

ATM BEHAVIORAL CODE AND GUIDELINES FOR BUSINESS PARTNERS

(As of 14.03.2024)

Sustainability plays a crucial role in the strategy of ATM Recyclingsystems. We protect the environment and the limited resources of our planet. We take responsibility towards our employees, our suppliers, our customers, and our neighbors. We expect our business partners to also adhere to these guidelines so that we act responsibly throughout our entire value chain. ATM Recyclingsystems also expects its business partners to comply with the fundamental Universal Declaration of Human Rights of the United Nations as well as applicable national and local laws and regulations.

Guideline on Labor Conditions and Human Rights

Child Labor:

Our business partners must not employ or support any form of child labor.

Wages and Benefits:

Our business partners comply with local laws and industry standards regarding wages and benefits.

Working Hours:

Our business partners comply with local laws and industry standards regarding working hours.

Modern Slavery (i.e. slavery, servitude, forced or compulsory labor, and human trafficking):

Our business partners oppose all forms of modern slavery (i.e. slavery, servitude, forced or compulsory labor, and human trafficking).

Freedom of Association and Collective Bargaining:

Our business partners respect employees' rights to freedom of association and collective bargaining according to the legislation applicable to them.

Harassment and Non-discrimination:

Our business partners do not tolerate harassment or discrimination within the workforce. Companies do not discriminate based on ethnic origin, nationality, social background, gender and gender identity, sexual orientation, age, disability, religion, or party or union affiliation.

Guideline on Corporate Ethics

Corruption, Extortion, and Bribery:

Our business partners must prevent corruption, extortion, and bribery in any form.

Data Protection:

Our business partners handle corporate and personal data with respect and comply with applicable legislation.

Financial Responsibility (Accurate Records):

Our business partners ensure accurate and complete financial records and disclose complete, fair, accurate, timely, and understandable financial results as well as other essential information.

Disclosure of Information:

Our business partners disclose information on working conditions, health and safety at work, environmental practices, business activities, structure, financial situation, and economic development of the company in accordance with industry customs.

Fair Competition and Antitrust Law:

Our business partners must comply with competition and antitrust laws.

Conflict of Interest:

Our business partners take appropriate measures to prevent relationships, activities, or transactions in which private interests or relationships have influenced or may influence a business decision.

Counterfeit Parts:

Our business partners' products bear clear markings and are traceable within the supply chain. They promptly notify us if they become aware of counterfeit parts in circulation.

Intellectual Property:

Our business partners respect our intellectual property.

Export Controls and Economic Sanctions:

Our business partners comply with restrictions on the export of goods and trade with countries sanctioned by international laws and regulations.

Protection from Retaliation:

Our business partners protect their employees from retaliation.

Environmental Policy

Principles:

Our business partners are committed to protecting the environment, ensuring compliance with regulations, and working towards continuous improvement of their environmental performance.

Greenhouse Gas Emissions and Reporting:

Our business partners are encouraged to actively participate in reducing greenhouse gas emissions. We expect them to create regular reports on their emissions and monitor and oversee their development. This transparency not only enables effective collaboration but also promotes joint efforts towards continuous emission reduction.

Energy Efficiency and Renewable Energy:

We expect our business partners to actively promote increased energy efficiency to optimally use resources. At the same time, they should increasingly rely on renewable energy sources to promote sustainable energy sources and minimize environmental impacts. These measures are crucial for sustainable and responsible cooperation across the entire supply chain.

Water Quality and Consumption:

Our business partners have integrated the reduction of water consumption and the preservation of water quality into their environmental goals.

Air Quality:

Our business partners comply with air quality objectives according to laws and regulations and aim to reduce air emissions.

Noise Emissions:

Our business partners should reduce noise emissions and implement measures to reduce noise in their operations.

Sustainable Resource Management and Waste Reduction:

Our business partners manage resources sustainably and strive to reduce waste.

Reuse and Recycling:

Our business partners should promote reuse and recycling to conserve resources and reduce waste.

Responsible Chemical Management:

Our business partners handle chemicals responsibly.

Responsible Procurement of Raw Materials:

ATM Recyclingsystems' suppliers support activities that ensure responsible procurement of raw materials. The procurement and use of raw materials obtained unlawfully or through ethically objectionable or unreasonable means are to be avoided. The use of raw materials such as conflict minerals affected by embargoes or other import restrictions is to be excluded. Therefore, suppliers are obligated to identify these raw materials in products in the supply chain and disclose the origin and sources of the raw materials they use.

Animal Welfare:

Our business partners are encouraged to respect animal welfare standards and support measures to protect animals.

Biodiversity, Land Use, and Deforestation:

Our business partners should advocate for biodiversity protection, sustainable land use, and forest conservation.

Soil Quality:

Our business partners should take measures to maintain soil quality and minimize soil pollution.

Additional Policies and Standards

Ethical Recruitment:

Our business partners are committed to ethical recruitment practices.

Women's Rights:

Our business partners promote gender equality and protect women's rights.

Diversity, Equality, and Inclusion:

Our business partners promote diversity, equality, and inclusion in their work environment.

Rights of Minorities and Indigenous Peoples:

Our business partners respect the rights of minorities and indigenous peoples.

Land, Forest, and Water Rights, as well as Forced Evictions:

Our business partners respect land, forest, and water rights and avoid forced evictions.

Use of Private or Public Security Forces:

Our business partners ensure responsible use of private or public security forces.

Counterfeits:

Our business partners avoid counterfeits and respect intellectual property rights.

Definition and Implementation of Similar Standards by Own Tier-1 Suppliers:

Our business partners define and implement similar standards for their Tier-1 suppliers.

Binding Requirements for Tier-1 Suppliers to Cascade Standards Down the Supply Chain:

Our business partners require their Tier-1 suppliers to cascade the defined standards down the supply chain.

Information on Implementation of Social Responsibility Requirements:

The implementation of social responsibility requirements is a criterion of the ATM supplier evaluation. To ensure an objective evaluation of this criterion, we ask you to submit appropriate documentation. (Examples: Code of Conduct, CSR Policies, Certificates, etc.)

Escalation Procedure for Deviations:

In case of deviations or violations of the Code of Conduct, ATM Recyclingsystems reserves the right to initiate an escalation procedure with the supplier:

Escalation Level 1:

In the first escalation level (insufficient documentation proving the implementation of social responsibility requirements), the supplier is asked to submit these within one month.

Escalation Level 2:

Stage 2 of escalation follows an unsatisfactory outcome of Stage 1. The supplier is invited to a meeting to discuss the problem and define scheduled corrective actions.

Escalation Level 3:

An unsatisfactory outcome of Stage 2 leads to the initiation of Stage 3 (supplier is not suitable) or even to the supplier being blocked.

De-escalation:

In case of a positive result of the effectiveness check in the respective escalation stage, a notice of de-escalation is sent to the supplier.