

Policy document COC01  
**Code of Conduct**

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# Salcomp Code of Conduct

## PURPOSE, SCOPE AND APPLICABILITY

Salcomp is committed to the highest standards of social and environmental responsibility and ethical conduct. We are committed to provide safe working conditions, treat employees with dignity and respect, act fairly and ethically, and use environmentally responsible practices.

The Code of Conduct outlines ethical behavior standards for employees and partners in our business activities. The Code explains employee responsibilities and the obligation to report any potential violations and cooperate in any investigation that may follow.

We are committed to operate in full compliance with all applicable laws and regulations. This Code goes beyond mere compliance with the law by drawing upon internationally recognized standards to advance social and environmental responsibility. When differences arise between standards and legal requirements, the stricter standard shall apply, in compliance with applicable law. The Code of Conduct applies to all Salcomp employees.

Salcomp uses its best efforts to have our suppliers, representatives and other contractors commit to Salcomp's Code of Conduct or to ensure that such parties have similar policies in effect.

## ETHICS

### Business Integrity

Salcomp expects the highest standards of ethical conduct in all of our endeavors. We shall always be ethical in every aspect of our business, including relationships, practices, sourcing, and operations.

### Improper payments

We shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. We shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates and applicable international anti-corruption conventions. We will not tolerate improper or corrupt payments made directly or indirectly to a customer, government official or third party, including facilitation or "grease" payments, improper gifts, entertainment, gratuities, favors, donations or any other improper transfer of value.

### Conflict of interest

We act in the best interest of Salcomp, and use Salcomp's property and resources exclusively for Salcomp's benefit. We disclose promptly any interests that might objectively be perceived as affecting our judgment or that may create an appearance of impropriety. We avoid any activity that might hurt the good reputation of Salcomp.

Salcomp seeks productive, ethical and transparent relationships with its suppliers. We expect our suppliers to be qualified according to Salcomp standards, to follow and exceed all applicable laws and regulations, and share the values expressed in our Code of Conduct.

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We do not accept or give gifts or entertainment beyond modest refreshments and business meals as well as business gifts of a nominal value, such as company logoed ball caps, pens and pads of paper.

### Disclosure of Information

Salcomp shall accurately record information regarding our business activities, labor, health and safety, and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties and as required by law.

### Protection of Intellectual Property

Salcomp invests in and rewards innovation. Salcomp’s intellectual property — that includes patents, software and other copyrighted materials, knowhow and trade secrets, brands and trademarks — is among its most valuable assets. We actively protect our intellectual property, and follow Salcomp classification and handling guidelines for our intellectual property and confidential information. Similarly, we respect and protect the valid intellectual property and confidential information of others.

## HEALTH AND SAFETY

Salcomp has a deep commitment to the health and safety of our employees and those who work with us. We earn the respect of each other and our partners by providing a safe, healthy and fair working environment. We do this through robust and consistent implementation of our process that meet or exceed regulatory requirements. We also expect the same from our contractors and suppliers.

### Health and Safety Permits

Salcomp obtains, keeps current, and complies with all required health and safety permits.

### Occupational Health and Safety Management

Salcomp identifies, evaluates, and manages occupational health and safety hazards through a prioritized process of hazard elimination, substitution, engineering controls, administrative controls, and/or personal protective equipment.

### Emergency Preparedness and Response

Salcomp identifies and assesses potential emergency situations. For each situation, Salcomp develops and implements emergency plans and response procedures that will minimize harm to life, environment, and property.

### Incident Management

Salcomp has a system for employees to report health and safety incidents and near misses, as well as a system to investigate, track, and manage such reports. Salcomp implements corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate employees’ return to work.

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### Working and Living Conditions

Salcomp provides employees with reasonably accessible and clean toilet facilities and potable water. Salcomp-provided dining, food preparation, and storage facilities shall be sanitary. Employee dormitories provided by Salcomp or third-parties shall be clean and safe and provide reasonable living space.

### Health and Safety Communication

Salcomp provides employees with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility.

## LABOR AND HUMAN RIGHTS

Salcomp shall be an employer of choice. All our employees deserve a fair and ethical workplace. We treat our employees with the utmost dignity and respect, and we uphold the highest standards of human rights.

Salcomp encourages diversity and equal opportunities and sees that recruiting people from both genders and from different age and nationality groups is a strength in the working environment.

