

## **Code of Conduct**

### **Preamble**

Schröter GmbH Feuerfest-Spezialbedarf sees itself as part of an internationally intertwined economy and, as a company at its locations, is part of the countries and their companies in which Schröter GmbH Feuerfest-Spezialbedarf operates. Schröter GmbH Feuerfest-Spezialbedarf follows the basic understanding of the "honorable businessman" and acknowledges its responsibility as a company.

- Schröter GmbH Feuerfest-Spezialbedarf observes the direct and indirect effects of its business activities on the environment and society and strives to bring economic, ecological and social interests into an appropriate balance of interests.
- Schröter GmbH Feuerfest-Spezialbedarf acts in accordance with generally recognised values and principles, behaves in accordance with the law and observes in particular the internationally recognised human rights and labour standards, as set out below.
- Schröter GmbH Feuerfest-Spezialbedarf stands for the goals and contents of the Code of Conduct and will make all suitable and reasonable efforts within the scope of its respective legal and factual possibilities to continuously comply with the voluntary commitment at all its company locations in Germany and abroad.

If existing national regulations contradict the contents of the Code of Conduct or if the domestic context makes it impossible to comply with them without restriction, Schröter GmbH Feuerfest-Spezialbedarf will look for ways to comply with the requirements of the Code of Conduct as far as possible.

### **Ethical/Moral Commitment and Integrity**

Schröter GmbH Feuerfest-Spezialbedarf pursues only legal business goals and practices and only maintains business relationships with reputable partners.

Schröter GmbH Feuerfest-Spezialbedarf behaves fairly and appreciatively towards business partners and customers. Schröter GmbH Feuerfest-Spezialbedarf respects different legal, economic, social and cultural backgrounds and the special circumstances of the countries and regions in which Schröter GmbH Feuerfest-

Spezialbedarf operates. In doing so, Schröter GmbH Feuerfest-Spezialbedarf respects the laws and laws of the countries and regions in which business activities take place.

Schröter GmbH Feuerfest-Spezialbedarf always bases its business activities on universally applicable ethical values and principles, including integrity and respect for human dignity.

Schröter GmbH Feuerfest-Spezialbedarf is based on free and fair world trade.

### **Corruption, trade control, money laundering**

Schröter GmbH Feuerfest-Spezialbedarf rejects any form of bribery and corruption. To this end, we already avoid any appearance of this – whether in the form of granting or accepting unfair advantages. Schröter GmbH Feuerfest-Spezialbedarf acts in accordance with the applicable regulations on import and export control and adheres to the legal requirements for the prevention of money laundering.

### **Fair competition**

Schröter GmbH Feuerfest-Spezialbedarf advocates free and fair competition. Schröter GmbH Feuerfest-Spezialbedarf does not tolerate anti-competitive agreements and ensures that the company acts in accordance with applicable antitrust laws. Schröter GmbH rejects competitive advantages due to unfair business practices.

### **Handling of personal data, protection of confidential data**

#### **Information and intellectual property**

Schröter GmbH Feuerfest-Spezialbedarf respects the personal rights of its employees, business partners and customers and complies with the applicable legal and official requirements for the processing of personal data and information security when handling personal information.

Schröter GmbH Feuerfest-Spezialbedarf protects entrusted trade secrets and other confidential information of its business partners and customers from unauthorized acquisition, use and disclosure, at least in accordance with the relevant legal provisions for the protection of trade secrets.

Schröter GmbH Feuerfest-Spezialbedarf respects the intellectual property of its business partners, customers and other third parties and ensures that sufficient precautions are taken to protect intellectual property rights when exchanging know-how and technologies.

#### **Safeguarding consumer interests**

Insofar as products and services of Schröter GmbH Feuerfest-Spezialbedarf concern the interests of consumers, suitable measures are taken to ensure the safety and quality of the products or services. Schröter GmbH Feuerfest-Spezialbedarf ensures that the products or services comply with the relevant statutory consumer protection provisions.

Within the framework of information and sales measures, Schröter GmbH Feuerfest-Spezialbedarf takes consumer interests into account by applying the legal requirements for fair business, marketing and advertising practices and consumer education.

### **Environmental Responsibility and Commitment**

The protection and preservation of the natural foundations of life affects and obliges us all. With this in mind, Schröter GmbH Feuerfest-Spezialbedarf conducts its business activities in an ecologically responsible manner and is committed to the goal of a climate-neutral future.

### **Protection of the environment and climate**

Schröter GmbH Feuerfest-Spezialbedarf takes its ecological responsibility seriously by applying the applicable legal requirements and recognized standards for the protection of the environment and climate. Schröter GmbH Feuerfest-Spezialbedarf is working to ensure that the negative impact of its business activities on the environment and the climate is continuously reduced.

Schröter GmbH Feuerfest-Spezialbedarf applies applicable law and takes appropriate measures that are based on legal and internationally recognized standards and cover the following topics, among others:

- Appropriate, professional and responsible handling of hazardous substances, Chemicals and waste, including their disposal
- Measures to reduce or avoid waste
- Minimizing emissions from operational processes (e.g. wastewater, exhaust air, noise, greenhouse gases);
- Conservation of natural resources, for example through measures to save water, chemicals and other raw materials and promoting the circular economy
- Use of climate- and environmentally friendly technologies, processes, raw materials and products;
- Measures to increase energy efficiency and the share of renewable energies in energy consumption at the company sites.

