



## CODE OF ETHICS FOR TUNGSRAM'S SUPPLIERS

### Relating to Employment, Environment, Health , Security & Safety

The present document aims to summarize the expectations of Tungshram Group related to its suppliers. Tungshram as a responsible company is expected to make a personal commitment to integrity, and we also expect and require high ethical conduct from all of our suppliers. A company's strong commitment in this regard is a requirement for being a Tungshram supplier and is the foundation for our mutually beneficial business relationship.

In particular, we expect Tungshram's suppliers to:

- Comply with laws and regulations protecting the environment, continuously improve their resource efficiency, and not adversely affect the local community.
- Provide workers a safe and healthy workplace. If housing is provided or arranged, it must meet host country safety standards.
- Employ workers above the applicable minimum age requirement or the age of 16, whichever is higher.
- Comply with laws and regulations governing recruitment, employment contracts, wages, hours, days of service, and overtime payment for workers. Upon end of employment, reimburse return transportation costs for workers recruited from outside the country. Provide workers with terms and conditions of employment in a language the worker understands.
- Not utilize forced, prison, or indentured labor, or subject workers to any form of compulsion, coercion or human trafficking.
- Not charge workers recruitment fees or utilize firms charging workers such fees. Not utilize fraudulent or misleading recruitment practices. Not withhold or destroy a worker's identity or immigration documents.
- Allow their workers to freely choose whether or not to organize or join associations for the purpose of collective bargaining as provided by local law. Provide workers a process for escalating and reporting concerns without retaliation.
- Prohibit physical, sexual or psychological harassment, exploitation or coercion.
- Assure that workers are hired, paid and otherwise subject to terms and conditions of employment based on their ability to do the job, not on the basis of their personal characteristics such as race, national origin, sex, religion, ethnicity, disability, maternity, age, and other characteristics protected by local law (This does not bar compliance with affirmative preferences that may be required by local law).

- Maintain and enforce a company policy requiring adherence to ethical business practices, including a prohibition on bribery of government officials.
- Respect the intellectual property of others.
- Adopt policies and establish systems to procure tantalum, tin, tungsten, and gold from sources that have been verified as conflict free.
- Maintain security measures consistent with international standards for the protection of their operations and facilities against exploitation by criminal or terrorist individuals and organizations.
- The Company undertakes to be aware of and comply with export laws, export controls, sanctions and custom laws and regulations of Hungary and the European Union, furthermore, those imposed by the United Nations, and the applicable regulations of any other country to ensure that the goods and technology will not be used, sold, transferred, or re-exported in violation of such laws and regulations. The Company undertakes not to export, re-export, or transfer goods and technology, either directly or indirectly, to any country subject to a comprehensive EU, UN or applicable government trade embargo, or to export, re-export, transfer the relevant goods and technology prohibited or restricted to any country, person or entity listed on the up-to date-version of the Consolidated United Nations Security Council Sanctions List, on the Consolidated List of the European Union Restrictive Measures, or on the Consolidated List of persons, groups and entities subject to EU financial sanctions.