



# **COMPLIANCE MANAGEMENT SUPPLIER CODE OF CONDUCT**

**EKW GROUP**

STAND: JULY 2025

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#### **SCOPE OF APPLICATION:**

The Supplier Code of Conduct applies to all natural or legal persons who sell or provide products, raw materials, processes, or services to the EKW Group (EKW GmbH and all companies associated with it – hereinafter: EKW) either directly or through third parties, e.g. associated companies, distributors, subcontractors, agents (hereinafter "Supplier"). The principles of conduct, standards, and requirements set out here apply to the supplier as far as they are applicable to its business areas. If local law at the supplier's business location imposes specific requirements, these shall apply.

This policy has been developed with the utmost care and to the best of our knowledge and belief. The Code will be reviewed at regular intervals and revised as necessary.



## FOREWORD

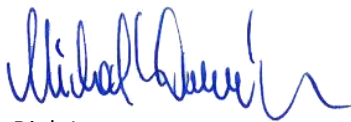
This Suppliers Code of Conduct is based on the Code of Conduct of the EKW Group as well as on internationally recognized standards and principles.

EKW is committed to the principles of integrity, legality, and sustainability and always acts in accordance with the relevant laws and other legal regulations. Sustainable action is a crucial factor for the success of any company, and thus we consider sustainability to be an essential element of our group priorities.

Sustainability goes beyond the boundaries of any company, and as part of our corporate responsibility, we want to build solid and effective relationships with our suppliers. We therefore ask you to familiarize yourself with these principles and to adhere to them, to comply with applicable law, and to uphold the principles of good corporate governance. Respecting human rights, ensuring fair working conditions, and conducting business in an environmentally and climate-conscious manner.

Your commitment is important!

With best regards



Dipl.-Ing.  
**Michael P. Wiessler**  
Managing Director

## 1. ENVIRONMENT

EKW expects their suppliers to minimize negative impacts on the environment and climate resulting from their business activities, to handle natural resources carefully, and to reduce their consumption as much as possible.

In particular, the supplier must ensure that its business activities do not cause harmful soil alteration, water pollution, air pollution, harmful noise emissions, or excessive water consumption.

The supplier complies with the provisions and standards of the relevant environmental protection regulations and acts in an environmentally conscious manner at all locations:

- He must treat, control, process, and/or dispose of waste, wastewater, and/or air emissions generated by his business activities in accordance with applicable laws, even if they do not constitute hazardous substances.
- The supplier should strive for scientifically based emission reduction targets and take measures that promote the decarbonization of the entire supply chain.
- The supplier should find solutions to improve the energy efficiency of its products and minimize energy consumption and greenhouse gas emissions.

### 1.1 ENVIRONMENTAL MANAGEMENT SYSTEMS

The supplier is encouraged to continuously monitor and reduce its ecological footprint. Suppliers with production sites should have appropriate environmental management systems, such as ISO 14001, EMAS, or similar.

### 1.2 BIODIVERSITY | ANIMAL WELFARE

The supplier should utilize supply chains that do not rely on deforestation and forest degradation to preserve biodiversity.

The supplier should support the ethically impeccable and species-appropriate treatment of animals.

### 1.3 CHEMICALS | HAZARDOUS SUBSTANCES

When handling chemicals and hazardous substances, the supplier must ensure responsible handling with regard to environmental and health protection.

The supplier must comply with the laws and regulations applicable to them regarding the prohibition or restriction of specific substances in products or during the manufacturing process and fulfill their duty to inform about declarable substances and mixtures.

Chemicals and hazardous substances must be identified, labeled, and handled appropriately.

## 2. LABOR AND HUMAN RIGHTS

The supplier must respect the human rights of employees, local communities, and other relevant stakeholders and avoid adverse impacts on them.

### 2.1 HUMAN RIGHTS CONVENTIONS | LABOR STANDARDS

The EKW expects its suppliers to respect human rights. This includes upholding all internationally recognized human rights as well as at least those rights formulated in the [Universal Declaration of Human Rights](#) and the fundamental rights principles established by the [International Labour Organization \(ILO\)](#).

The supplier must make reasonable efforts to ensure that activities related to their business do not cause or contribute to human rights violations.

The supplier must always comply with the national labor laws applicable to them. In the case of overlapping requirements, local law takes precedence.

### 2.2 CHILD LABOR | YOUNG WORKERS

Child labor is strictly prohibited.

The supplier must comply with ILO conventions and national laws, depending on which legislation regarding minimum age, child labor, and the employment of young people is stricter.

Suppliers may not employ children of compulsory school age (according to the legislation at the place of employment) unless the minimum age for entering the workforce is not less than 15 years. Exceptions are made for deviations in the legislation at the place of employment according to [ILO Convention No. 138](#).

### 2.3 FORCED LABOR | MODERN SLAVERY

The supplier must ensure that the use of forced labor or involvement in modern slavery is avoided under all circumstances. Examples of this include forced overtime, debt bondage, withholding of identification documents, and human trafficking.

