

PLANSEE

The Plansee Group

EN
**code
of
conduct**



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We trust that our employees will perform their tasks correctly, and we support them in that endeavor with the guiding principles summarized in our Code of Conduct.

By complying with this Code of Conduct, each employee contributes to our long-term success, now and in the future, for the benefit of all employees and their families, as well as our customers, suppliers, business partners, and neighbors in all the locations worldwide where we live and work.

*Note: To make this Code of Conduct easier to read, the masculine form is used for references to people and personal pronouns as recommended by the conventions of spelling. The terms used apply equally to all genders in accordance with the principle of equal treatment.

This document is a completely revised and extended version of our Code of Conduct, which we first published in 2007. It replaces all previous versions and applies in all the companies of the Plansee Group in which we hold more than a 50% stake, first and foremost Ceratizit S.A., Plansee SE and Plansee Group Functions.

The Executive Board of the Plansee Group is responsible for ensuring the implementation of the regulations formulated in this Code of Conduct. The Management Boards of the local legal entities are responsible for making sure the regulations are complied with and ensuring that suspected violations are carefully investigated.

The Executive Board of the Plansee Holding AG

December 2023



Mag. Karlheinz Wex



Mag. Ulrich Lausecker



Dr. Andreas Lackner



Mag. Andreas Schwenninger



Our commitment

Value creation

We are committed to the sustainable and profitable development of the Group and its companies. This is a prerequisite for our long-term competitiveness, for safeguarding our future, and for creating value for the company.

Excellence

It is our goal to achieve market-leading positions in each of our business activities and to constantly improve all of our products and processes. Excellence throughout the value chain of molybdenum and tungsten production is required in order for us to be chosen as the preferred supplier, customer, business partner and employer.

Respect and trust

We commit to being honest, direct and fair with our employees, customers, suppliers and other business partners, and everyone at the locations where we do business. Mutual trust and respect are essential prerequisites for successful long-term partnerships.



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**Our
expectations**

- **All employees respect international principles that aim to promote and protect human rights, including the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.**
- **All employees and business partners respect our Code of Conduct.**
- **All employees contribute to the good reputation of the Plansee Group. In our daily interactions with each other, with customers, suppliers, and other business partners, and in public, the virtual world, and on social media.**
- **Our employees actively promote the compliance with and implementation of the Code of Conduct**
- **Every employee is obligated to question behaviors that are not compatible with the rules of the Code of Conduct. If an employee is unsure, he should immediately seek the advice of a supervisor, an employee of the HR or Legal Department, or other trusted individuals.**
- **Any employee who violates the Code of Conduct or is involved in criminal activities will be subject to appropriate disciplinary measures.**
- **Are you uncertain whether particular behaviors are compatible with the rules of the Code of Conduct? Ensure transparency, address the potential conflict, consult with a supervisor, an employee of the HR or Legal Department or another trusted individual, and facilitate a legally correct decision.**
- **Violations of the rules of the Code of Conduct can also be reported through our whistleblower system. All contact details are published on our website. Further contacts can be found on the last page of this document.**



Areas of conflict and risks

The business model of the Plansee Group gives rise to certain boundary conditions and areas of conflict that are closely tied to statutory requirements for topics such as supply chains, sustainability, whistleblowing or data protection and especially with our customers' requirements for the entire range of issues related to sustainable corporate management.

Geopolitical developments, access to raw materials and energy sources, trade restrictions, and the availability of transport routes and capacities constitute essential framework conditions for the business activity of the Plansee Group. Risks arising from these areas of conflict are continually assessed in the Plansee Group and scenarios are developed for optimally servicing our customers for the purposes of business continuity management.

When it comes to choosing between economic, social, and ecological priorities, we aim to strike the right balance – for the benefit and success of our customers, our employees, and the people who live in the communities where we do business. Our values are the compass: sustainably successful, continuously innovative, and consistently responsible.

Naming the following boundary conditions and areas of conflict provides transparency in the Group and increases the sensitivity of employees, customers, and other business partners throughout the world.

It also creates awareness and understanding for the rules, instructions, and measures that are derived and increases trust in the Plansee Group as an attractive employer, reliable supplier, and responsible business partner.

People



Well over 10,000 people all over the world contribute daily to attaining the mission and goals of the Plansee Group.

It is important that all our managers and employees in every country are aware that people can be discriminated against, harassed, or exploited for many different reasons.

Every person who is involved in manufactu-

ring and processing our primary materials, consumables, supplies and products is entitled to fair working conditions.

