



Sustainability Policy for Suppliers of Indra Recycling GmbH

1. Introduction/Preamble

Sustainability is a long-term strategic success factor for Indra Recycling GmbH and its suppliers. With our sustainability guideline for suppliers, we actively demand sustainable business practices. At the same time, the sustainability guideline is the basis for Indra Recycling GmbH's economic, ecological and social responsibility. We also expect our employees to observe the principles of ecological, social and ethical behavior and integrate them into the corporate culture. We also strive to continuously optimize our business activities and our products and services in terms of sustainability. This document summarizes the basic principles and standards of Indra Recycling GmbH to its suppliers for production-related and non-production-related goods and services based on globally recognized guidelines and principles. The Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Entrepreneurship, the United Nations Guidelines on Business and Human Rights, the International Labour Standards of the International Labour Organization and the United Nations Global Compact. For future cooperation, the contracting parties agree on the applicability of the following provisions for a joint code of conduct. This agreement will be the basis for all future deliveries. The parties agree to comply with the principles and requirements of the Code of Conduct and to endeavour to contractually oblige their subcontractors to comply with the standards and regulations set out in this document. This agreement shall enter into force upon signing. A violation of this Code of Conduct may be a reason and cause for the Company to terminate the business relationship, including all associated supply contracts.

2. Requirements for suppliers

We place the following requirements on our suppliers:

2.1 Social responsibility

2.1.1 Human and labour rights

Our suppliers observe internationally recognised human rights and ensure that they are upheld. Our suppliers uphold basic human and labour rights on the basis of the applicable national legislation. The following principles are based on the basic principles of the International Labour Organization (ILO).



2.1.2 Exclusion of forced labour

No forced labor, slave labor or similar work may be used. All work must be voluntary and employees must be able to terminate work or employment at any time. In addition, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment. Our suppliers should stand up for the fourth principle of the Global Compact, the elimination of all forms of forced labor. Workers should be able to terminate the employment relationship within a reasonable period of time. Employees may not be required to hand over their identity card, passport or work permit as a precondition for employment. In line with ILO Conventions 29 and 105.

2.1.3 Prohibition of child labour

Our suppliers only employ employees who have reached the minimum age required to perform work in accordance with the applicable national legislation. Our suppliers will observe and respect the rights of children. Child labour may not be used at any stage of production. Suppliers are required to comply with the recommendation of the ILO conventions on the minimum age for the employment of children. According to this, the age should not be less than the age at which compulsory schooling ends and in any case not less than 15 years. If children are found at work, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers must be protected and special protection rules must be observed. The suppliers support the fifth principle of the Global Compact by advocating the abolition of child labour. Child labour may not be used at any stage of the manufacturing process. Business partners are encouraged to comply with the recommendation of the ILO Conventions on the minimum age for the employment of children. This minimum age should not be less than the age at which compulsory education ends and in any case should not be less than 15 years. In accordance with ILO Conventions 79, 138, 142, 182.

2.1.4 Fair pay

Remuneration for regular working hours and overtime must be in line with the national statutory minimum wage or industry minimum standards, whichever is higher. If the remuneration is not sufficient to cover the costs of ordinary living expenses and to build up a minimum of reserves, the supplier shall be obliged to increase the remuneration accordingly. Employees must be granted all the benefits required by law. Wage deductions as punitive measures are not permitted. The supplier must ensure that employees receive clear, detailed and regular written information about the composition of their remuneration. Our suppliers

pay compensation and benefits that are at least in line with national and local legal standards, regulations or agreements. The applicable regulations on working hours and holidays are observed. Compensation paid to workers must comply with all applicable laws governing remuneration, including laws on minimum wage, overtime, and statutory benefits. Deductions from wages as a disciplinary measure are not permitted. The basis according to which workers are remunerated is announced to



the employees in a timely manner in the form of a payslip or a comparable document. In line with ILO Conventions 26 and 131.

2.1.5 Fair working hours

Working hours must at least comply with applicable laws, industry standards or relevant ILO conventions. Overtime should only have to be worked on a voluntary basis and employees should be granted at least one day off after six consecutive working days. In line with ILO Conventions 1 and 14.

2.1.6 Freedom of association

Our suppliers respect freedom of association and the right to form interest groups. They grant their employees the right to defend their interests on the basis of national legislation. The right of workers to form and join organisations of their choice and to engage in collective bargaining must be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative possibilities for independent and free association of employees for the purpose of collective bargaining must be granted. Employee representatives must be protected from discrimination. They should be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner. Open communication and direct dialogue between workers and management are the best way to resolve workplace issues and compensation-related controversies. The business partners respect the workers' right to freedom of association, to join or not to join trade unions, to appeal to the workers' representatives, to join works councils in accordance with local laws. Workers must be able to communicate openly with management without fear of reprisals, intimidation or harassment. Suppliers support the third principle of the Global Compact (companies should uphold freedom of association and the effective recognition of the right to collective bargaining). In line with ILO Conventions 87, 98, 135 and 154.

