

Code of Conduct

BATHCO



In today's competitive business environment, adherence to certain principles is crucial for our success as a leading company in our industry. The Bathco Group is committed to operating with highest ethical standards and in full compliance with all applicable laws and regulations. While our Code of Conduct may not encompass every possible scenario, it's essential that we all share a mindset aligned with the principles of our Code, guiding our actions towards sustainable outcomes for all stakeholders.

Our primary goal is to be a flexible and focused business partner, laying the foundation for trusted relationships with our team members, communities, governments, partners, suppliers, customers, and shareholders.

This Code serves as a comprehensive framework, outlining the standards and expectations for everyone associated with Bathco, including suppliers, consultants, contractors, and other stakeholders. We expect all parties engaged in business with us to understand and adhere to the principles outlined in this Code in all their dealings related to our company.

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.

1. Responsibility

We recognize our duty to the environment, community, and health. Our goal is to act with utmost responsibility.

2. Care

We prioritize the well-being of our employees and partners. Ensuring good working conditions is key.

3. Trust

Bathco's integrity relies on each individual's responsible and honest conduct in business.

Whom we expect to follow our Conduct

Our employees

Include directors, management, employees, contractors and freelance staff.

Our partners

Any of our partners who interacts with Bathco on a regular or agreement basis.

Our Suppliers

Any external entity that Bathco enlists to supply goods and services, including vendors, consultants, contractors, and representatives who engage with external parties on behalf of Bathco.

Message from the Chief Executive Officer of The Bathco Group

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”). Bathco Board of Directors has formally endorsed our Code, which serves as a summary of the principles guiding our actions.

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.

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



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Environment Stewardship

Bathco requires its partners and entire supply chain to adopt structured environmental management systems and fully comply with relevant national and international standards.

Sustainable manufacturing and environmental stewardship rank among Bathco's core priorities and shape all its business relationships.

Resources and energy:

- Monitor usage of energy, raw materials, water, and other resources.
- Drive ongoing efficiency gains and promote responsible resource consumption.
- Prioritize low-carbon energy sources over fossil fuels whenever feasible.

Circular economy:

- Maximize recycling efforts and minimize reliance on virgin materials and natural resources.
- Reduce waste generation, favoring recovery methods over disposal.
- Handle waste responsibly, partnering only with licensed, qualified professionals.

Emissions reduction:

- Track and steadily decrease emissions to air, soil, and water.
- Respond swiftly to spills or leaks for immediate containment and long-term prevention.
- Regularly review and refine emergency response protocols.

Ethical production practices:

- Block non-compliant or contaminated materials from entering production.
- Adhere to all laws on handling, labeling, generating, and disposing of hazardous substances.
- Identify, evaluate, and mitigate any environmental impacts from operations or products, including biodiversity effects.

2

Human Rights

Bathco requires its partners and supply chain providers to uphold and advance the rights of employees and local communities, including ethnic minorities, treating everyone with fairness and respect.

Equal opportunities and non-discrimination:

- Honor human dignity, eliminate all discrimination, embrace diversity, and foster inclusive thinking, perspectives, and openness.
- Treat supply chain employees equitably and respectfully, regardless of ethnicity, nationality, gender, beliefs, religion, age, disability, sexual orientation, skin color, politics, social origin, or any other traits.
- Prohibit all forms of harassment.

Freedom of association and collective bargaining:

- Enable employees to freely form, join, or leave unions and associations to safeguard their interests.
- Ban discrimination against those advocating for employee rights.

Prohibition of child labor, forced labor, and abusive security:

- Uphold laws protecting children's and human rights.
- Strictly prohibit child labor (under 15 years), forced labor, employee exploitation, modern slavery, and human trafficking.
- Ensure all work is voluntary, free from threats, violence, or intimidation.
- Forbid using security forces that involve torture or harm; require providers to respect international human and environmental rights.

Fair working conditions, health & safety:

- Comply fully with applicable health, safety standards, guidelines, and regulations.

