

CODE OF CONDUCT FOR BUSINESS PARTNERS

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“DAS GRUNDGESETZ”

NKCG strongly supports and respects the content of the “Basic Law for the Federal Republic of Germany” and its paragraphs, especially pointing out:

I. Basic Rights

Article 1 [Human dignity – Human rights – Legally binding force of basic rights]

(1) Human dignity shall be inviolable. To respect and protect it shall be the duty of all state authority.

Basic Law for the Federal Republic of Germany in the revised version published in the Federal Law Gazette Part III, classification number 100-1, as last amended by the Act of 19 December 2022 (Federal Law Gazette I p. 2478).

INTRODUCTION

Nippon Kornmeyer Carbon Group’s (in the following mentioned as “NKCG”) Code of Conduct for Business Partners (BPCoC) is based upon German and European law and regulations. By entering into an agreement with NKCG, all our Business Partners confirm to accept the following principles.

BINDING GUIDELINES LAWS AND LEGISLATION, COMPETITION, CORRUPTION

NKCG always complies with laws and legislation and acts in accordance with the respective national legal provisions in all business matters. In Germany, companies must comply with a variety of environmental regulations arising from national laws, EU directives and international agreements. We adhere to the principles of fair and free competition and respect the competition and antitrust laws in all

countries where NKCG and its agents do business. We do not tolerate any corruption in the form of unlawful privileges. We do not accept any form of benefits and reject any sort of bribe.

ETHICAL CONDUCT, FAIRNESS TOWARDS BUSINESS PARTNERS

We abide by the internationally recognized principles on the prohibition of discrimination against individuals. Our business partners are treated in a fair manner and are selected according to comprehensible criteria. Suppliers found to be in violation of NKCG Code of Conduct will not be authorized for supply.

WORKING ENVIRONMENT, SOCIAL STANDARDS

The respective national regulations shall respect the right of association and collective bargaining. At the least, the respective national regulations shall be considered with respect to remuneration, working hours and social benefits. In Germany, a variety of laws and regulations apply to employees in companies. The most important legal frameworks are: Working Hours Act (ArbZG), Federal Vacation Act (BUrlG), Part-time and Fixed-Term Employment Act (TzBfG), Occupational Health and Safety Act (ArbSchG), Social Code (SGB), General Equal Treatment Act (AGG), Works Constitution Act (BetrVG), Dismissal Protection Act (KSchG), Maternity Protection Act (MuSchG) and many more. We ensure health and safety in the workplace. We are fully committed to NKCG within the context of our employment relationship. Potential conflicts of interest must be communicated to the supervisor and require appropriate resolution.

NKCG will not tolerate any type of harassment or violence in the workplace including sexual harassment as well as all kind of physical force against our employees. Specifically forbidden is the harassment based on race, color, religion, gender, national origin, age, or disability.



NIPPON KORNMEYER

CONTACT

Nippon Kornmeyer CarbonGroup

Im Nassen 3, DE-53578 Windhagen

+49(0)2645 9525 0

E-Mail: info@nk-carbon.com

Web: www.nk-carbon.com

ENVIRONMENT AND SAFETY

Our products meet the environmental standards of our market segment. In the process of production, natural resources will be consumed in an efficient and economical manner. The resources and work equipment made available to us are not to be used for anything besides the intended business purposes, unless special arrangements allow other usage.

Here are some of the most important regulations and requirements: Federal Immission Control Act (BImSchG), Closed Substance Cycle and Waste Management Act (KrWG), Water Resources Act (WHG), Federal Soil Protection Act (BBodSchG), Chemicals Act (ChemG), REACH (EU), Renewable Energy Sources Act (EEG), Environmental Impact Assessment Act (UVP), Nature conservation laws (BNatSchG), Energy Saving Ordinance (EnEV), Climate Protection Act (EU).

To protect the data of NKCG as well as the data of our business partners, our IT systems should only be used in line with the corresponding IT rules and regulations. We maintain the confidentiality of all information designated as such.



NIPPON KORNMEYER

Member of Nippon Carbon Group

> 100 YEARS EXPERIENCE IN ENGINEERING
& MANUFACTURING OF CARBON MATERIALS



Carbon Fiber Products



Carbon Speciality



Artificial Graphite Electrodes



Silicon Carbide Continuous Fibers



Battery Materials



Other Products



Nippon Carbon Co., Ltd.

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