

## Code of Conduct for SLOVMAG, a.s. Lubeník Suppliers

INTOCAST Group and SLOVMAG, a.s. Lubeník (member of INTOCAST Group) is one of the world's leading experts in refractory products and plant engineering and is one of the few companies in the market that manufactures and markets both shaped and unshaped refractory products, casting auxiliaries and metallurgical slag additives worldwide. SLOVMAG, a.s. Lubeník products always fulfil the highest quality and efficiency standards.

SLOVMAG, a.s. Lubeník is committed to sustainable and responsible corporate management that takes particular account of ecological and social aspects. It is therefore important to SLOVMAG, a.s. Lubeník to ensure that these objectives are pursued together with our suppliers and partners (hereinafter "**Suppliers**") along the supply chain and, in particular, to protect people and the environment.

SLOVMAG, a.s. Lubeník's Code of Conduct for Suppliers forms the basis for the joint and effective implementation of these principles and is fully observed by our Suppliers within the framework of our existing supply relationship. In addition, Suppliers shall endeavour to ensure that the principles set out in this Code of Conduct are also implemented in their upstream supply chain.

### 1 Compliance with laws and regulations

Suppliers are obliged to comply with all applicable laws, legal provisions and regulations of the countries in which they do business or are based. This also includes compliance with internationally recognised standards and conventions.

Furthermore, Suppliers must base their practices on generally recognised industry standards. They are obliged to obtain all necessary licences, permits and certificates before entering into a business relationship with SLOVMAG, a.s. Lubeník and to maintain these during the business relationship.

### 2 Commitment to the protection of human rights and labour rights:

#### 2.1 General information

SLOVMAG, a.s. Lubeník requires its Suppliers to respect and protect international human rights in accordance with the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the European Convention on Human Rights and other relevant standards.

#### 2.2 Equal treatment and prohibition of discrimination

Suppliers are encouraged to support the promotion of equality, diversity and inclusion. SLOVMAG, a.s. Lubeník expects to ensure a working environment free from any form of discrimination. It is prohibited to discriminate, give preferential treatment or to harass employees on the basis of gender, skin colour, religion, nationality, political or other beliefs, ethnic origin, disability, age, sexual orientation and identity or other characteristics.

#### 2.3 Fair working conditions

Suppliers are expected to ensure that regular working hours and overtime for all employees are within the legally permissible framework or in accordance with the relevant collective agreements. Suppliers shall ensure that their employees have the right to rest and leisure time in order to create a balance between work and private life.

It is also necessary that all employees are paid in accordance with the national statutory minimum wage or that remuneration is based on the minimum standards customary in the local industry. It must be ensured that the right of all employees to appropriate remuneration that is sufficient to enable them and their families to live in dignity is respected.

Care must also be taken to ensure that employees are treated respectfully and without prejudice in the workplace. In particular, it is prohibited to expose employees to humiliating treatment, sexual harassment and psychological or physical pressure.

#### **2.4 Freedom of association and collective bargaining**

SLOVMAG, a.s. Lubeník expects Suppliers to promote and maintain transparent and co-operative communication with their employees and employee representatives.

In accordance with national laws, the right of all employees to form and join trade unions freely and democratically and to engage in collective bargaining must be respected. Suppliers are prohibited from discriminating against employees who are engaged as employee representatives so that they can fulfil their duties without fear of consequences.

#### **2.5 Health and safety in the workplace**

Suppliers shall ensure that a safe and healthy environment is guaranteed at all workplaces. Suppliers must provide safe workplaces and equipment through appropriate maintenance and technical protective measures. In addition, it is required that the supplier's employees receive appropriate training and instruction and that this training is documented. This is intended to minimise workplace risks and prevent accidents and occupational illnesses. In particular, excessive physical and mental fatigue should be prevented through appropriate work organisation with regard to working hours and rest breaks. Suppliers are expected not only to ensure the physical safety of their employees, but also to support their mental health in the best possible way.

All work processes require documented risk management with appropriate controls that take into account physical, social and occupational health risks.

#### **2.6 Prohibition of child labour**

SLOVMAG, a.s. Lubeník does not tolerate child labour in its supply chain. Suppliers are obliged to prohibit and prevent all forms of child labour. This includes all forms of child labour as defined in the core labour standards of the International Labour Organization (ILO).

In order to ensure compliance with the minimum age, reliable mechanisms for determining age must be set up by Suppliers when hiring employees.

#### **2.7 Prohibition of forced labour**

SLOVMAG, a.s. Lubeník strictly rejects any form of forced labour, slavery or human trafficking. This is understood to mean any labour or service that is demanded of a person under threat of reprisals and to which that person has not voluntarily consented. Suppliers are obliged to refrain from any involvement in forced labour and must not profit from it in any way.

All employees must be granted the right to terminate their employment in accordance with the contractually agreed notice periods or the applicable national statutory notice periods.

