

## CODE OF CONDUCT

### SUPPLIER / SUBCONTRACTORS

CMT Rickenbach SA requires all these partners to respect moral and ethical values, to ensure the compliance of their activities with the principles and practices described below. Suppliers / subcontractors are committed to communicate these principles and practices to their own suppliers / subcontractors.

#### LABOUR RELATIONS AND EMPLOYMENT PRACTICES

##### GENERAL PRINCIPLES

Suppliers are committed to adopting and applying fair and ethical labour conventions based on internationally recognized fundamental human rights standards, including the Universal Declaration of Human Rights, international treaties and International Labour Organization conventions.

##### HEALTHY AND SAFE WORKING CONDITIONS

Suppliers/contractors will provide a safe and healthy working environment for their employees in accordance with applicable local laws and any regulations specific to the industries in which they operate. Appropriate procedures shall be put in place to prevent accidents and injury to health resulting from, related to or occurring during work activities or as a result of the operation of manufacturing facilities. Suppliers / subcontractors should be encouraged to designate a health and safety representative to monitor the compliance of their facilities with these requirements.

##### WAGES AND HOURS OF WORK

Suppliers / subcontractors must comply with local laws regarding minimum wage, standard working hours and benefits. Overtime will be voluntary and fully compensated at regular or premium rates, depending on local legal requirements.

In special circumstances, employees may be expected to work longer than normal hours for limited periods of time. When this occurs, overtime and consecutive working days will be in accordance with local regulations and planned to ensure safe and humane working conditions.

##### FREEDOM OF ASSOCIATION

Suppliers / subcontractors undertake to respect and recognize the right of employees to freely associate with any legal and peaceful collective bargaining or workers' association. In the event that local labor laws restrict these freedoms, the supplier / subcontractor is encouraged to facilitate parallel means of independent and free association and negotiation for employees.

##### NO DISCRIMINATION

Suppliers/contractors shall not discriminate against their employees in employment, including hiring, salary, benefits, promotion, discipline, termination or retirement, on the basis of: race, color, caste,

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origin, nationality, religion, disability, gender, sexual orientation, union membership, political affiliation or age.

## NO CHILD LABOR

Suppliers / subcontractors shall not employ persons under the age of 15 years or under the age of completion of compulsory schooling where this is over 15 years in the country concerned.

Suppliers / subcontractors must comply with all local legal requirements regarding young workers, in particular those relating to working hours, wages, health, safety and general working conditions. A young worker is defined as any worker over the age of 15 and under the age of 18.

## NO FORCED EMPLOYMENT

Suppliers / subcontractors shall not use forced labor, whether in the form of prison labor, indentured labor, bonded labor or other forms of labor. Forced labor shall be considered to include any work or service that is imposed under threat of punishment for non-performance or for which the terms and conditions of employment are not voluntary.

## NO DISCIPLINARY TREATMENT

Suppliers/contractors shall not subject anyone to harassment, corporal punishment and/or the threat of violence and shall prohibit the use of fines or any form of mental or physical abuse, coercion or intimidation.

## RESPONSIBLE ENVIRONMENTAL MANAGEMENT

Suppliers / subcontractors will fully comply with local legislation and industry regulations, including EHS.

## INDUSTRY-SPECIFIC ISSUES

## PRODUCT INFORMATION AND LABELLING

Suppliers/contractors will communicate honestly about the nature of the products they supply, including raw materials, handling and disposal. All product-related issues, including chemicals, GMOs or hazardous materials, will be accurately disclosed as required by local and international laws and/or standards commonly used in the industry in which they operate.

## COUNTRY OF ORIGIN OF PRODUCT COMPONENTS

Suppliers/subcontractors may be requested to provide CMT Rickenbach AG with information on the country of origin and the names of the sources of the components and raw materials included in the delivered products.

Any change in the source of components or raw materials or the place of production of the components must be submitted in advance in writing for approval to CMT Rickenbach AG.

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## PRODUCT INFORMATION AND LABELLING

### NO BUYING "DIRTY GOLD".

CMT Rickenbach AG adheres to the principles of responsible gold sourcing. To the extent permitted by current industry practices, CMT Rickenbach SA will require its suppliers / subcontractors to provide, to the extent possible, assurances that the gold supplied has been mined in a manner that respects human and labor rights and does not inflict damage to the environment, either directly or through pollution from chemical infiltration.

## ETHICAL PRINCIPLES OF THE COMPANY

### GENERAL PRINCIPLES

Suppliers / subcontractors must act in a "spirit of trust" with regard to ethical business principles.

Thus, they recognize that the basic business principles of trade secrets, respect for intellectual property, sincerity, truthfulness, transparency and keeping promises contribute to credible, stable and sustainable business relations with CMT Rickenbach SA.

### GIFTS AND GRATUITIES

Suppliers / subcontractors undertake not to offer their internal or external contacts incentives, rebates, bribes or other payments that could compromise objective and fair business decisions.

### SPECIAL REGULATIONS"

Suppliers / subcontractors shall ensure that any production, delivery or other action subject to obtaining specific governmental, legal or regulatory authorizations may only be undertaken when such authorizations have been granted.

## ENFORCEMENT AND COMPLIANCE

### GENERAL PRINCIPLE

CMT Rickenbach AG expects its suppliers / subcontractors to communicate the principles of this code of conduct to their employees, subcontractors and any other third parties with whom they do business, so as to ensure the integration of these principles into their activities.

### PRINCIPLES OF OPERATION

Suppliers / subcontractors must report any existing or potential discrepancies between their current operations and the requirements set forth in this code and provide remediation and corrective action plans for evaluation by CMT Rickenbach SA.

The purchasing staff of CMT Rickenbach SA will be trained to assess whether best practices are implemented in terms of procurement of raw materials and semi-finished and finished products in

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accordance with this code, and may involve colleagues and third parties to help determine whether this code is adhered to.

## EVALUATION

CMT Rickenbach AG is entitled to request information from its suppliers / subcontractors regarding their compliance with the terms of this code of conduct.

If necessary, CMT Rickenbach AG may request a supplier to present proof of compliance through independent certification.

CMT Rickenbach AG has the right to have products and materials independently tested in order to establish whether suppliers/contractors comply with the terms of this Code of Conduct.

CMT Rickenbach SA has the right to visit suppliers' production facilities and the facilities of their subcontractors and suppliers in order to establish whether the terms of this Model Supplier / Subcontractor Code of Conduct are being adhered to.

## NON-COMPLIANCE AND SANCTIONS

CMT Rickenbach AG reserves the right to terminate business relations with any supplier / subcontractor who violates this code of conduct or whose suppliers or subcontractors violate this code of conduct.

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