



# Supplier Code of Conduct

2024

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## 1. Introduction

**Traxys Group (Traxys) suppliers are expected to align with our values and expectations. Traxys is firmly committed to ethical behavior, protecting human rights, and fostering a responsible supply chain. This includes identifying, preventing, mitigating, and accounting for adverse environmental, human rights, or governance impacts in our operation and supply chain. We expect the same commitment from our suppliers.**

We are responsible to our customers, who value the positive economic, environmental, and social impact of the products they produce. We have developed our own Supplier Code of Conduct to guide us in this responsibility. This Supplier Code of Conduct applies to our suppliers and service providers, together referred to here as Suppliers, setting the minimum standards expected by Traxys.

We expect our Suppliers to comply with this Supplier Code of Conduct and to be open to collaborating with us to contribute to our sustainability targets, disclosures, and reporting requirements.

### 1.1 Legal and Regulatory Framework

We support the following frameworks and principles and comply with all other applicable laws and regulations, and we expect the same from our Suppliers.

- UN International Bill of Human Rights
- International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- Rio Declaration on Environment and Development
- United Nations Convention against Corruption as outlined in the ten principles of the United Nations Global Compact
- OECD Guidelines for Multinational Enterprises

- UN Guiding Principles on Business and Human Rights
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

### 1.2 Management System

Our suppliers are expected to establish, implement, and maintain policies and procedures aligned with the principles set out in this Supplier Code of Conduct. It is recommended that our Suppliers' employees have the right to report concerns regarding compliance with legal requirements or company policies/rules to their employer without fear of reprisal. In many jurisdictions, the right to report concerns is mandated by law.

### 1.3 Implementation and Compliance

Traxys will consider a Supplier's role and position in the supply chain when evaluating its compliance with this Supplier Code of Conduct. Additional material-, region- or supplier-specific regulatory compliance and sustainability targets, disclosures, and reporting requirements may be defined in commercial agreements.

Our Suppliers must allow Traxys the right to verify compliance with this Supplier Code of Conduct and must remedy identified instances of noncompliance within a reasonable time.

### 1.4 Monitoring

Business relations between Traxys and our Suppliers are based on honesty, trust, and cooperation. By accepting this Supplier Code of Conduct, the Supplier commits to meeting these requirements within its own operations and supply chain. In cooperation with Traxys, Suppliers should be able to demonstrate, upon request, their compliance with these requirements.

Traxys may verify the Supplier's compliance with the requirements in this Supplier Code of Conduct through dialogue, self-assessment questionnaires,

or on-site audits. This includes permission to interview employees and to access relevant, accurate and complete documentation and records. Any audits or checks that Traxys conducts at the Supplier's sub-suppliers will be performed upon agreement with the Supplier. Compliance verifications may be conducted either by Traxys' own employees or by an independent third party appointed by Traxys. It is the responsibility of the Supplier to ensure that its suppliers comply with the requirements of this Supplier Code of Conduct or equivalent standards and to evaluate and monitor its supply chain compliance.

If you, as a Supplier to Traxys, encounter a situation that does not appear to conform with this Supplier Code of Conduct or the law, we expect you to bring this to Traxys' attention as soon as possible so that the situation can be investigated, and the risk mitigated.

Violations and suspected violations of this Supplier Code of Conduct are to be reported to Traxys either through a Traxys contact person or through our Integrity Hotline:

- <http://traxys.ethicspoint.com>
- US: +1 855-389-9171
- Luxembourg: +352-800-201-11

Traxys maintains the confidentiality of all received personal information, adhering to appropriate legal and ethical standards.

## 2. Legal Compliance

**Adherence to all applicable legal requirements is crucial and the first step towards upholding this Supplier Code of Conduct.**

Suppliers are expected to stay informed and comply with all applicable laws and regulations related to the topics outlined in this document.

Suppliers are asked to identify potential conflicts between domestic regulations and international

human rights standards and honor the spirit of universally recognized human rights.

