

Code of Conduct for the Mosolf Group

("Code of Conduct")

Introduction

Since the MOSOLF Group was founded in 1955 – long before the term “compliance” became a notable buzzword – it has been an essential component of our corporate policy to

- conduct business with integrity and fairness,
- take responsibility for our employees, human rights and the environment, and
- base our activities on the applicable law of the countries in which the MOSOLF Group operates.

This fundamental attitude is the basis of our actions to date and a key factor in ensuring the long-term and sustainable success of the MOSOLF Group for the future. The MOSOLF Group includes MOSOLF SE & Co. KG based in Kirchheim unter Teck and all companies in which MOSOLF SE & Co. KG directly or indirectly holds more than a 50% interest.

This Code of Conduct applies worldwide to all locations of the MOSOLF Group and without exception to all persons belonging to the MOSOLF GROUP: the board of directors, senior managers, managers and all employees. We expect every individual to comply not only with the laws and regulations but also with the standards of this Code of Conduct and the values held within it and in our guiding principles. Due to their function as role models, all our managers are especially obliged to actively promote and practise the facilitation, dissemination and implementation of the principles of conduct, requirements and values stipulated in this Code of Conduct.

Each individual must measure his or her actions according to these principles of conduct, requirements and values and be guided by them. They are the binding basis of our daily actions.



Kirchheim/Teck, the.....2024

Dr. Jörg Mosolf
Chief Executive Officer (CEO)

Gregory Hancke
Chief Operating Officer (COO)

Dr. Kersten Ruoss
Chief Financial Officer (CFO)

Wolfgang Göbel
Chief Sales Officer (CSO)

I. Law & responsibility

We comply with all valid and applicable national and international laws, regulations and voluntary commitments as well as our internal company guidelines. By doing so, we avoid violating the law and damaging our reputation, which could lead to disadvantages for the MOSOLF Group. Among other things, we are obligated to prevent all risks to human rights and the environment, which are listed in the German Supply Chain Due Diligence Act (LkSG), to appropriately comply with the corresponding human rights and environmental requirements and to ensure that our business partners also act accordingly.

Thus, we prevent violating the law, which could lead to grave disadvantages such as claims for damages, reputational damage, criminal sanctions or fines.

II. Fair market behaviour

Financial responsibility

Transparency and accuracy are a top priority for the MOSOLF Group. Therefore, we always create and maintain our books, records and business documentation in accordance with the valid and applicable laws as well as the generally recognised principles of accounting and proper bookkeeping. All key business transactions are traceable and promptly documented by us. Internal and external reporting must always be correct and complete so that third parties can get an accurate picture of all important business transactions if needed. Essential documents of the business operation are preserved and archived by us according to the applicable and valid legal provisions (e.g., commercial law, tax law, social security law).

Disclosure of information

In the scope of disclosing and publishing information of the MOSOLF Group, we always abide by the applicable and valid regulations. This includes information on financial and non-financial topics such as sustainability initiatives, business activities, certifications and environmental standards. We also make our business decisions exclusively based on factually verifiable, objective criteria.

Free competition and antitrust law

We always conduct ourselves fairly in competition and observe the valid and applicable antitrust and competition law.

All persons belonging to the MOSOLF Group are therefore forbidden from making restrictive agreements, without exception. In particular, no agreements are to be made with competitors about prices, offers, business conditions, capacities, sales quotas or market shares, especially

since violations can result in negative consequences such as imprisonment, financial penalties, fines, disgorgement and third-party liability claims under civil law. We neither wrongfully exploit a potential market-dominating position, nor take part in other anti-competitive business practices.

We always want to convince our customers solely through the quality of our services. Therefore, in this context, we view fair competition as a permanent incentive to perform at a high level.

Import and export controls and economic sanctions

We expect and demand that all persons belonging to the MOSOLF Group consistently observe the applicable and valid international and national regulations of foreign trade law, especially the export control and embargo directives, and that no member conducts illegal business activities with sanctioned persons, companies or organisations.

Combating corruption & preventing conflicts of interest

Initiating business relationships and performing our business activities is done exclusively according to transparent and objective criteria, e.g., according to quality, price, technological standard or reliability of the business partner.

We take the ban on bribery, corruption and accepting or granting benefits very seriously and reject all forms of corruption, bribery, theft, embezzlement, fraud or extortion. Illegal payments or granting other benefits to an individual, a company or an official with the goal of influencing decision processes is not tolerated.

