

SUPPLIER CODE OF CONDUCT .



PREAMBLE

Ensuring the principles of sustainable development and compliance in our supply chain is important for the Oryx Stainless Group and its stakeholders. We want to partner with our suppliers to further develop their sustainability performance in our supply chain. We expect our suppliers to fully comply with applicable laws and to adhere to internationally recognized environmental, social and corporate governance (ESG) standards. We also expect our suppliers to use their best efforts to implement these standards with their suppliers and subcontractors.

We particularly expect you as our supplier to accept and support the following legal and ESG standards and to confirm by your authorized signature, that

SANCTIONS

- Neither any director nor any shareholder or beneficial owner of the company is subject to and/or targeted by any economic or financial sanctions or any other trade restrictions administered or enforced by the United Nations, the European Union, the United States of America, the United Kingdom or any other relevant jurisdiction.
- You do not pursue any business activities with Cuba, Syria, North Korea, Russia, Belarus, Sudan, South Sudan, Iran or the regions of Crimea, Sebastopol, Donetsk or Luhansk.
- You irrevocably and unconditionally hold the Oryx Stainless Group (including its employees, servants, agents, subcontractors, representatives) fully harmless from and keep the Oryx Stainless Group (including its employees, servants, agents, subcontractors, representatives) fully indemnified against all and any losses, damages, fines and expenses whatsoever which it may suffer arising or resulting from any breach or violation by you of any applicable sanction(s).

ENVIRONMENT

- You comply with all applicable environmental, health and safety regulations.
- You promote the safe and environmentally sound manufacturing, storage, transport, use and disposal of your products.
- You protect your employees' and neighbors' life and health, as well as the general public at large against hazards inherent in your processes and products.

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- You ensure by using appropriate management systems that product quality and safety meet the applicable requirements.
- You use resources efficiently, apply energy-efficient and environmentally friendly technologies and reduce waste, as well as emissions to air, water and soil.
- You minimize your negative impact on biodiversity, climate change and water scarcity.

SOCIAL

- You support the protection of internationally proclaimed human rights, fight forced labor (including but not limited to modern slavery and human trafficking) and child labor.
- You uphold the freedom of association and the right to collective bargaining in accordance with applicable laws.
- You treat your employees with respect and provide a workplace free of harassment or abuse of any kind, harsh and inhumane treatment, unlawful practices, or discrimination.
- You enable your employees and other stakeholders to report concerns or potentially unlawful practices at the workplace.
- You comply with minimum wages and working hours in accordance with local laws, and ensure compensation of a living wage according to local living conditions.
- You ensure that you do not supply products that contain conflict minerals which directly or indirectly finance or benefit armed groups and cause human rights abuses as outlined in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG). We expect you to fulfill your due diligence on mineral supply chains according to the recommendations outlined in the OECD DDG.

GOVERNANCE

- You abide by all applicable national and international trade laws and regulations including but not limited to antitrust, trade controls, and sanction regimes.
- You consider business integrity as the basis of business relationships.
- You prohibit all types of bribery, corruption and money laundering.
- You forbid gifts to private or public officials that aim to influence business decisions or otherwise encourage them to act contrary to their obligations.

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- You respect the privacy and confidential information of all your employees and business partners as well as protect data and intellectual property from misuse.
- You implement an appropriate Compliance Management System, which facilitates compliance with applicable laws, regulations, and standards.

Oryx Stainless Group reserves the right to carry out an audit to confirm compliance with this code of conduct. To perform such audits Oryx Stainless Group is entitled to engage professional third-party experts. Any material changes having an impact on your compliance to the code of conduct shall be communicated to Oryx Stainless Group immediately.

With your signature below, you acknowledge the principles stated above and demonstrate your commitment via compliance with your own (formal or applied) code of conduct or company policies that include these standards.

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Company name

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Place, date

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Company address (stamp)

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Authorized Signature

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Name, Function