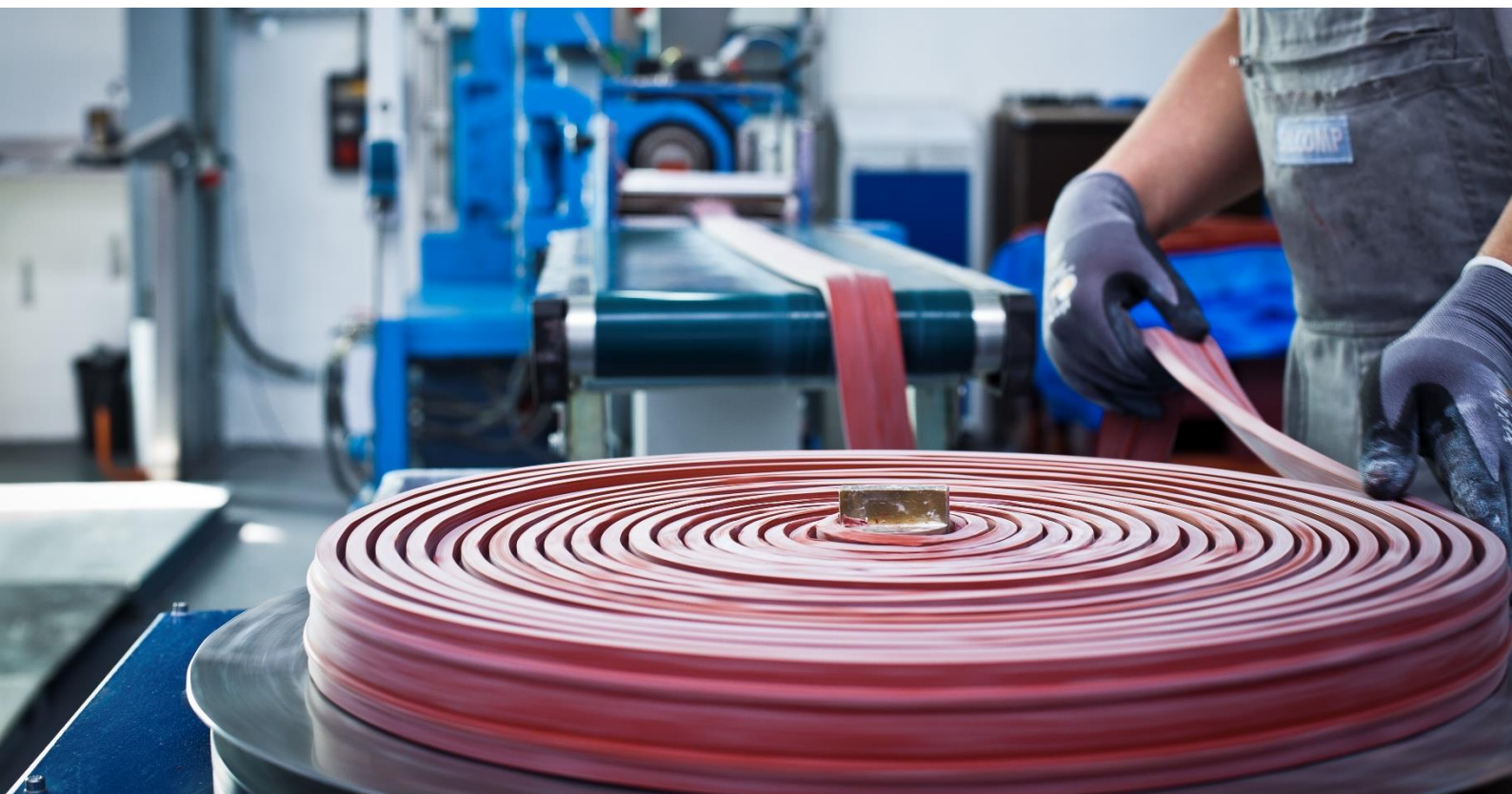




Code of Conduct

of SILCOMP Silikoncompounding GmbH

Revision 2.0, 12.06.2025



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1. General Principles, Law and Legislation

SILCOMP Silikoncompounding GmbH (SILCOMP) is committed to fulfilling its responsibility towards society, the environment and the climate in all its business activities. SILCOMP and our member companies conduct themselves fairly toward our business partners and in competition. We also protect the health and rights of our employees in the workplace.

SILCOMP is committed to complying with applicable laws and certain relevant regulations in all business activities and decisions in the countries in which it operates. At the same time, contracts are adhered to, taking changes in the general conditions into account. If local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct.