#### **2.8 Protection of individual freedom and autonomy**

SLOVMAG, a.s. Lubeník expects Suppliers to respect the personal rights and privacy of their employees. In addition, the protection and promotion of the right to freedom of expression is required.

### **3 Protecting the environment**

Suppliers must proactively orientate their actions towards the principle of sustainability along the entire value chain, from the procurement of raw materials to the manufacture of the end product, in all regions. Suppliers are obliged to comply with national environmental laws and regulations and to conduct their business in accordance with all relevant internationally recognised environmental agreements and standards.

Suppliers endeavour to reduce the use of resources such as energy, emissions, water consumption, wastewater production, air pollution and waste generation throughout the supply chain, or at least to mitigate their impact as far as possible. Suppliers are required to handle hazardous substances responsibly and, wherever possible, to replace them with less hazardous substances.

SLOVMAG, a.s. Lubeník expects appropriate steps to be taken throughout the supply chain to reduce the carbon footprint. It is also essential that the applicable national laws on animal protection and welfare are fully complied with.

## 4 Business integrity

### 4.1 Prohibition of corruption and bribery

Suppliers are obliged to conduct their business without engaging in or tolerating any form of bribery, corruption or other fraudulent business practices. As a minimum, they must comply with the relevant country-specific anti-bribery and anti-corruption laws and regulations.

Suppliers shall ensure that both the acceptance and the granting of invitations, gifts and donations take place within the applicable laws respectively within any binding guidelines. This means that no attempt may be made to influence business relationships for one's own purposes through such procedures. In particular, invitations and gifts for employees of SLOVMAG, a.s. Lubeník or persons close to them must be appropriate and in line with the general local business ethos.

### 4.2 Fair competition

Competition law is the most important instrument of the free market to ensure fair, unrestricted competition. Suppliers are expected to act fairly and responsibly in the marketplace and to comply with applicable competition and antitrust laws. Suppliers undertake not to enter into any arrangements or agreements with other companies that violate competition or antitrust law and that are intended to or have the effect of restricting or preventing competition.

### 4.3 Conflicts of interest

Suppliers are expected to act unselfishly in the interests of the company. The decision-making processes regarding business activities with SLOVMAG, a.s. Lubeník should be carried out exclusively on an objective basis. Relevant conflicts of interest towards SLOVMAG, a.s. Lubeník include business activities with relatives or otherwise related persons or institutions that are outside the scope of the business.

Suppliers have a duty to inform SLOVMAG, a.s. Lubeník of any circumstances that could give rise to potential conflicts of interest.

### 4.4 Foreign trade law

Suppliers are obliged to comply with the applicable export control regulations and export restrictions for their business and to provide correct and truthful information to customs and other authorities if required. In addition, current economic sanctions must be observed.

### 4.5 Money laundering

SLOVMAG, a.s. Lubeník does not tolerate any direct or indirect involvement in activities related to money laundering. Suppliers must comply with the applicable legal obligations.

### 4.6 Confidentiality / Intellectual property / Data protection

Suppliers undertake to protect SLOVMAG, a.s. Lubeník's information which by its nature is to be regarded as confidential.

Suppliers shall be responsible for ensuring that SLOVMAG, a.s. Lubeník's valid intellectual property rights are protected and respected. To this end, Suppliers must comply with all relevant regulations and laws for the protection of intellectual property, in particular with regard to copyright, trademark, design and patent law.

Suppliers must comply with applicable data protection laws and regulatory requirements when collecting, storing, processing, transferring and disclosing personal information.

## 5 Realisation of the above expectations

SLOVMAG, a.s. Lubeník considers compliance with the Code of Conduct and legal provisions to be central to the credibility and reliability of Suppliers. The expectations placed on Suppliers with regard to supply chains include the identification of risks and the implementation of appropriate measures. To this end, Suppliers should have appropriate risk management systems and controls in place to ensure compliance with the Code of Conduct. In the event of suspected violations or increased risks in the supply chains, Suppliers are expected to provide prompt notification of any problems identified and

measures taken to comply with the principles and obligations contained in this Code of Conduct.

SLOVMAG, a.s. Lubeník will obtain confirmation of compliance with this Code of Conduct by means of a self-declaration and reserves the right to verify compliance with the Code of Conduct by taking appropriate measures itself or through third parties such as on-site audits.

If Suppliers demonstrably do not meet the expectations in the Code of Conduct, fail to take improvement measures or fail to take remedial action within a reasonable period of time, SLOVMAG, a.s. Lubeník reserves the right to terminate individual contracts or the business relationship as a whole.

SLOVMAG, a.s. Lubeník encourages to report any violations of this Code of Conduct to the following address: [podatelna-podnety@intocast.sk](mailto:podatelna-podnety@intocast.sk)

The Code of Conduct is available at: [www.slovmag.sk](http://www.slovmag.sk)