We also expect that no person belonging to the MOSOLF Group tolerates or gives unlawful benefits of any kind, especially in the course of business activities with officials and authorities both at home and abroad. We always ensure that our employees act and conduct themselves with integrity.

We are especially critical of benefits that coincide with important contract negotiations. Therefore, we especially avoid invitations and gifts or other benefits that exceed the limits of appropriate and usual business practices and can challenge the objectivity and independence of the business relationship.

For decisions involving purchasing, personnel or hiring, a transparent and proper selection process takes place according to purely objective criteria and not according to the personal interests of the persons acting on behalf of the MOSOLF Group.

A conflict of interest is any situation in which a person belonging to the MOSOLF Group maintains a business relationship that exceeds the scope of ordinary activities with a business partner of the MOSOLF Group or one of its employees, whose decisions could influence the business with the respective company of the MOSOLF Group. Each person belonging to the

MOSOLF Group is urged to report the occurrence of potential conflicts of interest to their supervisor or to report this to the MOSOLF Group at "compliance@mosolf.com".

Conflict materials and high-risk raw materials

Without exception we expect that all persons belonging to the MOSOLF Group comply with the valid and applicable statutory regulations on conflict materials and meet their obligation of due diligence for responsible supply chains. For the MOSOLF Group it is fundamental that minerals, particularly tin, tantalum, tungsten, gold and the corresponding ores and metals, are acquired from sources which are conflict-free.

In the event that a product contains one or more so-called conflict materials or high-risk materials – for example, the important raw material cobalt – the MOSOLF Group ensures that it and its business partners can provide complete and transparent information at any time upon request about their supply chain up to the smelter and about the origin of the material. The use of mercury is forbidden.

Smelters without an adequate and sufficiently tested due diligence process must be strictly excluded by the MOSOLF Group.

III. Employees & social responsibility

Our employees are crucial for the success of the MOSOLF Group. Our interaction with one another and management of employees are characterized by mutual esteem, integrity, transparency and equal opportunity. We are aware of our responsibility to our employees, we ensure safe and healthy working conditions and we always ensure that we comply with the applicable statutory requirements.

In particular, we comply with the applicable national and international regulations on labour standards, wages and working hours. If no national legal provision exists, the so-called core labour standards of the International Labour Organisation (ILO) apply. Furthermore, our employees always receive remuneration that is at least in line with the applicable national laws and the legally valid and guaranteed minimum wage, including social security benefits, and one that enables a decent livelihood.

In accordance with the valid and applicable national and international laws, we always respect the rights of our employees to form employee representative bodies and unions and to participate in collective bargaining. Furthermore, we make sure that our employees have the freedom to form or join unions and that the unions can function in accordance with the laws of the place of work, which also includes the right to strike and the right to collective bargaining. Founding, joining and being a member of a union must never be used as a reason for unjust discrimination or retaliatory measures.

No child/forced labour

Within the MOSOLF Group, we know, respect and observe at least the core labour standards of the International Labour Organisation (ILO). We refrain from any kind of child labour and renounce all forms of forced or compulsory labour, servitude, bonded labour, slavery or practices resembling slavery. We do not employ children under the age of 15 or juveniles who are required to be in school full-time according to the applicable law of the respective country of employment. Provided that legal exceptions allow it, student internships that are coordinated with the respective schools are permitted. In addition, we do not require any deposits (financial or otherwise). Under no circumstances do we withhold identification papers as a condition for the employment of our employees. To prevent bonded labour, lending to employees is forbidden with the exception of granting staff loans at reasonable market conditions. Our employees always work on the basis of a written employee contract, during the working times agreed in the employee contract and at the salary agreed in the employee contract. We also oblige our business partners to comply with the above mandatory requirements.

Diversity and equal opportunity

We are fully committed to promoting diversity, equal rights and inclusion in all areas of our business operation. We respect the diversity of people in our workforce, amongst our business partners and in the communities in which we are active. We expect all persons belonging to the MOSOLF Group to comply with and observe the above-mentioned principles.

No discrimination

We expect all persons belonging to the MOSOLF Group to ensure a work environment that is completely free of any kind of discrimination. It is forbidden to disadvantage or discriminate against someone based on personal characteristics such as gender, skin colour, religion, nationality, political opinion, belief or other convictions, ethnic origin, social background, disability, health status, age, sexual orientation, union membership or any other personal characteristics. We also especially respect, support and protect women's rights, strive for equality and expect the same of all persons belonging to the MOSOLF Group.

