


Code of Conduct

A full-page background image of an industrial worker in a hard hat, safety glasses, and an orange high-visibility vest. The worker is standing on a yellow metal platform or scaffolding, looking towards a large, dark, cylindrical industrial vessel. The scene is dimly lit, with some light reflecting off the worker's gear and the metal surfaces.

Bathco has earned a global reputation for its position as a supplier of green metal, raw materials, and innovative technologies indispensable for the world's decarbonization. As leaders in our field, we want to be a responsible partner on each stage of business. At Bathco, sustainability not only entails ensuring that our own social, environmental and ethical standards are high, but also to ensure that our values are reflected across our supply chain.

BATHCO

At Bathco, we uphold the highest standards of integrity and accountability. Our guiding framework in daily business operations is **the Code of Business Conduct** (referred to as the “**Code**”). The Bathco Board of Directors has formally endorsed our Code, which serves as a summary of the principles guiding our actions.

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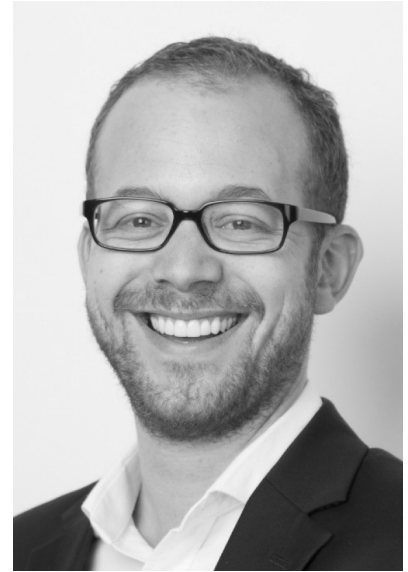
As leaders in our field, we want to be a responsible partner on each stage of business. At Bathco, sustainability not only entails ensuring that our own social, environmental and ethical standards are high, but also to ensure that our values are reflected across our supply chain.

Please, take your time to read and get acknowledged with our extended Code of Conduct. You can find the Code, as well as our corporate policies on our website..

Thank you for your attention,

Andreas Schwarz,
CEO

Bathco Ltd



In today's business world, we believe that keeping these conditions is super important for our success as a top company in our industry. Bathco always follows the rules and does business with high moral standards. Of course, our Code cannot cover every foreseeable situation where choices and decisions must be made. However, the more important aspect is that we all share the same mindset in our Code to lead our actions in the most sustainable way for all stakeholders.

Our main purpose is to be a flexible and focused business partner. It establishes the groundwork for trusted relationships among our team members and the communities, governments, partners, suppliers, customers, and shareholders with whom we interact.

Our guiding document, the Code, serves as a comprehensive framework. It is a set of rules with standards we expect everyone involved with us - suppliers, consultants, contractors, and other stakeholders ("Suppliers") to agree and follow the principles in this Code in everything they do for their business with us.

OUR PURPOSE

We are committed to taking care of the environment, being a good corporate citizen, and keeping our employees, contractors, and customers safe and healthy.

OUR VALUES

BATHCO

RESPONSIBILITY

We know we have a responsibility to the environment, community, and people's health. We want to be really responsible.

BATHCO

CARE

We care about our employees, counterparties and suppliers on each step of the process. We understand that People and their work conditions is the priority.

BATHCO

TRUST

We trust Bathco's reputation and honesty depend on each person taking personal responsibility for how they do business.

Operating in a complex, global landscape, our Code of Conduct ensures the safe and sustainable development of resources while enhancing the quality of life for individuals worldwide. It establishes the groundwork for trusted relationships among our team members and the communities, governments, partners, suppliers, customers, and shareholders with whom we interact.



LABOUR AND HUMAN RIGHTS

As a participant in the **United Nations Global Compact (UNGC)**, Bathco holds a deep commitment to upholding human and labor rights. We extend this commitment to our suppliers, partners and employees, expecting them to align with and uphold these values as well:



NON-DISCRIMINATION:

Cannot discriminate in hiring, pay, promotion, or termination based on age, disability, race, gender, and other protected characteristics.



