



Code of Conduct

Message from the Board of Directors

CIREX is one of the largest 'lost wax model' foundries in the world, producing high-grade steel and aluminium components with headquarters in the Netherlands and production locations in Germany, the Czech Republic and Slovakia. We give great importance to quality, health and safety, innovation, environmental awareness, sustainability and social responsibility. We owe our success and relationships to our employees. Within our company we continuously strive for optimisation of all processes and awareness of the employees. To continue to improve our performance in this rapidly changing world, it is very important that we remain true to our core values.

Our Code of Conduct includes our core values and main policy principles to meet at a minimum legal requirements and is in line with the expectations of other stakeholders, both internally and externally.

This Code of Conduct is a guideline for the Board of Directors, management, supervisors and employees to act appropriately within the company, but also with regard to external relations and stakeholders. The standards, values and guidelines included in this Code of Conduct must be respected at all times in order to remain a successful company and to prevent incidents.

We support the *Ten Principles* formulated by the UN Global Compact. We have officially joined the UN Global Compact. These *Ten Principles* form the basis for the Code of Conduct and therefore also the basis for our daily business operations. The '*Ten Principles of the UN Global Compact*' can be found below.

Human Rights	Environment
<p>Principle 1. Businesses should support and respect the protection of internationally proclaimed human rights; and</p> <p>Principle 2. Make sure that they are not complicit in human right abuses.</p>	<p>Principle 7. Businesses should support a precautionary approach to environmental challenges;</p> <p>Principle 8. Undertake initiatives to promote greater environmental responsibility; and</p> <p>Principle 9. Encourage the development and diffusion of environmentally friendly technologies.</p>
Labour	Anti-corruption
<p>Principle 3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;</p> <p>Principle 4. The elimination of all forms of forced and compulsory labour;</p> <p>Principle 5. The effective abolition of child labour; and</p> <p>Principle 6. The elimination of discrimination in respect of employment and occupation.</p>	<p>Principle 10. Businesses should work against corruption in all its forms, including extortion and bribery.</p>

For more information please visit:
www.unglobalcompact.org

The UN Global Compact's Ten Principles are derived from: the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

Good relations with our partners, customers, governmental bodies and other stakeholders is one of the keys for our success. You can make a contribution in creating and maintaining these healthy relations. It is important that you communicate with our relations with sincerity, openness, integrity and respect.



We collaborate only with external parties that act in line with our standards and values as set out in this Code of Conduct.

This Code of Conduct does not describe specific examples, but highlights our policies, standards and values. We trust that our employees act in accordance with the Code of Conduct and of course comply with applicable laws and regulations.

For everyone entering employment at CIREX the Code of Conduct is part of the introduction program. Every employee must also re-subscribe to this Code of Conduct every two years. Do your part by studying the Code of Conduct and by complying with our principles and values.

It is a joint responsibility of every employee to comply with the Code of Conduct and to ensure that your colleagues do this as well. It is the duty of everyone to report incidents, near incidents, suspicious matters and violations that contradict this Code of Conduct or any laws or regulations. Let us know if you notice anything. If you wish, you can report (also anonymously) these issues as described in our whistleblower policy or you can contact the appointed confidant.

If certain issues in this Code of Conduct are not clear to you then you can always ask for an explanation or pose questions.

J.J.G. Spoelder

Managing Director

A handwritten signature in blue ink, appearing to read 'J.J.G. Spoelder'.

31-03-2023



Human Rights

We respect, protect and promote all regulations in force to protect human rights.

Human rights are the basis of freedom, justice and peace.

Human rights are a duty of everyone: government, individual or social organisation.

All employees have a duty to ensure the universal human rights are respected in their daily work and dealings with others, both internally and externally.

We respect the rights of local communities and vulnerable groups to decent living conditions; education, employment, social activities; and the right of consent for developments that affect them and the land on which they live.

We avoid forced eviction and deprivation, during the acquisition, the development and the use, of land, forests and waters .

CIREX does not do any business with suppliers or other external parties whose actions are in conflict with international human rights.

Human Rights

Principle 1. Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2. Make sure that they are not complicit in human right abuses.

