

# CODE OF CONDUCT

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vacuMetal



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## INTRODUCTION

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At Vacumetal, we strive to create an inclusive and respectful community. Our Code of Conduct serves as a guide for our organization to foster an environment where everyone feels valued and respected.

This code embodies our shared values of integrity, collaboration, and respect for diversity. By following it, we contribute to a positive and productive work environment for each individual.

We, therefore, consider the principles laid out in this code of conduct as the fundamental conditions for doing business with Vacumetal.

## I. COMPLIANCE WITH THE LAWS AND REGULATIONS

We expect that all those with whom we do business comply with our social responsibility in all corporate activities. In all business negotiations and decisions, we observe the valid laws and other relevant rules of the countries in which we are active. In addition to complying with local and national laws, we also recognize the principles of the international conventions listed below:

Conventions of the International Labor Organization	
ILO-Convention 1	Working Hours
ILO-Conventions 29, 105	Forced and Compulsory Labor and Abolition of Forced and Compulsory Labor
ILO-Conventions 87, 98, 135	Freedom of Association and the Right to Collective Bargaining
ILO-Conventions 100, 111	Equal Remuneration and Equal Treatment
ILO-Convention 102	Social Security (Minimum Standards)
ILO-Convention 131	Minimum Wage Fixing
ILO-Conventions 138, 182	Minimum Age
ILO-Convention 155	Occupational Safety and Health
ILO-Convention 159	Vocational Rehabilitation and Employment of Disabled Persons
ILO-Convention 169	Indigenous and Tribal People
ILO-Convention 177	Home Work
ILO-Convention 181	Private Employment Agencies
ILO-Convention 183	Maternity Protection

## 2. PROHIBITION OF CORRUPTION AND BRIBERY

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Any form of corruption, breach of trust, and embezzlement is prohibited and may not be practiced or tolerated. No attempts may be made, either domestically or abroad, to exert undue influence over others in commercial transactions by exchanging gifts or offering or providing other advantages. The same applies to the non-permissible acceptance of advantages

## 3. CHILD LABOR

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Child labor may not be involved in any stage of business activity and may not be tolerated. Any person under 15 years of age is deemed a child. Exceptions are possible for countries in which the minimum age for employment or compulsory schooling is higher under local laws or developing countries covered by the exemption rule under ILO Convention 138, in which the minimum age has been lowered to 14.

Guidelines or procedures on compensation for child workers must be created, documented, complied with, and effectively communicated to the staff and other involved parties. Appropriate financial or other support should be made available to ensure that schooling is possible until the child has reached the age defined above.

The employment of young workers who, in accordance with the above definition, are no longer children but have not yet reached the age of 18, is permitted. If they are subject to compulsory schooling, they may not work outside school hours. Working hours may not exceed eight hours per day, and the total of school, work, and travel time may not exceed ten hours per day.

Young workers may not work at night or in situations that are dangerous or unsafe regarding their physical or mental health and development.

## 4. FORCED COMPULSARY LABOR

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All must respect and support compliance with internationally recognized human rights. Any work or services that are not offered by a person of his or her own free will or that are provided under threat of punishment or reprisals or in repayment of a debt may not be permitted or supported.

Work or services demanded of a person on the grounds of a court order are not considered forced or compulsory labor, as long as the work or service is carried out under the supervision and monitoring of the public authorities and the sentenced person is not hired out to individuals or private businesses and associations or in any other way made available to them.

## 5. HEALTH, OCCUPATIONAL AND ENVIRONMENTAL PROTECTION

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In order to work in step with the environment and avoid dangers to people and the planet, all valid health, occupational and environmental requirements must be complied with.

In order to ensure health protection and safety in the workplace, effective steps to avoid possible problems in this area and avoid employment related injuries or illnesses arising as a result of work must be taken, in connection with the work or in the course of the work. The causes of all risks in the working environment should, on the basis of the appropriate state of knowledge in the field of health and safety protection in the relevant industrial area, be reduced or eliminated altogether. All procedures to this effect must be documented.

An assessment of all workplace risks for new, pregnant or breastfeeding mothers, including those who must leave their duties, in order to ensure that all appropriate steps are taken to eliminate or reduce health and safety risks.

If, following the efforts to reduce or remove the causes of all risks, there are still risks in the working environment, the organization must, at its own costs, provide the staff with any appropriate personal protection equipment required. In the event of a work related injury, first aid and assistance of the employee in receiving further medical care.

A representative of the company management must be appointed to be responsible for ensuring a healthy and safe workplace for all employees and for implementing the requirements of these guidelines on health and safety protection. Additionally, an Occupational Health & Safety committee must be set up, consisting of a balanced group of representatives of management and employees. It should assess formal, regular work-related health and safety risks, in order to identify and remove existing and possible health and safety risks. Assessment reports and records of any corrective and precautionary measures taken must be kept.

All decisions made must be effectively communicated to all staff members. In order to ensure the improvement of health protection and safety conditions in the workplace, the committee must receive regular training and retraining.

The employees must be regularly permitted to attend health and safety training sessions and, if necessary, work-related training.

