

CODE OF CONDUCT FOR BUSINESS PARTNERS / SUPPLIER CODE OF CONDUCT

OUR JOINT COMMITMENT TO SOCIALLY RESPONSIBLE SUPPLY CHAINS

Contents and Scope of our Code of Conduct for DAS Business Partners worldwide

As an internationally active environmental technology company based in Silicon Saxony, DAS Environmental Experts assumes responsibility for the environmental impact of its products and services.

DAS Environmental Expert GmbH has been taking responsibility for the sustainable development of industrial processes. Through innovative solutions for waste gas treatment and water treatment, we and our partners are making an active contribution to environmental and resource protection.

This development is supported by our employees, whose ethical, responsible and safe actions contribute significantly to the success of our company. Our commitment to integrity, quality and sustainability applies equally to our suppliers and business partners. They are an essential part of our business activities and of our shared commitment to sustainable and socially responsible supply chains.

This is why we wish to apply the principles of our internal code of conduct and the associated DAS corporate mindset to our entire supply chain. With this Code of Conduct for Business Partners, we formulate clear expectations in the areas of:

- › **Social responsibility**
- › **Responsible use of materials**
- › **Environmental awareness**
- › **Ethical business conduct**

It forms the basis for a trusting, long-term partnership in line with our values – innovative strength, team spirit, respect, equal opportunities and participation.



As part of the general duty of care along the supply chain, our suppliers are responsible not only for complying with the requirements and standards set out in this Code of Conduct themselves, but also for passing them on to all their sub-suppliers, sub-contractors and other third parties and actively ensuring their compliance.

Our business partners commit themselves to ensuring at all times that their sub-suppliers also respect and implement the applicable legal provisions and the ethical, social and environmental standards of this Code.



1. Social Responsibility in our Supply Chains

Relevant Sources and Regulations:

- > UN Guiding Principles on Business and Human Rights
- > OECD Guidelines for Multinational Enterprises
- > ILO Core Labour Standards and Conventions

Our suppliers join us in taking responsibility for respecting human rights towards their employees, local communities and all relevant stakeholders. They ensure that their business activities do not adversely affect these rights and that, in accordance with the regulations listed here, they actively contribute to fair, safe and inclusive working conditions.

1.1 Prohibition of Illegal Employment

Our suppliers employ exclusively legal workers and comply with all applicable labour, social and residence regulations. They consistently prohibit any form of illegal employment, including undeclared work, misclassified self-employment, lack of work permits or unreported employment relationships. Our suppliers ensure that all employees meet the necessary legal requirements for employment and are registered and remunerated in accordance with applicable laws.

1.2 Exclusion of Forced Labour

Our suppliers actively exclude any form of forced or compulsory labour. They do not employ any workers who work under threat, intimidation or without voluntary consent. This includes debt bondage, prison labour without legal basis, or restrictions on freedom of movement. They act in accordance with the ILO conventions 29 and 105 on the elimination of all forms of forced labour and take effective measures to prevent such practices in their supply chain.

1.3 Prohibition of Child Labour

Our suppliers neither use child labour nor tolerate it. Employment relationships are based on the applicable national minimum age, which corresponds at least to ILO Convention No. 138 (15 years, or 14 years in certain developing countries). They also prevent any form of exploitative or hazardous child labour within the meaning of ILO Convention No. 182, in particular activities that endanger the safety, health or morals of children.

1.4 Fair Remuneration

Our suppliers pay their employees fair and reasonable remuneration that at least meets the statutory or collectively agreed minimum wages. They ensure that wages and salaries cover basic living expenses of employees and their families and enable social participation. The basis for this is ILO Convention No. 131 on the fixing of minimum wages. Remuneration is paid regularly, in full, transparently and comprehensibly. Unlawful wage deductions, in particular as a disciplinary measure, are prohibited.



