aim at continuously reducing their GHG emissions and contributing to the climate neutrality objectives.

► Renewable energy

Plansee Group Suppliers shall aim at using green and renewable energy. Plansee Group encourages its Suppliers to evaluate the percentage of its organization’s renewable energy use. The use of renewable energy should be promoted and prioritized, and the progress should be defined, tracked, and communicated.

Resource Use

► Water and wastewater management

Plansee Group expects its Suppliers to comply with all applicable environmental laws and have systems in place to manage and optimise water as a resource. Suppliers should actively monitor and control the water usage and aim at a continuous contamination reduction. Wastewater shall also be identified, monitored, controlled, and treated.

► Waste and hazardous materials

Plansee Group expects its Suppliers will comply with all applicable environmental laws and to have systems in place to manage waste and air emissions.

Plansee Group strongly recommends Suppliers implement waste management programs such as recycling, reuse, and waste reduction through partnerships, innovation, and material choices. Suppliers will aim at a waste reduction target.

Social

Human Trafficking & Slavery

Plansee Group strictly prohibits any form of human trafficking and slavery. Plansee Group Suppliers are asked to mitigate risks of human trafficking, slavery, and child labour in its supply chain. We reserve the right to ask you to complete the [Slavery and Trafficking Risk Template](#) (STRT) published by the Social Responsibility Alliance. We recommend to our Suppliers, in case of doubt, to require the STRT from their business partners (sub-suppliers and subcontractors).

Forced labour, including bonded or involuntary prison labour and any other forms of modern slavery, is unlawful and prohibited. This includes, but is not limited to, withholding payment or benefits, or retaining identity documents or other personal effects of value. Work should be voluntary, based on a recognized employment relationship established through national law.

Labour Right

► Child labour and young workers

Plansee Group expects its Suppliers to pledge to work against any form of child labour. Suppliers shall not employ children below the minimum working age or mandatory school age in the respective country.

► Occupational health and safety

Plansee Group Suppliers must provide safe and healthy working conditions for all workers in accordance with applicable laws and other relevant industry and building standards, including, but not limited to, protection against fire, accidents, and toxic substances. We request our Suppliers to conduct regular verifications and improvements (including awareness/training sessions) related to the occupational safety and health management system. Systemic approaches such as [ISO 45001](#) or [International Labour Organisation](#) guidelines shall support management and implementation of occupational health and safety.

► Wages, benefits and working hours

Plansee Group requires its Suppliers to comply with all applicable laws on working hours and overtime, as well as all applicable laws on wages and benefits. Minimum wages (at the least) accordingly to sector and legal agreements will be provided to employees in a timely manner.

► Discrimination, harassment & abuse

Plansee Group Suppliers pledge to treat all their employees equally, fairly and with respect, regardless of race, religion, nationality, disability, sexual orientation, gender, age, union membership or party membership. The expectation is that Plansee Group Suppliers enable their employees to report concerns or potentially unlawful practices at the workplace, prohibit all

forms of abuses and inhumane treatments in the workplace, and have policies to manage these requirements. Any form of discrimination, harassment or abuse shall be prohibited. Direct actions in case of any deviation from these expectations shall be taken.

► **Freedom of association**

Plansee Group expects its Suppliers to uphold the freedom of association and the right to collective bargaining in conformance with applicable laws. The international standards and definition regarding the collective bargaining can be found in the [International Labour Organization Convention](#). Workers must be permitted to choose freely their collective representatives and openly communicate on any concerns.

Human Rights

► **Security forces & data protection**

Plansee Group wants Suppliers to explicitly ensure that their organizations respect all internationally recognized human rights and standards. We also expect Suppliers to comply with standards and regulations regarding the privacy of interested parties and the protection of any shared data.

Plansee Group highly recommends having a privacy and security policy at least in conformance with the [International Bill of Human Rights](#) as described by the United Nations.

► **Land, property & housing rights**

Plansee Group expects you to respect the legal rights on land, property, and housing. All acquisitions and/or business developments by Suppliers should respect and should have a limited negative impact on the surroundings. At all times, Supplier land ownership must be held in accordance with applicable legal requirements. In case of impact on indigenous people, an evaluation and open communication between both parties will take place.