Human rights responsibility:

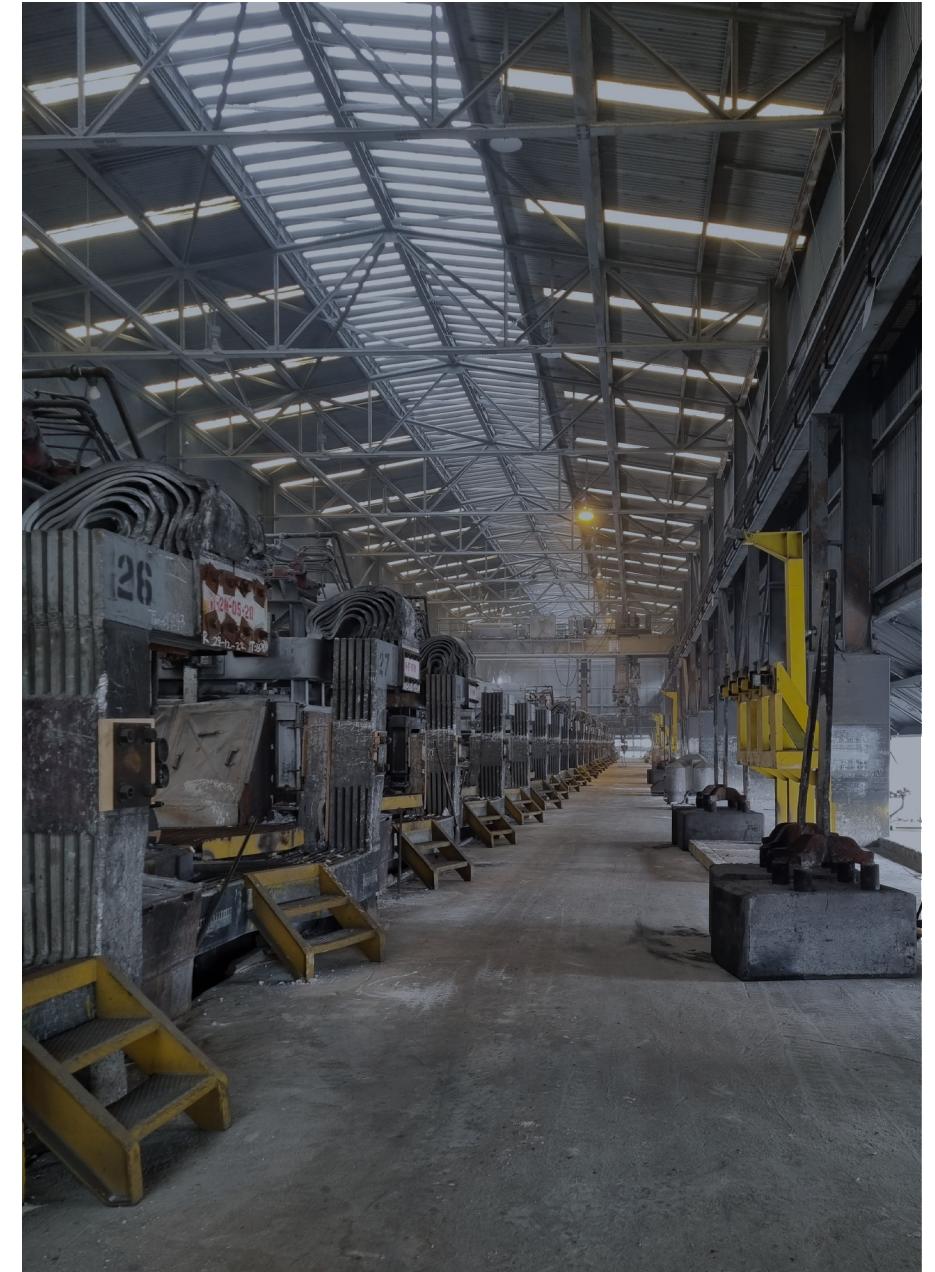
- Encourage employees to report unsafe practices or conditions, while tracking and steadily improving overall health and safety metrics.
- Perform routine inspections and audits to identify and eliminate hazards, dangerous behaviors, and their root causes.
- When providing employee housing, ensure it is clean, secure, safe (including fire prevention measures), and meets basic living needs.

