

Code of Conduct

This Code of Conduct was developed within the scope of an employee work group. On the basis of mutual principles and values, this code is to determine, today and in the future, the behaviour and activity of all the workforce of IMR Innovative Metal Recycling GmbH (hereinafter referred to as „we“).

Our employees have identified and established these three basic convictions as our company's essential values:

- 1. We always treat each other with respect and tolerance in our daily dealings with each other and expect the same from our business partners.**
- 2. We always behave reliably and with absolute integrity.**
- 3. We approach all our stakeholders with openness and appreciation.**

This applies both internally, i.e. in our dealings with colleagues, and externally, i.e. in our dealings with customers, suppliers and the public relevant to us. The requirements formulated in the following Code of Conduct (CoC) also serve as a guideline for the appropriate behaviour of all employees in order to maintain the good reputation of Innovative Metal Recycling GmbH and to consolidate it for the future in the market. All our employees voluntarily undertake to comply with the CoC from the time they sign their employment contract and until they finally leave the company. We expect all employees to identify with our principles and to act in accordance with them at all times. We consider it a matter of course for our managers to exemplify our basic convictions and to communicate them to the outside world. Furthermore, this CoC also formulates the demands that IMR Innovative Metal Recycling GmbH places on its business partners: Just as our business partners can expect all IMR employees to comply with this Code of Conduct, we also expect our business partners to comply with this CoC.

1 Compliance with law and order

1.1 Compliance with law and order

Compliance with the law is the most important basic requirement for us to be able to operate our business successfully. We therefore expect every employee to comply with applicable regulations and laws at all times. There are no exceptions to this and no room for discretion. In case of doubt, we will refrain from achieving targets rather than violating the law. Violations can not only have civil and criminal consequences for the individual employee, but can also result in sanctions against the entire company and thus all employees. For this reason, our employees are subject to strict disciplinary measures in the event of violations of the law.

1.2 Prevention of corruption

Corruption, behaviour detrimental to the company or unfair business practices are strictly rejected by both employees and third parties.

When dealing with customers, suppliers, service providers and state institutions or other business partners, the interests of IMR Innovative Metal Recycling GmbH and the private

interests of employees on both sides are strictly separated. Actions and decisions are always made free of extraneous considerations and personal interests.

The applicable corruption law must always be complied with.

Gifts and hospitality in relation to public officials, official employees or business partners or persons or companies seeking a business relationship with the company are generally prohibited, unless it is a matter of hospitality as a matter of courtesy. A further exception are generally customary small occasional gifts from business partners.

1.3 Antitrust and competition law

Integrity and fairness are always in the foreground for us, even in business competition. We always comply with the existing laws in the countries in which we do business. In particular, we do not engage in competitive agreements, e.g. on conditions or the division of target groups and markets, and do not tolerate them as a business practice. Every employee is obliged to comply with all national and international antitrust laws relevant to his or her area of responsibility as well as the laws against unfair competition.

1.4 Exportkontrolle und Wirtschaftssanktionen

Temporary restrictions imposed by governments or international organisations, e.g. trade embargoes, which may affect business relations with individuals or companies, are fully supported by IMR Innovative Metal Recycling GmbH. This means that in such a case no transactions will be carried out that are subject to corresponding restrictions.

This also includes compliance with export control regulations and maintaining the necessary licences to carry out cross-border transactions.

1.5 Handling confidential business information

Company and business secrets as well as confidential information of our customers are always kept secret and protected from possible disclosure to unauthorised persons. Sensitive business information of our business partners is only made accessible to employees who are in direct contact with the respective partner and for whose business purposes knowledge of the corresponding information is indispensable. Business secrets and confidential information may also not be passed on to unauthorised third parties, e.g. family members. This obligation also applies after leaving the company. To the same extent that we expect our employees to protect external business information and the intellectual property of third parties, it is essential for us to protect our intellectual property and confidential business information of the company.

If it is necessary to pass on data and information internally or externally, it must be checked in advance whether the recipient is entitled to receive it

1.6 Data protection

We take the protection of customer and employee data very seriously. We treat personal data confidentially and in accordance with the statutory data protection regulations and our private policy.

1.7 Financial responsibility

The documentation of financial information is always carried out conscientiously. The verifiability of cash flows is guaranteed to the best of our ability.

Employees who, in the course of their work, come into contact with the company's bookkeeping or other documentation relevant to finance and tax law are obliged to exercise due care within the legal framework.

2 Integrity

We do not tolerate the use of unethical or unfair means by our employees to achieve goals, even if the relationship is in the (financial) interest of the company. We design compensation systems in such a way that, as far as possible, no implicit incentives are created for unethical behaviour. Supervisors who "look the other way" in such cases or even instigate them will be sanctioned as quickly as possible.

3 Dealing with our employees

We have a responsibility towards all our employees. We respect every colleague as an individual. The individual strengths of each person are the prerequisite for the entrepreneurial success of our company.

3.1 Equal Treatment and Prohibition of Discrimination

Respect and tolerance are the basis of daily interaction in our company. The personal rights of all colleagues are a valuable asset and are respected as such. As a responsible employer, we promote equal opportunities for men and women. All employees are treated equally by superiors and colleagues, regardless of ethnicity, skin colour, gender, religion, national and social origin, personal circumstances, state of health or age.

The respective legal provisions apply.

3.2 Public appearance and communication

Internal and external communication is one of the most important tasks of management. At the same time, however, we see all IMR employees as communicative multipliers and brand ambassadors and also promote the employees' self-image as such. The most important premise for communication in our company is that it should be transparent, honest and credible: Communication should be transparent, honest and credible. For us, transparent communication also includes daily communication on the social media channels used by IMR. We consider direct feedback and communication with customers and followers to be particularly valuable in this context.