Labour

CIREX respects relevant laws, regulations and non-statutory agreements regarding minimum wages and correct payment of salary, the maximum number of working hours, rest hours and other working conditions.

We use the definition of child labour compiled by the International Labour Organization:

“The term “child labour” is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.”

We strongly reject child labour, forced labour, all forms of modern slavery and human trafficking. Should it nevertheless transpire that these violations take place then we will actively exert pressure to abolish this. If the desired effect is not achieved we will terminate the relationship with the party involved.

For young employees under the age of 18, we comply with legal obligations regarding working hours, dangerous working conditions and circumstances that hinder their personal development.

Freedom of association

Employees have the right to freedom of association and collective bargaining. Workers representation is granted by national law.

Labour

Principle 3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4. The elimination of all forms of forced and compulsory labour;

Principle 5. The effective abolition of child labour; and

Principle 6. The elimination of discrimination in respect of employment and occupation.

Discrimination, aggression and harassment

CIREX encourages diversity, equity and inclusion. We promote these aspects and give employees, temporary workers, and job applicants equal opportunities within the company. Our goal is to treat everyone fairly, respectfully, equal and in a dignified manner. We strive to realise a culture and a workplace where everybody feels valued and respected and everybody is open to different cultures and receives equal opportunities.

All forms of discrimination (such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status), or any form of aggression and harassment (physical, verbal and mental) is strongly disapproved.

Women's Rights

We provide equal opportunities in employment and career development and commit to equal pay for equal work.

Health and Safety

The Board of Directors gives the same priority to the safety, health and well-being of all employees as it does to other objectives of the organisation.

Realising good working conditions is a joint responsibility of the board of directors, management, supervisors and employees. Employees are systematically involved in the continuous improvement process through work meetings, through the online learning and knowledge platform and through other channels of information.

The policy will at least satisfy the relevant legal requirements. General guidelines are described in the "Internal safety rules" and in specific safety instructions.

The realisation of the policy is based on prevention: preventing unsafe work situations and preventing injuries and long-term health risks. The aim here is to give continuous attention to prevention and to include the realisation of this policy in the work preparation, work realisation and work consultation.

Work-related risks are continuously inventoried and evaluated. An action plan follows from the risk inventory and evaluation and is drawn up in consultation with the Health and Safety committee, and the progress of the measures to be taken is continuously monitored. A representation from the Workers Council is part of the Health and Safety committee.

When work related risks are unavoidable, these risks will be limited as much as possible by means of organisational measures, training, instructions, supervision and the supply of personal protection equipment.

Company buildings, company grounds and workplaces are set up in such a way, and the equipment needed for the work will be chosen in such a way that occupational health and safety risks, in relation to, but not limited to, fire safety, machine safety, physical strain, ergonomics and handling of hazardous substances are limited as much as possible.

We have in-house expert employees, as required by law, in the field of prevention, safety, health and welfare, firefighting, first aid, handling hazardous substances and accident and incident management. An emergency preparedness and response plan is in place and tested and trained regularly. For support, training and advice external experts are consulted if necessary.

It is ensured that parties which carry out work on behalf of CIREX pay attention to safety, health and well-being in the same way as CIREX does. This is described in a safety and environment regulation for third parties and the work licences attached to this.

CIREX invests in personal development and each year a training plan is drawn up for its employees. This includes both the training needs of CIREX as well as those of the employee. All employees are regularly informed, instructed or trained with regard to safety, health and well-being in relation to their work upon the commencement of, and during, their employment. Knowledge and skills are maintained and regularly tested. We are a recognised training company that provides opportunities for internships, traineeships and guided tours.

Environment

The Board of Directors gives the same priority to the environment as it does to other objectives of the organisation.

The environmental policy aims to comply with all statutory requirements and to act in line with the expectations of our internal and external stakeholders.

We aim to minimise the impact of our activities on the environment and to continuously improve with regard to, but not limited to:

- reducing emissions of greenhouse gasses and other emissions;
- reducing water consumption and protecting the water quality;
- the protection of the soil;
- reduction of industrial noise;
- the protection of the biodiversity;
- the reduction of energy consumption;
- the efficient use of energy and the use of renewable energy and to drive forward the decarbonisation of the entire value chain;
- the sustainable procurement of raw materials, materials and services;
- reducing waste, reuse and recycling of natural resources;
- responsible handling of chemicals and reducing the application of hazardous substances.

