

## Company principles of the SAXONIA Group

### PREAMBLE

As the SAXONIA Group, our economically, ecologically and socially responsible actions contribute to securing the livelihood of current and future generations and improving people's quality of life.

With precious metal raw materials from 100% conflict-free recycling sources, we constantly strive to conserve our available resources and minimize our use of energy.

In our human rights policy, we have defined the guiding principles and their integration into corporate practice. In this way, we ensure compliance with internationally recognized human rights, environmental and social standards along our value chain.

Our Code of Conduct formulates requirements and principles based, among other things, on the ten principles of the United Nations Global Compact, the International Charter of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the OECD Principles for multinational companies are based and thus serves as the basis for all activities and business relationships with our business partners.

Every employee of the SAXONIA Group contributes to the internal and external impact of the SAXONIA Group with their actions. For this reason, every employee is responsible for aligning themselves with the values of this Code of Conduct at all times.

When in doubt, ask yourself the following questions:

- Am I fair and honest?
- Are my actions legal?
- Is what I am doing the right thing?
- Will others view my actions positively in the future?
- Do I believe I am acting ethically?
- How would the company and I be perceived if my actions were reported in the news media?

If you have any questions, please contact your manager, managing director or the Group Compliance Officer.

### SCOPE

These company principles as well as the Code of Conduct apply equally to all companies of the SAXONIA Group worldwide.

## PRINCIPLES OF OUR CODE OF CONDUCT

### 1. Principle of legality

We observe the principle of exclusive legality in all activities, measures, contracts and other practices. This includes the prohibition of corruption and money laundering, compliance with competition and antitrust law, payment of taxes and customs duties, compliance with the state of the art, obtaining all necessary official approvals, compliance with export control regulations and non-impairment of the legal interests of third parties, as well as compliance with laws protecting social and environmental standards.

### 2. Prohibition of corruption, extortion and bribery

The SAXONIA Group does not tolerate any form of corruption or engage in any form of extortion or bribery, including any unlawful offers of payment or similar gratuities to decision-makers or public officials.

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

We respect the personal dignity, privacy and personal rights of each individual. We ensure that equal opportunities, equal treatment of all employees free from any discrimination and the principle of equal pay for work of equal value are guaranteed.

In our Group, we offer fair wages and social benefits and ensure compliance with all national, legal provisions and regulations on freedom of association, working hours, break times, holiday entitlements and the minimum wage.

### 4. Health and safety of employees

Our goal is to create an accident-free working environment for everyone by identifying and minimizing hazards and taking the best possible precautionary measures against accidents and occupational diseases.

### 5. Environmental protection and resource-saving use of energy

The SAXONIA Group works continuously to minimize the use of environmental resources and at the same time improve energy efficiency. In addition, we are committed to environmental protection in accordance with legal requirements, rules and standards.

With our measures for the use of renewable energy, we support the national and international goals for reducing CO<sub>2</sub> emissions.

### 6. Privacy and data security

The SAXONIA Group protects the data of its employees and business partners. The processing of personal data is prohibited without a legal basis or without the consent of the data subject. Ensuring data protection and data security is the task and obligation of all employees. The management is responsible for maintaining an appropriate security standard.

### 7. Dealing with business partners

Dealing with our business partners is based on honesty, trust, respect and fairness. It is subject to the rules of fair competition and is never guided by personal conflicts of interest.

The SAXONIA Group requires all business partners to comply with the corporate principles formulated in the Code of Conduct for business partners.

## 8. Whistleblower system

In the event of violations of corporate principles, laws or the Code of Conduct or even just suspicion on it, every employee, affected person and business partner is called upon to report this via the whistleblower system.

The report can be made personally or anonymously to the central whistleblowing of the SAXONIA Group by:

- Email: [whistleblowing@saxonia.de](mailto:whistleblowing@saxonia.de)
- Phone: +49 (0) 351 48 45 85 190 (Whistleblowing-Hotline)
- Mail: SAXONIA Holding GmbH  
Whistleblowing  
Dr.-Külz-Ring 10  
01067 Dresden  
Germany

Dresden, in August 2023



Chief Executive Officer  
SAXONIA Holding GmbH