

# CODE OF CONDUCT

## Preamble

At EUROFLEX GmbH we commit to our social, ecological and economic responsibility.

## Scope of validity

This Code of Conduct is valid for all subsidiaries all over the world. We undertake as a company to promote compliance with the Code to our suppliers, and if possible, also to our customers.

### **A. Basic principles of business ethics**

EUROFLEX GmbH orientates its business and social actions on the generally valid ethical and humanitarian principles. Our activities and products contribute to prosperity, while, at the same time, disadvantageous impacts on future generations are avoided where possible or at least restricted to an absolute minimum. This requires the unconditional compliance with fundamental human rights and the unconditional respect of cultures or habits and customs with respect to the employees but also with regard to all those who are affected by the activities of EUROFLEX GmbH.

#### **1. Forced labour, child labour and exploitation**

EUROFLEX GmbH outlaws forced labour, child labour or any other form of exploitation and contempt for mankind. We stand up for the promotion of human rights.

#### **2. Discrimination**

EUROFLEX GmbH does not tolerate discrimination under any circumstances, e.g. according to race, sex, ethnic or social origin, religion, age, disabilities or sexual orientation. We undertake to protect our employees against physical, sexual or verbal harassment and to penalise such occurrences.

#### **3. Freedom of expression**

Freedom of expression and freedom of speech are granted and protected.

## CODE OF CONDUCT

### **B. Compliance – conformity with existing laws**

EUROFLEX GmbH hereby undertakes to comply with the general laws and provisions as well as special laws to protect fair competition and to support their further development.

#### **1. Turnover tax fraud**

Precious metals constantly offer a target for turnover tax fraud when delivering recycling material to precious metal cutting establishments because of their high value. We, at EUROFLEX GmbH, undertake in particular to observe compliance with the current laws on turnover tax and to support the authorities in their fight against turnover tax fraud.

#### **2. Prevention of money laundering**

EUROFLEX GmbH takes suitable precautionary measures to prevent money laundering activities in connection with their precious metal transactions in advance. The authorities are supported in their attempts to prevent money laundering.

#### **3. Corruption**

The business relationships between EUROFLEX and their business partners should be characterised by fairness. We may not offer potential customers, authorities, regulatory agencies or other representatives of such facilities any rewards or advantages that are contrary to current legislation or good business practices.

Our employees may not accept any payments, gifts or other remunerations from third parties, which could lead to the objectivity of decisions being regarded as dubious.

Every employee is obliged to comply with the rules of fair competition within the scope of legal regulations. We respect the basic principles of fair competition and do not make any anti-competitive agreements on prices, conditions, customers, markets, quantities or areas.

#### **4. Reporting of irregularities**

Every employee has the right to point out circumstances to his/her superior that are indicative of a violation of the regulations contained in this Code of Conduct. This can also be done anonymously.

#### **5. Conflict Minerals**

Suitable measures are met by EUROFLEX GmbH in order to avoid the financing of terrorist activities in connection with precious metal transactions. This includes the support of international endeavours to gain clarity on the acquisition and origin of minerals from the Democratic Republic of Congo and neighbouring states. The objective is to prevent minerals mined there and their export from being able to support terrorism and military conflicts in these countries.

#### **6. Data Protection**

EUROFLEX recognizes the general privacy rights of their employees and the employees of their business partners.

EUROFLEX therefore ensures that personal data is always processed and disseminated in accordance with the applicable legal regulations.

## CODE OF CONDUCT

### **C. Sustainability**

EUROFLEX GmbH manufactures products of great value and vital importance for modern life. These products stand for innovation and technical progress, for environmental protection, Climate protection and energy saving. EUROFLEX GmbH orientates their entrepreneurial activities on the principles of sustainability.

#### **1. Resources**

EUROFLEX GmbH ensures, by constant innovation, that the production processes are always state-of-the-art and therefore the impact on the environment is kept as low as possible. At the same time, we are always searching for constant improvements that make it possible to keep the product-related resources used as low as possible while maintaining the efficiency at the same time.

#### **2. Environmental and health protection**

EUROFLEX GmbH complies meticulously with all environmental and health-related provisions. We take a proactive approach to the effects of climate change to minimize risks and seize new opportunities. The protection of our employees' health has special priority.

#### **3. Social responsibility**

EUROFLEX GmbH contributes to growth and prosperity. It ensures numerous jobs also in the supply industry. This industry is the main source of income in some regions. We are conscious of this responsibility and are committed to the sustainable task of safeguarding these jobs.

In addition, EUROFLEX GmbH contributes to social development, e.g. by promoting charitable causes.

### **D. Implementation and enforcement**

EUROFLEX GmbH takes all appropriate and proportionate efforts to continually implement and use the principles and values stipulated in this CoC.

EUROFLEX GmbH



Dr. Axel Pfrommer  
President & CEO