

## Supplier Code of conduct – the basis for our joint success

*As a global company, H.C. Starck Tungsten Powders (HCS), a member of the Masan High Tech Materials Group, has a high level of responsibility towards all its stakeholders, including business partners, employees, investors and the regions in which the company operates.*

*Our Code of Conduct is guided by the internationally recognized principles for the protection of human and labor rights as expressed in the United Nations Universal Declaration of Human Rights, the ILO Core Labor Standards, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Our company respects applicable law, whether local, regional or national, throughout the world, and expects not only its employees but also business partners to understand and accept the Code.*

*Therefore, as our business partner, you agree to take all reasonable and necessary steps to ensure that you and your own suppliers comply with this Code. If you have a policy of your own that is similar in content, we will be happy to accept it after a positive review.*

## **1 – Fair Competition**

HCS and its business partners are unconditionally committed to fair competition and fair contractual practices. Any forms of agreements or arrangements that result in an unfair advantage for one party are prohibited among competitors, as is the abuse of a dominant market position.

## **2 – Business and financial records**

Mutually provided documents, including those in electronic form, are the property of the respective business partner and are stored securely. Personal data shall be treated with the utmost care and in strict confidence. Within the sphere of influence of the respective business partners, all necessary measures are taken to prevent money laundering.

## **3 - Compliance with International Commercial Law and Provisions on Exports**

Business partners adhere to all international agreements, conventions and treaties, as well as national laws controlling trade and financial transactions, and consistently monitor compliance with international and national export control laws.

## **4 - Intellectual property rights**

The intellectual property rights of others are respected without exception. All employees are obliged to treat company and business secrets confidentially and not to pass them on to third parties in any form. Confidential information that HCS discloses to business partners must also be protected with the same care.

## **5 - Bribery and corruption**

HCS pursues a zero-tolerance policy towards bribery and corruption. We do not enter into business relationships whose existence or desired scope is dependent on the payment of bribes. For HCS, avoiding corruption also means obtaining information about business partners in advance.

## **6 - Behaviour toward Government Agencies; Cooperation**

Our company is committed to comply with all laws and regulations that govern its business. Therefore, HCS deals with all relevant investigative and governmental authorities in a respectful, cooperative and open manner.

## **7 - Environmental Protection and Safety**

HCS and its business partners have a responsibility to protect people and the environment in accordance with all legal and regulatory requirements in their respective jurisdictions, as well as international industry practice. Appropriate health and safety, environmental and quality guidelines are required of our business partners.

## **8 – Labour and employment**

HCS does not tolerate any form of discrimination or harassment, abuse or corporal punishment, whether in its own company or by business partners. Furthermore, HCS has a zero-tolerance policy towards any form of forced labor, modern slavery or child labor in accordance with the criteria of the ILO in its own company, with business partners and their supplier.

## **9 – Behaviour towards Suppliers of Raw Materials**

HCS works with partners whose stance on ethical, social and environmental issues is consistent with that of HCS. For this reason, all suppliers of raw materials must demonstrate compliance with all applicable policies, laws and regulations, such as OECD Due Diligence, the EU Conflict Raw Materials Regulation and, to the extent required, the Supply Chain Sourcing Obligations Act, and hold all necessary permits, licenses and authorizations. In addition, all parties involved in our supply chain commit to comply with our purchasing guidelines.

## **10 – Ensuring Compliance**

HCS does not tolerate any violations of the law and consistently adheres to the guidelines and rules described. We expect the same from our business partners.

## **11 – External Relations**

HCS has a policy for dealing with external stakeholders and who is authorized to communicate with them. We ask our business partners to provide us with contact persons who are authorized to speak on behalf of their companies in a legally binding manner.

## **12 – The Compliance Organisation and Contact Persons**

Your direct contact person at HCS is the first point of contact for any questions you may have in relation to the Code of Conduct. Alternatively, you can also make confidential reports via the "Your Voice Matters" whistleblower system available on our website. HCS guarantees that no business partner will be subject to adverse treatment because they have made a report in good faith.