To ensure ethical recruiting, we also rely on practices in staff recruitment in which applicants are assessed without discrimination or bias. Integrity, transparency, trust and performance are of primary importance in this process. We also expect all persons belonging to the MOSOLF Group to adhere to these principles.

Along the entire supply chain, we are committed to respecting, supporting and protecting the rights of the local communities in which we operate and the rights of minorities, indigenous people and other vulnerable and disadvantaged groups. We recognise the significance of integrating and protecting the above-mentioned communities, minorities, indigenous people and other groups, and will work together with them respectfully, fairly and cooperatively. All

persons belonging to the MOSOLF Group are also encouraged to abide by the above principles and to ensure that the rights of minorities, indigenous people and other vulnerable and disadvantaged groups are respected in all phases of cooperation.

No unlawful forced eviction, no unlawful dispossession of land, forests and bodies of water

Each person belonging to the MOSOLF Group is forbidden from carrying out illegal forced evictions. Any unlawful displacement, theft or confiscation and any other unlawful dispossession of land, forests and bodies of water through purchase, development or other use is also strictly forbidden.

Ban on hiring or using private or public security services to protect business projects

We agree not to use private, public or state security forces to protect our business, our operations and our business projects if due to a lack of instruction or control by us in deploying the security forces there is risk of using torture and cruelty, excessive force, inhumane or degrading treatment, injury to life and limb as well as interference with the right to form organisations and freedom of assembly.

IV. Business Environment

Data protection & confidentiality

The foundation for a trustworthy relationship with business partners and employees is the careful handling of their information and data.

Therefore, in all business processes we ensure the protection of personal rights, while taking into account the applicable legal requirements. To protect confidential and personal information, data and plans, we store it securely and protect it from unauthorised access, loss or manipulation with all available technical and organisational means, while taking into account the EU's GDPR and the applicable national laws.

Therefore, we also expect and demand that all persons belonging to the MOSOLF Group comply with all applicable statutory regulations on data protection and only collect, process and use personal data under the conditions set out in the valid data protection regulations, i.e. when this is legally permitted or the parties concerned agree, and exclusively for authorised purposes and in an appropriate manner.

All persons belonging to the MOSOLF Group are forbidden from transferring confidential information, documents, data and trade secrets to third parties without authorisation or using it themselves for purposes not authorised by the MOSOLF Group. When data and information is transferred internally or externally, all persons belonging to the MOSOLF Group must always

check in advance if the recipient is authorised to receive this and if the transfer to this person is necessary in each specific case. All persons belonging to the MOSOLF Group are required to maintain discretion in a suitable manner, especially when handling the confidential data and information of our customers, business partners or other third parties.

Protection of material property, intangible property and ban on counterfeit goods

We handle company property conservatively and carefully. It must be protected against loss, damage, destruction, embezzlement, misuse or theft. Each employee uses work equipment and other company items (e.g., computers, data storage media, documents, tools, spare parts, office supplies) as company property only within the scope of carrying out their work duties.

Intangible property (e.g., software code, logos, utility models), information, ideas and the expertise of our employees are also assets of the MOSOLF Group. Each employee is required to protect this property and must have authorisation before using it. The intellectual property of third parties, in particular, may only be used in a permissible manner for a determinable business purpose.

All persons belonging to the MOSOLF Group are forbidden from acquiring and using counterfeit goods or knowingly falsified materials or products. Any property right infringements, including but not limited to infringements on patents, trademarks and copyrights, are also serious violations of our principles and must be avoided by all persons belonging to the MOSOLF Group.

Information security

EDP and IT security is of fundamental importance to the MOSOLF Group. There are a considerable number of risks to the security of information and data of the MOSOLF Group, our customers, our business partners and all persons belonging to the MOSOLF Group, which can be caused by unauthorised access to our EDP and IT systems, the loss and misuse of data or by malware.

Environment

The basis of our ongoing economic success is to interact with the environment in a sustainable and responsible manner. Environmental regulations must therefore be strictly adhered to by all persons belonging to the MOSOLF Group. We ensure that our business operations require as few natural resources as possible, including energy, raw materials and other materials. Therefore, each person belonging to the MOSOLF Group is obligated to avoid especially harmful soil changes, air and water pollution, harmful noise emissions and excessive water consumption, which considerably impair the natural foundations for maintaining and producing

food, deny people's access to clean drinking water, impede or destroy people's access to sanitary facilities or harm people's health.

