

Code of Conduct for Axter Suppliers

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The Axter Code of Conduct for Suppliers defines the essential company requirements and processes that ensure effective implementation of specified environmental, compliance, and labour standards. Suppliers are expected to commit to the following:

Legal Compliance

Adhere to all applicable laws and regulations within relevant jurisdictions.

Human Rights and Labour Practices

Suppliers must respect all internationally recognised human rights, ensuring no involvement or complicity in human rights violations. This includes:

- Prohibition of forced labour
- > Prohibition of child labour
- > Non-discrimination and respect for employees
- Freedom of association
- Fair working hours, wages, and benefits
- Occupational health and safety, including security forces
- Accessible grievance mechanisms

For more details, please refer to the following Axter policies:

Anti-Slavery and Human Trafficking Statement

Whistleblowing Policy

Fair Operating Practices

Suppliers must commit to fair and ethical business practices, which include:

- Anti-corruption and anti-bribery measures
- Fair competition and compliance with antitrust laws, and respect for intellectual property rights
- Avoiding conflicts of interest
- Adherence to anti-money laundering and anti-terrorism financing laws
- Ensuring data privacy
- Compliance with foreign trade regulations

Please refer to this policy for more information:

<u>Bribery and Anti-Corruption Policy</u>

Responsible Minerals Sourcing

Suppliers must take reasonable steps to ensure that their products do not contain raw materials sourced from conflict-affected and high-risk areas, thus avoiding contributions to human rights abuses, corruption, or the financing of armed groups.

Environmental and Climate Protection

Suppliers are expected to:

- Follow all statutory and international environmental standards
- Minimise environmental pollution and strive for continuous improvement in environmental protection
- Establish and maintain an effective environmental management system, policy, and objectives
- Reduce air and water pollution emissions and promote sustainable practices

For additional details, view Axter's Sustainability Strategy: Sustainability Strategy

Supply Chain Responsibility

Axter expects partners to actively promote and uphold compliance with this Code of Conduct (or an equivalent) throughout their supply chains. Suppliers should:

- Establish and maintain ethical and social standards within their supply chain
- Regularly assess their supply chain to ensure compliance with these standards

For more on our commitments, view our full Environmental Policy:

Environmental Policy





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