This Code of Conduct is based on the ten principles of the United Nations Global Compact, which require companies to recognize, support, and implement a set of core values in the areas of human rights, labor standards, environmental protection, and anti-corruption within their sphere of influence.

These principles are based on a global consensus based on:

- the Universal Declaration of Human Rights
- the International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- the Rio Declaration on Environment and Development and
- the United Nations Convention against Corruption.

2. Principles of Social Responsibility

2.1. Respect for Human Rights

According to Principles 1 and 2 of the United Nations Global Compact, companies should support and respect the protection of internationally recognized human rights within their sphere of influence and ensure that they are not complicit in human rights violations. For this reason, SILCOMP respects and supports compliance with internationally recognized human rights, in particular, we protect and ensure:

- the personal dignity, privacy, and personal rights of every individual,
- the right to freedom of opinion and expression, and
- fair treatment of employees, without physical or psychological harshness, sexual or personal harassment, or discrimination.

2.2. Diversity Management

Within the framework of applicable laws and regulations and in accordance with Principle 6 of the United Nations Global Compact, SILCOMP opposes all forms of discrimination, harassment, bullying, abuse of any kind, or other disadvantages that could result in physical or mental harm and promote equal opportunities in all areas of the company. This particularly applies to discrimination against employees based on their ancestry, ethnic or cultural origin, nationality, skin color, religious affiliation, ideology, political and union activity, gender, sexual identity and orientation, age, disability, illness, pregnancy, or other personal characteristics.

In particular, SILCOMP advocates for gender equality in the workplace and guarantees equal opportunities, pay, and working conditions for women. At the same time, SILCOMP also considers and protects the special needs of women regarding pregnancy, maternity protection, breastfeeding, and family responsibilities.

In accordance with the Framework Convention for the Protection of National Minorities and the UN Declaration on the Rights of Indigenous Peoples, SILCOMP respects and supports the rights of minorities and indigenous peoples. SILCOMP recognizes the rights of minorities and indigenous peoples to the preservation and development of their institutions, traditions, cultures, identities, self-determination, to control the natural resources in their territories, and to compensation for lands, territories, and resources taken, occupied, or damaged without their free consent. SILCOMP prohibits discrimination and marginalization.

In line with these values, SILCOMP ensures that recruitment processes are fair, transparent, and based on equality, and that applicants are assessed without discrimination or bias.

2.3. Working Conditions

SILCOMP guarantees occupational health and safety in the workplace within the framework of international standards and the respective national regulations and supports continuous development to improve the working environment. SILCOMP also ensures that all employees are trained in occupational health and safety within the scope of their work.

Remuneration is based on applicable laws and any existing binding collective agreements and is supplemented by the relevant national minimum wage laws. SILCOMP also grants regular paid vacation time. Employees are informed clearly, in detail, and regularly about the composition of their remuneration.

SILCOMP ensures compliance with legal regulations and agreements regarding maximum permissible working hours. This includes scheduling or ensuring appropriate breaks and rest periods for employees and providing voluntary and appropriate compensation for overtime.

In addition, SILCOMP provides adequate social insurance for employees to protect them from the financial consequences of illness, accidents, old age, and unemployment.

2.4. Employment Relationships

When hiring young workers, SILCOMP ensures compliance with applicable laws and regulations, including appropriate working conditions, working hours, and training opportunities.

SILCOMP adheres to the United Nations regulations on human and children's rights and follows the 5th Principle of the United Nations Global Compact on the abolition of child labor. In particular, SILCOMP adheres to the Minimum Age Convention (International Labor Organization Convention 138) and the Worst Forms of Child Labor Convention (International Labor Organization Convention 182). If national regulations regarding child labor stipulate stricter standards, these standards must be observed first.

In accordance with the 4th Principle of the United Nations Global Compact, SILCOMP rejects any form of forced labor, modern slavery, or similar deprivation of freedom. Work is voluntary, and the employment relationship may be terminated by the employee at any time.

2.5. Freedom of Association and Collective Bargaining

SILCOMP respects its employees' rights to freedom of association and assembly, as well as their right to collective bargaining within the framework of applicable laws and regulations and thus adheres to Principle 3 of the United Nations Global Compact. This includes not retaliating against employees who exercise their rights in this area and being open to dialogue and cooperation with employee representatives.

2.6. Use of Private or Public Security Forces

When private or public security forces are deployed to protect the company, it is ensured that those affected are protected from extensive violence, torture, and violations of freedom of association and coalition. Respect for internationally recognized human rights by the security forces is guaranteed.

2.7. Land, Forest and Water Rights and Forced Eviction

SILCOMP complies with all applicable laws regarding land, forest, and water rights, as well as evictions, and will not tolerate any unlawful evictions or unlawful deprivation when acquiring, developing, or otherwise using land, forests, or waters that provide a person with a livelihood.