For new investments and changes to the process, the best available technologies are preferably chosen.

The electricity used for all production locations is CO₂-neutral generated and the CO₂-footprint of natural gas consumption is compensated through certificates.

Our environmental management system is certified according to ISO 14001.

Environment

Principle 7. Businesses should support a precautionary approach to environmental challenges;

Principle 8. Undertake initiatives to promote greater environmental responsibility; and

Principle 9. Encourage the development and diffusion of environmentally friendly technologies.

Anti-corruption

We do not tolerate any form of corruption. We expect everyone to act in accordance with the relevant laws and regulations in the field of corruption.

Bribery and other irresponsible and ethically improper acts will not be tolerated, such as taking or making an illegal payment, receiving and accepting unauthorized gifts and hospitality and/or invitations, money laundering including financing terrorism directly or indirectly, tax evasion, extortion, falsification of documents, distorting the true origin of a transaction, the use of inside information or anticompetitive actions in the broadest sense of the word.

We guarantee that the personal interests and private lives of our employees are respected. It is important to avoid conflicts between private and business interests, or even the appearance thereof. All decisions shall be made solely on the basis of objective criteria and shall not be guided by personal interests or relationships.

We offer a fair price and will compete in an honest and legally permitted manner. We will not take any dishonest or misleading actions with respect to customers, suppliers and competitors. We select our suppliers and service providers solely on the basis of objective criteria.

We keep accurate and transparent accounting records for all financial transactions. We always keep complete, accurate, timely and understandable financial reports.

We use external auditors to ensure that our financial reporting complies with applicable financial reporting laws and regulations.

Financial donations are only made to officially recognized NGO organizations and charities in the fields of culture, sport, education and charities etc., without receiving or expecting anything in return.

No financial contributions are made to political parties or related institutions.

No financial contributions are made to officials and holders of political office to accelerate decision making or administrative procedures.

Political lobbying is carried out centrally in collaboration with employer organisations and in accordance with the principles of openness and responsibility. Our interaction with political parties and interest groups is based on the principle of neutrality. Unfairly influencing policy makers and governments is not allowed.

Governance and additional aspects

All employees are responsible for handling confidential company, customer and personal data with care. Personal data may only be registered insofar as there is a legitimate interest for CIREX or the data subject. Only necessary personal data may be registered. If this legitimate interest lapses, this personal data must be deleted.

We expect our employees to handle the above mentioned confidential data or which can be suspected to be confidential with care and to protect it adequately, either physically or digitally, against loss, damage, theft, misuse, access by unauthorised persons or other forms of unwanted, accidental or illegal distribution, whether verbally, in writing or digitally, whether inside or outside the organisation. This also includes all forms of social media.

Anti-corruption

Principle 10. Businesses should work against corruption in all its forms, including extortion and bribery.

We expect our employees to respect the intellectual property of data, including specifications, drawings and know-how, either from CIREX or from third parties.

We comply with relevant laws regarding the protection of personal data and privacy rights.

We comply with relevant whistleblowing laws and protect whistle-blowers through our whistleblowing policy from undue disadvantage or intimidation.

We guarantee the products, services and information we provide comply with the relevant laws, regulations and standards with regard to quality, product safety, counterfeit products, environment, human rights and conflict minerals.

We are aware of our social responsibility to meet our obligations with regard to taxes and customs, and we explicitly seek compliance with applicable legislation. This also includes applicable import and export restrictions and economic sanctions for products, services, information and persons that must be observed.

We carry out internal quality, process, health and safety and environmental audits. These internal audits (system, process and product) are realised by our own certified auditors with the aim of analysing and continuously improving the management systems. The results of these audits are reported to the Board of Directors and are translated into action programmes for the purpose of realising improvements.

We act openly and transparently with external auditors. We are periodically audited by external auditors on the subjects quality, environment, health and safety, accounting and financial reporting according to legislation and national or international standards.