3.3 Occupational health and safety

We are convinced that the safety and health of our employees are essential for the success of our company. Therefore, for the benefit of our employees, we attach great importance to following our health and safety guidelines. This applies in particular to our colleagues at the plants and the machines. Caution and prudence are the defining parameters for all operations throughout the company. Our primary goal is to employ efficient and

committed employees and to achieve the lowest possible rate of illness and accidents at work. For this reason, we implement various internal measures to promote health, including occupational health management. We regard this commitment as a key element for productivity and the quality of our work.

3.4 Remuneration and benefits

Remuneration, including social benefits, is based on the applicable legal and company regulations.

3.5 Working time models

We comply with the relevant legal and company regulations on working hours, paid holidays, public holidays and the relevant conventions of the International Labour Organisation.

3.6 Duty of care

We have a responsibility for the welfare of our employees. Processes are therefore structured to respect employees as self-reliant workers and individuals. We are committed to ensuring that neither the company nor individual supervisors set targets in such a way as to cause excessive physical or psychological strain on employees. Employees with work-related problems can request support quickly, easily and informally.

4 Dealing with customers

When dealing with our customers, we make sure that we do not exert any pressure during the acquisition process. Communication when comparing competing offers is truthful, unambiguous and not disparaging.

5 Dealing with service providers

We expect the same standards from our suppliers and service providers as those of our company. Unethical behaviour and lack of integrity are grounds for immediate termination of the business relationship.

6 Human rights

We respect and support the protection of international human rights within our sphere of influence and ensure that we are not complicit in any human rights violations.

6.1 Freedom of association and the right to collective bargaining

We respect the fundamental right to freedom of association and the right to collective bargaining within the framework of national laws. Employees who engage in this form of activity do not have to expect any negative consequences.

6.2 Dealing with child and forced labour

We reject all forms of child and forced labour. Human rights, especially the rights of children, are always respected.

6.3 Indigenous peoples and local communities

We are committed to respecting and not violating the rights and interests of indigenous peoples in accordance with international standards and of local communities and populations.

6.4 Geopolitical neutrality

We ensure that we do not participate in any armed conflicts or human rights violations in potentially or already affected areas. We treat the cultural and religious heritage of all people with respect.

7 Sustainability

Actively shaping the future has been IMR's aspiration, challenge and guiding principle since its foundation. Both the company as a whole and each individual employee take this into account by assuming responsibility every day in all areas of the company and facing up to the great challenges of our time: To make a contribution to an intact environment through innovative metal recycling, to ensure the responsible use of resources and to vouch for fair cooperation, also in the sense of generational thinking.

Our sustainability agreement is based on internationally recognised principles and conventions, such as the „United Nations Global Compact (UNGC)“.

7.1 Environmental responsibility

Environmentally conscious actions and economic activity are the basis for strengthening IMR Innovative Metal Recycling GmbH in the future and for securing business success in the long term. We always take care to organise our operating procedures in such a way that the impact on the environment and the climate is as low as possible. Each and every one of our employees is required to adapt their individual behaviour to the special responsibility for the protection of resources of a modern recycling company. As a community we strive to harmonise the interests of people, nature and the economy and to contribute to a sustainable world. This also includes concrete process optimisations, such as "Think before you print" or waste separation.

7.2 Handling machinery and technical equipment

In the operation of our production facilities, we always take care to keep interactions as low as possible, especially with the immediate environment at our sites. Repair and maintenance of our equipment always takes precedence over any new acquisitions. We see digitalisation in plant construction as an additional opportunity to produce in an even more environmentally friendly way.

7.3 Social commitment

We see our company as an active member of society and are therefore involved in various ways at regional and local level. The active promotion of charitable institutions and the support of numerous charitable projects in the areas of sports, education and upbringing are particularly close to our hearts. [Here you will find a complete overview](#) of the projects we are currently supporting.

Donations and sponsorships are made exclusively on an altruistic basis.

7.4 Sustainability agreement with suppliers

Our corporate goals are long-term and responsible, so that a sustainable value chain and conservation of resources make a significant contribution to environmental protection.

As a basic requirement for successful cooperation with suppliers, we demand compliance with social, ecological and economic standards.

By signing the sustainability agreement, suppliers accept and confirm that they have understood these standards and will adhere to them. We oblige our direct suppliers to actively communicate the described requirements and standards within possible supply chains.

8 Final provisions

8.1 Information and communication

Each of our employees has been personally handed this Code of Conduct. The CoC applies to all employees at all locations. Questions regarding the Code of Conduct should be addressed to the respective manager.

8.2 Implementation of the Code of Conduct

All shareholders, managing directors and employees, including temporary workers, are obliged to comply with the Code of Conduct of IMR Innovative Metal Recycling GmbH. It is expected that everyone is familiar with this Code of Conduct, the company principles and guidelines and that these are applied in their daily work.

Every employee is to be familiarised with the Code of Conduct upon taking up employment. The management shall ensure awareness through preventive measures and a joint exchange.

8.3 Reporting violations and dealing with comments/ queries

All employees are requested to report uncertainties, serious grievances or suspected cases. The report should be made immediately to the manager or the personnel department. IMR Innovative Metal Recycling GmbH will investigate all reports with due diligence and, if necessary, initiate appropriate measures. The reports will be treated confidentially. No one is to expect disadvantages or negative consequences from a report made in good faith due to an actual or suspected violation of this Code of Conduct or other regulations. Hostile behaviour towards whistleblowers will not be tolerated as a matter of principle, nor will abuse of the opportunity to make a report.

8.4 Sanctions for violations

Deliberate violations of the law, policies or this Code of Conduct will not be tolerated in any way and will result in serious consequences under applicable employment laws. Unlawful conduct will not be tolerated by us.