Any work performed must be voluntary and must occur without the threat of negative consequences.

### 2.4 ETHICAL RECRUITMENT

The supplier should ensure complete transparency in the application and hiring process as well as equal treatment of all applicants and employees when recruiting staff.

Suppliers ensure that employees are not discriminated against in hiring practices.

The supplier should provide a safe environment in which applicants and employees can move freely and are not restricted by abuse, threats, and practices such as the unlawful retention of passports or belongings by their employer.

The supplier must ensure that potential employees are informed truthfully about the nature and content of their work and that, upon the commencement of the employment relationship, there is a mutually signed written contract or employment notification with a truthful and clear statement of mutual rights and obligations.

### 2.5 HEALTH PROTECTION | OCCUPATIONAL SAFETY

The supplier must have safety and occupational health measures that at least meet local legal requirements:

- The supplier should have a strategy for health protection and occupational safety. He must ensure a safe working environment, which includes workplaces, machines, equipment, and processes.
- The supplier must ensure that his employees have training, facilities, precautions, and protective equipment available to an appropriate extent. Excessive physical or mental fatigue must be prevented by suitable measures.

- Employees must be provided access to drinking water in sufficient quantity as well as to clean sanitary facilities. It is the responsibility of the supplier's management to provide sufficient resources for health and safety and to conduct regular risk assessments and reporting to ensure the continuous improvement of the system.

The supplier is recommended to implement a certified occupational health and safety management system according to ISO 45001 or comparable.

## 2.6 WORKING CONDITIONS | WORKING HOURS

The supplier should advocate for fair working conditions and comply with local laws and tariffs (if applicable) and the respective regulations regarding working and rest times as well as vacation regulations:

- The weekly maximum working time shall not be exceeded on a regular basis.
- The supplier should ensure that hours worked beyond the normal working week (overtime) are based on a voluntary basis, except in defined exceptional circumstances.
- Employees should have at least one day off on average every seven days.
- The use of temporary workers must be in accordance with locally applicable legal regulations.

## 2.7 WAGES AND SOCIAL BENEFITS

The supplier must ensure appropriate and documented remuneration that is not below the legally guaranteed minimum wage, is oriented to the respective national labor market, and provides for the compensation of overtime and legally mandated social benefits.

Employees must be paid on time. Wage deductions as disciplinary measures are not permitted.

## 2.8 HARASSMENT AND DISCRIMINATION | RESPECT FOR FUNDAMENTAL RIGHTS

The supplier always aligns his actions with ethical values and principles:

- The supplier must prevent any form of harassment, such as sexual harassment, sexual

abuse, physical punishment, psychological or physical coercion, or insults by all means.

- The supplier must prevent any form of unequal treatment against his employees, as long as it is not justified by the requirements of employment. This applies to discrimination in the recruitment process and in connection with employment, for example in promotions, training and further education, work assignments, remuneration, social benefits, disciplinary measures, or dismissals based on personal characteristics such as gender, skin color, ethnic or social origin, genetic characteristics, language, religion or belief, political opinion, membership of a national minority, trade union membership, health status, pregnancy, birth, disability, age, marital status, or sexual orientation.

- The supplier respects the personal dignity, privacy, and personal rights of each individual.

- The supplier must ensure equal opportunities in employment and pay equal wages for equal work

## 2.9 FREEDOM OF ASSOCIATION | COLLECTIVE MEETINGS

The supplier respects the right of employees to freedom of association, freedom of assembly, as well as collective and tariff negotiations, as far as this is legally permissible and possible in the respective country.

The supplier must respect the independence of trade unions and must strive for a working environment in which representatives of employee interests or union representatives do not have to fear reprisals, intimidation, harassment, or discrimination.

## 2.10 LAND RIGHTS

We expect our suppliers to respect the rights of local communities and indigenous peoples and to consider the local impacts of their business activities. The supplier must observe the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests, and waters when acquiring, developing, or otherwise using land, forests, and waters.

### 3. BUSINESS ETHICS

We expect our supplier to make a clear commitment to comply with legal requirements and ethical standards. Criminal acts must be avoided.

#### 3.1 ANTI-CORRUPTION

The EKW does not tolerate corrupt practices and takes action against them. Any form of direct or indirect bribery or advantage taking, whether through acceptance or through making payments, gifts, or benefits of any kind that are non-transparent, exceed the legal framework and the usual measure, and is prohibited.

We expect our suppliers to actively promote the prevention of corruption and fraud and to actively report any misconduct.

#### 3.2 PREVENTION OF MONEY LAUNDERING AND TERRORISM FINANCING

The supplier must comply with its legal obligations to prevent money laundering and terrorism financing and must not promote these either directly or indirectly.

