

## **Code of Conduct - EN**

### **1. Introduction**

At Vacumetal, we strive for an inclusive and respectful working environment. Our Code of Conduct serves as a guideline for everyone within our organization to promote a culture in which every employee feels valued, heard and respected.

This code reflects our core values: integrity, cooperation and respect for diversity. By following these principles, we collectively contribute to a positive, safe and productive work environment.

### **2. Compliance with laws and regulations**

Vacumetal also endorses the following international conventions of the International Labour Organization (ILO), including but not limited to:

ILO Convention 1 – Working Hours

ILO Conventions 29 and 105 – Abolition of Forced Labour

ILO Conventions 87, 98 and 135 – Freedom of Association and Collective Bargaining

ILO Conventions 100 and 111 – Equal Remuneration and Equal Treatment

ILO Convention 102 – Minimum Standards of Social Security

ILO Convention 131 – Minimum Wage Fixing

ILO Conventions 138 and 182 – Minimum Age and Prohibition of Child Labour

ILO Convention 155 – Occupational Safety and Health

ILO Convention 159 – Vocational Rehabilitation and Employment of Disabled Persons

ILO Convention 169 – Indigenous and Tribal Peoples

ILO Convention 177 – Home Work

ILO Convention 181 – Private Employment Agencies

ILO Convention 183 – Maternity Protection

### **3. Prohibition of corruption and bribery**

Any form of corruption, fraud, conflict of interest or embezzlement is strictly prohibited. It is not permitted to directly or indirectly offer or accept advantages intended to influence business decisions. Gifts or invitations are only allowed if they are of reasonable value and comply with normal business practices.

## **4. Child Labour**

Child labour is prohibited under all circumstances. A person younger than 15 years is considered a child unless local legislation prescribes a higher minimum age.

If younger employees (under 18 years) are employed, they may not work at night or perform work that poses a danger to their physical or mental health.

## **5. Forced Labour**

All forms of forced labour, bonded labour or labour under threat of penalty are prohibited. Employees must perform their work voluntarily and may terminate their employment at any time with reasonable notice.

## **6. Health, safety and environment**

Vacumetal requires that all employees and partners comply with applicable legislation regarding occupational safety, health and environmental protection.

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- Risks of occupational accidents and diseases must be prevented or minimised.
- Personal protective equipment must be provided by the organisation.
- Every employee has the right to clean sanitary facilities, drinking water and safe rest and eating areas.
- Company housing must be clean, safe and provide basic necessities.
- Any employee may withdraw from a situation that presents serious danger without permission.

A management representative is responsible for enforcing safety policies and monitoring a safe workplace.

## **7. Freedom of association**

Vacumetal applies the Sociocratic Circle Method (SCM). This model promotes equal decision-making without hierarchy: decisions are made based on consent (no overriding objection).

Every employee can participate in decision-making and is represented within a circle.

## **8. Discrimination**

Discrimination in any form is prohibited. No distinction may be made based on race, origin, age, gender, sexual orientation, disability, religion, political opinion, trade union membership or other personal characteristics.

Aggressive, threatening or sexually transgressive behaviour is not tolerated. Women must never be forced to undergo pregnancy tests or other unlawful checks.

## **9. Disciplinary measures**

Every employee has the right to respectful treatment. Physical or mental coercion, insults or inhumane treatment are prohibited.

Disciplinary policies must be fair, transparent and proportionate.

## **10. Working hours**

Vacumetal adheres to legal standards and collective agreements for working hours and rest periods.

A working week consists of a maximum of 40 hours, with a maximum of 50 hours of overtime per month after approval by a supervisor.

After six consecutive working days, every employee is entitled to at least one day off.

## **11. Remuneration**

Remuneration for a normal working week must always meet at least the legal or collective minimum wage and be sufficient to meet basic needs. Unlawful deductions from wages are not permitted. Payment may never take place in the form of vouchers or credits.

## **12. Protection of company and personal data**

Confidential information and trade secrets must be carefully protected against unauthorised access or disclosure. Personal data is processed in accordance with privacy legislation (GDPR), ensuring confidentiality and data security.

## **13. Management system**

~~The policies and procedures of this Code of Conduct must be effectively communicated and accessible to all employees in relevant languages.~~

## **14. Corrective actions**

In case of violation of this Code of Conduct, corrective actions will be established together with Vacumetal and must be implemented within a reasonable timeframe.

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## **15. Verification**

The Code of Conduct is verified annually and any changes are communicated to all employees.