This training should be repeated for all employees joining the company or changing division and in the event of any changes or additions.

All must guarantee all staff members free access to clean sanitary facilities, drinking water, appropriate premises for meal breaks and, where necessary, sanitary food storage facilities.

All must ensure that all overnight accommodation that is made available to the staff members is clean and safe and covers the basic needs, irrespective of whether it owns these itself, leases them or is contractually responsible for them. All staff members are entitled to remove themselves from situations of grave danger without first being required to Secure the permission of the employer.

## 6. FREEDOM OF ASSOCIATION

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At Vacumetal we make use of the Sociocratic Circle Organization Method.

SKM is an organizational model that strives for equal participation and decision-making within a group or organization. Instead of a hierarchical structure, the SKM emphasizes circular consultation structures, in which decisions are made on the basis of consent (no overriding objection) instead of consensus.

Everyone in the organization has the opportunity to participate in decision-making and is represented by a circle. The method is designed to promote effective communication, transparency and a sense of equality within the organization.

Vacumetal expects its partners to act in a similar form or method.

## 7. DISCRIMINATION

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All forms of discrimination, within the scope of the valid laws and rules, for instance also with regard to its own staff members and business partners. As regards recruitment, pay, access to training, promotion, dismissal or retirement, no discriminatory action must be carried out or supported with regard to race, nationality, geographical or social origin, family obligations, family status, union membership, political views, age or any other possible situation. Nothing may prevent employees from exercising their rights. Nothing may prevent the right for needs to be met regarding race, nationality or social origin, religion, disability, sex, sexual orientation, family obligations, union membership, political views or any other possible situation.

Threatening, offensive, exploitative or sexually coercive behavior, including gestures, language or physical contact, are forbidden at the workplace and in all premises leased by the company or for which the company is contractually responsible. Forcing women to take pregnancy or virginity tests is not permitted under any circumstances.

## 8. DISCIPLINARY MEASURES

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The employees must be treated decently and respectfully. There may be no involvement in or toleration of any corporal punishment, mental or physical coercion or verbal abuse of the employees. Harsh or inhumane treatment is prohibited.

## 9. WORKING HOURS

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All must comply with the national laws, collective agreements and industrial standards regarding working hours, breaks and statutory public holidays. The working week is laid down by law, but may not exceed 48 hours.

After six consecutive days of work, at least one day off must be provided. Exceptions to this rule apply only if the law of the land allows working hours to exceed this limit and a freely negotiated collective agreement is in place that allows average working hours, including appropriate rest periods.



## 10. PAYMENT

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All must ensure that the pay for a normal working week, not including overtime, always corresponds to at least the legal or industry minimum standard or the collective agreements. All must pay wages that cover basic needs and provide some discretionary income.

All additional payments provided for by the rules valid in the country must be paid. In countries in which a higher rate for overtime is not laid down by law or collective agreements, the staff must be compensated for overtime with the higher rate in line with the company standards or prevalent industry standards.

Undue deductions and deductions as disciplinary measures are prohibited. Exceptions apply only if wage deductions as disciplinary measures are permitted by the law of the land and a freely negotiated collective agreement is in place which allows this practice. Wages and social contributions may under no circumstances be paid late or be limited, for instance in the form of vouchers, coupons or bills of exchange and may not use labor-only contracting, a series of successive short-term contracts and/or other programs in order to circumnavigate its responsibilities towards the employees in line with the valid law and rules as regards employment and social security.

## 11. COMPLIANCE WITH COMPETITION LAW

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All must comply with the rules of free and fair competition and in particular, all statutory provisions of the anti-trust legislation must be complied with.

## 12. FOREIGN TRADE

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All provisions of the foreign trade, tax and customs laws of all countries in which business is conducted must be complied with.

### **13. PROTECTION OF OPERATING/BUSINESS SECRETS AND DATA PROTECTION**

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Operating and business secrets and all other confidential information must be treated as strictly confidential. This information must be appropriately protected from being inspected or passed on to third parties. In all use of personal data, the protection of privacy must be complied with and the security of these data guaranteed.

### **14. MANAGEMENT SYSTEM**

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These policies and procedures shall be effectively communicated and made accessible to personnel in all appropriate languages.

### **15. CORRECTIVE ACTIONS**

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In the event of non-compliance with the requirements of this code of conduct, corrective measures will be agreed with Vacumetal, to be implemented within an appropriate period of time.

### **16. RIGHT OF TERMINATION**

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In the event of serious cases of non-compliance with the requirements laid down in this code of conduct or ongoing non-compliance with the requirements defined in this code of conduct following the extensive implementation of corrective measures as described above, Vacumetal. is entitled to terminate the business relationship, including all subordinate service providers.

An appropriate notice period to implement the corrective measures must be provided before the right of termination is exercised.

Vacumetal would like to thank you for your support and is delighted to have laid a foundation for growth and sustainability.

## SIGNATURE OF CONSENT

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I have read the Vacumetal Code of Conduct and confirm that the following company practices its business in compliance with requirements mentioned above.

Company: \_\_\_\_\_

Stamp: \_\_\_\_\_

Name (Print): \_\_\_\_\_

Signature: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_