1.5 Fair Working Hours

Our suppliers organise working hours in accordance with national laws and industry standards. They prevent excessive working hours and ensure that regular weekly working hours do not exceed 48 hours as a rule unless national regulations permit exceptions. Overtime must be voluntary, clearly regulated and adequately remunerated. Our suppliers ensure adequate rest periods, daily breaks and at least one day off per seven-day period – in accordance with ILO Convention 1 (working hours in industry) and 14 (weekly rest).

1.6 Freedom of Association

Our suppliers respect the right of their employees to organise freely, to form trade unions or join such organisations, and to represent their interests through collective bargaining; all of this in accordance with ILO Conventions 87 (freedom of association) and 98 (right to collective bargaining).

Where legal restrictions exist, they use all available means to enable their employees [GD4.1] to exercise these rights. Reprisals against employees due to trade union or collective activities are prohibited.

1.7 Prohibition of Discrimination

Our suppliers ensure a discrimination-free working environment. All employees are treated equally regardless of gender, skin colour, origin, religion or beliefs, age, sexual orientation, gender identity, disability, social background or political views. The basis for this is ILO Convention No. 111. Equal pay for equal work – regardless of gender or gender identity – is guaranteed in accordance with ILO Convention No. 100.

1.8 Health and Safety at Work

Our suppliers ensure safe and healthy working conditions. They prevent injuries, work-related illnesses and health risks by

- › Systematically identifying hazards,
- › Implementing preventive measures,
- › Providing emergency preparedness,
- › Conducting safety training courses and
- › Ensuring access to clean drinking water, sanitary facilities and medical care at the workplace.

The basis for this includes ILO Conventions 155 and 187 and the ISO 45001 standard. National laws and regulations must be complied with. All partners are required to practice systematic occupational health and safety management system in accordance with ISO 45001.

2. Responsible Use of Materials



Relevant Sources and Regulations:

- › OECD Guidelines for Responsible Supply Chains of Minerals
- › Stockholm Convention on Persistent Organic Pollutants
- › REACH Regulation (EC) No. 1907/2006 – Chemicals Registration and Safety
- › EU Conflict Minerals Regulation (2017/821)
- › RoHS Directive 2011/65/EU – Restriction of Hazardous Substances

Our suppliers bear a special responsibility in the procurement and use of raw materials and chemical substances. They exclude hazardous substances from their process chain as far as possible and to the greatest extent possible. If hazardous substances that are indispensable in compliance with applicable laws and regulations, they will regularly check for substitutes. Our suppliers shall provide transparent and written information about any hazards and environmental risks associated with the delivered goods, including any special handling requirements. Together with us, they undertake to use materials responsibly in order to comply with ethical, ecological and legal requirements at all times.

2.1 Conflict Minerals

Our suppliers procure and use raw materials such as tin, tantalum, tungsten (and their ores) and gold (3TG) exclusively from responsible sources. They ensure that these materials are not used to finance armed conflicts or serious human rights violations or to exploitation in conflict and high-risk areas.

Our suppliers fulfil their due diligence obligations in accordance with the OECD Guidelines for Responsible mineral supply chains. Where applicable, they also take into account the requirements of the EU Conflict Minerals Regulation (EU 2017/821). Through transparency and traceability of their raw material sources they actively contribute to our shared commitment to sustainable and socially responsible supply chains.

2.2 PFAS (Per- and Polyfluoroalkyl Substances)

Our suppliers review the use of PFAS and limit it to the absolute necessary. The aim is to consistently minimise negative impacts on the environment and health.

As PFAS are among the persistent organic pollutants regulated under the Stockholm Convention, our suppliers give priority to alternative, more environmentally friendly substances. They are committed to continuously reducing the use of PFAS and to promote innovative solutions that protect both people and the environment.

