

CODE OF ETHICS

FOR SZIMIKRON LTD. AND ITS SUPPLIERS



26.06.2023., Kecskemét

SZIMIKRON Ltd. is committed to unyielding integrity and high standards of business ethics in all aspects of our business, particularly in our dealings with our suppliers, contractors, consortium partners and consultants (collectively, "Suppliers"). SZIMIKRON bases its supplier relationships on lawful, efficient and fair practices, and suppliers must comply with applicable laws and other regulatory requirements in their business dealings with SZIMIKRON, as described in this Code of Ethics for Suppliers, Contractors, Consortium Partners and Consultants. Suppliers are responsible for ensuring that they and their employees, workers, representatives, suppliers and subcontractors comply with the standards of conduct set out in their other contractual obligations in this guide. Please contact the contact person in your SZIMIKRON team if you have any questions.

Obligations of SZIMIKRON suppliers

You, as a supplier of SZIMIKRON, agree to:

A decent place to work: (I) comply with applicable laws and regulations on wages, hours of work, overtime, hiring and employment contracts; (II) allow workers to freely choose, under local laws or regulations, to organize or join unions of their choice for collective bargaining; (III) prohibit discrimination¹, harassment and retaliation; and (IV) fair and respectful treatment of all workers.

Environment, health and safety: (I) comply with applicable environmental, health and safety (EHS) laws and regulations; (II) provide a safe and healthy workplace for workers; and (III) ensure that the supplier does not adversely affect the local community. Where accommodation is provided or arranged, it must comply with the host country's safety standards.

Forced labour: the human rights of employees and others must be respected, which includes: (I) prohibiting the use of compulsory labour, including prison labour or forced labour, and ensuring that workers are not subjected to any form of physical, sexual or psychological coercion, exploitation, violence, duress or inhuman treatment or other forms of trafficking; (II) ensuring that workers' identity or immigration documents are not withheld or destroyed; (III) allowing workers to terminate their employment for any reason within a reasonable period of time; (IV) ensuring that no recruitment agency fees are deducted from workers' wages or otherwise charged to workers; (V) prohibiting the use of fraudulent or misleading recruitment practices; (VI) ensuring that workers are reimbursed for the cost of repatriation upon termination of employment (for workers recruited from outside the country); and (VII) providing workers with terms and conditions of employment in a language that the worker understands.

Child Labour and Young Workers: (I) Suppliers shall comply with the Hungarian legal requirements concerning the age of employment in all cases, in particular when employing workers for hazardous work.

Working with governments, irregular payments and liaising with SZIMIKRON staff and representatives: (I) maintaining and enforcing a policy requiring compliance with legitimate business practices, including the prohibition of bribery; (II) offering or providing any employee, representative, customer of SZIMIKRON, or government official, directly or indirectly, any cash, gift, entertainment, job offer, or other type of benefit that would constitute a bribe or kickback in connection with any purchase, transaction, or business of SZIMIKRON; and (III) agreeing to provide supporting information to SZIMIKRON upon request.

Non-competition: failure to disclose price, cost or other competitive information, or refusal to engage in collusive conduct with a third party in connection with any proposed, pending or ongoing procurement by SZIMIKRON.

¹ SZIMIKRON prohibits discrimination on the basis of race, color, religion, national origin, national or ethnic origin, ancestry, gender (including pregnancy and related conditions), sexual orientation (gender identity and gender expression), marital status, genetic characteristics, age, disability, military and veteran status, or any other characteristic protected by law.

Intellectual Property: respecting SZIMIKRON's and third parties' intellectual property rights, including patents, trademarks, copyrights and trade secrets.

Security and Privacy: (I) Respecting individual privacy rights by collecting, handling and protecting SZIMIKRON's personal data in a responsible and lawful manner; (II) implementing and maintaining appropriate physical, administrative and technical controls that comply with laws, standards and are designed to ensure the security and confidentiality of SZIMIKRON's confidential information² to prevent unauthorized or unlawful destruction, alteration, modification or accidental loss of SZIMIKRON's confidential information; and (III) to protect supplier operations and facilities from exploitation by criminal or terrorist persons or entities.

Trade Controls and Customs: Supplier will not disclose SZIMIKRON's technical information to any third party without SZIMIKRON's express written consent and will comply with all applicable trade control laws and regulations applicable to the import, export, re-export or transfer of goods, services, software, technology or technical data, including restrictions on access or use by unauthorized persons or entities.

Audit and Tax Law: Supplier shall ensure that all invoices and customs or similar documentation submitted to SZIMIKRON or to government authorities or audited by third parties accurately describe the goods and services supplied or provided and their price, to ensure that all documents, communications and accounts are accurate and reliable and that it does not engage in or participate in any activity that may be considered tax fraud or facilitation of tax fraud.

Responsible mineral sourcing: (I) adopting policies and establishing systems to procure tantalum, tin, tungsten, gold, and other rare earth minerals from sources that do not directly or indirectly finance armed groups in the DRC or in high-risk areas affected by conflict; and (II) provide, upon request, supporting data on the supply chain of tantalum, tin, tungsten, gold or other requested rare earth minerals.

Conflict of interest: any conflict of interest or avoidance of a situation that creates the appearance of a potential conflict of interest. A material conflict of interest typically exists when personal interests prevent or appear to prevent the supplier from performing the work/services in an unbiased manner. Suppliers must notify SZIMIKRON if an actual or potential conflict of interest arises. This includes any situation where there is a potential or apparent conflict of interest between the personal interests of the suppliers or their employees and the interests of SZIMIKRON.

Ask for help - How to raise a question or concern?

All SZIMIKRON suppliers must inform SZIMIKRON of any concerns about the contents of this guide that affect SZIMIKRON as soon as the supplier becomes aware of such an event, whether or not the concern involves the supplier. Supplier shall also take such steps as may be reasonably requested to assist SIMIKRON in investigating any such event involving SIMIKRON and Supplier.

Prompt reporting is key - Supplier may raise a question or concern as follows:

SZIMIKRON's known contact details: phone +36 76 484-100, , or contact telephone number, email address.

Note: Suppliers do not need to be absolutely certain that a violation has occurred, but should report concerns when they believe in good faith that something is not in compliance or a violation of law or regulation has occurred. SIMIKRON will thoroughly investigate each integrity concern raised and take corrective action as appropriate. SZIMIKRON prohibits retaliation against any person who reports a concern.

Dated: Kecskemét, 26/06/2023.

² SZIMIKRON's confidential information is information created or collected by SZIMIKRON, the disclosure or improper use of which may cause damage to SZIMIKRON.