

SUPPLIER CODE OF CONDUCT

I. Corporate Responsibility

Recom Technologies companies including all subsidiaries, holdings, and affiliated entities ("Recom Technologies") work with many suppliers worldwide to fulfill client engagements. In this context, Recom Technologies holds that corporate social responsibility should extend to its entire supply chain.

This Supplier Code of Conduct ("Code") outlines the standards and business practices to which Recom Technologies requires its direct and extended Suppliers to adhere in the course of their dealings and conduct with Recom Technologies, its employees and on its premises. The scope of this requirement includes all tiers of suppliers, manufacturers, contractors, subcontractors, agents, distributors, and consultants (each a "Supplier" and collectively "Suppliers"). It also extends to parent, subsidiary, agents, subcontractors, and affiliate entities and applies to all workers, including permanent, temporary, contract, foreign, or migrant workers (each an "Worker" and collectively "Workers").

It is the Supplier's responsibility to ensure compliance with both the intent of this Code among all Workers and throughout its supply chain, including all sub-tier suppliers/individuals, through dissemination, education, and verification.

Recom Technologies reserves the right to modify the provisions in this Code as it deems fit, but in particular due to changes related to its compliance program, changes on applicable legislations, rules or regulations. In such case, Recom Technologies notify its Supplier in writing and may provide training on respective changes if necessary. The Supplier will be bound by such modifications upon delivery of notice without the need for Supplier's consent or acknowledgment.

II. Legal Compliance and Business Ethics

Legal Compliance: The Supplier will uphold legal and regulatory standards in every aspect of business, and comply with the laws, policies and standards that guide activities around the world, including Code of Ethics and Business Conduct of Recom Technologies [CODE OF ETHICS AND BUSINESS CONDUCT](#). Suppliers shall:

- Comply with all applicable laws and regulations of the countries, states, and localities in which they operate. This includes, but is not limited to, laws and regulations related to ethical business practices, anti-trust or competition law, quality, labor and employment practices, health and safety, environmental protection, data privacy and protection, and economic sanctions (including embargoes), and any other laws that are otherwise applicable to the products and/or services provided to Recom Technologies.
- Abide by industry standards of conduct relevant to the areas described in this Code.
- Obtain, maintain, and operate in accordance with all applicable permits, licenses, and registrations.

Anti-corruption: The Supplier will comply with the provisions of all applicable anti-bribery and anti-corruption laws, rules and regulations in countries where the Supplier conducts its business, and shall comply with the Anti-Bribery and Anti-Corruption Policy of Recom Technologies as described in its Code of Ethics and Business Conduct. Suppliers will not pay bribes or engage in corrupt practices in order to advance business interests of Recom Technologies. This includes any direct or indirect offering, promising to pay or authorizing the payment of money or anything of value to local government officials for the purpose of influencing the decision of public officials.

Fair Competition: Suppliers must not engage in illegal cooperation with competitors including bid rigging, price fixing, market allocations, or any other prohibited conduct that limits free and fair competition.

Confidential Information: Suppliers must secure Recom Technologies's private and confidential information in their possession, use it only per our instructions, and safeguard it from unapproved or unintended disclosure. Suppliers and Workers are prohibited from taking photos or video while on Recom Technologies premises without preapproval. This obligation continues after our business relationship ends.

Non-retaliation: The Supplier will support an open environment where individuals feel comfortable asking questions and reporting concerns. In this context, Suppliers shall have a system in place to empower workers to report concerns or grievances in the workplace, free from fear or threat of reprisal, retaliation, intimidation, and harassment.

Conflicts of Interest: The Supplier will take appropriate measures to prevent conflicts of interest and make business decisions based on the interest of the Supplier's company and not for personal gain or benefit. Suppliers shall:

- Abide by all relevant laws, including those related to exchanges of value and any other special ethics rules, disclosure obligations, and conflict of interest provisions.
- Prior to establishment of a business relationship with Recom Technologies, proactively and promptly disclose to Recom Technologies any actual or perceived conflicts of interest, including any material ownership or beneficial interest by a public official, representative of a political party, or by a governmental body, or Recom Technologies employee or their relatives that may influence the business relationship between a Supplier and Recom Technologies.
- Have systems in place to ensure all business transactions are free from conflicts of interest.

Export, Import and Trade Controls: The Suppliers shall abide by all relevant applicable laws and regulations on trade, import and export controls in the countries/regions where they operate, and earnestly fulfill relevant responsibilities and obligations.

