



Deutsche Nickel GmbH Code of Conduct (CoC)

Schwerte

20. February 2024



Deutsche Nickel

From mission statement to code of conduct

Initial statement

- Our mission statement describes what values we share and how we want to work together – today and in the future. It gives us a clear target that needs to be achieved in order to achieve our goals and ensure sustainable corporate success
- Starting from the central idea “We. Perform. Nickel.” we can only achieve this goal together. Our values play a particularly important role here: personal responsibility, openness and transparency as well as law-compliant and at all times ethically correct behavior plays an important role

Turning a mission statement into a code of conduct

Objective

This Code of Conduct:

- Unites our fundamental rules and principles in a single document for the first time, signifying our commitment today and in the future.
- Provides a universal framework applicable to everyone within our organization, from management and department heads to each individual employee.
- Imposes expectations on us while simultaneously serving as a pledge to the external world for responsible conduct towards our business partners and the public, as well as within our internal interactions.
- Collectively, we bear the responsibility for upholding the reputation of our company, Deutsche Nickel GmbH; individual misconduct can inflict significant harm upon us all.
- Hence, we kindly urge you, dear colleagues, to carefully review this Code of Conduct and employ it as a guiding principle in our daily conduct.

Compliance with law and order

- For us, following laws and regulations is an essential basic principle of economically responsible actions..
- We comply with applicable legal prohibitions and obligations at all times, even if this results in short-term economic disadvantages or difficulties for the company or individual persons
- If National Law has more restrictive regulations than the regulations applicable to Deutsche Nickel GmbH, then National Law takes precedence

Avoidance of conflicts of interest

- At Deutsche Nickel GmbH all business decisions are made in the best interests of the company
- Conflicts of interest regarding private matters or other activities, including those of relatives or other close people or organizations, should be avoided
- Should such conflicts of interest still arise, then they are to be resolved in accordance with Law and the relevant company regulations
- Prerequisite for this is the transparent disclosure of the conflict

Fair competition

- The Compliance Commitment issued by the Deutsche Nickel GmbH Management is the tool for our dealings with our competitors
- Deutsche Nickel GmbH stands for technological competence, innovation, customer focus and motivated and responsibly operating employees
- This is the corner stone of our excellent reputation and sustainable economic success in global competition
- Corruption and cartel activities are a threat to this success and will not be tolerated (Zero Tolerance)
- For us bribery or cartel discussions are no means to win an order. We would rather miss out on business and achieving our financial targets, than break the law
- With its compliance program, Deutsche Nickel GmbH has taken far-reaching measures to ensure that corruption and antitrust regulations and the corporate guidelines based on them are adhered to

Fair competition

- Infringements will not be tolerated and will lead to sanctions against the relevant people
- Management, Heads of Departments and all other employees must be aware of the extraordinary risks which a corruption or bribery case could mean for Deutsche Nickel GmbH and to themselves personally
- Every employee is required to actively follow the Deutsche Nickel GmbH Compliance Management system within their area of responsibility.

Prevention of money laundering

- Deutsche Nickel GmbH recognises its legal responsibility with regards to the prevention of money laundering and refrains from any involvement in money laundering activities
- In case of doubt, every employee is requested to have unusual financial transactions, especially involving cash, which could give rise to suspicion of money laundering, checked by the responsible finance, legal or compliance officer

Equality of treatment and non-discrimination

- A culture of equal opportunities, mutual trust and mutual respect is of great importance to us
- We promote equal opportunities and prevent discrimination when hiring employees and when promoting or granting training and further education measures
- We treat all employees equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religious affiliation or belief

Behaviour towards fellow colleagues

Human and workers' rights

- We respect internationally recognised human rights and support their observance
- We reject any form of forced or child labour
- We recognize the right of all employees to form trade unions and employee representatives on a democratic basis within the framework of national regulations
- The right to appropriate remuneration is recognized for all employees
- The remuneration and other benefits correspond at least to the respective minimum national and local legal standards, or the level of the national economic sectors and regions

Co-operation with employee representatives

- For Deutsche Nickel GmbH, trusting and close cooperation with employee representatives is an important part and proven cornerstone of company policy
- The basis of mutual trust and co-operation is an open and constructive dialogue, characterized by mutual respect

Health and safety in the workplace

- The health and safety of our employees is of equal importance to the quality of our products and the economic success of the company
- Occupational health and safety are integral parts of all operational processes and are included in the technical, economic and social considerations from the very start of any planning phase
- Each of our employees promotes safety and health protection in their work environment and adheres to occupational health and safety regulations
- Every manager is obliged to instruct and support their employees in fulfilling this responsibility
- The same safety standards apply to employees of subcontractors working on behalf of Deutsche Nickel GmbH as to those of our own employees
- This issue will be taken into consideration during the subcontractor selection process

Sustainable environmental and climate protection

- Sustainable environmental and climate protection, as well as efficient use of resources, are important company objectives for us
- When developing new products and services as well as when operating production facilities, we ensure that all resulting impacts on the environment and climate are kept as low as possible and that our products make a positive contribution to environmental and climate protection for our customers
- Every employee has a responsibility to treat natural resources carefully and to contribute to protecting the environment and climate through their individual behaviour

Charitable donations

- We consider ourselves to be an active member of the community and get involved in this area in various ways.
- Charitable donations and other forms of community involvement are only carried out in the interests of the company
- We do not provide any financial contributions, in particular donations and sponsorship measures, to political parties at home or abroad, party-affiliated or party-like organizations, individual elected officials or candidates for political office

Public appearance and communication

- We respect the right to freedom of expression and the protection of personal rights and privacy
- Every employee should be aware that they can also be perceived as a part and representative of Deutsche Nickel GmbH in their private lives and are therefore required to protect the reputation and reputation of the company through their behaviour and appearance in public, especially towards the media
- When expressing private opinions, we ensure that the respective function or activity at Deutsche Nickel GmbH is in no way related to private expression

Reporting policy

- Deutsche Nickel GmbH is built on strong values: reliability, honesty, credibility and integrity
- We therefore attach great importance to open and truthful reporting and communication about the company's business transactions to investors, employees, customers, business partners, the public in general and government institutions
- Every employee ensures that both internal and external reports, records and other company documents are published in accordance with the applicable legal rules and standards and are therefore always complete and correct and issued in a timely and system-appropriate manner

Data protection and information security

- The protection of personal data, in particular that of or employees, customers and suppliers, is of the utmost importance to Deutsche Nickel GmbH
- We only collect or process personal data when this is absolutely necessary to fulfill the respective work task or as required by law
- No personal data may be collected or processed without the consent of the person concerned or legal permission

Company property

- We use the company's property and resources appropriately and carefully and protect them against loss, theft or misuse
- Our company's intellectual property represents a competitive advantage for Deutsche Nickel GmbH and therefore an asset worth protecting, which we defend against any unauthorized access by third parties
- We use the company's material and intellectual property solely for corporate purposes and not for personal purposes unless expressly permitted
- Our employees, together with their superiors, are responsible for ensuring that the type and extent of business trips are always proportionate to the purpose of the trip and are planned and carried out economically, taking time and cost aspects into account



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Thank you for your attention