

### 1. Foreword

As an internationally active Austrian technology company for the development and supply of elastomer compounds and components & system parts made of rubber and rubber-metal/plastic for sound and vibration technology, BATEGU is committed to high standards in the areas of sustainability, environmental protection, social responsibility and ethical business practices. We therefore expect our suppliers to comply with applicable laws and international environmental, social and governance standards such as the OECD Guidelines, the UN Guiding Principles on Business and Human Rights and the principles of the UN Global Contact and to actively contribute to achieving our sustainability goals.

This Code sets out clear expectations for responsible cooperation. Adherence to these principles is mandatory for all suppliers.

This Code forms the basis for a long-term, successful and sustainable relationship.

# 2. Ethical business practices (Governance)

### • Compliance with laws

Applicable laws and regulations, particularly in the areas of the environment, labour and trade, must be complied with.

### Transparency

Depending on their company size, suppliers commit to disclose ESG data and document progress in implementing sustainable practices.

## • Anti-corruption

Any form of bribery, extortion or corruption is strictly prohibited. Any abuse to gain a material or immaterial advantage for oneself or for a third party to which there is no legal entitlement is prohibited.



### Supply chain due diligence obligations

Risks in the supply chain must be identified and addressed to avoid violations of human rights and environmental standards.

# 3. Sustainability and environmental protection

BATEGU has a clear commitment to environmental and climate protection. The responsible use of resources - from electricity and heat to water and materials - is therefore our top priority.

BATEGU therefore expects its business partners to analyse the impact of their activities on the environment and to take appropriate measures. These include, among other things

#### • Responsible procurement of raw materials and conflict minerals

It must be ensured that all raw materials and other materials come from ethical and conflict-free sources. In particular, business partners must fullfill their due diligence obligations in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Business partners are required to comply with the requirements of international conventions and other legal instruments relating to the production, use, handling and disposal of certain substances, in particular the requirements of the Minamata Convention on Mercury of 10 October, 2013 and the Stockholm Convention on Persistent Organic Pollutants (POPs) of 23 May, 2001, as well as the relevant national and supranational implementing legislation. In the case of smelters or refiners of tin, tungsten, tantalum and gold, business partners shall only use raw materials that meet the requirements of the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" and have been audited by the Responsible Minerals Initiative (RMI) or similar organisations.

### • Hazardous materials handling

Suppliers shall ensure that hazardous materials are handled and disposed of in accordance with applicable safety standards.

• Measures are required to reduce the risks to people and the environment.

### Climate protection

The business partner shall take appropriate measures to reduce emissions, including greenhouse gas emissions, by developing and implementing strategies



to reduce greenhouse gas emissions in production and logistics. For example, preference shall be given to environmentally friendly transport and logistics solutions shall be preferred.

#### • Conservation of resources

Efficient use of water, energy and raw materials shall be achieved.

Waste and disposal management, including recycling and reduction of production waste, shall be available.

# 4. Social responsibility

### • Fair working conditions

The business partner is comitted to ensuring fair working conditions. This includes fair wages, reasonable working hours and guaranteed days off.

Overtime shall not be forced and shall be fairly compensated.

### Health and safety in the workplace

A safe and healthy working environment shall be provided.

Regular training on occupational health and safety measures and prevention is mandatory.

### • Freedom of assembly and freedom of association

The rights of workers to freedom of association and to form trade unions or similar organisations must be respected.

### • Equal opportunities and non-discrimination

Suppliers shall not discriminate on the basis of gender, race, religion, sexual orientation or any other characteristic and shall promote a culture of equality.

#### Ban on child labor

Child labor will not be tolerated under any circumstances. The minimum age for employment must be in accordance with ILO standards and local laws.



### Human rights

Business partners are required to respect human rights in accordance with international standards. Any form of abuse or violation of human rights in any form will not be tolerated.

### 5. Control and audits

- BATEGU reserves the right to conduct audits of suppliers to verify compliance with this Code.
- Suppliers must provide information and evidence upon request.

# 6. Consequences of non-compliance

- Failure to comply with this Code may result in the termination of the business relationship.
- However, suppliers will be given the opportunity to submit action plans to address any identified deficiencies.

## 7. General

This Code of Conduct will be regularly reviewed to ensure that it meets current legal and buisness requirements.

Together with our suppliers, we are committed to upholding and continuously improving the values of our company.

BATEGU Gummitechnologie GmbH

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