2.1.7 Prohibition of discrimination

Our suppliers do not tolerate discrimination against employees on the basis of gender, race, caste, skin color, disability, political opinion, ideology, origin, religion, age, pregnancy or sexual orientation. Personal dignity, privacy and

The personal rights of each individual are respected. The suppliers thus support the sixth principle of the Global Compact (companies should advocate for the elimination of discrimination in employment and employment). In line with ILO Conventions 110, 111, 158 and 159.

2.1.8 Occupational health and safety

Our suppliers ensure safety in the workplace. The supplier is responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may occur in connection with the activity. In addition, employees are regularly informed and trained about applicable health and safety standards and measures. Employees are given access to drinking water in



sufficient quantities and access to clean sanitary facilities. If bedrooms are provided, they must be clean, safe and meet the basic requirements. Our suppliers comply with at least the respective national standards for a safe and hygienic working environment. In line with ILO Convention 155. 2.1.9 Grievance Mechanisms / Whistleblowing and Protection from Retaliation The supplier is responsible at the operational level for establishing an effective grievance mechanism for individuals and communities who may be affected by adverse impacts, including in the supply chain. Even where legal systems are effective and well-resourced, grievance mechanisms can offer particular benefits, such as rapid access and redress, reduced costs and transnational reach. Employees who file a complaint for violations of this Code of Conduct or relevant laws shall not be subject to disciplinary action in any form.

2.1.10 Dealing with conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other commodities such as cobalt, the company establishes processes in accordance with the Organisation for Economic Cooperation and Development (OECD) due diligence principles for promoting responsible supply chains for minerals from conflict-affected and high-risk areas, and expects its supplier to do the same. Smelters and refineries without appropriate, audited due diligence processes should be avoided. If relevant, a separate chapter should be formulated on this subject due to the great importance of the topic in many industries. A reference to current standards and guidelines of the OECD makes sense.

2.2 Environmental responsibility

The supplier follows a systematic approach in order to meet its ecological responsibility. The core issues of the EMAS Regulation (No. 1221/2009) and ISO 14001:2015 are the following environmental aspects: emissions into the atmosphere, discharges into water, pollution of soils, consumption of raw materials and natural resources,

Energy consumption/efficiency, release of energy (in the form of heat, radiation, light, noise), waste generation, land use/biodiversity. These should be taken into account in the supplier's environmental management system. We suggest the introduction of an environmental management system according to EMAS or ISO 14001 or the supplier orients itself on the topics covered by the two (or similar) standards.

2.2.1 Treatment and discharge of industrial wastewater

Wastewater from operating procedures, manufacturing processes and sanitary facilities must be typed, monitored, checked and, if necessary, treated before discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.



2.2.2 Dealing with air emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions must be typified, routinely monitored, checked and, if necessary, treated before they are released. The supplier also has the task of monitoring its exhaust gas purification systems and is required to find cost-effective solutions to minimise any emissions.

2.2.3 Handling of waste and hazardous substances

The supplier follows a systematic approach to identify, handle, reduce, and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a risk when released into the environment must be identified and managed in such a way as to ensure safety in the handling, transport, storage, use, recycling or reuse and disposal of such substances. Chemicals and other substances that pose a risk to humans and the environment if released are avoided. If a complete waiver is not possible for scientifically verifiable reasons, at least legally prescribed limit values must be observed. The substances must be identified and clearly labelled as such. A hazardous substance management system must be set up for them so that they can be safely handled, transported, stored, reprocessed or reused and disposed of using appropriate procedures. In addition, the supplier takes appropriate measures to minimise or exclude the hazardous substance in the future.

2.2.4 Reduce consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of all kinds, including water and energy, must be reduced or avoided. This is done either directly at the point of origin or through procedures and measures, e.g. by changing production and maintenance processes or procedures in the company, by using alternative materials, by saving, by recycling or by reusing materials.

2.2.5 Dealing with energy consumption/efficiency

Energy consumption must be monitored and documented. Economical solutions must be found to improve energy efficiency and minimise energy consumption.

2.2.6 Environmentally friendly production

Responsible use of raw materials and natural resources is ensured in all phases of production. The supplier is called upon to give preference to renewable energies and to ensure that energy is consumed sparingly. During product development, attention is paid to the principle of recyclability or return of the products to natural cycles.

2.3 Ethical Business Conduct

For the individual areas, we refer to the OECD Guidelines for Multinational Enterprises and the Global Compact.



2.3.1 Fair competition

The standards of fair business, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which prohibit agreements and other activities that influence prices or conditions in particular when dealing with competitors. Furthermore, these regulations prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to determine their prices and other conditions autonomously when reselling. Our suppliers do not enter into any agreements or concerted practices with other companies that have the object or effect of preventing, restricting or distorting competition in accordance with the applicable antitrust laws and do not unlawfully exploit any dominant market position.