Where the standards in this Supplier Code of Conduct are higher than local laws, the higher standards shall be followed. In the event of actual or potential contradictions between this Supplier Code of Conduct and applicable laws and regulations, Suppliers are asked to notify Traxys.

## 3. Health and Safety

**At Traxys, our top priority is to keep our people safe and out of harm's way.**

We strive to maintain a work environment that is productive, safe, and secure for everyone involved.

Suppliers are expected to provide their employees with a safe and healthy working environment and take all feasible steps to prevent accidents and injuries.

Suppliers should take an adequate, risk-based health and safety approach, including, for example, providing safety equipment and relevant instructions and training that all employees can understand.

Employees shall have the right to refuse a work situation if they reasonably believe it presents an imminent and severe risk to their health and safety.

All work premises, including, in applicable cases, accommodations and canteens, shall be regularly checked to maintain fire safety and hygiene standards. If accommodations are provided, Suppliers must ensure that each employee has the right to their own bed and a separate sleeping area for their gender.

## 4. Human and Labor Rights

**Traxys is committed to upholding human and labor rights, treating employees with respect and dignity, and avoiding involvement in human or labor rights abuses.**

## 4.1 Human Rights Due Diligence

Suppliers should undertake due diligence, remain aware of, and address any adverse human rights impacts from their operations, products, or services. Suppliers should also work proactively to identify, prevent, mitigate, and maintain accurate records of all risks to human and labor rights risks.

## 4.2 Child Labor

Child labor is unacceptable anywhere across the Traxys supply chain. Suppliers are expected to prevent child labor in their operation and supply chain and ensure legal working conditions for young workers. If child labor is identified, remediation must be done in the child's best interest.

Employees must not be younger than 15 years of age (or 14 if allowed by national law) or older where local law stipulates a higher minimum age.

Young workers (under 18 years old) must not perform mental, physical, social, or morally hazardous work that interferes with mandatory schooling. Young workers must not work night shifts. Suppliers must maintain records of legal working age for all employees, including age verification documentation.

## 4.3 Modern Slavery

**Traxys does not tolerate modern slavery, including forced labor, human trafficking, and other forms of exploitation. This refers not only to all work performed involuntarily but also to instances of coercion, mental and/or physical threat or abuse, abuse of power and deception.**

Suppliers, including their recruitment agencies, are expected to not engage in or tolerate restrictions on the movement of employees, excessive recruitment fees or cash deposits, confiscation of passports or any other identity documents, withholding of wages, abusive working conditions, violence against employees or any form of forced, compulsory or

illegal labor, including trafficking, prison labor, child slavery or bonded labor or any other kind of exploitation or abuse.

## 4.4 Discrimination, Harassment and Harsh or Inhumane Treatment

**Harsh or inhumane treatment, discrimination or harassment in the workplace are unacceptable to Traxys.**

We expect our Suppliers to respect each employee's personal dignity, privacy, and rights, not tolerate physical or mental harassment or abuse, and prohibit employee punishment.

Suppliers are encouraged to develop diverse teams and a workplace where people feel included and safe, supporting fair recruitment, remuneration, employment practices, non-discrimination, and equal opportunities.

Suppliers must prohibit and not tolerate sexual, coercive, threatening, abusive, or exploitative behavior, language, or physical contact in their operations. Suppliers shall establish and maintain mechanisms to report, investigate, and sanction discriminatory or harassing behaviors without reprisal or retaliation.

Suppliers are expected to not discriminate unfairly in hiring, promotion, or termination of employment based on age, nationality or ethnicity, religion, political beliefs, sexual orientation, gender identity or expression or any other characteristic protected by law or ILO Conventions and foster a discrimination-free workplace.

Suppliers should establish procedures to enable workers to raise concerns or request information about business operations without fear of retaliation.

## 4.5 Working Hours and Compensation

**Working hours in compliance with all applicable laws and fair remuneration are key to providing**

**decent working conditions. Sufficient rest and time off from work prevent workplace injuries and increase efficiency.**

Working hours, overtime, breaks, and time off should follow relevant legal requirements and all applicable collective agreements.

