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1 JL Goslar Anodes code of conduct for social responsibility

1.1 Preamble

This code of conduct for social responsibility (hereinafter referred to as “CoC”) lays out what we regard as trust-based co-operation and dialogue with regard to working conditions, social and environmental compatibility, and transparency, in particular.

This code of conduct is a voluntary specification with which we want to guarantee in particular the adherence to global stipulations regarding ethical and moral trading, as well as the guidelines for correct behaviour with regard to competition and antitrust law (Compliance). This includes the promotion of fair and sustainable standards when dealing with suppliers and clients as well as all members of the company.

Socially responsible corporate management is one of the basic, core principles of business activities. The consequences in terms of economic, social and ecological factors should be considered in all business decisions and should be weighed up taking into account the interests at stake. We at all times remain focused on the principles of the UN Global Compact¹. We contribute voluntarily and to the best of our ability to the greater good of the individual and to the sustainable development of the global society at all locations where we operate.

Business associates shall be dealt with fairly. Contracts shall be honoured, provided the general conditions do not significantly change. Universally held ethical values and principles should be taken into account. This applies especially to human dignity.

¹ Available at <http://globalcompact.de/index.php?id=14>

The following numbers constitute our minimum standards and are intended to prevent situations that may call into question the integrity of our company and/or our employees.

2 General provisions

2.1 Scope

This code of conduct applies to all JL Goslar Anodes subsidiaries and production plants worldwide.

2.2 Laws, standards and ethical behaviour

JL Goslar Anodes adheres to the valid laws, standards and regulations in the respective countries in which they operate. It follows universally held ethical values and principles, in particular integrity, honesty and human dignity, openness and non-discrimination of religion, ideology, gender and ethnicity.

2.3 Business associates, authorities and consumers

JL Goslar Anodes follows the generally accepted commercial practices of fairness and honesty. It fosters partnership and trusting interaction with the authorities, and consumer protection standards are taken into account.

2.4 Trade secrets

Trade secrets from business associates are treated as confidential by JL Goslar Anodes and all its company members. It is forbidden to forward confidential information to a third party or to make it available to the public. This continues to apply to company members after their employment contract has been terminated.

3 Guidelines on antitrust and competition law

3.1 Antitrust law

JL Goslar Anodes is bound to fair competition. Competition protection laws, in particular the antitrust law, and other competition regulatory laws are observed.

Unlawful agreements on price or other conditions, trading areas or clients as well as abuse of market power contradict JL Goslar Anodes principles.

3.2 Bribery, corruption and corruptibility

JL Goslar Anodes does not condone bribery and corruption and does not tolerate this behaviour. It uses suitable means to promote transparency, trading with integrity, responsible leadership and company accountability.

The applicable criminal law on corruption shall be adhered to. The penalty for a breach of this law always follows the labour law provisions.

4 Global guidelines

4.1 Human rights

We expressly and fully support internationally accepted human rights².

² The Universal Declaration of Human Rights - UN-Doc. 217, so-called UN Human Rights Charter

4.2 Child labour

We reject child labour and all forms of exploitation of children and juveniles. The applicable laws shall be adhered to.

4.3 Forced labour

We will not tolerate any form of forced labour, debt bondage, serfdom or slave labour as well as any conditions similar to those of slavery. No company member shall be forced to work, either directly or indirectly, through the use of force or intimidation³.

4.4 Remuneration

All employees should receive fair remuneration for their work, which is at least sufficient to cover basic requirements. Payment shall be made in a practical manner and in line with legal stipulations (e.g. cash, cheque, bank transfer) and an adequate pay slip should be provided⁴.

4.5 Working hours

Working hours should comply with the valid national law, the industry standard or the relevant ILO conventions. Overtime must be conducted on a voluntary basis⁵.

4.6 Health and occupational safety

The national and international rules for ensuring occupational health and safety in the workplace shall be adhered to. Appropriate systems for occupational safety, which prevent risks to health and safety⁶, shall be established

4.7 Environmental protection

JL Goslar Anodes observes the aims of sustainable environmental protection and operates at all sites in an environmentally conscious manner. To this end, the company aspires to follow production methods that conserve the environment and resources. The company uses natural resources responsibly in accordance with the principles of the Rio Declaration concluded by the United Nations⁷.

4.8 Matters of dispute

When purchasing, in particular tin, JL Goslar Anodes takes into account the source and the supply chain of the mineral. This prevents the support, either directly or indirectly, of armed groups who have committed gross violations of human rights in the Democratic Republic of the Congo or in neighbouring countries. JL Goslar Anodes suppliers also follow these principles.

5 Ethical and social fundamentals

5.1 Discrimination

JL Goslar Anodes does not tolerate discrimination in the appointment or employment of company members, in particular discrimination against race, ethnic or national background, colour of skin, gender, mental or physical disabilities, age, creed, affiliation to a workers organisation or other personal characteristics.

5.2 Harassment

JL Goslar Anodes condemns physical, psychological or sexual violence as well as verbal harassment.

5.3 Freedom of opinion

We guarantee the right to freedom of opinion and freedom of expression.

3 Cf. ILO conventions 29 and 106

4 Cf. ILO conventions 16 and 131

5 Cf. ILO conventions 1 and 14

6 Cf. ILO convention 155

7 27 Principles of the Rio Declaration on Environment and Development, concluded by the conference of the United Nations for environment and development (UNCED), Rio de Janeiro, 1992

8 Cf. ILO conventions 100, 111, 158 and 159 (CoC 14.09.2011)

5.4 Privacy

Privacy is respected.

5.5 Suppliers

JL Goslar Anodes strives to share these principles with its direct suppliers, to promote as far as possible adherence to the contents of the code of conduct by these suppliers and to request that they also follow the code of conduct. JL Goslar Anodes also strives to recommend to its suppliers that they for their part request of their suppliers that they also follow the code of conduct.

6 Adherence to the code of conduct**6.1 Provisions**

JL Goslar Anodes shall bring the code of conduct to the attention of their company members in an appropriate manner and at fixed intervals, and observes adherence to the code.

6.2 Contact person

JL Goslar Anodes has named a contact person, who is responsible for the code of conduct. This contact person shall provide definitive information on adherence to the code of conduct. By using appropriate organisational measures, JL Goslar Anodes shall ensure that both the employees and the management adhere to the code of conduct. This is best conducted by introducing and maintaining appropriate reviews and plausibility checks.

Ilseburg, date *14.4.2023*



Executive board