2.3.2 Confidentiality/Data Protection

The supplier undertakes to meet the reasonable expectations of its client, suppliers, customers, consumers and employees with regard to the protection of private information. The Supplier shall comply with data protection and information security laws and government regulations when collecting, storing, processing, transmitting and disclosing personal information.

2.3.3 Intellectual Property / Counterfeit Parts

Intellectual property rights and products must be respected; Technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information are protected. The use, use or use of counterfeit parts is expressly prohibited and will be severely punished.

2.3.4 Integrity, bribery, taking advantage

Indra Recycling represents the principle of strict legality for all actions, measures, contracts and other processes of Indra Recycling GmbH. Accordingly, we expect our suppliers to comply with the applicable laws, the basic principles of the United Nations Global Compact and this Code of Conduct in the course of their business activities with Indra Recycling and to work towards compliance with this Code of Conduct by third parties used to perform contracts with Indra Recycling. The highest standards of integrity must be applied to all business activities. The supplier must have a zero-tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing the standards are to be applied to ensure compliance with anti-corruption laws.

2.3.5 Avoidance of conflicts of interest

Our suppliers make decisions based on objective considerations and are not unduly guided by personal interests.

2.3.6 Money laundering

Our suppliers comply with the relevant legal provisions for the prevention of money laundering.



2.3.7 Export controls and economic sanctions

Numerous countries such as the UK, France, Germany, and the United States have enacted laws to control the export of strategic products, technology, and software. Indra Recycling GmbH, its employees and contractors are bound by these laws and regulations. Indra Recycling's corporate policy expressly requires compliance with all applicable export control regulations. Failure to comply may result in civil or criminal sanctions, including fines, imprisonment, loss of export licenses, exclusion, revocation of previously issued licenses, seizure and confiscation of goods. Such sanctions may be imposed on Indra Recycling, individual employees and/or other persons associated with Indra Recycling. Due to the enormous importance of compliance with all applicable export control regulations, employees or Indra Recycling partners who knowingly violate such controls or the Compliance Policy will be subject to appropriate disciplinary measures. Indra Recycling encourages partners and employees to report actions that may violate laws or other regulations and policies of Indra Recycling. Indra Recycling, in turn, is obliged to investigate reported incidents and take appropriate action. Indra Recycling does not take action against people who ask questions, point out compliance issues or report possible misconduct. The impeccable application and management of export control measures underline Indra Recycling's commitment to ethical business conduct and compliance with applicable laws and regulations.

3. Compliance with the Code of Conduct

We expect our suppliers to identify risks within supply chains and take appropriate action. In the event of a suspicion of violations or to secure supply chains with increased risks, the Supplier will inform the Company promptly and, if necessary, regularly about the identified violations and risks as well as the measures taken. The company verifies compliance with the standards and regulations listed in this document by means of a self-assessment questionnaire and, if necessary, in supplier discussions. If a violation of the provisions of this Code of Conduct is detected, the Client shall notify the Supplier in writing within one month and shall set the Supplier a reasonable grace period to bring its conduct into line with these Regulations.

3.1 Implementation of the requirements

3.1.1 Communication

Our suppliers communicate this Code of Conduct to third parties who are used to fulfil the contractual relationship with Indra Recycling, take the Code of Conduct into account when selecting them and make every effort to oblige them to comply with it and check this regularly. A violation of this Code of Conduct constitutes an impairment of the business relationship between Indra Recycling and the Supplier. Without prejudice to other rights, Indra Recycling reserves the right to demand clarification of the facts and initiation of countermeasures from its supplier in this case. If the supplier demonstrably fails to initiate suitable improvement measures within a reasonable period of time, or if the violation is so serious that a continuation of the business relationship becomes unreasonable for



Indra Recycling, Indra Recycling reserves the right to terminate the contractual relationship in question, without prejudice to any other rights.

3.1.2 Monitoring and Obligation to Provide Evidence

Upon request, the Supplier shall provide Indra Recycling with all the necessary information for an initial assessment correctly and comprehensively as part of a self-assessment. It shall also provide other information demonstrating compliance with the Directive. Indra Recycling will monitor the implementation of this policy. The supplier must inform Indra Recycling of any events that are contrary to the principles of the Directive.

Hockenheim, 29/08/2024

A handwritten signature in black ink, appearing to read 'R. Boecker', written in a cursive style.

Ralf Boecker

A handwritten signature in black ink, appearing to read 'A. Gerstner', written in a cursive style.

Andreas Gerstner

A handwritten signature in black ink, appearing to read 'Thomas Jelley', written in a cursive style.

Thomas Jelley

Place, date, Senior management