Suppliers are expected to provide wages, compensation, and benefits that, at a minimum, comply with all applicable legal requirements or collective bargaining agreements. They are also encouraged to meet or exceed legal standards for worker compensation.

Suppliers should ensure that employees are informed of their employment rights and obligations in their native language or a language they understand, in a written labor contract, or otherwise in compliance with applicable labor laws.

If applicable to the nature of the work, the location, and other circumstances, Suppliers are encouraged to provide family-friendly working conditions that promote a healthy work-life balance, including, if applicable, the possibility of caring responsibilities and recreation.

#### 4.6 Freedom of Association and Collective Bargaining

**Traxys supports freedom of association and the right to lawfully and peacefully associate, organize and bargain collectively. We encourage Suppliers to engage in dialogue with their employees to foster workplace engagement.**

Suppliers are expected to recognize and respect the rights of employees to freely associate, organize and bargain collectively per the laws of the countries in which they are employed.

In accordance with applicable laws, Suppliers are expected to allow employees to appoint independent work representatives and communicate openly with management about

working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

Suppliers should ensure an employee's choice not to join such associations is respected.

#### 4.7 Land & Resource Acquisition and Use of Property

**Land and the right to tenure are central to reducing poverty, income and gender inequality and contributing to food security, peace, and security.**

A Supplier should be the legal and rightful owner or leaseholder of the property on which they operate.

It is expected that Suppliers mitigate any negative social, health, environmental, or economic impacts from land or resource acquisition, involuntary resettlement, or restrictions on land use.

In case of expropriation or imposed relocation, Suppliers should ensure that a remediation plan, including adequate compensation, is negotiated transparently to maintain the livelihoods and living standards of the persons affected.

### 5. Responsible Sourcing of Minerals and Metals

**Traxys is committed to the ethical sourcing of all minerals, following best practices and in compliance with all applicable laws and regulations. In its sourcing of ore and minerals from conflict-affected and high-risk areas, Traxys strives to influence the supply chain positively, supports well-established traceability mechanisms, and follows the OECD due diligence guidance for responsible supply chains of minerals from conflict-affected and high-risk areas as well as EU regulation 2017/821 on Conflict Minerals supply chain due diligence obligations.**

Suppliers of raw materials and components containing tin, tantalum, tungsten, gold (3TG), or cobalt that are part of the direct supply chain for Traxys:

- Must comply with all applicable laws concerning responsible sourcing and conflict minerals.
- Must follow the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas based as applicable to their position in the supply chain, including relevant reporting.
- Must ensure that all 3TG and cobalt in their supply chain are traceable to the mine site or a certified smelter.

Suppliers are expected to ensure that 3TG smelters and refiners in their supply chain are assessed as compliant with accepted third-party audit programs, such as the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Initiative.

Suppliers should aim to have their cobalt smelters and refiners assessed as compliant with third-party audit programs. At a minimum, Suppliers are encouraged to ensure their cobalt smelters and refiners actively participate and engage with such third-party audit initiatives.

While respecting commercial confidentiality, Suppliers must, upon request, report on their 3TG and cobalt supply chain due diligence by completing and submitting the Responsible Minerals Initiative's Conflict Minerals Reporting Template (CMRT) and/or Cobalt Reporting Template (CRT).

## 6. Environment

**Protecting the environment, mitigating climate change, and building circularity is important to Traxys. Any adverse environmental impact from the business must be minimized, and performance concerning the environment**

**should be improved continuously. This includes the protection of biodiversity and ecosystems, sustainable resource use, and responsible land ownership, acquisition, and use.**

Suppliers are requested to establish, implement, and maintain a risk-based approach to identify, reduce, or minimize negative environmental impact from their activities, products, and services.

Suppliers are expected to take precautionary measures when they know or have reason to believe that their operations could harm the environment or public health. They strive to develop and support environmentally friendly techniques in their processes, designs, and choice of methods and materials.

Suppliers are asked to mitigate the environmental, social and economic costs that arise from their operations.