ANTI-HARASSMENT AND ABUSE:

Must maintain a workplace free from all forms of harassment and abuse.



FORCED AND CHILD LABOR:

Must not use forced or child labor.

Shall not be complicit with any form of slavery or human trafficking.



WORKING CONDITIONS:

Must follow local laws regarding working hours, wages, and benefits.



FREEDOM OF ASSOCIATION:

Workers should be free to join associations or engage in collective bargaining.

We value and strive to build inclusion, diversity and equity in our workplace where everyone is valued and can be empowered to achieve their full potential.

HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION

Being registered in the European Union regulation REACH Bathco and all stakeholders are committed to promoting environmental stewardship around the world. We extend this commitment to our suppliers, partners and employees, expecting them to align with and uphold these values as well.



WORKER SAFETY:

It is our commitment to ensure a work environment that prioritizes safety and well-being. As part of this dedication, Bathco has established standards for environmental, health, and safety, which are accessible for everyone to review on our website.

There are extensive local and national laws designed to promote a safe workplace and these laws are strictly enforced. Extensive and continuous training and regular safety audits are essential for understanding and complying with safety laws.

We need to give workers the right protective gear and teach them how to use it.



ENVIRONMENT:

According to our responsibility being a member of ASI we pay special attention to environment aspects.

Our suppliers must have systems to handle waste, air pollution, and water discharges safely. They need to get and keep all the necessary permits for the environment.



ENERGY:

Suppliers are encouraged to use energy, water, and materials carefully.

Talking openly about product changes and finding eco-friendly alternatives is something we expect them to do.

BUSINESS ETHICS

For Bathco business ethics involves making decisions and conducting business activities in a manner that is morally and socially responsible. Business ethics encompasses various aspects, including honesty, integrity, fairness, transparency, and accountability.



BUSINESS INTEGRITY

We expect all counterparties not to be involved in corruption, extortion, embezzlement or bribery. It is essential that suppliers shall abide by all applicable anti-corruption laws and regulations of the countries in which they operate.



DISCLOSURE OF INFORMATION

We accurately record and disclose information regarding business activities, labor practices, health and safety standards, and environmental practices to all relevant parties.



PROTECTION OF INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

We are obligated to respect intellectual property rights and safeguard customers' confidential information.



DATA PROTECTION

Bathco is very strict in corporate information security. Suppliers must ensure compliance with data protection laws, especially the General Data Protection Regulation (GDPR) where applicable.



CONFLICTS OF INTEREST

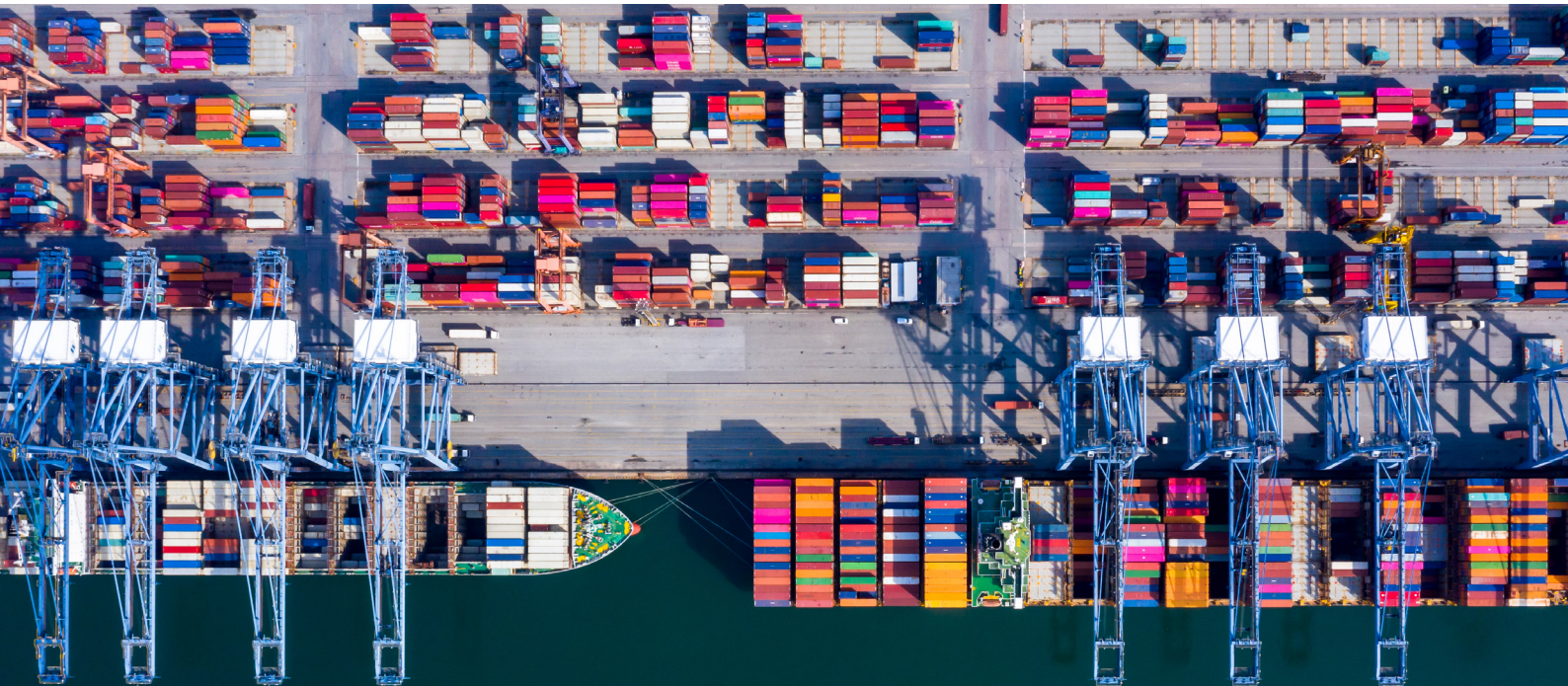
A conflict of interest arises when a supplier's employee has a close relationship with a Bathco employee who can influence decisions affecting the supplier's business. We are trying to avoid conflicts of interest and the appearance thereof. Any conflicts or potential conflicts must be declared to Bathco.

ENDORSEMENT, MONITORING AND FOLLOW-UP

We consider all our stakeholders to agree to this Code without amendment or abrogation.

Even though the Code can't cover every decision to make, it's crucial for us to have a good sense of what's right. This helps us make choices that are good for everyone involved. Bathco's reputation and honesty depend on each employee, each stakeholder, each supplier or partner taking personal responsibility for how they do business.

A special importance is given to suppliers. The supplier shall provide sufficient evidence that they are in full compliance with the above-mentioned requirements. Furthermore, Bathco reserves the right to monitor existing and new suppliers for compliance with this Code of Conduct. Monitoring may be unannounced and may be performed by an independent third party. Bathco will inform the supplier of the results of the monitoring. If the supplier fails to comply with the terms of this Code and does not give any reasons to Bathco for this without delay or fails to take corrective action within the agreed time period, Bathco reserves the right to terminate the business relationship with the supplier with immediate effect and without any liability or obligation.



QUESTIONS?

We will be glad to answer any questions related to compliance or our Code of Conduct.

If you find any suspected violation of this Code and applicable law, please, report us directly to the following contact: (csr@bathco.ch)



REPORTS!

Please advise us of any unethical conduct or irregularity regarding our Code of Conduct.

Ethics Management will maintain strict confidentiality concerning all reports and related information, and can also ensure anonymity at your request.