



**COMELF SA Global Code of Conduct:
Business Partners - Suppliers, Subcontractors**

COMELF SA Global Code of Conduct: Suppliers, Subcontractors and Business Partners

Effective date: 10.01.2026

Applicable: To all suppliers, subcontractors and business partners of COMELF S.A.

1. GENERAL INTRODUCTION AND USE

COMELF S.A. is committed to conducting business in a responsible, ethical, and sustainable manner. This Code of Conduct for Business Partners – Suppliers and Subcontractors (the “Code”) sets out our fundamental expectations regarding business practices, ethics, human rights, working conditions, and environmental protection for everyone in our supply chain.

Acceptance of and compliance with this Code is a **mandatory prerequisite** for becoming and remaining a Business Partner - Supplier or Subcontractor of COMELF S.A. We expect all of them to convey these same principles to their own Business Partners - Suppliers and Subcontractors.

This Code is drawn up in accordance with:

Romanian legislation (Labor Code, laws on occupational health and safety, the environment, and combating corruption).

European Union legislation (Relevant Regulations and Directives, including those on environmental protection and GDPR).

Recognized **International Standards**: The Universal Declaration of Human Rights, International Labour Organization (ILO) Conventions, OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights, ISO 26000.

2. LEGAL COMPLIANCE

Business Partners - Suppliers and Subcontractors must comply with all applicable laws and regulations in the countries in which they operate. This includes, but is not limited to, legislation in the field of:

- Work and employment.
- Occupational health and safety.
- Environmental protection.
- Trade practices and competition.
- Protection of Personal Data.
- Combating corruption, bribery and money laundering.

3. HUMAN RIGHTS AND WORKING CONDITIONS

3.1. Dignity and Equity

Discrimination: Any form of discrimination in hiring, remuneration, access to training, promotions, termination of employment contracts based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political opinion, union membership, or any other criterion provided by law is prohibited.

Harassment: Any form of harassment, including sexual, psychological, or verbal harassment, is prohibited.

Fair disciplinary procedures: Disciplinary measures must be lawful, proportionate, respect the right to defense, and **absolutely prohibit corporal punishment, threats, or any other degrading treatment.**

3.2. Freedom of Association

Business Partners - Suppliers and Subcontractors must recognize and respect the legal right of all employees to associate, to join or not to join a union, and to bargain collectively, without fear of retaliation, intimidation or harassment.

3.3. Forced Labor and Slavery

The use of any form of forced, compulsory, bonded labor or human trafficking is prohibited.

3.4. Child Labor

The use of child labor is prohibited, in accordance with ILO Conventions. "Child" is defined as any person below the minimum age for completing compulsory schooling or under 15 years of age. Hazardous work is prohibited for persons under 18 years of age.

3.5. Wages, Benefits, and Working Hours

Wages for normal work and overtime must be at least equal to the legal minimum or that stipulated by collective agreements, if higher.

Weekly working hours must not exceed the legal limit. Overtime hours are subject to the statutory pay increase.

Employees are granted regular breaks and weekly rest days in accordance with the law.

3.6. Occupational Health and Safety

Business Partners - Suppliers and Subcontractors must ensure a safe and healthy working environment, preventing accidents and occupational illnesses by:

Identification and assessment of risks.

Implementation of control measures and emergency procedures.

Ensuring **regular and documented training** in Occupational Health and Safety (OHS) for all employees.

Providing appropriate personal protective equipment, where necessary.

4. THE ENVIRONMENT

Business Partners - Suppliers and Subcontractors must conduct their business in compliance with all applicable environmental regulations and strive to:

Obtaining the necessary environmental permits.

Preventing pollution and reducing resource consumption (water, energy, materials).

Proper waste management, prioritizing reuse, recycling and recovery.

Reducing greenhouse gas emissions.

5. BUSINESS ETHICS AND CONFLICT OF INTEREST

5.1. Corruption, Bribery and Fraud

It is prohibited to offer, promise, grant, or demand bribes or any other undue advantage in order to obtain or retain business, an advantage, or favorable treatment.

5.2. Gifts and Meetings

Gifts, hospitality or any other benefit offered or received in a professional context must not influence or appear to influence business decisions. The internal policies of the parties must be respected.

5.3. Confidentiality

Confidential information belonging to COMELF S.A. (technical, commercial, financial) received from the supplier or within the framework of the collaboration must not be disclosed to third parties or used for any purpose other than that for which it was provided, without our written consent.

5.4. Personal Data Protection

Business Partners - Suppliers and Subcontractors who process personal data on behalf of COMELF S.A. must comply with the provisions of the **General Data Protection Regulation (GDPR) - EU 2016/679** and national legislation, and sign the necessary agreements (e.g. Agreement on Data Processing).

6. RESPONSIBLE PROCUREMENT

6.1. Conflict Minerals

Business Partners - Suppliers and Subcontractors who supply and use products that may contain **tin, tantalum, tungsten, gold, cobalt, or mica** must:

Adopt a **Responsible Sourcing Policy for Conflict Minerals**.

Perform **due diligence** on their supply chain in accordance with the **OECD Guidelines and EU Regulation 2017/821**.

Provide statements and evidence upon request by COMELF S.A., confirming that the minerals do not originate from sources that finance armed conflicts or serious human rights violations in the Democratic Republic of Congo or other conflict zones.

Pass these requirements on to your own suppliers.

7. COMPLAINTS AND LITIGATION PROCEDURES (CRITICAL)

Business Partners - Suppliers and Subcontractors must implement a **documented, fair, and confidential procedure** for receiving, investigating, and resolving employee complaints or grievances. This process must:

Be clearly communicated and accessible to ALL employees, regardless of their status.

To explicitly prohibit any form of retaliation against the employee who files a complaint in good faith or who participates as a witness.

Provide an alternative avenue for redress (e.g., reporting to human resources, ombudsman, ethics hotline) that does not necessarily involve the direct supervisor.

To ensure an objective and prompt investigation.

Be integrated with legal and fair disciplinary procedures.

8. MONITORING, COMPLIANCE AND REPORTING

COMELF S.A. reserves the right to verify compliance with this Code through questionnaires, documentary audits, or on-site audits, with prior notice.

Business Partners - Suppliers and Subcontractors are required to maintain records and documents to prove compliance.

Any violation of this Code may result in requests for immediate corrective action, suspension of orders or **termination of the contract**.

Business Partners - Suppliers and Subcontractors must immediately report to COMELF S.A. any incident or situation that may violate the provisions of this Code.

Approval and acceptance of this Code of Conduct is done by signing the attached membership form or by including a reference to it in the commercial contract.

For questions or to report issues related to this Code, please contact:

Material Resources Assurance Directorate (DABM) or Legal Department – COMELF S.A.