2.3 REACH and RoHS Compliance

Our suppliers guarantee that all chemical substances and mixtures used comply with the requirements of the European REACH Regulation (EC No. 1907/2006). They assume responsibility for full registration, evaluation, authorization and restriction of chemical substances in order to actively avoid risks to humans and the environment. In addition, they ensure compliance with the RoHS Directive (2011/65/EU), which restricts the use of certain hazardous substances in electrical and electronic components and equipment. Our suppliers document this compliance transparently and communicate openly about possible risks or necessary substitution measures.



3. Environmental Responsibility

Relevant Sources and Regulations:

- › Paris Climate Agreement (UNFCCC)
- › Science Based Targets initiative (SBTi)
- › ISO 14001 – Environmental management systems
- › Basel Convention on the Control of Transboundary Movements of Hazardous Wastes
- › National Environmental Laws

The balance between industrial growth and the conservation of natural resources is at the heart of our vision and also shapes our expectations of our suppliers. As an environmental technology company, we attach particular importance to ensuring that our partners take ecological impacts into account in their business activities, avoid or minimise environmental pollution, and actively contribute to the preservation of nature. Our suppliers therefore undertake to comply with the objectives of environmental legislation and the associated relevant international laws and regulations.

3.1 Greenhouse Gas and Air Emissions

Our suppliers identify, monitor and limit emissions into the air – in particular greenhouse gases such as carbon dioxide, methane or nitrous oxide as well as pollutants such as particulate matter, nitrogen oxides, sulphur dioxide and volatile organic compounds.

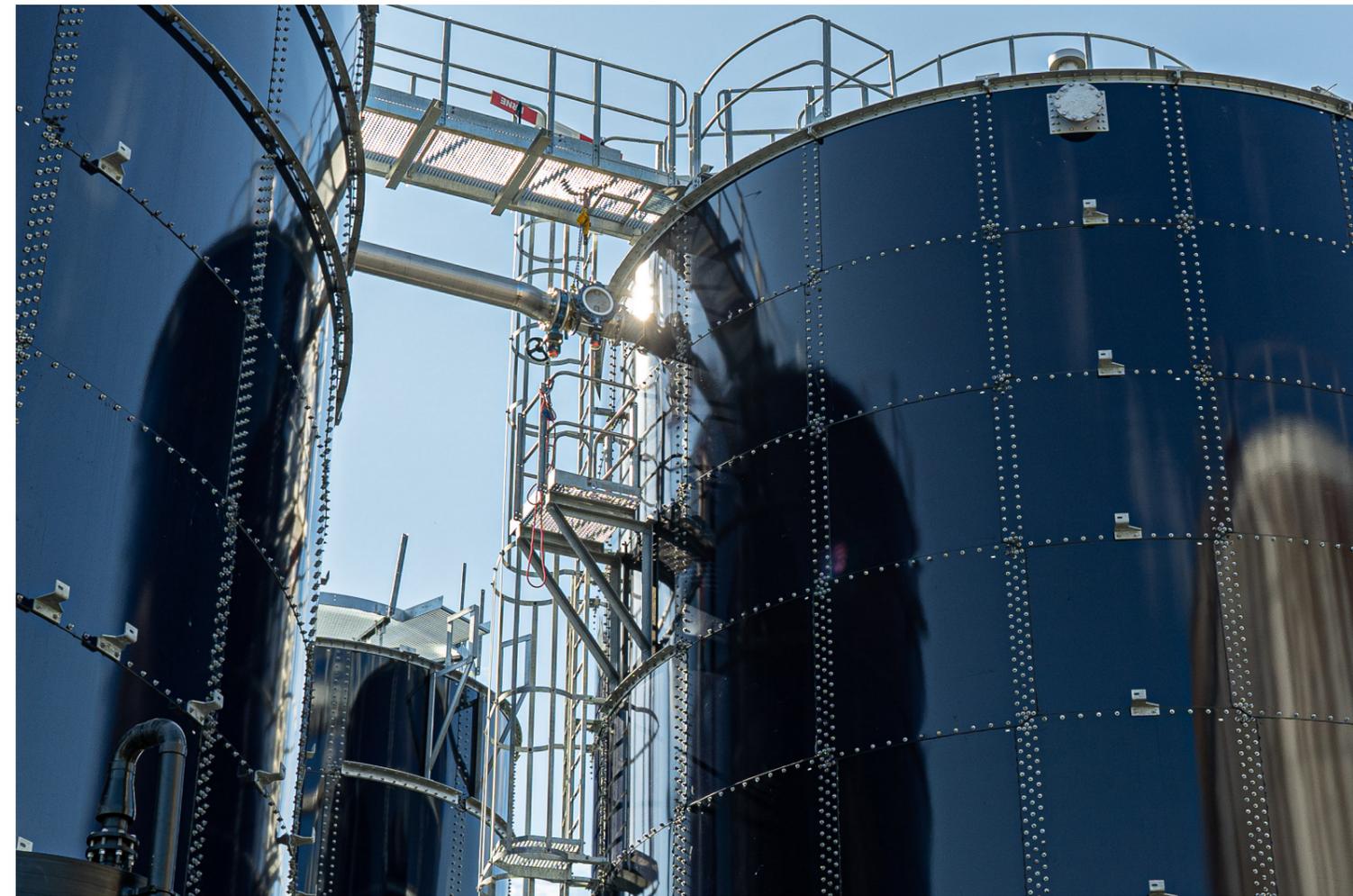
They operate their plants properly and implement appropriate mitigation measures such as filters or catalytic converters and ensure compliance with all legal limits. In addition, they take additional measures to gradually reduce climate-impacting emissions, for example through higher energy efficiency, optimised processes or the use of renewable energies.

