



# SUPPLIER

## Code of Conduct

### SCoC

MARCH **2023**



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**“ Corporate responsibility and environmental awareness is a key driver for Tokai COBEX. We revised our ESG strategy to better respond to the needs of the society and maintain our leadership position as a provider of advanced products and services, an employer of choice, a reliable member of the Tokai Carbon group and a sustainable partner for the businesses and local communities we cooperate with. ”**

**Alexander Loscher**  
COO

We as a supply chain partner need full support and collaboration of our suppliers to achieve our vision for sustainable procurement and in order to reach a carbon neutral world where ecosystems and resources are preserved through circular economy. In the meantime we develop together an ethical way of conducting business, with a focus on human rights and social impact at all levels.

Sustainability is definitively the key driver for business performance, reputation and corporate citizenship. We expect from you as our business partner to commit and spread our vision and principles in your own business activities.

Our Supplier Code of Conduct lays out what we expect from our partners. This is, first and foremost, lawful behavior, compliance with anti-corruption and competition law as well as with export controls and customs regulations. Further, we require our suppliers to respect and promote human rights and to comply with the UN Global Compact principles regarding social issues and environmental protection. Our target is to have all major suppliers, who do not have a Code of Conduct on their own that lives up to our ethical standards, adhere to our Supplier Code of Conduct. We screen all new suppliers with regard to export controls and intend to establish further supplier screenings using social and environmental criteria.

Thank you for your commitment.

**Kind regards,**

**Alexander Loscher**

Our corporate philosophy is ties of reliability. Inspired by our Japanese parent company Tokai Carbon, we believe in the importance of trust between Tokai COBEX and its stakeholders. Our five fundamental corporate values guide our actions and embed our commitment to all aspects of sustainability deeply in our corporate culture:

### COMMITTED

All buyers are committed to working with the best solutions for our environment and continuing to improve the quality of our products. It applies to all logistics aspects and our target to minimize CO2 emissions. We must ensure that the Tokai COBEX teams and our suppliers (and their suppliers) are involved in this endeavor.

### FUTURE ORIENTED

In our work with partners, we follow the total cost of ownership concept (TCO). We integrate all logistics costs, procurement risks, issues on quality and image and all hidden costs related to the time the teams took to reach the target.

### BEING FAIR

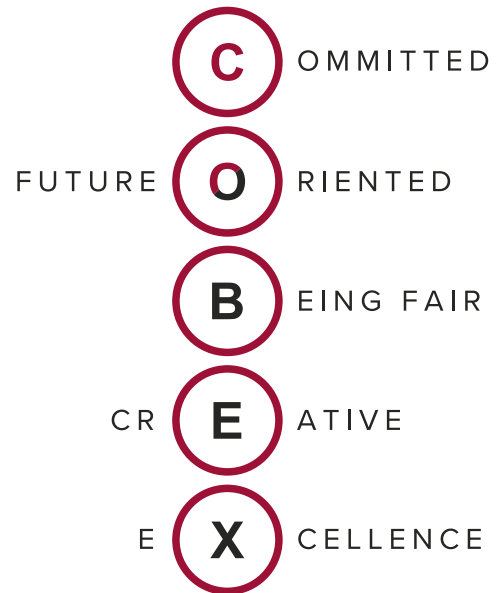
Looking after the quality of life, diversity and professional development of our internal clients is one of the main factors we use to promote commitment and improve our collaborators' performance within Tokai COBEX.

### CREATIVE

We must identify all synergies and develop action plans to integrate all ESG criteria in our specifications, requests for quotation and contracts.

### EXCELLENCE

The target is to turn us into actors in the process and purchase of sustainable goods and services. We have been taught how to buy responsibly and include ESG in our process to stay alert and anticipate our future.



Tokai COBEX GmbH and its affiliates (“Tokai COBEX Group”) are recognized as experts in Carbon products. Our aim is to provide our customers with products which set the highest quality standards while operating within legal, ethical and sustainable principles. Together with our Suppliers and Subcontractors, we strive to set the standards in our industry.

Therefore, Tokai COBEX Group has committed to a Code of Conduct that is binding on all its employees. We also expect all our Suppliers and Subcontractors to commit to legal, ethical and sustainable behavior while cooperating with Tokai COBEX Group by following the standards below.