#### 3.3 INFORMATION AND SECURITY DATA PROTECTION

The supplier must ensure that the technical information systems are sufficiently secured against cyber threats by adhering to the usual standards (e.g., virus protection, encryption, segmentation, roles and rights management, etc.). This also applies particularly to cloud service providers.

The use of a certified information security management system is recommended.

The processing of personal data of employees and business partners, including collection, storage, compilation, use, and provision, is carried out only in accordance with the applicable legal requirements. The supplier must handle any information in an appropriate manner and protect it. Data and information are used exclusively according to their classification.

The supplier must ensure that data that needs to be protected is collected, processed, secured, and deleted in an appropriate manner.

#### 3.4 FAIR COMPETITION | ANTITRUST LAW

The supplier must respect fair and free competition and comply with the applicable competition

and antitrust regulations. This includes business practices that unlawfully restrict competition, the improper exchange of competitive information, as well as price agreements, offers manipulations or an abusive market allocation.

#### 3.5 CONFLICTS OF INTEREST

The supplier shall avoid and disclose relevant conflicts of interest for and towards the EKW Group, if these could influence the business relationship.

Decisions are made only on an objective basis.

#### 3.6 FINANCIAL RESPONSIBILITY AND DISCLOSURE OF INFORMATION

Suppliers document significant business transactions in a timely and traceable manner. Internal and external records must be complete and accurate.

Financial records must be prepared in accordance with the principles of proper accounting and maintained in compliance with legal retention periods.

The supplier must keep their records accurately, completely, timely, appropriately, and understandably in accordance with the applicable legal and regulatory requirements. To the extent that legal provisions require the disclosure of records, EKW fulfills this obligation. We expect the same from our supplier. Therefore, the supplier must disclose financial and non-financial information in accordance with the regulations applicable to them and prevailing industry practices.

#### 3.7 MATERIAL AND INTELLECTUAL PROPERTY

The supplier must respect the protection of intellectual property and observe it throughout the entire supply chain. This equally applies to the material property of EKW, which must be protected from loss, theft, or misuse.

#### 3.8 EXPORT CONTROLS | ECONOMIC SANCTIONS

The supplier must comply with all applicable regulations and laws for the import and export of goods, services, and information as well as payment transactions.

We expect our suppliers to provide qualified and timely export control and foreign trade data, as

well as to implement adequate standards for security in the supply chain within the framework of global customs security programs. Existing sanctions and embargoes are to be observed in business activities in accordance with laws and regulations.

#### 4. RESPONSIBLE SUPPLY CHAIN | CONFLICT MATERIALS

EKW and all affiliated companies are committed to a responsible supply chain.

We expect our supplier to fulfill the due diligence obligation to promote responsible supply chains for minerals from conflict and high-risk areas, particularly tin, tantalum, tungsten, their ores, and gold (3TG). If goods and materials contain conflict minerals, the supplier must comply with their obligations under the conflict minerals regulation.

#### 5. WHISTLEBLOWER PROTECTION | QUESTIONS

EKW investigates reported indications of possible misconduct. To learn about possible violations of rules, we rely on suppliers, business partners, and third parties to report possible misconduct.

Reports of violations of labor and human rights, breaches of our ethical corporate principles, non-compliance with environmental regulations, or other violations of our principles and guidelines can be reported to us through various channels.

##### EKW Reporting System:

With the **EKW Reporting System**, we ensure that in accordance with the Whistleblower Protection Act, reports can be submitted anonymously and securely or with the voluntary provision of name and contact details.

##### E-Mail | Mail:

Report via E-Mail:

[Compliance@ekw-refractories.com](mailto:Compliance@ekw-refractories.com)

Report via Mail:

EKW GmbH  
Compliance Officer  
Bahnhofstr. 16  
67304 Eisenberg / Pfalz  
Germany

For questions regarding the code, the contacts for our suppliers or their employees are the already known business contacts. Furthermore, suppliers have the opportunity to contact the EKW Compliance Officer at any time.

#### 6. FULFILLMENT OF THE REQUIREMENTS

EKW reserves the right to verify compliance with the principles and standards set out in this Code of Conduct for Suppliers through appropriate risk-based measures. This may occur, for example, in the form of questionnaires, assessments, or supplier audits on-site.

On-site inspections are always be announced in advance and conducted together with the representatives of the business partner, in compliance with applicable law, including data protection regulations as well as contractual agreements, including confidentiality obligations.

In the event of identified deviations, it will be clarified together with the supplier how corrections could be sustainably implemented within a reasonable timeframe. The implementation of the measures is carried out independently by the supplier and without incurring costs for EKW.

#### 7. LEGAL CONSEQUENCES OF VIOLATIONS

EKW values a cooperative collaboration. In the case of minor violations of this Supplier Code, the supplier is generally given the opportunity to implement appropriate remedial measures within a reasonable period, provided that they are fundamentally willing to remedy and improve.

In the case of serious or repeated violations of this Code of Conduct for Suppliers, EKW reserves the right to initiate appropriate legal action.

Eisenberg, July 2025