3. Principles of Ethical Business Conduct

3.1. Financial Policy

3.1.1. Fair Competition and Antitrust Law

SILCOMP respects fair competition. Applicable laws that protect and promote competition, in particular applicable antitrust laws and other laws regulating competition, are observed.

In dealings with competitors, these regulations specifically prohibit agreements and other activities that influence prices or conditions, allocate sales territories or customers, or impermissibly hinder free and open competition. Furthermore, these regulations prohibit agreements between customers and suppliers that aim to restrict customers' freedom to independently determine their prices and other terms for resale (pricing and terms determination).

Given that the distinction between prohibited cartels and permissible cooperation can be problematic, SILCOMP provides its employees with a contact person who can be contacted in case of doubt. Management will support its employees upon request.

3.1.2. Anti-Corruption/Money Laundering and Conflicts of Interest

According to the 10th principle of the United Nations Global Compact, companies must combat all forms of corruption, including extortion and bribery. For this reason, in dealings with business partners (customers, suppliers) and government institutions, the interests of the company and the private interests of employees on both sides are strictly separated. Actions and decisions are made free from extraneous considerations and personal interests. Applicable criminal law on corruption must be observed. Among other things, the following must be observed:

- The granting of personal benefits (particularly monetary benefits such as payments and loans, including the granting of small gifts over an extended period of time) by SILCOMP and its employees to public officials (such as civil servants or public employees) with the aim of obtaining advantages for SILCOMP, themselves, or third parties is prohibited.

- Monetary personal benefits to employees of other companies in return for preferential treatment in competition and business transactions may not be offered, promised, granted, or approved. Likewise, in dealings with business partners, personal benefits of value may not be demanded or accepted. SILCOMP must require its employees not to accept promises of such benefits. SILCOMP management and employees may not offer, promise, demand, grant, or accept gifts, payments, invitations, or services in business transactions that are granted with the intention of unduly influencing a business relationship or that pose a risk of jeopardizing the professional independence of the business partner. This generally does not apply to gifts and invitations that fall within the scope of customary business hospitality, custom, and courtesy.
- Taking up paid secondary employment is only permitted with the express prior approval of the responsible human resources department.

SILCOMP may issue a binding policy regarding the acceptance and granting of gifts, hospitality, and events. Exceptions may be made to these policies regarding appropriate low-value and symbolic gifts, appropriate business meals, and appropriate company events, including those hosted by business partners (customers, suppliers). If SILCOMP employees find themselves in a conflict of interest or are unsure whether a conflict of interest exists or could arise, they may contact management.

Furthermore, SILCOMP undertakes to comply with all laws and regulations to combat money laundering and terrorist financing, ensuring that no illegally obtained income is concealed and introduced into the legitimate economic and financial system.

3.1.3. Export Controls and Economic Sanctions

SILCOMP complies with all applicable import and export control laws, sanctions, and embargoes issued by national and international authorities. This includes restrictions on the export or re-export of goods, software, services, and technology to specific destination countries, as well as prohibitions on transactions involving specific countries, regions, organizations, and individuals.

3.2. Information Policy

3.2.1. Financial Responsibility and Disclosure of Information

To maintain the long-term trust of employees, business partners, and the public, SILCOMP's reporting must always be accurate and truthful and comply with relevant laws. This includes open and

transparent reporting on business activities, finances, corporate governance, and sustainability performance.

Books and records are maintained in accordance with legal, regulatory, and tax regulations, as well as internationally recognized accounting standards.

3.2.2. Trade Secrets, Intellectual Property and Plagiarism

SILCOMP obligates its employees to respect trade and business secrets. The intellectual property of SILCOMP, its customers, suppliers, and competitors must be respected and protected. Confidential information and confidential documents may not be disclosed to third parties without authorization or otherwise made accessible unless authorized to do so or the information is publicly available.

SILCOMP undertakes to implement all necessary and appropriate measures within its area of responsibility to ensure that neither customer products nor their processable components or raw materials, nor the corresponding know-how, fall into the hands of unauthorized third parties or leave the legitimate supply chain.

3.2.3. Whistleblowing and Protection Against Retaliation

SILCOMP has established an employee grievance system so that individuals or groups can report concerns or information about potential violations of this Code of Conduct, laws, or regulations. Complaints can be made anonymously. This ensures that whistleblowers are not subjected to repression, discrimination, intimidation, or harassment, and their identity is kept confidential, where permitted by law. Every report will be handled discreetly and carefully reviewed to take appropriate action and address any identified issues.