Suppliers should comply with all local, national, and international laws and regulations for protecting biodiversity and natural habitats. Suppliers are to take measures to avoid and minimize the impact of their operations on critical habitats, endangered species, and ecosystems of high conservation value in line with the 2030 Targets of the Kunming-Montreal Global Biodiversity Framework ([www.cbd.int/gbf/targets](http://www.cbd.int/gbf/targets)).

Where applicable, the Supplier acknowledges and agrees to comply with all provisions of the EU's Carbon Border Adjustment Mechanism (CBAM) regulations. This includes but is not limited to, providing accurate and timely data regarding the carbon emissions associated with producing and transporting goods supplied to Traxys.

Suppliers that are required to comply with CBAM or similar regulations must provide Traxys with detailed environment-related data on the carbon emissions associated with producing supplied goods. For CBAM, the installation-level emissions factor data must be furnished in accordance with the communication template prescribed by the EU.

The Supplier agrees to submit the installation-level data to Traxys within the specified timeframe per CBAM requirements ([Carbon Border Adjustment Mechanism - European Commission \(europa.eu\)](https://ec.europa.eu/euro-observatory/en/cbam)).

Suppliers with a potential material impact on Traxys' total greenhouse gas emissions footprint must supply applicable information to Traxys where necessary.

Suppliers must control, measure, document and plan their work to minimize the environmental impact of their business, particularly in the following areas:

- Greenhouse gas (GHG) emissions
- Circularity
- Chemicals and hazardous substances
- Waste
- Other emissions to air, water and soil
- Energy consumption
- Water consumption

Traxys sets, evaluates and monitors its own GHG emission reduction targets. Our suppliers represent a significant part of our scope 3 emissions reduction targets, and we expect our Suppliers to set GHG emission reduction targets in line with the Paris Agreement, supported by Science-Based Targets.

## 7. Business Ethics

**Traxys is committed to conducting business with high ethical integrity, including respecting competition law, following all applicable customs and export control rules, and respecting individuals' right to privacy. We expect the same from our Suppliers.**

### 7.1 Anti-Corruption

Suppliers must comply with all applicable anti-corruption and anti-bribery laws and regulations and not engage in, or cause Traxys to engage in, any form of corrupt practices. They should not offer

anything of value to improperly influence Traxys employees or any third parties, such as subcontractors or public officials.

Suppliers are requested to avoid all potential conflicts of interest while engaged with Traxys and notify Traxys of any potential conflicts of interest that cannot be avoided.

Suppliers shall not offer, request, or accept gifts, favors, or hospitality deemed more than modest in respect to value or deemed inappropriate.

Suppliers are requested to engage in Traxys' supplier due diligence process with a commitment to transparency.

### 7.2 Competition Law

Suppliers must always negotiate agreements, regardless of the contract form, in accordance with fair competition principles and observe the highest level of diligence.

Suppliers are expected to avoid concluding any formal or informal contracts or agreements intended to prevent or restrict competition or result in the prevention or restriction of competition or contracts or agreements that breach applicable laws relating to competition or fair trade.

### 7.3 Personal Data Protection

Suppliers are advised to follow all applicable principles and international regulations for personal data protection within their operating jurisdiction and use personal data only when lawful and necessary to fulfill legitimate business purposes.

Data privacy principles:

- Inform individuals as much as possible about when and why you use their data.
- Use only the types of personal data essential to accomplish your lawful and reasonable purposes.



- Store personal data only as long as necessary to fulfill such purposes and if legally permitted.
- Protect personal data in your care by taking appropriate technical and organizational security measures and notify the relevant authorities of any personal data breaches, if legally required.

## 7.4 Trade Compliance

Suppliers should seek to maintain and share accurate trade data and documents related to their products. Suppliers are expected to comply with all applicable laws and regulations in relation to sanctions and export controls and not engage in or cause Traxys to engage in any form of breach of sanctions or export controls.

Suppliers are expected to maintain and, upon request, submit relevant and valid records, information, and documentation about supplies to Traxys, including HS tariff codes, export control classification status, country of origin, and supporting documentation for both non-preferential and preferential origin for free-trade purposes.