



Driven by your needs.



Code of Ethics

*"Integrity is a driving force
behind Sustainable Business
Performance."*



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1.4. Public Institutions

The relations with public institutions must be dealt only by the persons whose functions justify it. All these relations have to be conducted with transparency and in compliance with the Cebi Anti Corruption Policy.

1.5. Community

Cebi is aware that its decisions may have a significant impact, direct and indirect, on the local communities in which Cebi operates. As a result, Cebi must act in compliance with the local legislation and regulations, and is committed to protecting the environment.

1.6. Financial Responsibility

Cebi undertakes to keep accurate records of all its financial transactions, concerning all its interested parts, including its customers, its suppliers and its employees and respecting the local and international laws and regulations. The budget is planned annually and its financial statements are audited by internal and external actors.

2 IMPLEMENTATION

Cebi places the highest value on the integrity of the company and of each of its managers, employees and representatives.

All managers and employees of Cebi are responsible for complying with all applicable laws and regulations in each country in which their respective company does business and for knowing and complying with this Code of Ethics.

Violations of laws or this Code or other policies of the company may be subject to disciplinary action, which may include termination of contract.

Managers are responsible for ensuring that their policies and practices are consistent with this Code. Integrity issues and concerns should be raised with managers or appropriate personnel such as Human Resources Department or the General Management of the company or of Cebi International S.A.

The policies in this Code apply across Cebi, in all businesses and in all countries. If a local law conflicts with a policy on this Code, you must comply with local law. If a local custom or practice conflicts with a policy in this Code, you must comply with the Code.

Any question or doubt regarding specific rules in each country must be reported to the General Management of the local company.

2.1. When the Code applies

The Code is intended to create a common guide for employees of all Cebi companies. In some cases, Cebi companies may have local policies with content that overlaps with this Code. If a local policy is less restrictive than the Code, the Code will apply.

2.2. Cebi's Responsibilities as Employees and Managers

As Cebi employees, we all:

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Act as a role model at all times

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- Must demonstrate integrity in everything we do
- Familiarize ourselves with and follow the Code of Ethics and other company policies that may apply in our locations
- Contact your direct Manager, the HR department or your General Management regarding possible Code or policy violations or other ethical concerns

In addition to their responsibilities as employees, Cebi managers must:

- Create an environment where Cebi employees feel comfortable raising and speaking openly about ethical questions or concerns
- Ensure that employees understand the importance of this Code and follow it.

3 INDIVIDUAL BEHAVIOUR

Competition and Fair Dealing

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Cebi seeks to outperform competition fairly and honestly.
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We seek competitive advantage through superior performance, never through unethical or illegal business practices. Each employee should endeavor to respect the rights of, and deal fairly with Cebi's customers, suppliers and competitors.

3.1.1. Fair competition

The rules and laws of fair competition forbid any written or unwritten understandings, agreements, plans, arrangements or schemes among competitors involving prices, territories, market shares or customers.

As a result of this, Cebi employees must not enter into such agreements or understanding with Cebi's competitors.

It is forbidden to give any gratuity in cash, in kind, or other (in particular, merchandise, services, entertainment or personal travel) to any representative of a customer, directly or indirectly, in order to obtain a contract or any other commercial or financial benefit, except when gifts are of reasonable value (less than 100 €).

3.1.2. Choosing suppliers and service providers

The choice of suppliers or service providers for Cebi must be based on quality, need, performance and cost. During negotiations with suppliers and service providers, it is the responsibility of each Cebi employee to promote Cebi's best interests within legal limits and to obtain the best conditions, without any favoritism because of friendship or discriminatory criteria forbidden by this Code of Ethics.

Cebi's policy forbids the acceptance of any gift or gratuity from suppliers in any form whatsoever (in particular, amounts of money, merchandise, services, entertainment or personal travel) except where the gift or gratuity is only of taken value (100 € or less).

When it would be impolite to refuse a gift, the employee must inform his/her supervisor who will decide what to do with the gift in accordance with the local management and/or the Human Resources Department of the company.



3.1.3. Consultants and other service providers

Agreements by and between Cebi and its agents, representatives, and consultants, or any other service provider must clearly list the actual services to be performed, the basis for fees or the price, and all other terms and conditions.

All payments must be determined and paid in relation to the actual services provided. Agents, representatives, and consultants are not permitted to act on behalf of Cebi unless explicitly authorized to do so in writing by duly empowered representatives of Cebi Management.

3.2. Conflict of Interest

A conflict of interest exists when an employee or a close relative might benefit personally from a transaction involving a Cebi company or when an employee attempts to choose or have a company or individual chosen for such a transaction in which he or she or a close relative or friend has a financial interest.

