

Supplier Code of Conduct



Introduction

Since 1983, REFKO Feuerfest GmbH has been a leading company in the development and supply of innovative, high-quality monolithic refractory materials. The products are designed for high-temperature processes in the metal, cement, lime and glass industries, as well as in thermal waste treatment.

Sustainable business practices begin in the supply chain. For REFKO, the quality of raw materials, the reliability of suppliers and the responsible treatment of people and the environment throughout the entire value chain are not taken for granted, but form the foundation of our business success.

This Code of Conduct for Suppliers sets out the minimum ethical, social, environmental and economic requirements that REFKO sets for its suppliers, service providers and business partners. It is based on REFKO's own Code of Conduct, its 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 applies to all suppliers, service providers and business partners of REFKO, regardless of whether they supply raw materials, production materials, logistics services, IT services or consultancy services. It defines binding minimum requirements and forms the basis for supplier assessment 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

The Code of Conduct applies to all individuals and legal entities in a supplier, service provider or business partner relationship with REFKO Feuerfest GmbH, including their own suppliers along the upstream value chain. By entering into a business relationship, the supplier acknowledges the requirements set out herein and undertakes to ensure that their own suppliers and subcontractors also comply with them.



Compliance

Compliance with the law

Suppliers shall comply with all applicable national and international laws, regulations and official requirements. These include, in particular, competition law, environmental law, labour law, tax law and 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 must not, either directly or indirectly, offer, promise, grant or accept payments, gifts or other benefits in order to improperly influence decisions. This applies equally to REFKO employees, public authorities and other third parties.

Decisions and actions relating to business activities are always taken 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 financial ties between individuals on the supplier's side and REFKO employees that could jeopardise objective business dealings, 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 fixing, the allocation of markets or customers, and the exchange of competitively sensitive information with competitors are prohibited. Participation in REFKO's tenders takes place in full compliance with applicable competition law and, where relevant, public procurement regulations.

Money laundering and sanctions

Suppliers must not engage in any transactions that serve to launder money, finance terrorism or circumvent economic sanctions. Suppliers represent and warrant that they are not listed on sanctions lists maintained by the EU, the UN or other relevant authorities. REFKO reserves the right to terminate business relationships with sanctioned parties with immediate effect.

Confidentiality and Data Protection

Information received by suppliers in the course of their business relationship with REFKO must be treated as confidential. This applies in particular to technical data, formulations, customer lists and strategic planning. Disclosure to third parties is prohibited without the express written consent of REFKO. This obligation remains in force beyond the duration of the business relationship.

Where personal data is processed in the course of 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 organisational measures to protect such data.

IT systems, digital interfaces and information used in connection with the business relationship with REFKO must be protected by appropriate measures against loss, manipulation, unauthorised access, malware and other IT security incidents. Access rights to data and systems must be restricted to the extent necessary. Security incidents, data breaches or other incidents affecting or potentially affecting REFKO's information, systems or business processes must be reported immediately.

Human rights and occupational health and safety

Duty of care

Suppliers are committed to respecting internationally recognised human rights, as enshrined in the Universal Declaration of Human Rights, the core labour standards of the International Labour Organisation (ILO) and the UN Guiding Principles on Business and Human Rights. Suppliers are required to actively identify and minimise human rights risks throughout their own supply chain.

Fundamental labour rights

Any form of child labour, forced labour or human trafficking is prohibited. Suppliers shall not employ anyone below the legal minimum age. All employees enter into their employment voluntarily and without coercion or threat. The withholding of identity documents, the charging of recruitment fees and any form of debt bondage are strictly prohibited. Employees must be able to terminate their employment at any time. Contracts and terms of employment are communicated in a language that all employees can understand.

Fair working conditions

Suppliers pay their employees at least the statutory minimum wage. Wages are paid in full, on time and without unauthorised deductions. Overtime is remunerated in accordance with the law and must not be required. Working hours, rest periods and holiday entitlements are governed by the applicable legal provisions.

