



Vacuum Brazing Consultants Limited
Trading as VBC Group
Castle Business Park
Pavilion Way
Loughborough
Leicestershire
LE11 5GW
United Kingdom
+44(0) 1509 218008

VBC Group Code of Conduct

We aim to improve people's quality of life and safeguard current and future generations' livelihoods by acting in an economically, ecologically, and socially responsible manner.

VBC Group is committed to upholding internationally recognised human rights and social standards throughout the value chain. Our business partners play a significant role in achieving these goals. We regard a shared appreciation of ethical values and sustainable practices to be a mainstay of these relationships.

The requirements and principles of this Code of Conduct are integral to contractual obligations and the collaboration of our business partners and VBC Group. Our business partners therefore undertake to comply with and promote the following principles of this Code of Conduct, and to provide regular and appropriate training to their workforce to this end. This Code of Conduct's contents shall also apply in its entirety to suppliers and other third parties used by our business partners to fulfil any contracts with VBC Group. Therefore, our business partners shall integrate requirements corresponding to the contents of this Code of Conduct into their respective contracts. We expect them to use their best efforts to oblige their suppliers and other third parties accordingly.

QUALITY

VBC Group makes sure that quality is central to all we do. We are committed to continuous improvement by working together and complying with agreed processes across the business.

VBC Group also requires that our business partners demonstrate a commitment to quality and comply with our purchasing requirements as well as any other applicable customer-specific requirements. We encourage our suppliers to work openly and collaboratively with us to ensure we are continually improving our operations.

PRINCIPLE OF LEGALITY

VBC Group respects the principle of strict legality in all activities, measures, contracts, and other practices of the VBC Group, and expects the same from its business partners. This includes paying taxes and customs duties, observing fair competition and antitrust laws, prohibiting corruption and money laundering, complying with the state of the art, obtaining all necessary official authorisations, complying with export control regulations, and not infringing on any third party's legal rights as well as laws protecting social and environmental standards.

HUMAN RIGHTS

We expect our business partners to consistently respect and actively protect internationally recognised human rights. The United Nations Guiding Principles on Business and Human Rights provide the underpinning for this. This includes protecting local communities, indigenous peoples, and human rights defenders.

CHILD LABOUR

Our business partners undertake to employ only persons who have reached the minimum legal age for work set out by statutory provisions in the country of employment and not to tolerate any form of child labour. Beyond that, our business partners also undertake to observe and respect the dignity and rights of children.

VBC Group Code of Conduct

FORCED LABOUR

We expect our business partners to strictly reject any form of forced labour, which includes but is not limited to human trafficking, torture, and slavery or compulsory labour of any kind. The principle of freely chosen employment is to be respected and observed.

FREEDOM OF ASSOCIATION

The fundamental right of employees to form and join trade unions of their own free choice are to be respected by our business partners. Membership in trade unions or employee representative bodies shall not constitute a reason for unjustified discrimination. The right to collective bargaining for the settlement of disputes pertaining to working conditions and the right to strike shall be granted within the framework of statutory provisions.

EQUAL OPPORTUNITIES AND FAIR TREATMENT

We expect our business partners to take exception to discrimination of any kind, be it based on skin colour, ethnic origin, gender, age, nationality, social background, disability, sexual orientation, religious affiliation, human ideology, or political and trade union activity. The same applies to any form of harassment and psychological abuse. Given comparable requirements and tasks, the principle of equal remuneration for work of equal value shall apply irrespective of gender.

FAIR WORKING CONDITIONS

Our business partners undertake to enforce the right to fair labour conditions. This includes fair wages and social benefits equal to or higher than the rates prescribed by national or regional authorities, legal standards, or other labour agreements. The statutory provisions on minimum wage in the respective countries are to be observed alongside the applicable regulations on working hours, breaks, and vacation entitlements.

HEALTH AND SAFETY

At the Minimum, our business partners are expected to operate a suitable and sufficient health and safety management system, which defines the requirement to assess work-related risks, implement controls to eliminate or reduce those risks and to provide adequate instruction and training to those who may be impacted. Our business partners shall also comply with national workplace safety and hygiene standards and take appropriate measures to meet occupational health and safety requirements to ensure healthy working conditions.

PROTECTION FROM EVICTION AND DEPRIVATION OF LAND

Our business partners undertake to refrain from any unlawful evictions. They shall also refrain from any unlawful deprivation of land, forests, and waters via the acquisition, development, or other use thereof.

THE USE OF PRIVATE OR PUBLIC SECURITY FORCES

Our business partners undertake to refrain from hiring or using private or public security personnel if, due to a lack of instruction or control on the part of the company, there is a risk of breaching the prohibition of torture and cruel, inhuman, or degrading treatment, of jeopardising life or limb, or of infringing on the freedom of association.

