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# CODE OF CONDUCT FOR SUPPLIERS

## LTH CASTINGS GROUP

LTH Castings d.o.o. and all of its subsidiaries (hereinafter collectively referred to as "LTH Castings") are committed to fair and credible business dealings with employees, customers, suppliers, competitors and other stakeholders. LTH Castings is aware that legal and cultural requirements in the global marketplace differ. It is expected from suppliers to act fairly, honestly and responsibly in all aspects of the business. The Supplier Code of Conduct (hereinafter "the Code") sets out key standards that are consistent with LTH Castings' values and that every LTH Castings supplier must adhere to. LTH Castings follows internationally set standards in the field of sustainable development, in particular the United Nations Global Compact and the standards set by the International Labor Organization (hereinafter ILO).

### Rules

#### ***1. Validity***

The Code applies to all suppliers, consultants, vendors, contractors, agents and other providers of LTH Castings goods and services worldwide (hereinafter referred to as the "Supplier"). The Code is valid for an indefinite period of time, but LTH Castings reserves the right to amend the Code at any time and in any way and for any reason or no reason.

#### ***2. Business compliance for suppliers***

The Supplier acknowledges and agrees to comply with the standards of the Code, which is an integral part of the business relationship between the Supplier and LTH Castings and which is binding on the Supplier. The supplier must ensure that the Code is complied with by all its subcontractors. The requirements defined in this Code are a key element in the selection and evaluation of suppliers. Violation of the requirements defined in this Code constitutes a material breach of contract by the supplier.

#### ***3. Compliance with laws, rules and regulations***

In its operation, the supplier must comply with the applicable laws, rules and regulations of the countries in which it operates. If the legal or other regulations in force in the country of the supplier's operation differ from the regulations under this Code, a stricter regulation will be observed in each individual case.

#### ***4. Respect for human rights***

The Supplier will treat individuals with respect and fairness, while respecting the human rights set out in the United Nations Universal Declaration of Human Rights.

The supplier will always protect the human rights of its employees. Equal treatment of all employees must be a fundamental principle of the supplier. No employee of a supplier may be unjustifiably disadvantaged or disadvantaged because of their ethnic or religious affiliation, race, gender, ideology, disability, age, sexual orientation, appearance, political beliefs or trade union membership.

The supplier must prevent any harassment, corporal punishment or torture, mental abuse, forced or involuntary work, and threats of such conduct in the work environment.

#### ***5. Prohibition of child labor***

The supplier must comply with the minimum age limit for employment laid down by national law or regulation and meet the relevant standards of the International Labor Organization (ILO).

#### ***6. Payment and working hours***

The supplier must comply with all applicable international standards, national laws and mandatory industry standards regarding wages and benefits. The supplier ensures that workers are paid for their work in a timely manner and clearly discloses the basis on which the workers are paid. Deductions from wages as a disciplinary measure are not allowed if they are not permissible in accordance with the

legislation binding on the supplier. The supplier provides its employees with fair and competitive salaries and benefits and supports the principle of equal pay for equal work.

The working hours of the employees of the supplier may not exceed the maximum number of hours specified by the applicable legislation binding on the supplier and the standards of the International Labor Organization. The working hours and distribution of working hours of employees at the supplier must comply with applicable legislation and industry standards.

### **7. Freedom of association and collective bargaining**

According to the applicable legislation, the supplier must respect the rights of its employees to freedom of association, trade union membership, membership in the workers' representative body and participation in collective bargaining negotiations. Employees of the supplier must be free to decide whether or not to join a trade union / workers' representative body of their choice and must not be exposed to threats or intimidation or any retaliation.

### **8. Safety and health at work**

The supplier will ensure a safe and healthy workplace and provide services that meet the requirements of applicable quality standards and health and safety standards. The supplier will proactively manage health and safety risks at work in order to ensure an incident-free environment in which occupational injuries and diseases are prevented. The supplier will implement management and control systems, which identifies hazards and assesses and manages the risks associated with their specific industry..

### **9. Compliance with antitrust and competition law**

The Supplier will strictly comply with all antitrust, commercial and other laws, rules and regulations governing monopolies, unfair competition, restrictions on trade and competition, and relations with competitors and customers.

The Supplier will not enter into agreements with competitors or other acts that would unfairly affect competitiveness, including (but not limited to) pricing or market sharing.

### **10. Bribery, corruption, prevention of conflicts of interest**

The supplier must comply with all national and international anti-bribery standards, as well as applicable anti-corruption laws, regulations and standards. The Supplier warrants that it does not allow any corruption or bribery or any other illegal business practices in the course of its business. In his conduct, he may not demand, receive, offer or grant any unjustified benefit if it is contrary to moral norms or any other benefit.

The Supplier shall avoid any interaction with an LTH Castings employee that could give rise to a conflict of interest or that appears to give rise to a conflict of interest in the performance of the employee concerned to ensure the best interest of LTH Castings. This includes offering or providing pay or employment opportunities to LTH Castings employees..

### **11. Disputed minerals**

The supplier ensures that the products supplied by LTH Castings do not contain metals made from minerals or their derivatives originating in the disputed areas, which directly or indirectly finance or benefit armed groups and cause or promote human rights violations.

### **12. Product safety**

The Supplier undertakes to manufacture and deliver safe products for LTH Castings.

### **13. Environmental protection**

The supplier must, on his own initiative and with responsible management of the company, strive to minimize the negative ecological impacts of his activities, products and services. The supplier must achieve environmental responsibility and efficiency in its operations. In its operations, the supplier must comply with ISO 14001 guidelines, applicable environmental legislation and United Nations guidelines for the environment and development.

The supplier must establish a monitoring and management system, namely:

- improving energy efficiency and reducing greenhouse gas emissions
- safe storage of hazardous substances
- by using natural resources in an economical way and by reducing the amount of waste
- the use of environmentally friendly technologies.
- Air quality
- Water consumption and wastewater quality

#### **14. Protection of data, confidential information and intellectual property**

The Supplier protects and respects the personality of employees and other stakeholders and respects and protects the privacy of employees and other stakeholders of LTH Castings.

The Supplier will comply with the applicable legislation governing data protection and comply with all legal requirements regarding the collection, processing, transmission and use of personal data.

The Supplier is responsible for ensuring that any confidential business information or secrets which it has become aware of as a result of its dealings with LTH Castings (hereinafter referred to as "confidential information") remain strictly confidential, improperly used or disclosed to third parties. The Supplier shall ensure the proper management of its information systems, which contain confidential information or data, and shall protect them from unauthorized access, use, disclosure, alteration or destruction. The Supplier may collect confidential data (personal data or data constituting a business secret) only for lawful business purposes and use them in a lawful, transparent and secure manner. It may only pass them on to persons with authorized access who need them to carry out their work, protect them in accordance with security regulations and retain them only for as long as necessary, and oblige third parties with access to personal data to protect them.

At the same time, the supplier will protect and safeguard the intellectual property of LTH Castings as confidential information.

#### **15. Management and governance systems**

The supplier must implement mechanisms for regular identification, assessment and management of risks in all areas listed in this Code, as well as all applicable legal requirements. The supplier provides regular communication and training of employees to become familiar with the requirements of this code. The Supplier permits LTH Castings to evaluate its performance in accordance with this Code upon prior notice by conducting an audit of this area with the Supplier.