supplier code of conduct



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"We believe that if we act together for sustainable development, we will contribute to ensuring a better future for our planet and the society we live in. If you have read our principles, accept our values and become part of our supply chain in a responsible and conscious way, please sign below as proof of your commitment. This testimony means a lot to us."

Paweł Jarski CEO Elemental Holding SA

Elemental is a global organization whose operations play an important role in the fight against climate changes. Our goal is to become a global leader in the recycling of spent automotive catalysts (SAC), to become a European leader in the segment of recycling of printed circuit boards (PCBs) and lithium-ion (Liion) batteries, and to strengthen the position of our group as a regional leader in recycling of waste electrical and electronic equipment (WEEE). To achieve this, we consistently implement the latest technologies in our plants, improve management processes, increase the network of waste stream acquisition, and improve skills of our team.

Ensuring compliance with the principles of sustainable development in our supply chain is important to us, therefore we expect our suppliers to fully comply with all applicable laws and recognized standards of human rights, environmental standards, social standards and corporate governance, in particular those specified in international conventions. We also expect them to apply these standards to their suppliers and subcontractors, as applicable.





PRINCIPLE OF ACTING IN COMPLIANCE WITH THE LAW

Our suppliers are required to comply with all applicable local, national and international laws and regulations.

ETHICAL BUSINESS

- Suppliers provide their employees and collaborators with training that guarantees proper implementation of ethical business principles and full understanding of this Code and international standards.
- · We expect our Suppliers to act ethically, honestly and transparently.
- In particular, Suppliers must not offer or accept things of value, bribes or other forms of corruption.
- Suppliers of the Elemental Group ensure that precious metals supplied do not come from conflict zones that finance or bring any other benefit to armed groups and may lead to violations of human rights.
- Suppliers do not cooperate with high-risk countries included in the black and gray lists published by the Financial Action Task Force (FATF) at https://www.fatf-gafi.org/en/countries/black-and-grey-lists. httpl./www.sanctionsmap.eu) or the United States (https://sanctionssearch.ofac.treas.gov/)

We encourage you to report corrupt-like behavior according to our Whistleblowing Procedure published on the www.elemental.biz website.





ENVIRONMENTAL PROTECTION

We expect Suppliers of the Elemental Group to act in a sustainable and environmentally responsible way, while minimizing the negative impact of their operations on the environment. We expect Suppliers to take systemic measures for the effective use of natural resources, sustainable transport, production and minimization of harmful emissions to air, water and soil.

Our Suppliers are obliged to properly manage waste, in particular to ensure the highest possible levels of recycling of waste they generate.

We expect our Suppliers to apply proper management systems to ensure that products supplied by them meet applicable quality and safety requirements, and that they have been produced in a sustainable manner and with as little harm to the environment as possible.

Our Suppliers take care of natural resources by minimizing their negative impact on biodiversity, climate change and water scarcity, in particular, they take proactive measures to reduce their carbon footprint.





ETHICAL WORK

Suppliers of the Elemental Group should respect diversity and ensure their work environment is free from discrimination and harassment.

In particular, our Suppliers should provide equal opportunities irrespective of age, gender, race, origin, religion or nationality, disability, identity, gender expression, trade union membership, political opinions.

The use of child labor and forced labor in any way whatsoever is strictly prohibited.

CONDITIONS OF WORK

Suppliers are required to ensure safe and healthy conditions of work to all their employees and collaborators, as required by applicable occupational health and safety standards. In particular, suppliers should ensure occupational health and safety standards adopted in **the Health and Safety Policy** effective in the Elemental Group.

Suppliers must provide their employees and collaborators with minimum wages and working hours consistent with applicable laws and local living conditions.

LOCAL COMMUNITIES

Suppliers care about the well-being, identity, culture, and religion of indigenous peoples and local communities.

Suppliers monitor the impact of their operations on the health and safety of the local community.





CONFIDENTIALITY AND DATA PROTECTION

Suppliers are required to protect any and all personal data and confidential information they receive, such as for example analyses, contracts, financial data, and to apply measures required to minimize the risk of breaching security of these data and information.

In the event of a suspected or detected breach of data and information security, it should be reported immediately according to the Whistleblowing Procedure published on the website www.elemental.biz

AUDIT AND ENFORCEMENT OF PRINCIPLES

The Elemental Group reserves itself the right to carry out audits to verify whether the Supplier acts in compliance with this Code.

CONSEQUENCES OF NON-COMPLIANCE

Failure to comply with the rules of this Code may result in termination of cooperation with the Elemental Group.

UPDATES AND REVISIONS

The Elemental Group reserves itself the right to update and revise this Code.

Elemental Holding SA

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