Working hours, wages and benefits:

- Limit employee working hours to the maximum allowed by national law.
- Avoid wage deductions as disciplinary measures unless permitted by local laws (excluding legitimate contractual or legal claims for damages).
- Offer employees fair, competitive pay and benefits that support a decent standard of living for them and their families.
- Pay wages promptly and on time.

Local Community:

- Take responsibility for the well-being of communities in your operating areas.
- Address local residents' concerns and promote safe, healthy living conditions.
- Support initiatives like local hiring, sourcing from nearby suppliers, education programs, and infrastructure improvements.



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Ethical conduct

Bathco requires its partners and their supply chain providers to uphold the highest integrity standards, actively preventing corruption, money laundering, and similar misconduct.

Operating with unwavering ethical principles remains a core priority for Bathco throughout its entire supply chain.

Fair competition and antitrust

- Conduct all business in full compliance with fair competition and antitrust laws.
- Promote free and fair market practices while avoiding any actions that restrict competition, such as cartels, market entry barriers, or coordinated activities with competitors.

Conflicts of interest

- Educate employees on conflict-of-interest risks, requiring them to step back from related decisions and report issues immediately.
- Promptly disclose to Bathco any potential conflicts, including situations where its employees hold professional, personal, or significant financial interests in your business (as a direct supplier). Report to the compliance team at hr@bathco.ch.

Anti-corruption and bribery

- Zero tolerance for corruption, extortion, or embezzlement in any form.
- Prohibit offering or accepting bribes or improper incentives in business dealings.
- Refrain from giving Bathco employees gifts or personal benefits linked to business relationships.
- Implement preventive measures like training on key risks for exposed roles and controls for government interactions.
- Establish approval thresholds and reviews for donations, sponsorships, gifts, entertainment, and hospitality involving private parties or public officials.
- All such offers must serve a legitimate business purpose, remain reasonable and modest in value, and never imply expectations of favors. Bathco prohibits employees from accepting gifts, hospitality, or benefits that could influence decisions.

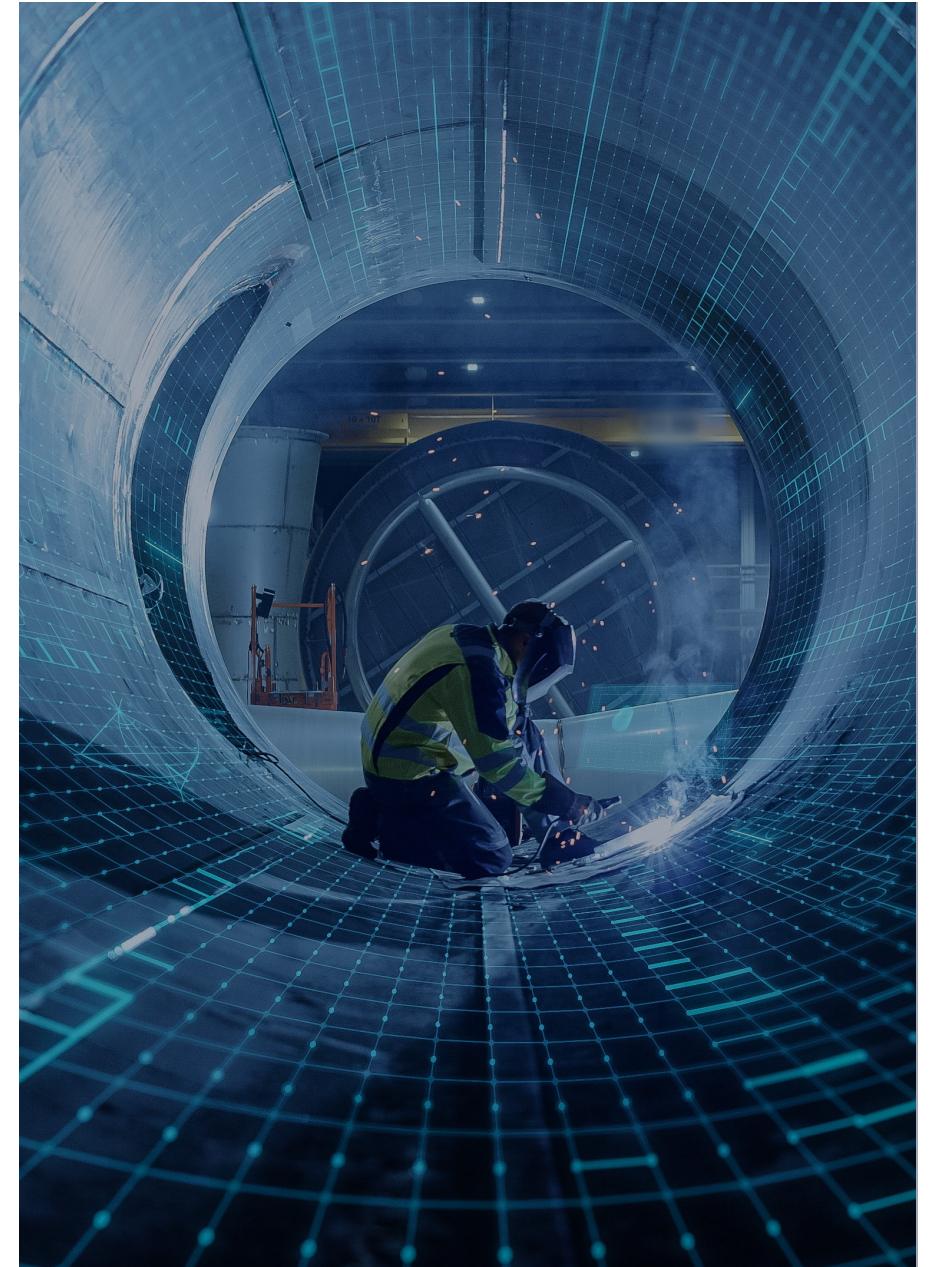
Human Rights Integrity responsibility

Anti-money-laundering

- Partner only with entities that have legitimate business purposes and verifiable funding sources.
- Implement safeguards to detect and prevent money laundering, including reviews of any suspicious activities.

Trade compliance

- Adhere fully to all relevant international and national trade regulations, including sanctions, embargoes, and export controls.
- Conduct due diligence or screening on third parties (such as banks, customers, and suppliers) to avoid dealings with restricted entities or violations of trade restrictions.



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Products, property, and data

Bathco expects its business partners including suppliers and subcontractors to protect Bathco products, property and data information with utmost care.

Protecting intellectual property:

- Handle all company assets with the highest level of care and diligence.
- Treat Bathco's confidential information – including, for example, product specifications and ongoing research and development activities – in a way that prevents any leakage or theft.
- Protect confidential information, use it only for legitimate business purposes, and respect the privacy and valid intellectual property rights of all employees and business partners.
- Do not use Bathco's name, brands, or product trademarks in any advertising, marketing, or publicity materials without Bathco's prior written approval.

Bathco employee's personal data and data security:

- Protect and safeguard employees' personal data in line with all applicable data protection laws.
- Collect, process, transfer, and use employees' personal data only when necessary for a clearly defined and authorized purpose.
- Ensure that employees' personal data is not accessed, used, or disclosed by unauthorized persons.

Product safety compliance:

- Ensure that all products are correctly labeled and that any specific handling requirements are clearly communicated.
- Provide, where there is a legitimate need, all relevant documentation containing necessary safety information for hazardous substances, such as product details, safety data sheets, notifications or registration confirmations, intended uses, and exposure scenarios.
- Proactively and transparently share information on the health, safety, and environmental characteristics of your products with Bathco.

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Suppliers' responsibility: Governance & Management System

Compliance with laws and internal policies

Bathco carries out all business activities in line with applicable legislation and widely accepted international standards and expects all business partners—including suppliers and subcontractors—to uphold the same level of integrity and legal compliance.

Before any cooperation begins, Bathco requires suppliers to formally acknowledge this Supplier Code of Conduct. Suppliers may alternatively provide their own Code of Conduct, as long as it clearly and demonstrably addresses all topics covered in Bathco Supplier Code of Conduct.

