



## COGEBI GROUP CORPORATE SOCIAL RESPONSIBILITY CODE OF CONDUCT

The purpose of this Corporate Social Responsibility Code of Conduct ("CSR Code" or "Code") is to establish a set of guiding principles applicable to the entire Cogebi Group of companies and our various stakeholders, i.e. customers, suppliers, contractors and business partners. As new companies become part of the Group, Cogebi will ensure that the standards and principles of this Code are implemented in these new companies in the shortest possible time.

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As our insulation business uses mica, a mineral whose mining is widely associated with the use of child labor, we require our suppliers to confirm their acceptance of the Code in writing, which must be reconfirmed annually by all suppliers. We reserve the right to terminate our relationship with any supplier who has not confirmed compliance with the Code, or with any supplier who fails to comply with or violates the provisions of the Code, if such failure or violation becomes known to us and the supplier fails to remedy it.

**COGEBI Group and their suppliers hereby declare to comply with the following principles:**

### **1. Legal compliance**

- To comply with all applicable national and international laws.

### **2. Prohibition to engage in corruption and influence-peddling activities.**

- Not to tolerate or engage in any form of corruption or influence peddling, including making payments or offering benefits of any kind to public officials or employees of our industrial partners and customers, with the aim of influencing decisions in violation of applicable regulations.

### **3. Competition, anti - trust and intellectual property rights**

- To act in accordance with national and international competition laws and not to participate in illegal agreements with competitors regarding prices, market allocation, customers, market sharing or bid rigging.
- To respect the intellectual property rights of others.

### **4. Prevention of conflicts of interest**

- I. All persons subject to this CSR Code shall take appropriate measures to prevent a conflict of interest from arising in the functions under their responsibility and address situations that may objectively be perceived as a conflict of interest.
- II. For the purposes of this CSR Code:
  - a) a conflict of interest exists when the impartial and objective exercise of the functions of a person subject to this Code is compromised for reasons involving personal life, political affinity, economic interest or any other direct or indirect personal interest.

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Personal interests include but are not limited to any potential benefit or advantage to a person subject to this Code.

- b) a perception of a conflict of interest shall be treated as if it were an actual conflict, as it may constitute a reputational risk, even if it turns out to be unsubstantiated.

### 5. Respect for the fundamental rights of employees

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- To respect the principles of human dignity, privacy and the fundamental rights of each individual.
- To promote equal opportunity and treatment of employees regardless of any discriminatory criteria, including color, race, nationality, social origin, disability, sexual orientation, political or religious beliefs, gender or age.
- To prohibit any unfair behaviour, including any gesture, language or physical contact of a sexual, coercive, threatening, abusive or operational nature.
- To provide fair remuneration and ensure minimum income in accordance with applicable national legislation.
- To recognise the right of workers to freedom of association in accordance with the law, and therefore neither promote nor discriminate against workers' organisations or trade unions.

### 6. Labour standards and prohibition of the use of child labour

- To eliminate all forms of illegal, forced or compulsory labour and modern slavery, defined as the recruitment, transportation or harbouring of children\*, women or men, using force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.
- Not to engage children\* in any form of labour.  
*\*The term "child" refers to any person under the age of 16, or under the age of completion of compulsory education, or under the minimum age for employment in the country, whichever is higher.*
- Workers under the age of 18 are not allowed to perform work that could endanger their health or safety, including night shifts.
- All work must be voluntary and workers must be free to leave or terminate their employment at any time.
- To respect the maximum number of working hours established by national legislation.

### 7. Health and safety of employees in the workplace

- To be responsible for the health and safety of its employees in their workplace.
- To control all hazards and take the most appropriate and reasonable precautions against accidents and occupational diseases.
- To provide effective training for employees and ensure that they are able to deal with health and safety issues in their work.
- To implement or use a system of management of safety and health at work.

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### 8. Protection of the environment

- To act in accordance with regulations and international standards applicable to the protection of the environment.
- To reduce pollution of the environment and make continuous improvements in environmental protection.

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### 9. Supply chain

- To strive to promote compliance with this CSR Code throughout the supply chain.
- To respect the principles of non-discrimination in the selection and treatment of any supplier.

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Peter Landendinger  
CEO