Diversity & Inclusion

► **Ownership**

Plansee Group, all factors equally considered (quality, price, etc.), encourages collaboration with women-owned businesses and minority-owned businesses. Plansee Group encourages Suppliers to develop diversity in all levels of the workforce and leadership and positively consider a collaboration with women-owned businesses and/or minority owned businesses.

► **Workforce demographics**

Plansee Group encourages Suppliers to develop a diverse workforce and adopt an inclusive approach. Promoting inclusion and diversity will be highly valued. Equal treatment of each individual is an important expectation of our Suppliers.

Governance

Organizational Commitment

► Business ethics and integrity

Plansee Group expects Suppliers to commit to keeping accurate records of its business transactions and accounting operations. Plansee Group encourages Suppliers to engage and interact with regulators, government bodies as well as audit companies to ensure compliance with applicable legal and business requirements and policies. Business will be conducted transparently and lawfully.

► Anti-Bribery and anti-corruption

Plansee Group Suppliers commit to counter bribery and corruption. In case of suspicion of any form of bribery, audits may be required to investigate the concern. Suppliers shall establish clear statements and policies to prevent corruption and any form of bribery and work in the best interest of collaboration with Plansee Group.

► Business conduct and trade

Plansee Group Suppliers pledge to comply with all applicable laws, rules, and regulations in the countries where they operate. Plansee Group Supplier transactions with the Plansee Group must always be in strict conformity and compliance with all relevant economic sanctions and export control laws and regulations.

► Antitrust

Plansee Group Suppliers pledge to comply with all applicable laws regarding fair competition. A clear statement about antitrust practices is an essential element in the code of conduct of the Supplier.

► Whistle-blower

Plansee Group Suppliers are highly encouraged to implement a professional whistle-blower system respecting confidentiality and other legal requirements.

Resiliency

► Business continuity and planning

Plansee Group Suppliers are requested to have a business continuity plan and secure their business and mitigate impacts of market volatility, potential supply chain risks, and a fast-evolving market.

Data Protection & Privacy

► Data protection

Plansee Group Suppliers will protect the Plansee Group's confidential information and act to prevent its misuse, theft, or improper disclosure thereof and will comply with all applicable laws and Plansee Group strongly suggests it to be supported by a privacy program.

► Intellectual property

Plansee Group Suppliers are committed to protect data and intellectual property. Suppliers will comply with privacy and information security laws and legal requirements, in general and when data is collected from any interested party.

Plansee Group expects its Suppliers to train their employees in regard to these guiding principles and commitments as indicated above and as laid down in the respective Supplier's Code of Conduct, and to keep record of these trainings.

Conflict minerals

Suppliers ensure they only source raw materials from socially, ethically, and ecologically sustainable sources. Suppliers involved in Conflict Minerals follow and act in line with the OECD Due Diligence Guidance and follow our conflict mineral policies.

In accordance with the [OECD Due Diligence Guidance](#), Plansee Group recognizes that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas exist, and recognizing that we have the responsibility to respect human rights and not contribute to conflict, we commit to adopt, widely disseminate and incorporate in agreements with Suppliers the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas, as representing a common reference for conflict-sensitive sourcing practices and Supplier risk awareness from the point of extraction until end user. We commit to refraining from any action which contributes to the financing of conflict, and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

Plansee Group Suppliers potentially handling Conflict Minerals are expected to follow legal requirements and implement the OECD Due Diligence Guidelines Annex 2. Additionally, Plansee Group Suppliers are expected to make the same commitments as Plansee Group with regards to conflict minerals. We are engaged in applying the below-mentioned actions and expect Suppliers to act accordingly within their company and supply chain.

Regarding serious abuses associated with the extraction, transport, or trade of minerals:

1. While sourcing from, or operating in, conflict-affected and high-risk areas, Plansee Group will neither tolerate nor by any means profit from, contribute to, assist with, or facilitate the commission by any party of:

- i) any forms of torture, cruel, inhuman, and degrading treatment.
- ii) any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty, and for which said person has not offered himself voluntarily.
- iii) any forms of child labour.
- iv) other gross human rights violations and abuses such as widespread sexual violence;
- v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Regarding risk management of serious abuses:

2. Plansee Group will immediately suspend or discontinue engagement with upstream Suppliers where Plansee Group identifies a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1.