In our recruiting, retention, promotion and other employment activities, we are committed to complying with the applicable employment and labor laws and regulations where we do business.

Salcomp aims at being a good corporate citizen. We support programs targeting in improvement of well-being and sustainability in the communities in which we operate. Salcomp also makes an effort to encourage and support our employees to engage in similar activities.

### Anti-Discrimination

We do not tolerate discrimination against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by applicable national or local law, in hiring and other employment practices. We take reasonable measures to accommodate religious practices.

### Anti-Harassment and Abuse

We are committed to a workplace free of harassment and abuse. Our employees shall not be threatened with, or subjected to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and sexual harassment.

### Prevention of Involuntary Labor and Human Trafficking

We are committed to ensuring that all work is voluntary. We do not use any form of slave, forced, bonded, indentured, or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

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### Underage Labor and Juvenile Worker Protections

We employ workers in our operations who are at least 18 years of age. We may employ juveniles who are older than 15 years of age but in such circumstances, they do not perform work that might jeopardize their health, safety, or morals. We do not require juvenile workers to work overtime or perform nighttime work.

### Wages and Benefits

Salcomp shall meet all legal requirements relating to wages and benefits, pay accurate wages in a timely manner, and wage deductions shall not be used as a disciplinary measure. All use of temporary and outsourced labor shall be within the limits of the local law.

### Freedom of Association and Collective Bargaining

Salcomp recognizes and adheres to employees' lawful rights to associate with others, form, and join (or refrain from joining) organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment.

### Grievance Systems

Our employees have mechanisms to report grievances and we are supporting open communication between management and employees. We provide anonymous complaint mechanisms for all employees to report workplace grievances. We protect whistleblower confidentiality and any form of retaliation is strictly prohibited.

### Privacy

Salcomp respects privacy. Salcomp collects, uses, holds and otherwise processes personal and customer data responsibly, lawfully and carefully. We apply applicable privacy management measures and we monitor compliance with our commitments.

### Responsible Sourcing of Materials and Services

As a part of Salcomp's supply chain management, our suppliers and other co-operation partners play a significant role. We expect them to meet our requirements and further develop their system of quality and sustainability management.

Salcomp exercises due diligence on relevant minerals in their supply chains aiming at ensuring that no materials are used originating from conflict areas, being produced utilizing child labor or forced labor, or materials associated with human trafficking or gross human rights violations, or with negative environmental impacts.

## ENVIRONMENT

Salcomp is committed to the protection of the environment and working against climate change. Salcomp continuously seeks ways to reduce CO<sup>2</sup> emissions and to prevent pollution throughout our operations and products. Salcomp's environmental programs are planned to reduce the environmental impacts of our products during design, procurement, manufacturing and use. We also expect our business partners and suppliers to share our commitment to the environment.

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### Environmental Permits and Reporting

Salcomp shall obtain, keep current, and comply with all required environmental permits. Salcomp shall comply with the reporting requirements of applicable permits and regulations.

### Hazardous Waste Management

Salcomp shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle hazardous waste.

### Non-Hazardous Waste Management

Salcomp shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle non-hazardous waste.

### Water Management

Salcomp's production processes are environmentally friendly as water is used mainly for cooling purposes; operations do not need specific wastewater treatment. Salcomp is following local legal requirements for water source management.

Salcomp shall implement a systematic approach to identify, control, and reduce wastewater produced by its operations. Salcomp conducts routine monitoring of the performance of its wastewater treatment systems.

Salcomp implements a systematic approach to prevent contamination of stormwater runoff. Salcomp shall prevent illegal discharges and spills from entering storm drains, the public water supply, or public bodies of water.

### Air Emissions Management

Salcomp shall identify, manage, reduce, and responsibly control air emissions emanating from its operations that pose a hazard to the environment. Salcomp shall conduct routine monitoring of the performance of its air emission control systems.

### Boundary Noise Management

Salcomp shall identify, control, monitor, and reduce noise generated by the facility that affects boundary noise levels.

### Pollution Prevention and Resource Reduction

Salcomp shall reduce energy, water, natural resource consumption, and greenhouse gas emissions by implementing conservation and substitution measures. Salcomp shall minimize hazardous substances consumption by implementing reduction and substitution measures.

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