3.2.4. Data Protection and Data Security

Employees must comply with the legal principles governing the protection of personal data of our employees, members of companies with which we maintain business relationships, and our investors. Personal data of natural persons may only be collected, processed, and used in accordance with legal regulations and operational guidelines. Data of employees, customers, and investors will be treated confidentially and stored in accordance with legal requirements.

4. Principles of Ecological Responsibility

4.1. Environmental Protection

According to Principles 7, 8, and 9 of the United Nations Global Compact, companies should support a precautionary approach to environmental issues, undertake initiatives to foster greater environmental responsibility, and promote the development and dissemination of environmentally friendly technologies. For this reason, SILCOMP aims to sustainably protect the environment for present and future generations. National and international laws and agreements enacted to protect the environment must be observed. SILCOMP strives for the continuous improvement of our environmental and climate protection measures and promotes and supports the environmentally and climate-conscious actions of our employees.

4.2. Energy and Water Management

SILCOMP promotes the use of renewable energies such as solar energy, wind energy, hydropower, or biomass to meet its own energy needs in order to reduce its carbon footprint and associated greenhouse gas emissions. At the same time, SILCOMP encourages the use of energy-efficient operational processes by modernizing building structures, optimizing production processes, utilizing energy-efficient technologies and equipment, and using low-carbon transportation.

Furthermore, SILCOMP promotes responsible water use, prioritizing water-saving technologies and practices in its operations, and monitoring the resulting wastewater. This ensures that no pollutants are released into the environment unnoticed and that water quality is not negatively impacted.

SILCOMP also supports its employees in the prudent use of energy and water to reduce everyday consumption.

4.3. Air/Soil Quality, Greenhouse Gas Emissions

SILCOMP strives to minimize emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals, greenhouse gases, and combustion byproducts. SILCOMP prevents unacceptable soil contamination from manufactured products, required materials, or waste products.

4.4. Noise emissions

SILCOMP responds to the specific needs of our employees, as well as the local communities and residents, by reducing our noise emissions to a minimum through technical and organizational

measures. This serves to avoid negative impacts on the environment and human health and is achieved through soundproofing barriers, the use of quiet machinery/equipment, and the planning of work processes and transport routes.

4.5. Animal Welfare, Biodiversity, Land Use and Deforestation

Silcomp strives to protect biodiversity and the natural ecosystems affected by its business activities. For this reason, SILCOMP supports animal welfare, ensuring that animals are treated and kept according to ethical and legal standards, and that animal products come from responsible or certified sources. Furthermore, SILCOMP ensures that habitats and thus biodiversity are preserved and that harm to flora and fauna is prevented. This also includes responsible land use, which means deforestation, land grabbing, and habitat-destroying measures are avoided wherever possible. Particularly when sourcing raw materials, SILCOMP ensures that these criteria are also adhered to throughout the supply chain.

4.6. Responsible and Sustainable Chemical/Resource Management

Chemicals used at SILCOMP that pose a risk if released into the environment are recorded in the chemicals management system and safely stored, transported, used, reused, recycled, and disposed of in accordance with legal and occupational health and safety regulations.

SILCOMP also supports activities that ensure responsible and sustainable raw material procurement. The procurement and use of raw materials obtained illegally or through ethically reprehensible or unreasonable means must be avoided. At the same time, ecological and social criteria must be considered in raw material procurement.

Furthermore, SILCOMP pursues a systematic approach to identifying, managing, reducing, and responsibly disposing of or recycling solid waste (including product and packaging waste). The principle of waste prevention, verification for reuse and recycling before waste is disposed of, applies. This is supported by the application of efficient production methods, the effective use of resources, and consideration of potential waste reduction during the planning and development phases of projects. Suppliers should actively promote the reuse and recycling of materials and products. They should implement systems for the collection, separation, and further processing of reusable or recyclable materials and provide their employees with training and incentives to participate in recycling programs. Suppliers should also encourage the use of recycled materials in their products and packaging.

5. Requirements for Suppliers

SILCOMP communicates the principles of this Code of Conduct to its direct suppliers and requires and encourages compliance with its contents. SILCOMP requires its suppliers to comply with applicable laws in both the country of manufacture, the country of purchase, and the country of destination of the deliveries. Suppliers are also encouraged to demand compliance with the contents of this Code of Conduct from their direct suppliers.

6. Compliance

SILCOMP will inform its employees of the content of the Code of Conduct and the resulting obligations. SILCOMP will guide the design and, if necessary, adaptation of policies and processes based on the principles of the Code of Conduct.

Status: June 2025

Lutherstadt Wittenberg

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This Code of Conduct was partly adopted from the wdk compliance guidelines.