Our suppliers are committed to the Paris Climate Agreement and make effective, long-term contributions to climate protection. This includes setting scientifically based emission targets in line with the 1.5 °C or maximum 2 °C target according to the criteria of the Science Based Targets initiative (SBTi).

In addition, they are certified according to ISO 14001 or are aim to obtain this certification in medium term.

3.2 Wastewater

Our suppliers treat industrial wastewater from operational processes, cleaning, cooling or other activities in a professional manner before discharging it into water bodies, the public sewage system or the environment. They act in accordance with all applicable legal regulations, permit requirements and industry-specific environmental standards. To this end, they implement measures to prevent, reduce and control pollutant inputs and regularly monitor the relevant wastewater parameters. In addition, they actively explore opportunities to recycle or reuse wastewater streams in order to further reduce water consumption and environmental impact.



3.3 Resources and Waste

Our suppliers use natural resources such as raw materials, water and auxiliary materials sparingly and responsibly. They continuously reduce their resource consumption, e.g. by using recycled or renewable materials, sustainable procurement or technical solutions for recovery and reuse. They operate a legally compliant and environmentally friendly waste management system. Hazardous substances are handled in accordance with national and international

regulations. Waste, especially hazardous substances, is avoided or minimised wherever possible. Unavoidable waste is stored safely, labelled correctly and disposed in an environmentally friendly manner through certified disposal companies. Where possible, our suppliers replace environmentally harmful substances with less harmful alternatives.



4. Ethical Business Conduct

Relevant Sources and Regulations:

- › OECD Guidelines for Multinational Enterprises
- › UN Convention against Corruption (UNCAC)
- › EU General Data Protection Regulation (GDPR)
- › WIPO – World Intellectual Property Organisation
- › EU Sanctions Portal

Business conduct based on integrity and compliance with the law forms the basis for trusting cooperation along our supply chain. Our suppliers comply with all applicable laws, respect ethical principles and actively contribute to integrity, fairness and transparency in economic life.

4.1 Fair Competition

Our suppliers maintain free and fair competition at all times. They comply with all applicable antitrust and competition law requirements and refrain from anti-competitive agreements on prices, markets, customers or production volumes. They also refrain from practices such as obstructing of competitors, the exploitation of dominant market positions, or participation in unfair tendering. In this way, they make a contribution to a fair and innovation-friendly market environment.