III. Respect for Basic Human Rights of Employees

Suppliers must respect their Workers by ensuring them, within the context of the Supplier's business operations, a right to life, personal liberty, and personal security. Suppliers must comply with all applicable laws and regulations, including treaties and international standards such as the **UN Global Compact's Ten Principles, UN Guiding Principles, Universal Declaration of Human Rights, International Bill of Human Rights, OECD Guidelines for Multinational Enterprises, and the ILO's Core Labour Standards** as codified in the 8 core conventions. Special attention to ensuring these rights are upheld should be given to those who are at heightened risk for vulnerability or marginalization such as women, young people, indigenous peoples, ethnic/racial minorities, people with disabilities, and migrant or foreign workers.

Non discrimination: Suppliers will not discriminate in hiring, compensation, discipline, termination or retirement, relying on a person's race, color, gender, national origin (or ethnicity), age, religion, disability, sexual orientation, gender identity, veteran status, marital status and any other protected characteristics or beliefs.

Harassment: Suppliers will not subject their employees to physical, verbal, sexual, or psychological harassment, nor use corporal or physical punishment to discipline employees.

Coercion: Suppliers shall not use any means of coercion such as intimidation, threats, or harassment, directly or indirectly, to pressure Workers into accepting or staying in a job. All Workers are to freely choose their employment and must be aware of all terms and conditions associated with their employment status, job functions, compensation, and process for termination of employment by either the Supplier or Worker. The Supplier must provide this information to the Worker in their primary language and all contractual elements are to be agreed upon before the commencement of employment activities. Records of all Worker contracts and agreements should be kept and be available for review or verification purposes by Recom Technologies or an appointed third party.

Compensation: Suppliers will comply with applicable compensation laws and regulations, including those relating to minimum wages, overtime premiums, allowances and benefits. Suppliers shall pay at least the legally required compensation or the prevailing industry compensation, whichever is higher.

Working Hours: Suppliers will comply with all applicable laws and regulations regarding working hours. Other than in exceptional circumstances, workers must not work over the legal limits or over regular overtime hours per week. Overtime shall not be requested on a regular basis and must be voluntary.

Work Documentation: Suppliers must only employ Workers with legal authorization to work in accordance with all local laws and regulations. Authorization must be validated through appropriate legal documentation. Suppliers shall not confiscate, or in any way withhold, legal documentation of Workers.

Freedom of Association and Right to Collective Bargaining: Recom Technologies recognizes the right of Workers to form employee representative bodies and to bargain collectively to regulate working conditions. In its operations, the Supplier shall uphold the right of employees to join trade unions. Establishing, joining, or becoming a member of a trade union shall not be used as a reason for unjustified

discrimination or retaliation. Unions shall be allowed to operate freely and in accordance with the law of the place of employment. This includes the right to strike and the right to collective bargaining. The supplier shall exclude the use of security forces to interfere with freedom of association. Recom Technologies encourages suppliers to promote constructive and transparent dialog between employees, their representatives, and management when handling internal conflicts and grievances relating to working conditions.

IV. Prohibition of Child Labor

Suppliers will not employ individuals in violation of the local mandatory school age or under the legal employment age in the country where they operate. Moreover, in no case will Suppliers employ workers under age 15, except for child actors and models employed in advertising or media who are protected by applicable child labor requirements.

V. Prohibition of Forced Labor

Suppliers will employ all employees under their own free will with no one being subjected to bonded or forced labor. This policy applies to not only the supplier's business operations but also those of their supplier network with which the company conducts its business. Suppliers are prohibited to procure raw material from banned areas and entities that are in sanction lists.

In particular, Suppliers are obliged to conduct extensive due diligence to ensure that none of the components or materials comprising its products originate from the following suppliers: Hoshine Silicon Industry (Shanshan) Co., Ltd, Xinjiang Daqo New Energy Co., Ltd, Xinjiang East Hope Nonferrous Metals Co., Ltd, Xinjiang GCL New Energy Material Technology Co., Ltd, Xinjiang Production and Construction Corps (XPCC), and none from their suppliers in the upstream level is included in the UFLPA Entity List, as mentioned in the following link: <https://www.dhs.gov/uflpa-entity-list>.