Regarding direct or indirect support to non-state armed groups:

3. Plansee Group will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling, or export of minerals. "Direct or indirect support" to non-state armed groups through the extraction, transport, trade, handling, or export of minerals includes, but is not limited to, procuring minerals from, making payments to, or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

- i) illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
- ii) illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- iii) illegally tax or extort intermediaries, export companies or international traders.

Regarding risk management of direct or indirect support to non-state armed groups:

4. Plansee Group will immediately suspend or discontinue engagement with upstream Suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3.

Regarding public or private security forces:

5. Plansee Group agrees to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

6. Plansee Group recognizes that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment, and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

7. Where Plansee Group, or any company in our supply chain, contracts public or private security

forces, we commit or require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, Plansee Group will support or take steps to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

8. Plansee Group will support efforts, or take steps, to engage with central or local authorities, international organizations, and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

9. Plansee Group will support efforts, or take steps, to engage with local authorities, international organizations, and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

Regarding risk management of public or private security forces:

10. In accordance with the specific position of the company in the supply chain, Plansee Group will immediately devise, adopt, and implement a risk management plan with upstream Suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream Suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where we identify a reasonable risk of activities inconsistent with paragraphs 8 and 9, Plansee Group will respond in the same vein.

Regarding bribery and fraudulent misrepresentation of the origin of minerals:

11. Plansee Group will not offer, promise, give, or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport, and export.

Regarding money laundering:

12. Plansee Group will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport, or export of minerals derived from the illegal

taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream Suppliers.

Regarding the payment of taxes, fees, and royalties due to governments:

13. Plansee Group will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, Plansee Group commits to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative ("EITI").

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees, and royalties to governments:

14. In accordance with the specific position of the company in the supply chain, Plansee Group commits to engage with Suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

Applicability to sub-suppliers and subcontractors

The commitments and obligations of this Supplier Code of Conduct also apply to all sub-suppliers and subcontractors, and partners. We require our Suppliers to pass on equivalent supplier compliance standards to their own suppliers to ensure conformance to the commitments set forth herein.

Monitoring & termination

This Supplier Code of Conduct is the foundation of our relationship with our Suppliers and Plansee Group will follow-up on the implementation and compliance. Plansee Group reserves the right to request a direct meeting or to conduct audits or assessments of the Supplier's operations relevant to ensuring adherence and alignment to the Plansee Group Supplier Code of Conduct, including but not limited to, visiting the Supplier's facilities to conduct audits and evaluate through questionnaires of Supplier's relevant operations and policies, upon providing advance notice to Supplier. If Plansee Group realizes that their Suppliers are not meeting the requirements and expectations set out in this Supplier Code of Conduct, Plansee Group may offer guidance specifying which issues need to be corrected or improved. Suppliers acknowledge and agree to remedy any non-compliance to this Supplier Code of Conduct within an acceptable time frame, as deemed by Plansee Group. This Supplier Code of Conduct applies to all business transactions, purchase orders and Supplier agreements between Plansee Group and Suppliers and is incorporated by its reference into Plansee Group's Standard Terms and Conditions and Purchase Orders. Nonetheless, Plansee Group reserves the right to immediately terminate the co-operation in case of violations or breaches of any commitments under this Supplier Code of Conduct. The Supplier shall be required to compensate the Plansee Group for the damages and expenses incurred on account of the culpable breach of the obligations pursuant to this Supplier Code of Conduct and to indemnify the Plansee Group against any corresponding claims by third parties.

The leadership of the respective Plansee Group purchasing departments, our Director of Global Procurement, Sandra Horninger and our Director of Global Raw Materials, Eric Rowe are responsible for the yearly review and alignment with the evolving regulations and standards and the approval of the Executive Board of the Plansee Holding AG, as well as the monitoring of the previously described Code of Conduct.

The latest version of this document is available on our website.