4.2 Information Security and Data Protection

Our suppliers protect their information and communication systems actively against unauthorised access, loss, alteration or misuse. They implement appropriate technical and organisational measures to ensure the confidentiality, integrity and availability of information. In addition, they comply with all applicable data protection requirements, particularly when handling personal data of employees, business partners and customers. Such data is processed lawfully, for specific purposes and in a comprehensible manner – in accordance with the EU General Data Protection Regulation (GDPR).

4.3 Intellectual Property

Our suppliers treat confidential information such as technical documents, internal processes or economic plans with the utmost care. They use this information exclusively within the scope of the cooperation and do not disclose it without express consent. They also consistently respect intellectual property rights, including inventions, trademarks, copyrighted protected content and technical developments. The unauthorised use or disclosure of such content is prohibited.

4.4 Combating Corruption

Our suppliers strictly reject any form of corruption, bribery and undue influence. They do not grant, demand or accept any direct or any indirect advantages that could unlawfully influence business decisions. Business invitations or gifts are only permissible within the legally permitted scope and at a reasonable level so that there is no doubt about the independence of decisions. Instead of gifts on business occasions, especially on holidays, we welcome it when suppliers make donations to charitable organisations. Preferably, these projects should be in line with the values of DAS Environmental Experts (e.g. environmental or educational initiatives, social initiatives to strengthen community, inclusion and respect).

4.5 Money Laundering Prevention

Our suppliers take appropriate measures to prevent money laundering, terrorist financing or other crimes. They work exclusively with business partners whose business activities they can understand and where there is no reasonable doubt as to their lawful conduct.

4.6 Export Controls and Sanctions

Our suppliers comply with all applicable regulations on export controls, customs regulations and international trade and sanctions regulations. They ensure that products, technologies, software or services are not supplied to persons, organisations or countries to which restrictions apply. To this end, they regularly check relevant sanctions lists and carefully document exports and business relationships.



5. Compliance and Review of Standards

DAS Environmental Experts reserves the right to review compliance with the requirements of this Code of Conduct together with its business partners. To this end, we use transparent procedures such as questionnaires, assessments or on-site audits. All audits are announced in advance, in compliance with legal and contractual requirements and in close consultation with the supplier's representatives. As part of audits, our suppliers grant access to relevant operating sites, testing facilities and documents during audits, insofar as this is necessary for the assessment of compliance and no trade secrets are addressed. They ensure that strategic sub-suppliers are also subject to appropriate checks. If deviations are identified, we work with the supplier to develop a sustainable corrective action plan in a timely manner. The suppliers implement this plan on their own responsibility and document the progress. In this way, we jointly strengthen transparency, trust and the continuous improvement of our supply chains.



6. Consequences and Joint Remedial Measures

Compliance with this Code of Conduct is an essential part of every business relationship for DAS Environmental Experts. If violations are identified, we evaluate them together with our suppliers and agree on appropriate measures to remedy the situation. In the event of serious or repeated violations, as well as a lack of willingness to cooperate, DAS Environmental Experts reserves the right to take further steps. In individual cases, this may include the suspension or termination of the business relationship.



This Code of Conduct is more than a set of rules – it is an expression of our shared commitment to sustainable, responsible and fair supply chains. We see our suppliers not only as contractual partners, but also as co-creators of a future in which economic success, social responsibility and ecological action go hand in hand.

We invite all our partners to actively shape this path – with innovative strength, quality, open communication and mutual respect. Together, we create a working and business environment characterised by trust, participation and equal opportunities.

By living the principles of this code together, we contribute to creating sustainable values – for our companies, our employees and society worldwide.

DAS

Environmental Experts.

DAS Environmental Expert GmbH
Goppelner Str. 44
01219 Dresden
Germany

 +49 351 40494-000

 contact@das-ee.com

 www.das-ee.com