Equal treatment and freedom of association

Suppliers treat all employees equally, regardless of gender, age, nationality, ethnic origin, religion, belief, disability, sexual orientation or trade union membership. Recruitment, 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 organise and bargain collectively without being disadvantaged as a result.

Health and Safety

Occupational safety and health

A safe and healthy working environment must be ensured for all employees. 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 communicated to all employees. Risk assessments are carried out and updated regularly.

Access to the premises

Suppliers working on the premises of REFKO or the contract manufacturer must comply with the safety and access rules in force there. Employees must be briefed before commencing work on site and provided with the necessary personal protective equipment. Work clothing and protective equipment provided must be worn appropriately.

Environmental protection

Climate protection and greenhouse gas emissions

REFKO is actively working to reduce its greenhouse gas emissions throughout the entire value chain and expects its partners to demonstrate a similar level of awareness. Energy consumption and emissions must be recorded and disclosed upon request.

Environmental 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 the responsible use of water resources must be ensured.

Resource efficiency and circular economy

Resource consumption must be optimised, waste minimised and materials should be reused and recycled wherever possible. REFKO specifically focuses on recycled materials and secondary raw materials and gives preference to partners who share this approach. Packaging materials should be designed to be environmentally friendly and, where possible, replaced with recyclable alternatives.

Product safety and quality

Quality management

REFKO is certified to DIN EN ISO 9001:2015 and expects its suppliers to demonstrate an equivalent commitment to quality. Suppliers must ensure that delivered products and raw materials comply with the agreed specifications, standards and testing requirements. Relevant quality management systems must be maintained and demonstrated upon request.

Any deviations from agreed quality standards must be reported to REFKO immediately. Complaints are taken seriously, systematically analysed and permanently resolved through appropriate corrective measures. Rising complaint rates due to substandard raw materials may adversely affect to customer satisfaction.

Product safety

Suppliers shall ensure that delivered materials comply with applicable product safety regulations, hazardous substance labelling requirements (e.g. REACH, GHS/CLP) and the contractually agreed specifications. Safety data sheets shall be provided in full and kept up to date. REFKO shall be notified of any significant changes to the composition of raw materials prior to delivery.

Delivery reliability and communication

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



Monitoring and enforcement

Reporting of breaches

Suppliers shall immediately report any known or suspected breaches of this Code to REFKO. REFKO provides the following contact options for this purpose:

- Email: info@refko.de
- In writing to: REFKO Feuerfest GmbH, Concordiastraße, D-56235 Ransbach-Baumbach, for the attention of the 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 breaches

Within the framework of a trusting working relationship, REFKO may, where there are reasonable grounds and following prior consultation, request a review of compliance with the Code. This may take the form of a self-assessment, the submission of relevant documents or, in exceptional cases, a jointly agreed on-site inspection. REFKO will take a cooperative approach and respect the supplier's operational circumstances.

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

- Request for a written action plan with specific corrective measures and deadlines
- Temporary suspension of the supplier relationship
- Extraordinary termination of the business relationship in the event of serious or repeated breaches

REFKO endeavours to resolve breaches through dialogue and joint measures, provided the supplier demonstrates a genuine willingness to improve.



Contact

If you have any questions regarding this Code or the supplier assessment, please do not hesitate to contact us:

REFKO Feuerfest GmbH,

Concordiastraße,

D-56235 Ransbach-Baumbach

Contact:

Jan Schröder,

Ceramics Technician (Quality Management)

Tel: +49 (0) 2623 2075

Email: schroeder@refko.de



Entry into force and confirmation

This Code of Conduct for Suppliers shall be deemed to have been accepted upon the commencement of a business relationship with REFKO. The Company may update this Code if there are significant changes to applicable laws or its business strategy. Suppliers will be informed of any significant changes.

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

Place, Date

Signature and stamp of supplier

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