In addition, the MOSOLF Group ensures that the respective national energy and environmental laws and regulations are complied with at its business and production locations and in its geographical areas of activity, and that a high degree of transparency is created with regard to the emissions it produces and those produced in upstream processes. Furthermore, the MOSOLF Group takes effective measures to reduce its direct and indirect CO2 emissions and continuously works on improvements in this area.

The MOSOLF Group continues to accelerate its use of renewable energies and alternative energy sources and prefers this wherever it is possible. The consumption of raw materials is to be reduced to a minimum in every business operation of the MOSOLF Group. In particular, the sustainable use of energy and water resources must be ensured.

Any emissions that lead to a deterioration of the air quality must be reduced to a minimum. The MOSOLF Group ensures continuous monitoring of any environmental pollution generated in the scope of its business operations.

The use of renewable materials must be continuously expanded by the MOSOLF Group, and the generation of waste reduced to a minimum. In the course of waste reduction, recyclable materials must always be sorted. The release of substances that present a danger to people and the environment is to be prevented at all costs. Exporting hazardous waste is prohibited.

The MOSOLF Group also endeavours and expects of all persons belonging to it to improve the value of its own waste products in order to promote recycling and reusing raw materials.

All persons belonging to the MOSOLF Group are required to mark hazardous materials, chemicals and substances and to ensure their safe handling, transport, storage, reuse, recycling and disposal. Furthermore, they must comply with all valid and applicable laws and regulations with regard to hazardous materials, chemicals and substances. The MOSOLF Group and the persons belonging to it are also required to comply with substance restrictions and product safety requirements, which are stipulated by valid and applicable laws and regulations.

The MOSOLF Group also attaches great importance to preserving biodiversity, promoting sustainable land use and preventing deforestation and soil degradation. All persons belonging to the MOSOLF Group are called upon to actively follow these principles in their work. This especially applies to the destruction of the soil's biological balance, which can render it unusable, and to illegal deforestation, which includes converting natural forests into farmland, for example. The MOSOLF Group and the persons belonging to it are committed to protecting habitats and take measures to preserve the quality of soil.

Finally, all persons belonging to the MOSOLF Group must comply with the environmental obligations set forth in the following three international conventions:

- The Minamata Convention on Mercury from 10 October 2013,

- The Stockholm Convention on Persistent Organic Pollutants from 23 May 2001 and
- The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal from 22 March 1989.

V. Animal welfare

For the MOSOLF Group, it is especially important that its business activities consider the protection and well-being of animals. Therefore, the MOSOLF Group expects all persons belonging to it who process animal products to implement standards and best practices to guarantee the welfare of animals across the entire supply chain. The MOSOLF Group is committed to ensuring that alternative animal experiment-free methods are preferred, provided that this is legally possible and justifiable. All persons belonging to the MOSOLF Group are obligated to comply with national and international regulations on animal protection and animal testing, including the German Animal Protection Act and Directive 2010/63 of the European Union (so-called Laboratory Animals Directive).

In addition, the MOSOLF Group is committed to the following ethical principles and expects that the persons belonging to it share these values and ensure they are practised in the entire supply chain:

- The “Five Freedoms” of the Farm Animal Welfare Committee (FAWC) for assessing the welfare of animals (freedom from hunger, thirst and malnutrition; freedom from discomfort; freedom from pain, injury and illness; freedom from fear and distress; and freedom to express normal behaviour)
- The “3R” Principle of animal testing (Reduction, Refinement, Replacement)
- The principles of the World Organisation for Animal Health (OIE) for animal welfare (Terrestrial Animal Health Code and Aquatic Animal Health Code)

VI. Occupational safety and health protection

The MOSOLF Group and all persons belonging to it must comply with the valid and applicable laws on health protection and occupational safety. The MOSOLF Group supports the safety and health of its employees with sufficient and appropriate measures such as preventative and consistent occupational safety and a safe and healthy work environment. The MOSOLF Group also implements the following measures to minimise the risk of accidents at work:

- Creation of sufficient and appropriate safety standards for providing and maintaining the workplace, workstation and work equipment,
- Provision of suitable safety measures to avoid exposure to chemical, physical or biological materials,

- Implementation of measures to prevent excessive physical or mental fatigue, especially as a consequence of unsuitable work organisation in terms of working hours and breaks,
- Ensuring sufficient training and instruction of employees.