Recom Technologies does not tolerate any form of Forced Labor and requires its Suppliers to comply with all applicable international laws and regulations. These laws include but are not limited to the following:

- United States Uyghur Forced Labor Prevention Act (UFLPA)
- United States UFLPA Entity List
- United States The California Transparency in Supply Chains Act
- United Kingdom The Modern Slavery Act 2015
- Germany The Lieferkettengesetz / Supply Chain Act
- Norway The Norwegian Transparency Act (Åpenhetsloven)
- France The Duty of Vigilance Law
- Australia The Modern Slavery Act 2018

VI. Safe and Healthy Workplace

The protection and promotion of the health of its workers is a top priority for Recom Technologies. The Supplier shall comply with all national and international standards and laws on occupational safety (in particular safety at work, health protection, working hours) that apply to its location of business. Upon request of Recom Technologies, the Supplier shall

- introduce and operate an effective, certified occupational safety management system according to ISO 45001 (or similar) and provide evidence of this by way of a corresponding certificate, and
- provide evidence of a health and safety policy.

The Suppliers will operate a safe and healthy work environment for their employees and maintain compliance with applicable workplace safety and industrial hygiene standards, as mandated by applicable laws and regulations. Suppliers must be committed to eliminating unsafe acts and conditions, thereby preventing harm to their workers, customers and the general public. Where applicable, this also applies to housing and eating facilities.

The Supplier shall organize working hours (overtime and maximum working hours, rest periods, work schedules, maternity / parental leave, sick leave, leave for family reasons, paid overtime) in such a way that occupational accidents due to physical and mental fatigue are avoided and the health of employees is maintained (ILO 1, ILO 14). Recom Technologies encourages Suppliers to provide for representation of employees' interests in the regulation of working hours, or at least give appropriate consideration to the needs of employees in the organization of working hours.

VII. Environmental Responsibility

Recom Technologies believes in doing business with suppliers who share our commitment to protecting the quality of the environment around the world through sound environmental management. Suppliers will comply with all applicable environmental laws and regulations and will promptly develop and implement plans or programs to correct any non-compliant practices.

Recom Technologies requires that the supplier shall also make continuous efforts to reduce their environmental pollution and risks and improve environmental protection within their own sphere of influence on an ongoing basis. The use of resources (in particular energy, water, raw materials and/or (primary) materials) and the environmental impacts (in particular emissions, pollutants, waste) are to be consistently minimized.

Suppliers shall seek to reduce waste and adopt responsible measures to minimize and mitigate the environmental impact of their operations.

Water and Waste: The Supplier must embrace the responsible management and stewardship of water and waste and take proactive steps to assess and address pharmaceuticals and personal care products in the environment. Suppliers shall:

- Comply with all relevant laws and regulations pertaining to the treatment and safe disposal of water and waste.
- Encourage environmental stewardship by implementing programs, where relevant to their business, to identify and mitigate issues related to water management.
- Where relevant to their business, commit to controlling the concentrations of active pharmaceutical ingredients or other relevant substances that may enter the environment from manufacturing plants, and managing waste responsibly through generation, collection, storage, transportation, and disposal.

Plastics and Packaging: The Supplier must take steps to reduce dependency on single-use plastics and prioritize the improvement of the environmental profile of packaging materials. Suppliers shall, where relevant to their business:

- Implement programs to promote the circular design of products and packaging to be reused, recycled, or composted and increase recycled content in products and packaging materials.
- Ensure transparency of plastic and other relevant materials' inventories (including paper, or raw materials or ingredients which may contribute to deforestation) and engage in traceability efforts including providing relevant plastics or other materials' data.

Raw Materials and Conflict Minerals: The Supplier will uphold human rights standards and environmental standards related to materials across the supply chain, work to detect and eliminate conflict mineral sources and to understand and reduce environmental harm or degradation, including in relation to materials that may contribute to deforestation or human rights abuses.

'Conflict minerals' refer to metallic minerals, such as tin, tantalum, tungsten, gold and cobalt that were exploited, this produces serious problems regarding human and environmental rights during exploit and sales. Suppliers shall, where relevant to their business:

- Shall establish specific policies or perfect procedures not to use or sell "conflict minerals" mined in areas that may result in serious human rights abuses and environmental issues.
- Conduct due diligence and provide verification on the origin, source, and chain of custody of minerals which may come from conflict-affected or high-risk areas, including areas for which applicable laws and regulations provide reporting requirements and/or usage, import or export restrictions ('conflict minerals').

Climate Action: The Supplier will operate in an environmentally responsible manner to reduce greenhouse gas emissions. Suppliers shall:

- Optimize the use of natural resources and materials, improve energy efficiency, transition toward low-carbon energy sources and manage and measure greenhouse gas (GHG) emissions associated with their business operations and products.
- Seek opportunities to reduce their GHG emissions and share information on these efforts with Recom Technologies.

Decarbonization: Recom Technologies is committed to the Paris Agreement (COP 21) and has set a CO2 reduction target throughout its entire product life cycle. As part of the nomination process, the Supplier undertakes to implement measures to reduce its direct and indirect CO2e emissions (including in its

upstream value chain). This includes, for example, the use of green electricity and the use of secondary materials or biomaterials.

Compliance with the requirements concerning CO₂e emissions reduction is a decisive criterion for Recom Technologies in the process of selecting its Suppliers. Recom Technologies expect Suppliers to ensure transparency with regard to their own emissions as well as those of the upstream supply chains (e.g. by using life cycle assessments (LCA)), and to set reduction targets, including targets that apply to their supply chain.

VIII. Responsible Supply Chain

The Suppliers shall ensure that they and their suppliers/partners are in compliance with local laws and regulations on labor protection and environmental protection as well as relevant international treaties, and shall take appropriate steps to prevent, mitigate, terminate or minimize adverse implications on labor protection and the environment through internal rules and regulations.

The Supplier shall take all reasonable precautions to ensure that Supplier and each of its vendors or sub-contractors complies with requirements consistent with this Code and fulfills the minimum criteria, as listed below;

- (a) be of specialized capability, both technically and from supply and execution;
- (b) have an excellent track record in health, safety and environment performance and capability to manage the risks inherent to the scope of the supply;
- (c) demonstrate good labour practices, including in its supply chain;
- (d) implement anti-slavery or labor and human rights policies, regulations which are applicable to Recom Technologies's employees and its end users;
- (e) provide a commitment to meet health, safety and environment requirements of Recom Technologies; and
- (f) be financially sound and solvent.
- (g) include in their contracts with their subcontractors and suppliers, provisions prohibiting the subcontractors and suppliers from using materials, work or services resulting from Modern Slavery.

IX. Implementation of Corporate Due Diligence

For Recom Technologies, the commitment of its Suppliers to meet their social and environmental responsibilities is an indispensable prerequisite for any business relationship. It is therefore expected that the Supplier has established or is implementing a due diligence process with appropriate measures to ensure that its suppliers and subcontractors, in turn, also comply with the standards and rules set out in this document, and takes as minimum the following actions:

Risk management: The supplier is expected to implement an appropriate and effective management system for corporate due diligence toward people and the environment in its organization as well as with its direct suppliers. This includes but is not limited to contractual agreements, a supplier policy for sustainable procurement, and audits. The Supplier shall pass on sustainability requirements in accordance with this Supplier Code of Conduct to its suppliers

Notification and remedy mechanisms: If the Supplier becomes aware that requirements from the Supplier Code of Conduct have been violated in its own business area or in its supply chain, it shall immediately take appropriate remedial action. In case of confirmed violations, the Supplier shall inform Recom Technologies (ethics-humanrights@recom-tech.com) immediately of any violation of the obligations arising from this Standard in its own business area or in its supply chain, or of any official investigation procedure in this regard.

X. Implementation of the Supplier Code of Conduct

Recom Technologies meets due diligence obligations in the supplier network based on international standards and laws. We review and implement compliance with the expectations and requirements defined in this Supplier Code of Conduct as follows:

Audit and Information Rights. On an ad hoc basis, Recom Technologies requires collaboration with suppliers and sub-suppliers with the target of achieving traceability and maximum transparency in relevant high-risk supply chains, to the source of origin if needed. Upon request, the Supplier shall fully and truthfully answer questions from Recom Technologies about compliance with its obligations under

this Standard, including its actions, any violations, and grievances. The Supplier shall also provide relevant documentation upon request and nominate contacts for inquiries.

In order to review suppliers' compliance with the standards set out in this document, Recom Technologies uses for example, standardized self-assessment questionnaires with requirements relating to nomination, as well as third-party audits, and on-site inspections by sustainability experts appointed by Recom Technologies. The self-assessment questionnaires and the audits cover broader content than that specified in this Supplier Code of Conduct.

The Supplier shall cooperate to the best of its abilities in responding with honesty to the self-assessment questionnaire and with the audits. Recom Technologies may request further suitable certificates as Supplier verification. Recom Technologies reserves the right to carry out risk analyses along the supplier's entire supply chain. This may take the form of audits, for example, by independent third parties appointed by Recom Technologies or internal assessors.

Reporting Channels. In case of (potential) violations of the above-mentioned requirements, Recom Technologies has implemented a grievance mechanism, which is available by e-mail at ethics-humanrights@recom-tech.com

Handling of Violations. In the event of non-compliance with the mandatory requirements described in this Supplier Code of Conduct, Recom Technologies reserves the right to terminate business relationships, provided that no other effective means are available, and further increasing of influence is impossible.

RECOM TECHNOLOGIES

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