### 3.1 Integrity

Tokai COBEX expects the highest standards of fair business practices and ethical behavior from its suppliers and subcontractors in all endeavors:

- 1** You refrain from any criminal or unethical influence on decisions of Tokai COBEX employees, employees of other companies or public officials, and commit to fighting any form of corruption in your company, including bribery, extortion and embezzlement. You commit to refraining from and preventing any corrupt activities.
- 2** You commit to prohibiting and avoiding any kind of anti-competitive activities or agreements and you stand up against illegal cartels.
- 3** You commit to avoiding all potential conflict of interest while engaged with Tokai COBEX.
- 4** You respect intellectual property rights and protect business secrets from unauthorized disclosure.
- 5** You commit to providing services and goods based on applicable export controls and customs regulations.
- 6** You commit to maintaining accurate and complete accounting records.
- 7** You are bound by all applicable national and international trade laws and regulations including but not limited to antitrust, trade controls and sanction regimes.
- 8** You respect the required privacy while using personal data, safeguard sensitive information in all relevant processes and ensure compliance with the applicable legal requirements.
- 9** You adhere to internationally recognized environmental, social and corporate governance standards (ESG standards).

## **3.2 Environment**

Tokai COBEX expects its suppliers and subcontractors to recognize global environmental preservation as a top priority, striving to achieve harmony between business activities and the environment and engaging in activities aimed at achieving a sustainable recycling-oriented society:

- 1** You commit to sustainable business practices and the application of all applicable legal standards for environmental protection. This includes obtaining required permits, implementing recycling measures, reducing waste, preventing hazardous releases to the environment, and prohibiting unlawful eviction and taking of land, forests and waters.
- 2** You propose innovative solutions to help us reduce our energy consumption and overall CO2 footprint.

## **3.3 Social**

Tokai COBEX expects its suppliers and subcontractors to build a safe working environment where their priority is that every employee finishes their workday in good physical and mental health:

- 1** You commit to providing working conditions that support health, safety and security at all workplaces and to implement management systems to facilitate continuous improvement.
- 2** You commit to upholding the human rights of workers, treating them with dignity and respect, abiding by applicable stipulations regarding employment and labor conditions and fighting in particular human trafficking or slavery, forced labor, child labor and discrimination at workplace.
- 3** You hire, employ and compensate workers based on fair and legal criteria that are in line with applicable national law and international employment standards.
- 4** You commit to freedom of association, equal treatment in employment and provide adequate living wage.
- 5** You comply with applicable laws and regulations regarding „Conflict Minerals” such as e.g. the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 or any similar EU directives or regulations or national legislation, if applicable. You support, embrace and enact the ESG standards based on the principles of the United Nations Global Compact initiative, the United Nations Guiding Principles on Business and Human Rights and the International Labor Organization (ILO).

Tokai COBEX commits to the principles of the UN Global Compact and expects its suppliers and subcontractors to work towards full implementation of such principles, along with this Code, during their business as well as in all companies working on their behalf.

Tokai COBEX encourages its suppliers and subcontractors to seek guidance regarding the principles and standards in this Code. Suppliers and subcontractors are expected to report any concerns and disclose any violation against this Code, including sharing any information and findings about potential violations or misconduct of their own employees and cooperating in any investigation.

**For disclosure, you should use the Tokai COBEX Compliance Whistleblowing Hotline where such disclosures can also be made anonymously when needed:**

■ **Report the misbehavior via the system**

<https://tokaicobex.integrityline.com/frontpage>



■ **Report the misbehavior by phone**

**France:** +33 1 87 21 22 91 **Germany:** +49 30 99 25 71 46 **Poland:** +48 2 21 52 33 61

**Company access PIN:** 4253

Violations of the above principles and standards as well as their non-disclosure or insufficient pursuit may lead to the termination of the business relationship on short notice. Tokai COBEX reserves the right to claim damages for any prejudice suffered due to such violations and to verify compliance with this Supplier Code of Conduct.

# Contact

If you have any questions, please send your request to this e-mail address:

**info@tokaicobex.com**

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All audit certificates, our policy and Code of Conduct are available for download at <https://tokaicobex.com/en/sustainability/>