To avoid conflict of interest, permanent employees cannot:

- Acquire an interest in a competitor, supplier or customer without the prior written approval of the Chief Executive Officer of Cebi International S.A.;

- Recruit members of their family or the family of their spouse (up to and including 3rd degree of relationship) without the prior written approval of a Member of the Executive Board of Cebi. In case a job application is received from a member of a manager's family, this manager shall not be involved in the recruitment.

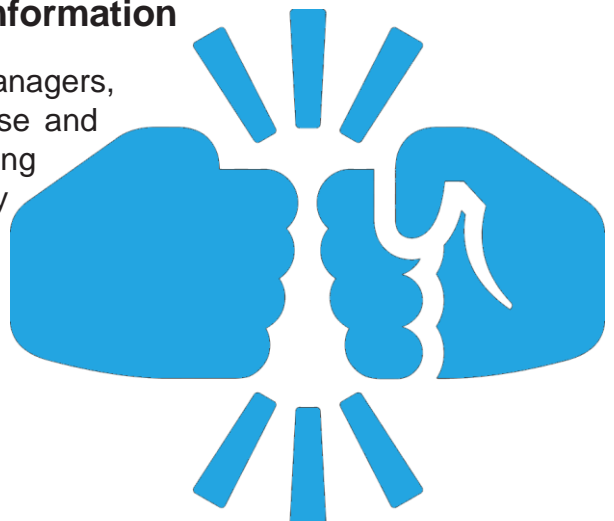
In case an employee has a doubt concerning a potential conflict of interest that may result from an action he/she is willing to take, Cebi requires to advise his/her hierarchic supervisor or Human Resources Department.

3.3. Bribery and Corruption

Cebi employees in all countries are absolutely prohibited from engaging in bribery. Under no circumstances may a Cebi employee or a third party acting on Cebi's behalf offer anything of value to a government official or any other third party, or their representatives, to obtain or retain business or for any other commercial advantage.

3.4. Safeguarding Company Property and Information

Safeguarding Cebi's assets is the responsibility of all managers, employees and company representatives. We must use and maintain such assets with care and respect while guarding against waste and abuse. These include not only physical property, plant equipment and inventory, but other tangible assets such as securities and cash, company cars, office equipment and supplies, and information systems. It also includes tangible property such as software, patents, trademarks, copyrights and other proprietary information and know-how.



Employees should:

- Use company assets according to all company policies and procedures, comply with security programs that help prevent their unauthorized use or theft, and abide by all regulations or contractual agreements governing their use;
- Protect from disclosure or misuse all confidential information connected with the company, including unannounced products, business and financial information, acquisition and disinvestment plans, proprietary technical data, competitive position, strategies, customer data, product costs and selling prices;
- Take actions necessary to safeguard all passwords and identification codes to prevent unauthorized access to the company's information systems resources;
- When leaving Cebi for any reason whatsoever (retirement, end of employment contract or any other reason) return to the relevant hierarchic level all documents and data containing confidential information without keeping any copy and any asset in their possession.

3.5. Truth and Accuracy of Accounts, Books and Records

All assets, liabilities, expenses and other transactions carried out by the Cebi companies must be recorded in the companies' books and accounts which are to be kept truthfully and accurately, in accordance with the applicable accounting principles, rules and laws. Archiving procedures must be clearly defined and respected.

No undisclosed funds or unrecorded assets of Cebi companies shall be established or maintained for any reason whatsoever. Documents pertaining to commercial or financial transactions must reflect these transactions faithfully.

No payment may be approved or made with the intention or understanding that all or any part of such payment is to be used for any purpose other than that described in the documents supporting said payment. No false or artificial entry may be made in the books and records of Cebi or its subsidiaries for any reason whatsoever.

Employees must, at every level of the Cebi companies, ensure that reports, records and information used or communicated by them enable Cebi to make full, fair, accurate and timely disclosure in reports, documents and other public communications.

3.6. Counterfeits parts

Cebi is committed to detect counterfeit parts and materials, provide notification to recipients of counterfeit products, when warranted, and exclude them from the delivered products.

3.7. Export controls and economic sanctions

Cebi observes national and international laws that apply to its global business operations. Many countries restrict or regulate exports and trade activities with other countries, entities and individuals. Violating these laws can have serious consequences, including significant fines and/or imprisonments.

4 RESPECT FOR FUNDAMENTAL RIGHTS

4.1. Child Labour

Cebi complies with national laws and regulations on child labour, and in all instances:

- Strictly refuses to employ children who are below the age for finishing compulsory schooling, and in any case not less than 15;
- Complies with the provisions of ILO Convention No. 138 pertaining to the employment of young persons between 15 and 18 years of age.

