



SAMSON Code of Conduct for Suppliers

Code of Conduct for Suppliers of SAMSON AKTIENGESELLSCHAFT and its subsidiaries as well as of all its affiliated companies.

Preface

At SAMSON AKTIENGESELLSCHAFT, we are committed to our responsibility as part of global supply and value chains. Our actions are based on the basic principles of sustainable corporate governance, integrity and compliance in business. This Code of Conduct sets out the fundamental standards that we expect all our business partners to comply with. As a result, it serves as the basis for a trustful, long-term business relationship with our suppliers. It is based on international standards, such as the UN Guiding Principles on Business and Human Rights, the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG), the conventions of the International Labour Organization (ILO) as well as the principles of the UN Global Compact.

Our objective is to work together with our suppliers and service providers to uphold sustainability and transparency throughout the supply chain. We strive to systematically identify and mitigate risks and make a positive contribution to the environment, society and the economy.

To effectively put these basic principles into practice in our day-to-day business, we have drawn up a set of rules that we expect our suppliers and business partners to follow. The rules outline our expectations and requirements in the key fields of action. They serve as a benchmark for a responsible, future-proof supply chain. We expect all suppliers to follow these rules and incorporate them into their own organization and throughout their supply chains.

1. Respect for human rights

We expect our suppliers to protect and fully respect human rights. Child labor, forced or compulsory labor and human trafficking in any form are prohibited. Employees must be allowed to commence and terminate their employment at their own free will. Everyone must be treated equally, regardless of gender, ethnicity, religion, age, sexual identity or disability. We do not tolerate discrimination, harassment or humiliation in any form. The dignity, privacy and physical integrity of staff must be respected at all times. Furthermore, freedom of association must be granted and the right to collective bargaining respected.

2. Labor conditions and social responsibility

We expect our suppliers to maintain fair and safe labor conditions. This includes compliance with legal regulations and collective bargaining agreements relating to working hours as well as the punctual payment of wages, which must comply with at least the minimum statutory requirements. Overtime is only permitted in accordance with statutory regulations and must be adequately remunerated.

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Occupational health and safety have top priority. Risks to health and safety must be identified, minimized and prevented as far as possible. Work-related accidents and occupational diseases must be prevented by taking precautionary action. Employers must ensure that staff have access to clean drinking water, clean sanitary facilities and adequate break rooms at all times. Discrimination, physical and mental abuse, intimidation and sexual harassment in any form are strictly prohibited.

3. Environmental protection and conservation of resources

Our suppliers bear responsibility for environmental protection and the efficient use of resources. We expect them to minimize the negative environmental impact of their activities, comply with all national and (where applicable) international environmental laws and take additional action exceeding these requirements, wherever possible. The generation of waste, emissions and wastewater is to be avoided or reduced as far as technically possible. We explicitly welcome the use of environmentally friendly technologies and procedures. Hazardous substances must be stored, transported, used and disposed of in a safe manner. We expect our suppliers to ensure that all approvals, test reports and regulatory requirements are observed and monitored on a regular basis. Sustainability is an essential part of all processes and business decisions. Consequently, it must be incorporated into all of these processes.

4. Integrity and compliance

Integrity, transparency and compliance in business are important to us. We expect our suppliers to comply with all applicable laws and regulations, especially antitrust laws as well as data protection and export control regulations. Corruption, bribery, extortion and undue influence in any form are prohibited. Gifts, invitations or other gratuities are only to be offered or accepted if they comply with generally recognized business practices and do not influence business decisions. Confidential information and personal data must be handled with utmost care and protected against unauthorized access. We expect our suppliers to not engage in any form of money laundering, terrorist financing and other illegal activities.

5. Conflict minerals and raw materials from high-risk areas

Strict due diligence obligations apply to the sourcing of raw materials, such as tin, tantalum, tungsten, gold and cobalt. Our suppliers establish processes that meet the OECD guidance on responsible mineral supply chains to ensure traceability of these materials. Our suppliers must ensure that these raw materials are not mined in regions of conflict or high risk where human rights violations, exploitation or violence occur. We expect our suppliers to work exclusively with approved smelters and refineries that demonstrably apply recognized due diligence processes. Transparency concerning the origin of raw materials used is indispensable for the business relationship with our suppliers.



6. Implementation and control

Our suppliers implement the requirements stipulated in this Code of Conduct and communicate them to upstream suppliers and subcontractors. They appoint persons within their organization to be responsible for monitoring compliance with the standards who are able to provide adequate evidence of compliance on request. Suppliers must allow SAMSON or an appointed third party to perform audits, document reviews or on-site inspections upon reasonable advance notice. If violations are identified, suppliers must immediately take adequate action, which must be clearly documented.

7. Incident reporting system

It must be possible for suppliers and their staff to report potential violations of this Code of Conduct in good faith and in a confidential manner. We do not tolerate any form of reprisal or discrimination against persons who report incidents. An internal or external incident reporting system must be set up or made accessible to allow incidents to be reported effectively and without delay.

8. Commitment to this Code and consequences

This Code of Conduct is part of the business relationship between SAMSON AKTIENGESELLSCHAFT and the supplier. Major violations of the fundamental principles set out in this document can lead to the business relationship being restricted, suspended or terminated, depending on the severity of the violation. We ask our suppliers to sign this Code of Conduct and ensure compliance with the standards and requirements specified in this document throughout the supply chain.

Compliance with requirements

Once an order and our General Terms and Conditions of Purchase have been accepted, our suppliers are obliged to comply with the requirements specified in these documents. Furthermore, we expect our suppliers to fully and truthfully complete all relevant supplier self-assessment or compliance questionnaires to ensure that our standards and statutory requirements are observed. We reserve the right to check compliance with these requirements through appropriate action (such as self-assessments or audits). In the event of violation, we are entitled to take appropriate remedial action including the restriction or termination of the business relationship. Contractual obligations arising from existing agreements remain unaffected, provided they do not contradict the provisions stipulated in this document.

Incident reporting platform

If information concerning illegal conduct or violation of this Code of Conduct exists, it can be reported confidentially and, if desired, anonymously using our own incident reporting platform **bkms system at** <https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=8aEMtQ&c=-1&language=eng>.

Alternatively, the contact person at SAMSON can be contacted. All incoming reports will be checked and processed according to the applicable compliance procedure in a timely fashion.



Consent to this Code of Conduct:

Place, Date

Signature and Company stamp Supplier

Company: _____

Name in Block letters: _____

Position: _____