We do everything in our power to guarantee and implement universal human rights, as well as occupational health and safety, throughout our supply chain and in all affiliated companies.

Our rules

- We respect the personal dignity and privacy of every individual.
- We do not allow any abuse of human rights.
- We do not tolerate child labor or any form of forced labor.
- We do not tolerate any discrimination, harassment or offence based for example on color, national origin, gender, religion, age, physical or mental disability, trade union or political affiliation, sexual orientation, marital or family status.
- People with physical or mental disabilities can be sure that our entrances and workplaces are designed to meet barrier-free requirements
- Our employees are recruited, selected, continually trained, promoted, and remunerated based exclusively on work-related criteria such as experience and performance.
- We ensure that each employee is adequately paid for his work and that statutory conditions are met.
- We ensure that international, national, and local laws on working hours are complied with.
- We avoid situations where the private interests of an employee conflict with the interests of the company. Conflicts of interest may arise if an employee
 - has a business interest in a company that is a customer, service provider, or other business partner of the Plansee Group.
 - employs close relatives or purchases goods or services from relatives or from companies controlled by relatives, while acting on behalf of the company.
 - Is privately engaged in any organization whose activities could negatively influence the interests of the company or its employees.
- We ensure that the protection of the physical and mental health of all employees is an important part of our daily work in the entire company.
- We minimize all risks and dangers at every workplace to guarantee the physical integrity, health and well-being of all employees, suppliers and visitors.
- We guarantee fundamental human rights in the workplace, especially the freedom of association and the right to collective bargaining.

Customers



The Plansee Group manufactures 100,000 products for hundreds of applications and thousands of different customers. Whether semi-finished products, standard products, individual tools, custom components, or expensive engineering – the range of require-

ments of our customers from a great variety of industries is wide.

We aim to supply every customer in accordance with their requirements for delivery deadlines, quality level, quantities, and legal conditions.

Our rules

- **We comply with universally accepted standards for management systems.**
- **By continually improving and enhancing our integrated management system, we ensure that we meet the legal requirements, the requirements of our customers, and of ourselves in terms of quality, occupational safety, environmental protection, and energy efficiency. Suitable training is offered.**
- **We are committed to developing, producing, and marketing products and services that meet our customers' requirements.**
- **Besides our management standards and the legal requirements, we take into consideration additional regulations agreed with the customers that are customary in our sales markets. These include regulatory frameworks in the automobile, electronics, and aviation industries, and in medical technology.**
- **Our continuity management aims to supply our customers even in the case of difficult internal or external circumstances.**

Legal statutes



For a group of companies with production sites and sales offices in 50 countries, complying with all legal frameworks is a responsibility that brings new challenges every day for to the management, the local managing directors, and all employees on site. Leadership principles, skills profiles for managers, as well as training programs form the

internal guidelines for successful business activity in various legal systems with a wide range of legal opinions and interpretations. Employees, customers, business partners, and other stakeholders can use our whistleblower system to report suspected violations of the Code of Conduct and of legal statutes, safely and anonymously.

Our rules

Corruption and bribery

- We do not tolerate any form of corruption, bribery or extortion.
- Offering, soliciting, giving or receiving money, goods, or other inducements or kickbacks that are intended to influence an individual, a company, a public official or a governmental institution is strictly forbidden.
- Bribery may include money, goods, privileges or some other promise made to influence the action, vote, or decision of a person.
- Gifts given to customers, suppliers, and other business partners should be chosen carefully, in compliance with applicable laws and to avoid any appearance of bad faith or impropriety in the mind of the recipient. Gifts must not be made to public officials or other civil servants unless they are permitted under applicable local law.
- Employees should never accept any advantages of any kind from third parties, including from customers, suppliers, service providers, consultants, or other persons and institutions.
- We act in accordance with national and international competition laws and do not take part in behavior that violates competition and antitrust law, such as price fixing, allocating markets or customers, sharing information on markets or offers.

Fraud and theft

- 'Fraud' is any intentional action that aims to take property or money from the company through deception or other illicit means.
- 'Theft' means taking company property without permission.
- We do not tolerate any form of fraud or theft.
- We protect our company's assets from damage, loss, and criminal activity.
- We never use company assets for personal enrichment or for illegal activities.

Primary materials & Products



Primary materials

Our essential raw materials and primary materials, such as tungsten, cobalt and tantalum, occur and can be mined in regions that are embroiled in armed conflict or cannot ensure compliance with human rights.