VII. Whistleblowing, whistleblower system and supply chain complaints procedure, retaliation protection

The MOSOLF Group maintains and complies with programmes and processes that meet the legal requirements to ensure the confidentiality, anonymity and protection of whistleblowers on the business partner and employee side. Persons belonging to the MOSOLF Group are strongly urged to promptly report to the MOSOLF Group all incoming information or allegations regarding a violation of this Code of Conduct. Even if a person belonging to the MOSOLF Group has reason to believe that an employee of the MOSOLF Group has acted in violation of the Code of Conduct and/or its principles, or that the risk of this type of violation has otherwise arisen within the supply chain or such a violation has already taken place, then this person is urged to report their findings, complaints and concerns regarding this matter to the MOSOLF Group in a suitable manner. This can be reported directly to the respective supervisor or to the MOSOLF Group at "compliance@mosolf.com" or through the whistleblower system / supply chain complaints procedure according to the Supply Chain Due Diligence Act on the website of the MOSOLF Group. The MOSOLF Group's whistleblower system / supply chain complaints procedure can be accessed by all persons belonging to the MOSOLF Group at any time via the link <https://mosolf-compliance.integrityline.app/>.

At the request of the whistleblower, the anonymity of the reporting person is ensured within the scope permitted by law. It is strictly forbidden to penalise or discriminate against the reporting person in any way on the basis of their report and its content. However, the rights and interests of those affected by the information are also protected by us to the best extent possible. Therefore, we strictly require compliance with fundamental principles such as the presumption of innocence and avoiding the initiation of investigative measures without clear indications of a violation of the Code of Conduct and the principles of conduct stipulated in it. Finally, not least to protect the interests and rights of the affected party, wrongful use of the whistleblower system or the supply chain complaints procedure will neither be accepted nor tolerated without penalty.

VIII. Conclusion

We as the MOSOLF Group and each one of us as individuals are responsible for complying with the valid and applicable laws, this Code of Conduct and our internal guidelines. The MOSOLF Group requires that all persons belonging to it accept and adhere to this Code of Conduct. The MOSOLF Group also requires that all its managers exemplify the content and

importance of the principles set out in this Code of Conduct and that they inform and sensitise their employees accordingly about its content and importance. In addition, each manager must ensure compliance and observance of the principles of conduct and the requirements of this Code of Conduct in their respective area of responsibility. But each employee is also obligated to follow this Code of Conduct, to actively and regularly stay informed about it and the principles of conduct and requirements contained therein, e.g., by participating in training courses offered by the MOSOLF Group, and especially to follow the valid legal provisions and internal regulations for their field of work.

The MOSOLF Group reserves the right to regularly check in a suitable manner that the principles of conduct and requirements of this Code of Conduct are complied with in order to identify, minimise and prevent risks.

We do not tolerate any misconduct or violations against this Code of Conduct. Please note that each violation against the principles of conduct and the requirements of this Code of Conduct may involve serious consequences, especially labour law sanctions such as termination, claims for damages or other sanctions and labour law measures. In addition, legal violations may result in fines and criminal sanctions imposed by authorities and courts, towards both the MOSOLF Group itself as well as the persons belonging to it. Therefore, in the interest of everyone, we call on each person belonging to the MOSOLF Group to comply with this Code of Conduct. Furthermore, violations against the applicable law, this Code of Conduct or internal guidelines should be reported to a supervisor, the human resources department or the management board. Discrimination against whistleblowers will not be tolerated. Hints will be investigated, and we will take all necessary measures to remedy the situation. In doing so, we will proceed according to the principles of proportionality. The provisions in Section VII remain unaffected by this.

If uncertainties or questions arise about this Code of Conduct or on the topic of compliance, all persons belonging to the MOSOLF Group, especially its employees, can contact their manager or submit their query to the MOSOLF Group at "compliance@mosolf.com".

The MOSOLF Group thanks all persons belonging to it for taking part in complying with this Code of Conduct and the principles of conduct and requirements stipulated therein and thereby actively contributing to sustainably securing the foundation of a successful future for the MOSOLF Group and its business operations.