

SUPPLIER
CODE OF CONDUCT



VERSION 4

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The KAMAX Supplier Code of Conduct is a basic requirement for all business relationships between KAMAX and its suppliers and needs to be signed by every supplier. We kindly ask all our new suppliers to print, sign, stamp and return this document to their contact in the KAMAX Purchasing Department.

I. PREAMBLE

KAMAX and all its legal entities (hereafter simply called “KAMAX”) are committed to honesty and integrity in their conduct towards employees, customers, suppliers, competitors and any other stakeholders. As a global company, we are aware of the many different local legal and cultural requirements around the world, and expect from our suppliers that they act with the same fairness, honesty and responsibility in all aspects of their business. This Supplier Code of Conduct is part of our Corporate Social Responsibility Policy and highlights important standards that are consistent with the KAMAX Corporate Guidelines. Every supplier of KAMAX must strictly adhere to this Code. In addition to the following rules, the KAMAX Group Code of Conduct also applies.

II. SCOPE OF APPLICATION

This Supplier Code of Conduct applies to all suppliers, consultants, vendors, dealers, contractors, agents and other providers of goods and services to KAMAX worldwide (hereafter called “Supplier”). KAMAX reserves the right to amend or terminate this document, at any time and in any manner, for any reason in sole discretion.

III. COMPLIANCE WITH THE SUPPLIER CODE OF CONDUCT

The supplier acknowledges and agrees to comply with the requirements of the Supplier Code of Conduct as an integral, mandatory component of the business relationship between the supplier and KAMAX. The supplier must also be familiar with the business practices of its own suppliers and subcontractors, and require all of them to comply with this Supplier Code of Conduct or a Code of Conduct that is substantially comparable to it. For any questions related to the Supplier Code of Conduct, the Supplier can contact the KAMAX Purchasing Department.

1. BASIC BEHAVIORAL REQUIREMENTS

1.1. Behavior which abides by the Law

Observance of the law and the legal system is a fundamental principle for our company. Every supplier of materials or services must obey the laws and regulations of the legal systems in which they operate.

Regardless of the penalties provided by the law, any supplier guilty of a violation will also face business consequences we deem appropriate.

1.2. Responsibility for the Image of KAMAX

The business conduct and performance of our suppliers can have a direct impact on our reputation. Every supplier shall be concerned with the good reputation of KAMAX in their country.

1.3. Mutual Respect, Honesty and Integrity

Irrespective of rule 1.1 the supplier shall treat all individuals with respect and fairness and shall observe basic human rights set forth, for example, in the Universal Declaration of Human Rights of the United Nations and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the UN International Labor Organization (ILO). This includes, but is not limited to, the prohibition of forced or child labor and human trafficking, the provision of reasonable wages, social benefits, working hours, freedom of association or collective bargaining and other fair working conditions in compliance with applicable laws.

The Supplier shall maintain an environment without retaliation, free of discrimination and harassment on the basis of gender, age, race, skin color, ethnicity or national origin, citizenship, religion or religious beliefs, physical or mental disability, veteran status, sexual orientation or any other characteristics protected by applicable law.

1.4. Management, Responsibility and Supervision

Supplier's management is responsible for its staff. It is the responsibility of every manager to make sure that no laws are violated within his/her area of responsibility.

2. TREATMENTS OF BUSINESS PARTNERS AND THIRD PARTIES

2.1. Abiding by Fair Competition and Anti-Trust Legislation. Anti-Corruption

Only fair competition can develop freely. The principle of integrity also applies to the competition for market shares.

Every employee of our suppliers is obligated to abide by the rules of fair competition. Determining whether specific behavior constitutes a violation of anti-trust law can be difficult. However, some types of behavior clearly constitute a violation of anti-trust legislation: suppliers and their competitors may not engage in conversations in which prices or capacities are arranged. It is also inadmissible to enter into an agreement not to compete with a competitor; to submit bogus offers for bidding; or to divide up customers, territories, or production programs.

2.2 Offering, Granting and or Demanding Advantages

Our suppliers compete for orders with the quality and the price of their products and services. No supplier employee may directly or indirectly offer or grant unjustified advantages, monetary or otherwise, to others in their business dealings. Client gifts to KAMAX employees must be selected so as to avoid any appearance of bad faith or impropriety in the mind of the recipient. If in doubt, the recipient shall be asked to obtain prior permission for the gift from his/her supervisor.

If the recipient refuses such a request, it means that he or she considers the gift to be improper.

No gifts may be made to public officials or other civil servants. Employees concluding contracts with consultants, intermediaries, agents, or comparable third parties must see to it that these also do not offer unjustified advantages.

No supplier employee may use his/her job title to demand, accept, obtain, or be promised advantages. This does not apply to the acceptance of occasional gifts of insignificant value - any other gifts must be refused or returned.

These rules also apply in cases where a suppliers' employee asks for advantages for the benefit of third parties, also if it such requests are declared a sponsoring or such like.

In case you would like to report compliance violations or have any questions concerning compliance at KAMAX, please turn to/ contact our Compliance Officer via email at helpline@kamax.com.

2.3 Special Rules for Awarding Contracts

Any bidder for a contract shall be examined fairly and without prejudice. Employees whose work involves the awarding of contracts must abide by the following rules:

- The employee must inform his/her supervisor of any personal interest he/she could possibly have in connection with the execution of his/her professional duties.
- There must be no unfair discrimination for or against any sub-suppliers in their competition for contracts.
- Invitations from business partners may only be accepted if the occasion and scope of the invitation are appropriate, and if refusing the invitation would be discourteous.
- Gifts from business partners must be refused and returned unless they are occasional gifts of insignificant value.
- No employee may have private contracts fulfilled by companies with which he/she has company business dealings if he/she could derive any advantage therefrom.
- This is particularly applicable if the employee exercises or is capable of exercising a direct or indirect influence upon having that company receive a contract from KAMAX or one of its subsidiaries.

3 AVOIDING CONFLICTS OF INTERESTS

The supplier shall prevent its employees from succumbing to conflicts of interest or loyalty in their professional activities. Such conflicts can come about if an employee is active on behalf of, or has interests in, another company.

4 HANDLING OF INFORMATION

4.1 Records and Reports

Open and effective cooperation requires accurate and truthful reporting. This applies equally to the relationships with investors, employees, customers, suppliers, other business partners, the public and all governmental offices.

Any records and reports produced internally or distributed externally must be accurate and truthful. According to proper bookkeeping principles, data and other records must always be complete, correct, and appropriate in terms of time and system. The requirement of truthfulness also applies to expense accounts.

4.2 Confidentiality

Confidentiality must be maintained with regard to KAMAX corporate matters which have not been disclosed to the public. This includes details concerning the Company's organization and equipment, as well as matters of business, manufacturing, research and development, technical documents, internal reporting figures, etc.

The obligation to maintain confidentiality extends beyond the termination of the business relationship with KAMAX.

5 ENVIRONMENT, HEALTH AND SAFETY

5.1 Environmental and Technical Safety

Protecting the environment and conserving resources are high-priority targets for KAMAX. Active worldwide environmental management ensures that the law is observed and sets high standards. Beginning at the product development stage, environmentally friendly design, technical safety, and health protection must always be the goal.

Suppliers must comply with environmental protection laws and regulations, and conserve resources and protect the environment wherever possible.

Natural resources, including energy and water, have to be used sparingly and their consumption should be optimized. To improve the air quality, any discharges of pollutants into the air as well as greenhouse gas emissions should be avoided or at least reduced as much as possible.

In order to reduce water pollution emissions into water have to be reduced or avoided completely. The hierarchical principle of avoidance, reuse, reprocessing or recycling or other recovery must be applied to the management of the waste generated in the company / during production before the final disposal. The aforementioned environmental protection efforts are to be carried out, measured and checked in an appropriate manner.

In the sense of responsible chemical management, only minimally harmful chemicals should be used for humans and the environment. These substances have to be used sparingly.

Safety must be guaranteed during handling, transporting, storing, using, recycling or recycling and ultimately disposing of these substances

KAMAX is committed to complying with the “Paris Agreement” with the aim of a complete reduction in CO2 emissions across the entire supply chain. With over 50% of the added value, our suppliers have a large share in the success of our efforts to sustainably lower the CO2 footprint. We therefore expect our suppliers to have complete transparency of the emissions data from their own as well as the upstream extraction and manufacturing processes. In this context, we also expect our suppliers to take sustainable, effective measures to permanently reduce direct and indirect CO2 emissions.

5.2 Employee protection

KAMAX is extremely aware of its social responsibility with regard to the observance of human rights. We therefore require all of our suppliers to adhere to the guidelines described in the UN initiative “Global Compact” and the “UN Guiding Principles on Business and Human Rights”. Particular attention is paid to the respect and recognition of human rights such as, in particular: - the prohibition of modern slavery (e.g. human trafficking, forced labor, etc.) - the ban on child labor - ensuring the right to freedom of assembly and association - Compliance with the applicable occupational health and safety regulations and laws - the prohibition of discrimination and harassment.

6 RESPONSIBLE SOURCING OF MATERIALS

KAMAX is bound to compliance with the Dodd-Frank Wall Street Reform and Consumer Protection Act’s (Dodd-Frank) provisions and corresponding enabling regulations regarding conflict minerals, as defined therein, including regulations promulgated by the Securities Exchange Commission.

To support such compliance, supplier shall exercise all due diligence required by Dodd-Frank to enable accurate reporting on the source and chain of custody of conflict minerals.

Supplier shall make its due diligence measures available in the format specified by KAMAX and shall respond to the request for compliance information in a timely manner.

Supplier shall have a policy to assure compliance with this section and to reasonably assure that the materials in the products they manufacture (if applicable) do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in their or any country.

7 AUDIT AND INFORMATION

Supplier shall furnish KAMAX with all information needed and, if necessary, allow KAMAX to audit the adherence to this Code of Conduct at the expense of supplier. Upon request, the supplier shall give KAMAX access to all relevant documents in due time. Audit by an official third party is also an acceptable option.

We herewith expressly confirm that we agree with the Supplier Code of Conduct in its most current version.

Authorized Signature

.....
Place / Date

.....
Signature

Company:

Name:

Address:

Position:

ZIP Code / City:

Please find the latest versions of the “KAMAX Supplier Code of Conduct” as well as the “KAMAX Group Code of Conduct” online at: www.kamax.com