

SUPPLIER CODE OF CONDUCT

I. OVERVIEW

Sustainable supply chain is at the core of Castolin Eutectic's business operation. Our customers, employees, investors, and regulators entrust us to conduct business in alignment with their ethical standards and business practices. They also rely on Castolin Eutectic to ensure the same from our business partners.

To this end, the Supplier Code of Conduct (the "Code") asks our suppliers to conduct business and act in alignment with our positive reputation and the following international principles and standards:

1. Ten Principles of the UN Global Compact ([The Ten Principles of UNGC](#))
2. The OECD Guidelines on Responsible Business Conduct ([OECD MNE Guidelines](#))
3. International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work & applicable ILO Labour Standards ([ILO Fundamental Principles and Rights at Work](#), [ILO Labor Standards](#))

The Code applies to all third parties that Castolin Eutectic engages to purchase goods or services, including people and companies, as well as their own employees, subcontractors, and suppliers. Supplier shall ensure that all its employees and business partners are aware of this Code and comply to the requirements set out by it.

Castolin Eutectic expects that its Suppliers conform to the following:

II. CODE OF CONDUCT

1. General Principle

Suppliers shall operate in full compliance with applicable laws and regulations of the countries in which they operate, and in compliance with this Code.

2. Respecting Human Rights

Suppliers shall comply with applicable labour laws including those applying to child labour, slavery, human trafficking, and forced labour and employ only those employees who meet the definition of those laws. Suppliers shall employ only workers who meet the applicable minimum legal age requirement for their location. In the absence of local law, Suppliers shall not employ children under the age of fifteen (15), except as set forth in the next sentence. If local minimum age law is set below 15 years of age and is in accordance with developing country exceptions under ILO Convention 138, the lower age will apply.

3. Compensation and Working Hours

Suppliers shall comply with applicable wage and hour labour laws including those related to minimum wages, overtime hours and legally mandated benefits.

4. Discrimination

Suppliers shall not tolerate unlawful discrimination in the workplace. Suppliers shall comply with applicable local laws concerning discrimination in hiring and employment.



5. Environment

Suppliers shall consider the impact their operations have on the environment and reduce that impact where practicable to protect the environment. Suppliers shall comply with applicable environmental laws and regulations in the countries in which they operate.

7. Freedom of Association

Suppliers shall recognize and respect rights of workers to join organizations of their own choosing or to refrain from joining organizations. Suppliers shall respect the rights of workers to bargain collectively through representatives of their own choosing where a union has been chosen in accordance with applicable laws and regulations.

8. Gifts and Gratuities

Suppliers shall not offer, pay, or accept kickbacks, bribes or other improper payments or benefits prohibited by law. Additionally, Suppliers is prohibited from offering to, or accepting from, Castolin Eutectic representatives any gifts or gratuities when involved in contract negotiations. Only provide and accept gifts and entertainment that are reasonable complements to business relationships. Cash gifts or gratuities are also prohibited, regardless of amount. Any Supplier that violates this policy risks immediate loss of all existing and future Castolin Eutectic business.

9. Health and Safety

Suppliers shall provide a safe working environment that is supportive of accident prevention and minimizing exposure to health risks. Suppliers shall comply with all applicable safety and health laws and regulations in the countries in which they operate.

10. Responsible Sourcing

Castolin Eutectic's expects suppliers and vendors of raw materials, parts, and components to comply with all applicable laws. They include laws on forced labour, conflict minerals and deforestation, such as the European Union regulations on Deforestation-free Products and Conflict Minerals. Suppliers shall cooperate with Castolin Eutectic to determine the country of origin and the source, including the applicable smelters, and the chain of custody, as necessary, such as to implement the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

III. COMPLIANCE VERIFICATION

Castolin Eutectic may occasionally request information or access for purposes of verifying compliance by Supplier. In the event such a request is not deemed satisfied by the Supplier's response, Castolin Eutectic may, in its sole discretion, decline to make further purchases under any prior agreements between Castolin Eutectic and Supplier.

IV. EVENT OF VIOLATION

Suppliers shall take necessary corrective actions to promptly remedy identified noncompliance with this Code. Castolin Eutectic reserves the right to terminate its business relationship with any Supplier who is unwilling or unable to comply with this Code.

V. NON-COMPLIANCE REPORTING

Violations of the Supplier Code of Conduct may be reported anonymously and confidentially through the following Integrity Helpline: <http://castolin.ethicspoint.com/>.



Miscellaneous

If and to the extent that individual provisions of this Supplier Code of Conduct are not in line with applicable mandatory local laws, such mandatory local laws shall prevail.

Approval and Validity

This Supplier Code of Conduct is approved by the following signatures and shall become effective the day it is signed.

It is binding for all Supplier, Consultants, and Service Providers in a business relationship with any legal entity belonging to the Castolin Eutectic Group and may be amended by Castolin Eutectic at any time.

Kriftel, March 31st, 2025

Pierre Fleck

Global Chief Executive Officer

Bert G. Jansen

Global Chief People & Compliance Officer



Supplier Commitment to Castolin Eutectic's Supplier Code of Conduct

On behalf of the organization named below, I confirm our commitment to comply with Castolin Eutectic's Supplier Code of Conduct and its requirements. We have read, understood, and agree to comply with its requirements. By signing, we ensure our alignment with its principles.

Name of organization: _____

Address: _____

Name of authorized signatory: _____

Title: _____

Signature, date, and location: _____