

Code for Business Partner

Introduction

DMP Rohstoffe AG (referred to below as "DMP") stands for reliability, sustainability and innovation. As a corporate group we are responsible for satisfying the tough expectations of all stakeholders regarding our conduct as a company as well as the steadily growing body of legal requirements. True to our belief, we will continue running our business with complete integrity in accordance with the highest ethical standards and will do so everywhere, at all times and regardless of what others may expect or demand. We understand the term "compliance" as an unconditional commitment to integrity, ethics and abidance by the law.

DMP attaches great importance to having business partners who share its values and its principles of compliance and ethics. To achieve a mutually fair, trusting and long-term partnership, DMP therefore asks its business partners (suppliers of goods and service providers) to undertake to adhere to the guiding principles of DMP for sustainable, ethical and law-abiding transactions as set forth in this code.

The provisions of this code are based on the content of the following recognised conventions and standards:

- Principles of the United Nations Global Compact (UNGC)
- Guidelines for Economic Cooperation and Development for Multinational Enterprises (OECD)
- Agreements of the International Labour Organisation (ILO)
- Charter for Sustainable Development of the International Chamber of Commerce (ICC)
- SA8000 (standard for corporate social responsibility in company management)
- Recommendations of the procurement offices of the Swiss Confederation

These provisions are subject to compulsory national, supranational or international laws and regulations, which take precedence over this code if they set higher standards, on a case-by-case basis. This code takes precedence if they set lower standards.

The code applies worldwide for the business partners of DMP and their employees. A further expectation which DMP has of its business partners is that their important¹ suppliers (or pre-suppliers) and subcontractors also comply with the principles set forth in this code.

Triesen, 4 April 2018

Arthur Beck
Chairman of the Board of Directors
DMP Rohstoffe AG

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DMP Rohstoffe AG

¹ The term "important supplier" (or "pre-supplier") means anyone who performs a major part of the contract (delivers a substantial part and/or performs a substantial sub-service), and/or anyone involved in an especially risky area.

I. Business ethics & integrity

The DMP business partner runs its business in an ethical manner; it acts with integrity and complies with laws and regulations.

1. Respecting the law and agreements

The business partner respects national laws and regulations as well as the pertinent international agreements.

2. Product safety

Products and services of the business partner are not dangerous to humans and the environment if properly used and meet the agreed and/or legally specified standards with respect to product safety. The business partner communicates appropriate information on safe use.

3. Prohibition of corruption and bribery

The business partner must not be involved in any type of corruption. This includes bribes, payment of bribes and blackmail in order to influence representatives of business partners, politics, the public administration, the justice system or public authorities.

4. Fair competition

Every business activity conducted by the business partner must be in accordance with the rules of fair competition. The business partner obeys the pertinent cartel/competition laws as well as laws against unfair competition.

5. Protection of intellectual property

The business partner respects the protection of intellectual property belonging to third parties.

6. Trade restrictions and money laundering

The business partner complies with applicable trade and economic restrictions and the legal provisions against money laundering and the financing of terrorism.

7. Misuse of confidential information

The business partner takes appropriate measures to ensure that its employees do not misuse confidential information.

8. Taxes and duties

The business partner obeys the applicable tax laws.

9. Whistleblower Hotline

If employees detect violations by others at work or assume in good faith that these violations are occurring, the business partner must enable employees to report their concerns freely without fear of reprisal or harassment in the enterprise. The business partner appropriately follows up on reports of this kind and takes any necessary actions.

10. Personality rights

The business partner takes appropriate measures to ensure that its employees' personality and data protection rights are safeguarded and not violated.

II. Respect for human rights

The DMP business partner respects prevailing human rights and treats its employees with dignity and respect.

1. Ban on child labour

The business partner is not allowed to employ anyone under the age of 15.

2. Ban on forced labour

All forms of forced and compulsory labour are prohibited. The business partner is not allowed to force its employees to hand over their ID, passport or work permit as a prerequisite for being employed.

3. Ban on discrimination

Equal opportunity must be ensured in hiring, employment and compensation. The business partner should not discriminate against anyone based on gender, age, ethnic or national affiliation, religion, sexual identity, union membership or a disability of any kind.

4. Ban on disciplinary punishment

The business partner is not allowed to punish employees in any way physically or psychologically. This provision applies in particular if employees submit a report in good faith on corporate practices violating national, international or internal regulations.

III. Socially acceptable work conditions

The DMP business partner provides its employees with fair work conditions.

1. Safe and healthy workplaces

Work safety and health protection must be ensured at least in keeping with the national regulations. The business partner must apply directives and procedures for work safety and health protection and inform its employees accordingly in order to reduce or avoid the risk of accidents and occupational diseases.

2. Living wages

The business partner pays its employees fairly and ensures minimum wages set by law or collective agreement or deemed usual in the industry. The business partner grants each employee the social benefits to which he or she is legally entitled and creates a transparent compensation system which is paid regularly through legal means of payment. Illegal and unjustified pay deductions may not be made.

3. No excessively long working hours

The business partner ensures that its employees comply with the maximum working hours set by law or a collective agreement or deemed usual in the industry. In particular, the maximum weekly hours of work (including overtime) is not allowed to exceed the legally permitted limit. The business partner compensates overtime in accordance with legal and contractually agreed provisions. The employees are entitled to the days off specified under the law. Moreover, the employees are entitled to a regular annual holiday in accordance with the applicable legal provisions.

IV. Compliance with environmental standards

The DMP business partner runs its business responsibly and in an environmentally compatible manner. It reduces negative impact on humans and the environment from its business operations while observing the applicable provisions.

1. Efficient use of resources

The business partner champions the efficient use of resources to the extent possible. In particular, non-renewable resources are employed as sparingly as possible.

2. Avoiding and mitigating environmental pollution

Where applicable, the business partner records and monitors polluting emissions and continually reduces them as far as possible. The materials used should be recyclable if possible. The business partner develops procedures to regulate the transport, the storage and the danger-free and eco-friendly treatment and disposal of waste.

3. Dealing safely with hazardous materials

Where applicable, the business partner guarantees the safe handling of materials whose release could endanger humans and the environment. It does so with the help of a hazardous materials management system, which ensures their safe use and transport as well as their safe storage, reprocessing, reuse and disposal.

4. Environmentally compatible products

When developing products and services, the business partner makes sure their use is economical in terms of the consumption of energy and natural resources. The products should be able to be reused, recycled or disposed of without any danger.

V. Transparency in the supply chain

Upon request, the DMP business partner will provide information about its supply chain and uses its management system to ensure the implementation of these principles.

1. Preferred business partners

DMP prefers business partners that transparently inform DMP about their chain of suppliers when requested to do so. Furthermore, DMP prefers business partners that make an ongoing active effort to improve in environmental and social terms.

VI. Implementation

DMP may take appropriate measures if the business partner fails to comply with this code.

1. Monitoring and duty to furnish evidence

On request, the business partner must give DMP all the information needed for a correct and comprehensive initial assessment as part of a self-evaluation. In particular, if the business partner is unable to satisfy aspects of this code in part or as a whole, it must inform DMP transparently. Moreover, the business partner makes available other information to furnish proof that it is complying with this code.

DMP reserves the right to check the implementation of this code, namely if there is a suspicion of any violations of this code or its principles based on press reports, complaints or the like.

2. Non-performance

DMP reserves the right to demand action in the case of non-performance of this code and, if need be, to end the business relationship.