### **Animal and species protection**

Schröter GmbH Feuerfest-Spezialbedarf observes the principles for the protection of animals and biodiversity and aligns its business activities accordingly. The keeping and use of animals must meet the applicable legal animal welfare requirements and be

species-appropriate. The Washington Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is the guideline in this regard.

### **Human rights and labour standards**

Human dignity is inviolable. That is why Schröter GmbH Feuerfest-Spezialbedarf respects the internationally recognized human rights that are laid down in the Universal Declaration of Human Rights of the United Nations.

Schröter GmbH Refractory Special Supplies is based on the internationally recognized labor standards of the International Labor Organization (ILO), as listed below in the Code of Conduct.

In all its business activities, Schröter GmbH Feuerfest-Spezialbedarf strives neither to cause nor contribute to human rights violations. Schröter GmbH Feuerfest-Spezialbedarf expects the same from its business partners. As far as necessary and possible, Schröter GmbH Feuerfest-Spezialbedarf supports its suppliers in this regard.

### **Employment relationships**

Schröter GmbH Feuerfest-Spezialbedarf treats its employees with appreciation. Schröter GmbH Feuerfest-Spezialbedarf rejects any form of unlawful punishment, abuse, harassment, intimidation or other unworthy treatment against employees.

Schröter GmbH Feuerfest-Spezialbedarf applies the applicable labor law to all employment relationships and expects the same from its contractual partners. At the beginning of the employment relationship, employees must be provided with understandable information about the essential working conditions, including their rights and obligations, working hours, remuneration and payment and billing modalities.

Schröter GmbH Feuerfest-Spezialbedarf respects and protects the right of employees to terminate their employment relationship in compliance with the relevant notice period.

### **Rejecting child labour and protecting young workers**

Schröter GmbH Feuerfest-Spezialbedarf does not tolerate child labour and observes the applicable legal minimum age for taking up work. In any case, Schröter GmbH Feuerfest-Spezialbedarf does not employ any persons under the age at which compulsory schooling ends under the law of the place of employment or under the age of 15. Internships are organized in accordance with the legal provisions.

Schröter GmbH Feuerfest-Spezialbedarf expects its contractual partners to have appropriate means of determining age in order to prevent child labour. If child labour is detected, all necessary measures must be taken immediately to focus on the welfare, protection and development of the child.

In the case of persons under 18 years of age, the rights of young workers must be respected; they may only be discontinued if it is ensured that the work and

conditions of employment do not pose a risk to their health, safety or morality nor are harmful to its development.

### **Refusing forced labor**

Schröter GmbH Feuerfest-Spezialbedarf rejects forced or compulsory labor in any form. This also applies to any form of debt bondage, servitude, slavery or slave-like practices, human trafficking and extends to all forms of involuntary work and services that are incompatible with internationally recognised labour and social standards.

### **Principles of remuneration**

Schröter GmbH Feuerfest-Spezialbedarf applies the statutory or, where applicable, collective bargaining provisions for the remuneration of work services. Schröter GmbH Feuerfest-Spezialbedarf ensures that the payment of employees in the company does not fall below the applicable statutory minimum wage, the minimum wage set by collective bargaining agreements or customary in the industry. In countries or regions without a statutory or collectively agreed wage framework, Schröter GmbH Feuerfest-Spezialbedarf ensures that the wage paid is sufficient for regular full-time working hours to meet the basic needs of the employees.

Wage deductions that are not permitted by law, including wage deductions as a disciplinary measure, will not be tolerated by Schröter GmbH Feuerfest-Spezialbedarf.

### **Working hours**

Schröter GmbH Feuerfest-Spezialbedarf applies the statutory or applicable collective bargaining provisions on working hours, including overtime, rest breaks and recreational leave.

Schröter GmbH Feuerfest-Spezialbedarf makes sure that

- the regular weekly working hours plus maximum possible overtime hours are not exceeded,
- Working time regulations are complied with

### **Freedom of association**

Schröter GmbH Feuerfest-Spezialbedarf respects the right of employees to freedom of association and freedom of assembly as well as the right to collective bargaining and collective bargaining, insofar as this is legally permissible and possible in the respective country of employment. If this is not permitted, Schröter GmbH will seek appropriate compromises for its employees.

### **Diversity and inclusion, non-discrimination**

Schröter GmbH Feuerfest-Spezialbedarf values the diversity of its employees and promotes a working environment that enables inclusion. For this reason, Schröter GmbH Feuerfest-Spezialbedarf is committed to equal opportunities and rejects any form of discrimination and unequal treatment on the basis of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or ideology.

Schröter GmbH Feuerfest-Spezialbedarf lives the principle of equal pay for male and female workers for work of equal value.

### **Health and safety at work**

Schröter GmbH Feuerfest-Spezialbedarf complies with national and international occupational health and safety standards. Schröter GmbH Feuerfest-Spezialbedarf ensures a safe and health-promoting working environment (avoidance of accidents, injuries and work-related illnesses) in order to maintain the safety and health of its employees and third parties.