We use guidelines, certifications, and inspections in the markets we purchase from to ensure that our raw materials are ethically sourced. By consistently expanding a circular economy for materials such as tungsten or cobalt, we gradually reduce the dependence on fresh materials from the mines.

Our rules

- We exercise due care to ensure social and ecological responsibility when procuring raw materials and other purchased products and services in our supply chain.
- Further information on the conduct we expect from our suppliers is set forth in the Plansee Group Supply Chain Policy.

Products

Our products made of the materials molybdenum and tungsten have special qualities that are needed not only in civil applications, but also in the nuclear and military fields.

Given the potential for misuse, we must make sure our products are delivered only to regions and countries where we can be sure they will be used exclusively for civil purposes or to defend communities with values that commit to peace, democracy, freedom, and principles based on the rule of law.

Our rules

We comply with the applicable (re)export and import controls that restrict the exchange of materials or intangible assets with certain countries, regions, companies, or persons, or require a permit from government authorities. This also includes the provision of technical information and services.

Information



Confidential information about manufacturing processes and customer applications is one of our Group's most important assets. When navigating the conflicting priorities of protecting information and exchanging it

between employees, customers, and service providers, we ensure clear rules, secure IT systems, and periodic awareness measures to optimally protect information and data.

Our rules

- We respect third-party intellectual property rights such as patents, usage models, brands, designs, and copyrights.
- We protect all information that might jeopardize the obtaining or enforcement of intellectual property rights when that information becomes known.
- We take suitable measures to optimally protect the fixed assets, information systems, intangible assets, confidential information, trade and business secrets, and know-how of the Plansee Group as well as of customers, suppliers, and other business partners.
- 'Confidential information' refers to all non-public information concerning our Group and its companies, customers, suppliers, and other business partners, such as product and business plans, specifications, financial information, production methods and processes, customer and employee lists, and computer software.
- We only allow employees to have access to confidential information if they need it to do their job effectively.
- Employees are not allowed to store, record, or forward confidential information without a specific assignment or permission, whether in databases or with the help of audio, video, photo, copies, or replicates.
- We use internet, email, and social media responsibly and ensure that all passwords remain confidential and tokens are stored securely.
- We classify documents in accordance with our internal guidelines.
- We are convinced that information and training on company and information security are essential factors for minimizing risks for the company, and we offer training sessions for appropriate groups of employees on a regular basis.
- We protect the personal data of employees, customers, suppliers and other business partners and process it in compliance with the legal requirements.

Energy consumption & Environment



Energy consumption

The Plansee Group has manufactured products from molybdenum and tungsten for over 100 years. Our task is to use these materials – which require relatively energy-intensive production– to enable (new) high-tech applications and achieve excellence in all levels of our value creation. We are transparent with our customers about the conflict between the energy consumption required in production and the performance of our tools and products in manufacturing processes and end applications, to enable decisions that favor the most efficient solution. Our carbon footprint is determined both for individual production sites and for individual products and product groups.

Our rules

- We constantly develop our processes to continually increase our energy efficiency.
- Every employee is obligated to handle energy prudently.

Environment

To protect the environment from the relatively low risks from our production activity, prevention is a key factor.

We aim to use natural resources such as air, soil, and water as efficiently as possible and minimize emissions through effective measures – particularly through fire, noise, and water protection and the installation of powerful filter systems.

Our rules

- We comply with all laws governing environmental protection.
- We work on developing products and manufacturing processes that consume fewer resources (energy, raw materials, and water) and lead to less waste (raw materials, chemicals, and wastewater).
- We develop and operate recycling procedures and use recycled material in our products to minimize our environmental impact.
- We create awareness and train our employees on a regular basis regarding the dangers and risks in the production environment.

If employees have questions or are unsure about the topics addressed in the Code of Conduct, they should ask their supervisor, an employee of the Legal or HR Department, or the Ombudsperson.

Contact for data protection: compliance@plansee-group.com

Contact for corporate security and IT security: corporate-security@plansee-group.com

Contact for the whistleblower system:

The Plansee Group has an up-to-date compliance management system. The appointment of an external legal Ombudsperson through the law offices of FS-PP in Berlin, Germany is an important part of the compliance management system. The Ombudsperson and all employees of the law offices of FS-PP in Berlin, Germany, are subject to the lawyer's duty of secrecy.

The Ombudsperson passes information on to representatives of the Plansee Group only if the whistleblower has expressly given his consent. Information can be forwarded anonymously, and the Ombudsperson will protect the whistleblower's identity. Additional information on the whistleblowing procedure can be found at plansee.com.



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