Cebi rejects any kind of forced or child labor at a Cebi company or at its business partners.

4.2. Forced or Compulsory Labour

Cebi complies with national laws and regulations on forced or compulsory labour, and in particular:

- Cebi does not engage in or support the use of forced or compulsory labour;
- Cebi does not withhold any part of any personnel's salary, benefits, property or documents;
- Cebi strictly refuses employment fees or costs borne whole or in part by employees;
- Employees have the right to leave the workplace premises after completing the standard workday and be free to terminate their employment;
- Cebi does not engage in or support human trafficking.

4.3. Equal Opportunities

Cebi undertakes to offer equal opportunities to all its employees for their career progression.



4.4. Discrimination

Cebi complies with national laws related to discrimination. In particular, Cebi does not engage in and does not support discrimination in hiring, remuneration, access to an internship or a training, promotion, transfers, reprimand, termination of contract, or retirement based on his/her place of birth, race, national or social origin, nationality, caste (actual or alleged membership or nonmembership), ethnic group, fortune, religion, philosophical conviction, gender, age, sexual preferences, family status and/or responsibilities, union membership, physical appearance, actual or future health and disability, pregnancy or any other condition that could give rise to discrimination.

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Cebi respects human rights based on accepted international laws and processes, including the Declaration of Human Rights by the United Nations which should be regarded as fundamental and universally valid.
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4.5. Sexual or Psychological Harassment

All employees have the right to work in a positive environment, free from any illegal harassment as construed pursuant to the regulations and policies in force in the country in which Cebi is doing business.

Cebi forbids any illegal conduct constituting sexual or psychological harassment. In particular, Cebi engages to:

- Not interfere with the exercise of personnel’s rights to observe principles and practices or to meet needs relating to race, national or social origin, religion, disability, gender, sexual preferences, family responsibilities, union membership, political opinions or any other condition mentioned above;
- Not allow any behaviour that is threatening, abusive, exploitative or sexually coercive, including gestures, language and physical contact;
- Not subject personnel to pregnancy or virginity tests under any circumstances.

All complaints of harassment will be handled with the utmost confidentiality. Any employee who believes he or she has been harassed should report the alleged conduct immediately to either his or her superior or directly to the local Human Resources Department. Prompt action will be taken to investigate and act on complaints of conducts in violation of this Code. If a claim is valid, appropriate discipline and corrective action will be directed at offending parties.

4.6. Freedom of Association and Right to Collective Bargaining

Cebi promotes the freedom of association and the right to collective bargaining in compliance with local legislation and regulation. The employees of Cebi have the right to form, join and organise trade union(s) of their choice and to bargain collectively on their behalf with the organization. Moreover, the company ensures that the representatives of Cebi employees are freely elected and that any representative and personnel engaged in organizing workers are not subjected to discrimination, harassment or retaliation.

4.7. Remunerations and Working Time

The remunerations of Cebi employees comply at least with the local laws. Concerning the working time and the authorized absences, Cebi complies with the local laws.

4.8. Recruitment and Promotions

It is forbidden for the employees of Cebi, to accept or ask for money promises or payments or goods which could promote the recruitment of an individual as employee or his/her mobility or his/her promotion.

4.9. Health and Safety at Work

It is imperative to observe all international and location-specific health and safety regulations based on the respective country's legislation as well as its national laws governing working hours. Cebi supports continuous further developments aimed at improving the work environment.

In particular, Cebi forbids consumption on its premises of drugs and alcohol. Moreover, employees are not allowed to be under the influence of such substance at their workplace. The possession, sale or use of illegal drugs on company premises or during the working time is prohibited.

4.10. Workplace Violence

Cebi prohibits violence, threat of violence, intimidation and disruptive conduct on company premises and even off company premises if the employee is on company business or the behavior is an extension of the workplace, such as online bullying directed at a coworker. The prohibition applies to all Cebi employees, whether full-time, part time or temporary – as well as customers, suppliers, contractors and visitors.

For the safety of all employees, customers and visitors, Cebi prohibits the possession of firearms or other weapons on company property, in company vehicles, in rental vehicles, while on company business or at company-sponsored events. Cebi's employees should immediately notify management, Security or HR of any prohibited behavior. Security procedures may vary region by region, so please consult local policies.

4.11. Privacy and Personal Data

Cebi respects the confidentiality of our customers' and employees' personal, financial and health information. Personal data should be handled, used, or shared only when there is a legitimate reason to do so, and then only in accordance with applicable law and company policy.