Values and expectations in the supply chain

Bathco works with a broad range of partners of different sizes, operating models, and locations, including both providers of services and suppliers of materials. While it is understood that capabilities and implementation approaches may differ, partners are expected to adopt and apply the principles of this Supplier Code of Conduct within their organizations in a way that is appropriate to their operations and sphere of influence.

This Code sets out the core values that shape Bathco Group's global approach to human rights, environmental protection, responsible business conduct, and the prevention of corruption. These commitments are central to how the Group operates internally and to the behaviour expected from employees, management, and shareholders.

Accordingly, all business partners—including customers, suppliers, and agents—are expected to respect these values and to take practical measures to ensure that their own supply chains are managed in line with these standards.

Implementation should, at a minimum, cover the following points:

- **Confidential reporting channels:** Suppliers must set up mechanisms that enable employees and other stakeholders to safely and confidentially raise concerns or suspected misconduct. All notifications are to be reviewed without delay, with appropriate remedial measures taken where required by law. The rights and protection of both the reporting person and the person implicated must be ensured at all times.
- **Risk management processes:** Suppliers must establish strong procedures to regularly identify, evaluate, and address risks in all areas covered by this Code, including human rights, environmental impacts, anti-corruption, and compliance with trade regulations.

Suppliers are required to clearly define and formally document internal standards that are consistent with the principles set out in this Supplier Code of Conduct. They should put in place suitable policies, translate them into practical procedures, and provide ongoing training so that managers and employees understand and can apply the ethical, environmental, and compliance expectations described in this document.

Regular communication is essential to keep these requirements front of mind and to ensure consistent awareness and compliance at all levels of the organisation.

Suppliers' Human Rights Integrity and Responsibility

Bathco underscores that respect for human rights is fundamental to responsible business practices. Suppliers are required to uphold internationally recognized human rights standards, provide fair and safe working conditions, and prohibit any form of forced, child, or discriminatory labor within their operations and supply chains.

Products, Environment, Assets, Data, and Information

Suppliers shall manage their products and operations with care for the environment, striving for efficient use of resources and minimizing pollution or waste generation. They are expected to safeguard Bathco's physical and intellectual assets as well as confidential data and information, ensuring these are protected from misuse, unauthorized disclosure, or loss.

Compliance Monitoring and Reporting

Suppliers must establish a management system with robust controls to detect, prevent, and address any violations of this Supplier Code of Conduct. Upon request and mutual agreement, share incident reports and documentation with Bathco. Take immediate corrective actions to resolve issues and prevent future occurrences.

Code of Conduct Dissemination

Suppliers shall cascade the requirements of this Supplier Code of Conduct across their entire supply chain. Ensure that subcontractors and business partners uphold comparable standards and implement verification mechanisms to confirm adherence.

Supplier Reviews

To ensure responsible business practices, we periodically assess our suppliers' adherence to our standards and expectations. These reviews help us identify, mitigate, and prevent potential risks within our supply chain. By accepting this Supplier Code of Conduct, our business partners authorize Bathco to verify their compliance. This verification may include reasonable oversight measures such as completing questionnaires, conducting interviews, or performing on-site or remote audits.

Raising Concerns

Bathco encourages an open and transparent culture where everyone feels confident to raise concerns.

Employees are expected to speak up if they:

- Have questions or concerns about this Code of Conduct or relevant laws.
- Suspect that the Code or applicable legal requirements may have been violated.
- Observe behaviour or practices that seem inconsistent with our ethical or legal standards.

We welcome reports not only from employees but also from our wider network of stakeholders—including customers, suppliers, and other business partners. Concerns can be shared confidentially with the HR department at hr@bathco.ch.

We strictly protect anyone who, in good faith, reports or questions a possible breach. Retaliation or discrimination of any kind against whistleblowers is not tolerated and will be treated as a serious breach of this Code of Conduct.



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Contact

Head Office
Bathco AG
Tödistrasse 61
CH-8002 Zurich
Switzerland

info@bathco.ch