ENVIRONMENTAL STANDARDS

ENVIRONMENTAL PROTECTION

In keeping with the precautionary principle, our business partners undertake to make every effort to minimise risks to people and the environment and to protect natural resources. Our business partners are expected to

VBC Group Code of Conduct

operate a suitable and sufficient environmental management system, which includes the requirement to assess environmental risks, implement controls to eliminate or reduce those risks and to provide adequate information to those who may be impacted. All processes, operating sites, and production resources employed by our business partners must meet applicable statutory requirements and standards for environmental protection.

CLIMATE ACTION

We expect our business partners to engage in persistent and active climate action, for example, by increasing energy efficiency or generating or procuring energy from renewable sources. They are to provide a transparent view of their carbon emissions and set ambitious carbon reduction goals with the ultimate goal of being net-zero by 2050.

WATER CONSUMPTION AND QUALITY

Our business partners undertake to use water with due care. In regions where water is scarce, they are to minimise the withdrawal of water and afford access to potable water and sanitation. Wastewater quality standards shall be defined and monitored within the scope and structure of applicable statutory and regulatory requirements.

AIR AND SOIL QUALITY

At the minimum, our business partners shall comply with applicable statutory provisions and local authorities' requirements. Materials and waste disposal We expect our business partners to minimise any impact their operations may have on the environment and to use resources sparingly. Materials are to be reused whenever possible. In dealing with waste, our business partners follow the principle of first avoiding waste, then recycling, and finally disposing of it as a last resort. At the minimum, our business partners shall comply with applicable statutory provisions and authorities' requirements.

SUBSTANCES OF CONCERN

Our business partners are required to observe the rules of material compliance – that is, the statutory substance prohibitions, restrictions, and declaration requirements and any applicable standards. This means observing the ban on the production of products containing mercury, the prohibition on using mercury and mercury compounds in manufacturing processes and treating mercury waste.

BUSINESS RELATIONS

AVOIDING CONFLICTS OF INTEREST

We expect our business partners to make decisions based on objective considerations and not to be improperly guided by personal interests. A business partner who becomes aware of a potential conflict of interest shall take internal measures to remedy these conflicts and notify VBC Group without delay.

FREE COMPETITION

Our business partners are obliged to observe the rules of fair competition and comply with all applicable statutory regulations. They shall also refrain from forming cartels or engaging in concerted practices deliberately or incidentally designed to bypass, restrict, or distort competition as defined by antitrust laws, or abuse a dominant market position.

ANTI-BRIBERY AND CORRUPTION

Our business partners undertake to abide by the applicable anti-corruption laws. They shall ensure that their employees, subcontractors, or representatives do not offer, promise, or grant advantages to associates of the

VBC Group Code of Conduct

VBC Group with the aim of obtaining a contract or other preferential treatment during business. Business partners must only offer gifts or hospitality in an open and transparent way and your gifts or hospitality must never be illegal. Where gifts or hospitality are offered, these should not be intended or interpreted as an attempt to improperly influence business decisions.

The same rules apply to agreements with third parties concluded in connection with a contract with VBC Group.

MONEY LAUNDERING

Our business partners are required to comply with laws to prevent money laundering and duly fulfil their reporting obligations.

CONFLICT MINERALS

VBC Group supports the aims and objectives of the U.S. legislation on the supply of “conflict minerals” “we support ending the violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region”.

VBC Group does not knowingly procure specified metals that originate from the “Conflict Region”, and we ask our suppliers to undertake reasonable due diligence with their supply chains to ensure compliance with this request. Furthermore, VBC Group undertakes on an annual basis that all suppliers submit a new declaration confirming compliance by completing the CMRT document.

We expect our business partners to desist from all activities that directly or indirectly contribute to the funding of armed groups. To this end, they shall comply with the VBC Group Policy for Conflict Raw Materials as well as the applicable statutory provisions in Conflict Raw Materials.

DATA PRIVACY AND DATA SECURITY

Our partners undertake to enforce the right to informational self-determination, the privacy of personal data, and the security of all business information and personal data in all business processes in compliance with statutory provisions and the applicable privacy and information security laws.

Business partners must also safeguard our resources and information and ensure that all data and documents are kept secure. Furthermore, the use of appropriate nondisclosure or confidentiality agreements to protect confidentiality and proprietary information shall be employed when deemed fitting.

CUSTOMS AND EXPORT CONTROL REGULATIONS

Our business partners undertake to comply with international customs and export control regulations and proactively share foreign trade-related information in the interests of a secure supply chain.

LOBBYING & POLITICAL SUPPORT

VBC Group are committed to undertaking any lobbying activities in compliance with all applicable laws, and to behaving ethically in all our interactions with governments, agencies, and their representatives. Our business partners must also act legally and with honesty, integrity, and transparency at all times, in all interactions with governments, their agencies and representatives.

WHISTLEBLOWER SYSTEM

All business partners, their employees, and affected parties are encouraged to report suspected cases and violations of this Code of Conduct. This shall serve to mitigate the consequences of such violations and prevent future misconduct of this nature.

END