

Code of Conduct

1. AIM AND PURPOSE

This Code of Conduct defines our core values and the principles by which we operate. Signer Titanium attaches great importance to respect for human rights, labour standards and the protection of the environment in all areas of our business activities. We support efforts to work together to build and maintain a responsible, transparent and sustainable supply chain that prioritises workers' rights and environmental protection. This Code of Conduct sets out the expectations that we also have of our business partners and their partners. Compliance with these is a basic prerequisite for successful cooperation. We support the principles of the United Nations Global Compact and are committed to the United Nations Universal Declaration of Human Rights, the core labour standards of the International Labour Organization (ILO) and the various laws and regulations that apply to social issues.

2. SCOPE OF APPLICATION

This Code of Conduct applies to all employees of Signer Titanium. We also call on our business partners to comply with this Code of Conduct or to apply equivalent codes of conduct. We also encourage our suppliers to enforce the contents of this Code of Conduct in their supply chains.

3. BASIC VALUES

We strive for a long-term relationship of trust with our business partners. This includes honest and transparent communication and the renunciation of short-term advantages. We cultivate a corporate culture of responsibility, reliability and continuity. We promote a culture of mutual trust, respect and open dialogue. We strive for above-average quality in our services and are committed to maintaining the suitability, appropriateness and effectiveness of the quality management system. We comply with the applicable laws and regulations.

4. DESCRIPTION

4.1 Human rights

We respect and honour

- international human rights, such as civil and political rights:
 - o Right to life and physical integrity
 - o Right to freedom and security
 - o Freedom of opinion, thought and religion
 - o Right to equality before the law

- economic, social and cultural rights:
 - o Right to work and fair working conditions
 - o Right to education
 - o Right to an adequate standard of living
 - o Right to participate in cultural life

- the collective rights:
 - o Right to self-determination
 - o Right to peace and development

We do not participate in human rights violations.

4.2 Labour standards

- **Freedom of association**
We recognise the right of all employees to form trade unions and employee representative bodies on a democratic basis. No one may be disadvantaged or penalised for exercising these rights.
- **Forced labour**
We strictly reject any form of forced or compulsory labour. Forced or compulsory labour is any work or service that is demanded of a person under threat of punishment and for which the person concerned does not volunteer.
- **Child labour**
We strictly reject any form of child labour or other exploitation of children and young people. No person under the minimum age specified in the ILO conventions or in accordance with the applicable local laws may be employed.
- **Discrimination**
We do not tolerate any form of discrimination or harassment. We treat all employees equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual orientation, religious affiliation, political opinion or ideology. We pay attention to fair working conditions, including the payment of fair wages and compliance with statutory working hours. We are committed to treating our employees with dignity and respect and to preventing and combating all forms of harassment and violence in the workplace.
- **Health and safety at work**
Our employees form the backbone of our success. We safeguard health by organising workplaces in such a way as to prevent potential hazards that could lead to accidents, illnesses or other safety risks.

4.3 Environmental protection

We are committed to respecting all applicable environmental laws and regulations. This includes minimising waste, avoiding pollutant emissions and conserving natural resources. We expect all business partners to take measures to reduce their environmental footprint.

- **Precautionary principle for environmental problems**
We utilise all our experience, technical expertise and creativity to conserve resources and avoid harming people and the environment.
- **Promoting environmental awareness**
We work continuously to improve our environmental performance and the use of our resources. When conducting our business activities, we ensure that any impact on the environment is minimised.
- **Accelerating the development and dissemination of environmentally friendly technologies**
We promote renewable energy sources and rely on environmentally friendly systems, machinery and equipment. We examine the use of the latest environmentally friendly technologies.
- **Raw materials and commodities**
We contribute to the continuous improvement of the environmental performance of our products throughout their entire life cycle. When procuring raw materials and ingredients, we ensure that they are obtained and processed in an ethical and environmentally friendly manner.

4.4 Dealing with conflict minerals

We take the necessary care to avoid the use of conflict minerals in order to prevent human rights violations, corruption and the financing of armed groups or the like. Our suppliers also undertake to ensure that goods and materials for the manufacture of their products are not used illegally or unethically and that no minerals from conflict or high-risk areas are used.

We rely on a transparent supply chain for the raw materials and components we use.

4.5 Business ethics

We conduct our activities in accordance with the principles of honesty and fairness and the applicable regulations on competition, anti-money laundering and anti-corruption.

- **Free competition**
Agreements that significantly impair competition and cannot be justified by reasons of economic efficiency, as well as agreements that lead to the elimination of effective competition, are not permitted and will not be entered into.
- **Combating money laundering and the financing of terrorism**
We are committed to ensuring the integrity of our business relationships in order to recognise any risk of money laundering and terrorist financing. We do not support any prohibited activities.
- **Corruption, extortion and bribery**
We do not engage in any activities that could be categorised as active or passive corruption. We do not accept or offer bribes or other payments that could jeopardise the objectivity and fairness of business decisions.
- **Respect for intellectual property rights**
We respect the intellectual property of others and do not use confidential information of third parties.
- **Confidentiality and data protection**
All confidential and internal information must be protected from unauthorised and inappropriate transfer or disclosure. Employees are prohibited from using, stealing or sharing confidential information for inappropriate or unlawful purposes or for personal gain. Breaches of confidentiality, data protection or data security must be reported immediately by law. We comply with the applicable regulations in the area of data protection.
We also take the protection of the personal data of employees, suppliers and customers seriously and only process data to the extent necessary to fulfil mutual obligations and business purposes.

4.6 Due diligence obligations in the supply chain

- **Risk analyses**
We analyse our procurement structure and compile the supply chain for our products by listing the actual and potential direct and indirect suppliers. The risks associated with due diligence obligations in the supply chain are analysed, evaluated and regularly reviewed. If high risks are identified, we endeavour to take preventive action.
- **Corrective measures**
In the event of violations of this Code of Conduct, we take immediate corrective action. We communicate openly and take appropriate steps to ensure that such incidents do not occur again.

4.7 Complaints mechanisms

Appropriate grievance mechanisms or whistleblower systems are set up to enable employees and other stakeholders in the supply chain to report violations.

We and all business partners should report transparently and openly and co-operate with audits or reviews by us or by independent third parties.

All reports will be treated confidentially.

4.8 Compliance

This Code of Conduct is a central component of our business relationships and reflects our shared values. We expect all employees, business partners in the supply chain and our customers to take the principles seriously and work together to pursue a responsible and sustainable business policy.

The principles set out in this Code of Conduct are supplemented and clarified by other internal documents (processes and work instructions). The Code of Conduct is published on our website on the Internet and is available there in various languages. In the event of any discrepancies between the language versions, the German version shall prevail.