4.12. Environment Sustainability

Cebi undertakes to continuously improve the environmental performance of its production processes and to comply with the laws and regulations in force in the countries where Cebi operates. Cebi encourages its employees to actively participate in the environmental protection.

4.13. Environmental Footprint and Safety of our Products

Cebi undertakes to produce and sale, in compliance with the local and international laws, products that respond to the highest environmental and security standards.

Moreover, Cebi is developing to implement innovative technical solutions to reduce at a minimum the environmental impact and guarantee a maximum level of safety.



5 COMMITMENT TOWARDS CEBI'S SUPPLIERS

5.1. Minimize Environmental Impact

Cebi's suppliers have to comply with all applicable health, safety and environmental laws and regulations and, as far as possible, ensure that any detrimental effects from its activities, products and services upon the environment are minimized. Cebi's suppliers must:

- Obtain and keep all required environmental permits and registrations
- Reduce, control and/or eliminate wastewater, waste and pollution
- Minimize the use of water where practical
- Reduce all emissions of Greenhouse Gas
- Manage, store, move and handle hazardous substances in accordance with law

5.2. Source mineral responsibility

Cebi's suppliers must have policies in place that reasonably ensure that the tantalum, tin, tungsten and gold in the products that they manufacture come from socially and environmentally responsible sources and do not directly or indirectly finance or benefit armed groups.



6 COMPLIANCE WITH THIS CODE

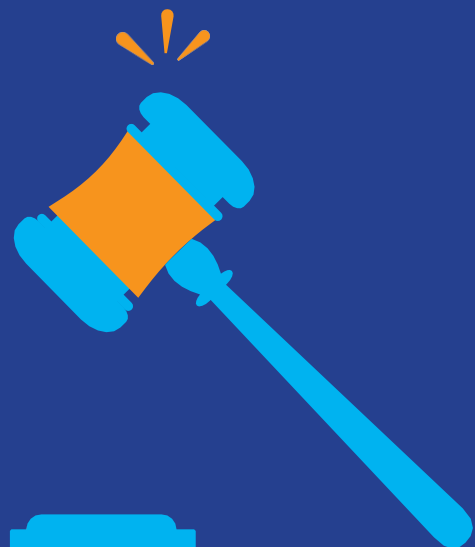
All Cebi employees have to read, understand, and comply with this Code of Ethics and, if necessary, to recall the rules and policies to others in connection with their job at the workplace.

Violations: Any Cebi employee who is not sure if they are carrying out a practice that is or may be in violation of this Code of Ethics is strongly encouraged to speak to his/her superior or the Human Resources Department in order to obtain more information about the application and scope of the Code of Ethics.

Interpretations: All questions about the interpretation, scope, and application of this Code of Ethics should be referred to their own manager or Human Resources who will consult with Cebi Management to find an answer, when necessary.

If a Cebi employee believes in good faith that one of the principles laid down in this Code of Ethics has been or is about to be violated, he/she should inform the General Management of the local company or directly contact Cebi International S.A. at legal@cebi.com.

Sanctions: Any violation of this Code may be sanctioned. The range of sanctions may include but are not limited to a warning to the employee or dismissal of the employee, depending on the gravity of the violation and the applicable provisions of national legislation.



7 MANAGING RECORDS KEPT ON THE BASIS OF THIS DOCUMENT

<i>Date</i>	<i>Record Name</i>	<i>Registration Location</i>	<i>Storage Location</i>	<i>Document Revision</i>	<i>Department Responsible for the Revision</i>
July 2018	Cebi_Code_of_Ethics_07_2018	U:\01-CEBI_Public_Docs\20 - CEBI-International\Group_Policies_&_Guidelines	U:\01CE-BI_Public_Docs\20 - CEBI-International\Group_Policies_&_Guidelines	Creation	HR Cebi International
July 2019	Cebi_Code_Ethics_07_2019	U:\01-CEBI_Public_Docs\20 - CEBI-International\Group_Policies_&_Guidelines	U:\01CE-BI_Public_Docs\20 - CEBI-International\Group_Policies_&_Guidelines	Update	HR Cebi International
July 2020	Cebi_Code_Ethics_07_2020	U:\01-CEBI_Public_Docs\20 - CEBI-International\Group_Policies_&_Guidelines	U:\01CE-BI_Public_Docs\20 - CEBI-International\Group_Policies_&_Guidelines	Update	HR Cebi International

8 VALIDITY AND DOCUMENT MANAGEMENT

This document is valid as of 2020.

Name:

Function:

