

Code of Conduct



Introduction

REFKO Feuerfest GmbH has been a leading company in the development and supply of innovative, high-quality unformed refractories since 1983. The products address high-temperature processes in the metal, cement, lime and glass industries as well as in thermal waste treatment.

Sustainable business begins in the supply chain. The quality of raw materials, the reliability of suppliers and the responsible treatment of people and the environment along the entire value chain are not a matter of course for REFKO, but the basis of business success.

This Code of Conduct sets out the minimum ethical, social, ecological and economic requirements that REFKO imposes. It is based on its own Code of Conduct, values and internationally recognised standards.

Only a supply chain built on integrity, respect and responsibility creates lasting value.

Herbert Hönl

Managing Director



Purpose and scope

Purpose

This code is aimed at all employees, suppliers, service providers and business partners of REFKO, regardless of whether they provide raw materials, production materials, logistics services, IT services or consulting services. It defines binding minimum requirements and forms the basis for supplier evaluation at REFKO.

The Code is based on internationally recognised standards, including the ILO Core Labour Standards, the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the GDPR.

Scope of application

The Code of Conduct applies to all natural and legal persons in a supplier, service provider, business partner or employee relationship with REFKO Feuerfest GmbH, including its own suppliers along the upstream value chain. By entering into a business relationship, the supplier acknowledges the formulated requirements and undertakes to demand them from its own suppliers and subcontractors.

Compliance

Law-abiding

Suppliers and other business partners, as well as all employees, comply with all applicable national and international laws, regulations and official requirements. These include, in particular, competition law, environmental law, labor law, tax law as well as regulations on export and foreign trade controls. REFKO expects suppliers to be informed about current legal requirements in their areas of activity and to implement them consistently.

Corruption and bribery

Corruption and bribery are incompatible with REFKO's principles. Suppliers may not offer, promise, grant or accept, directly or indirectly, payments, gifts or other benefits in order to unduly influence decisions. This applies equally to REFKO employees, authorities and other third parties.

Decisions and actions in relation to business activities are always made in the interests of the company. REFKO undertakes not to offer any gifts, payments, invitations or services to business partners that could unduly influence business relationships.

Conflicts of interest

If there are personal or economic interdependencies between persons on the part of the supplier and employees of REFKO that could jeopardise the objective conduct of business, this must be reported immediately. This includes family relationships, joint shareholdings in companies or other financial interests.

Fair competition

The provisions of antitrust and competition law must be complied with. In particular, price agreements, the sharing of markets or customers and the exchange of competition-sensitive information with competitors are prohibited. Participation in REFKO's tenders is carried out in full compliance with applicable competition law and, where relevant, procurement law requirements.

Money laundering and sanctions

All of the parties mentioned may not engage in any business that serves the purpose of money laundering, terrorist financing or the circumvention of economic sanctions. Suppliers assure that they will not be included on sanctions lists of the EU, the UN or other relevant authorities. REFKO reserves the right to terminate business relationships with sanctioned parties immediately.

Confidentiality and data protection

Information that suppliers receive in the course of their business relationship with REFKO or employees in the course of their employment must be treated confidentially. This applies in particular to technical data, recipes, customer lists and strategic planning. Disclosure to third parties is prohibited without express written permission from REFKO. This obligation applies beyond the duration of the business relationship.

If personal data is processed in the context of the cooperation with REFKO, this must be done in accordance with the General Data Protection Regulation (GDPR) and the applicable national data protection regulations. Suppliers shall take appropriate technical and organizational measures to protect such data.

IT systems, digital interfaces and information used in connection with the business relationship with REFKO must be protected against loss, manipulation, unauthorized access, malware and other IT security incidents by appropriate measures. Access rights to data and systems must be limited to the extent necessary. Security incidents, data breaches or other impairments that affect or could affect information, systems or business processes of REFKO must be reported immediately.

Human rights and occupational health and safety

Due diligence obligations

Suppliers are committed to respecting internationally recognized human rights as enshrined in the Universal Declaration of Human Rights, the core labor standards of the International Labor Organization (ILO) and the UN Guiding Principles on Business and Human Rights. Suppliers are required to actively identify and minimize human rights risks along their own supply chain.

Basic employee rights

Any form of child or forced labor as well as human trafficking is prohibited. Suppliers do not employ persons under the legal minimum age. All employees enter into their employment voluntarily and without coercion or threat. The retention of identity documents, the charging of recruitment fees and any form of debt bondage are strictly prohibited. Employees must be able to terminate the employment relationship at any time. Contracts and working conditions are communicated in a language that is understandable to all employees.

Fair working conditions

Suppliers pay their employees at least the minimum wage required by law. Wages are paid in full, on time and without inadmissible deductions. Overtime is paid in accordance with the law and may not be forced. Working hours, rest periods and holiday entitlements are based on the applicable legal regulations.

Equal treatment and freedom of association

All of these parties treat all employees along the value chain equally regardless of gender, age, nationality, ethnic origin, religion, belief, disability, sexual orientation or trade union membership. Hiring, remuneration, development and dismissal are based solely on qualifications and performance. Harassment, bullying, and psychological or physical violence in the workplace are prohibited. Suppliers respect their employees' right to unionize and bargain collectively without being discriminated against.

Health and safety

Occupational health and safety

A safe and healthy working environment must be guaranteed for all employees, both internally and externally. This includes appropriate technical and organisational protective measures, the provision of personal protective equipment and regular safety briefings. Emergency plans for fire, evacuation and first aid must be in place and known to all employees. Risk assessments are carried out and updated regularly.

Access to the company premises

Suppliers who work on the premises of REFKO or the contract processor comply with the safety and access rules applicable there. Employees are instructed on site before starting work and equipped with the necessary personal protective equipment. Company clothing and protective equipment provided must be worn as intended.

Environmental protection

Climate protection and greenhouse gas emissions

REFKO is actively working to reduce its greenhouse gas emissions along the entire value chain and expects its partners to be similarly aware. Energy consumption and emissions are to be recorded and disclosed on request.

Pollution

All applicable environmental laws, regulations and official permits must be complied with. Emissions to air, soil and water must be minimised. Hazardous substances must be properly labelled, stored and disposed of. Ecologically sensitive areas must be protected and responsible use of water resources must be ensured.

Resource efficiency and circular economy

Resource consumption must be optimised, waste minimised and material cycles closed where possible. REFKO focuses specifically on recyclates and secondary raw materials and prefers partners who share this approach. Packaging materials should be designed to be environmentally friendly and, where possible, replaced by recyclable alternatives.

Product safety and quality

Quality Management

REFKO is certified according to DIN EN ISO 9001:2015 and expects its suppliers to have an equivalent level of quality. Suppliers ensure that the products and raw materials supplied comply with the agreed specifications, standards and test requirements. Relevant quality management systems must be maintained and proven on request.

Deviations from agreed quality standards must be reported to REFKO immediately. Complaints are taken seriously, systematically analysed and permanently remedied by appropriate corrective measures. Increasing complaint rates due to inferior raw materials can endanger REFKO's customer satisfaction in the long term.

Product safety

Suppliers ensure that supplied materials comply with the applicable product safety regulations, hazardous substance labelling obligations (e.g. REACH, GHS/CLP) and the contractually agreed specifications. Safety data sheets are provided in full and up-to-date. Significant changes in the composition of raw materials are notified to REFKO prior to delivery.

Delivery reliability and communication

Reliable supply chains are crucial for REFKO's ability to supply customers. Suppliers inform REFKO at an early stage of impending supply bottlenecks, raw material shortages or other disruptions. Coordinated capacities, delivery windows and stockpiling strategies are developed together with REFKO to strengthen security of supply



Control and enforcement

Reporting of violations

All parties mentioned shall immediately report known or suspected violations of this Code to those responsible at REFKO. REFKO offers the following contact options for this purpose:

- E-mail: info@refko.de
- In writing to: REFKO Feuerfest GmbH, Concordiastraße, D-56235 Ransbach-Baumbach, Attn: Management
- External reporting office of the Federal Office of Justice: www.bundesjustizamt.de/hinweisgeberstelle

Reports are treated confidentially. There are no negative consequences for reporting a suspicion in good faith.

Consequences of violations

Within the framework of a trusting cooperation, REFKO can request a review of compliance with the Code if there is a justified reason and after prior consultation. This can take the form of a self-disclosure, the submission of relevant documents or, in exceptional cases, a jointly agreed on-site inspection. REFKO proceeds in partnership and respects the operational conditions of the supplier.

Violations of this Code will be taken seriously by REFKO. Depending on the severity of the violation, the following measures may be taken:

- Request a written action plan with concrete corrective actions and deadlines
- Temporary suspension of the supplier relationship
- Extraordinary termination of the business relationship in the event of serious or repeated violations

REFKO strives to resolve violations through dialogue and joint action, provided that the supplier demonstrates a credible willingness to improve.

Contact person

If you have any questions about this Code or supplier evaluation, please do not hesitate to contact us:

REFKO Feuerfest GmbH,

Concordiastraße,

D-56235 Ransbach-Baumbach

Contact:

Jan Schröder,

Ceramic technician (quality management)

Phone: +49 (0) 2623 2075

E-mail: schroeder@refko.de



Entry into force and confirmation

This Code of Conduct for Suppliers shall be deemed to have been accepted upon the establishment of a business relationship with REFKO Feuerfest GmbH. REFKO reserves the right to update this Code in the event of significant changes in the legal framework or the corporate orientation. Suppliers will be informed of significant changes.

Suppliers declare in writing that they comply with the requirements of this Code by entering into a business relationship with REFKO. Upon request by REFKO, Suppliers shall provide all necessary evidence, documentation and information to verify compliance with the Code within a reasonable period of time.

Location, Date

Signature and Stamp Supplier

Version: 1.0

17.09.2026

