



Code of Conduct



Message from the board of directors

CIREX is a unique company with a very special production process. CIREX is one of the largest 'lost wax model' foundries in the world that uses high-grade steel components. CIREX places considerable emphasis on quality, safety and innovation. Within our company we are continuously trying to improve optimisation. In this rapidly changing world we can only continue to improve our performance in the appropriate manner if we remain loyal to our core values.

Our Code of Conduct contains our core values and the most important policy principles of CIREX. The Code of Conduct forms a guideline for directors, management, supervisors and employees for acting appropriately within the company. The rules, values, standards and guidelines for behaviour from the Code of Conduct should be complied with at all times so that we can continue to be a successful company and prevent incidents.

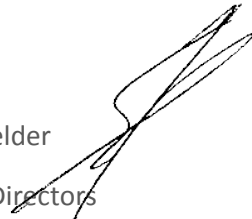
Good relations with our partners, clients, government bodies and other stakeholders form one of the keys for our success. You can make a contribution to creating and maintaining these healthy relations. It is important that you communicate with our relations with sincerity, integrity and respect.

This Code of Conduct does not describe any concrete situations but it does explain the rules, values and standards of CIREX. We have every confidence that our employees will act in accordance with the Code of Conduct. If there are any questions or uncertainties about the Code of Conduct or what the right decision is then you can always ask for more information or for help.

Do your part by studying the Code of Conduct and by complying with our principles and values and let us know if you notice anything that is in conflict with our Code of Conduct.

J.J.G. Spoelder

Board of Directors



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Introduction

The Code of Conduct contains the rules, values and standards of CIREX. These rules, values and standards form the common theme throughout our business practices and are always applicable.

CIREX agrees with the 10 principles that have been formulated by the UN Global Compact. CIREX has officially subscribed to the UN Global Compact. These 10 principles form the basis for the Code of Conduct and accordingly the basis for the business practices of CIREX. The '10 Principles of the UN Global Compact' can be found in the column below.

This Code of Conduct always applies and everybody within CIREX should act in accordance with the rules, values and standards it states. Everybody who enters employment at CIREX must study the Code of Conduct as part of the introduction programme.

CIREX aims to solely collaborate with external parties and suppliers that act in line with the rules, values and standards as stated in this Code of Conduct or which at the very least do not conflict with this Code of Conduct.

This Code of Conduct is not just a guideline for our daily actions but also a guideline for our relationships with each other and with clients, suppliers, stakeholders and our immediate environment.

10 Principles of the UN Global Compact

Human Rights.

Principle 1. Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2. Make sure that they are not complicit in human right abuses.

Labour

Principle 3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4. The elimination of all forms of forced and compulsory labour;

Principle 5. The effective abolition of child labour; and

Principle 6. The elimination of discrimination in respect of employment and occupation.

Environment

Principle 7. Businesses should support a precautionary approach to environmental challenges;

Principle 8. Undertake initiatives to promote greater environmental responsibility; and

Principle 9. Encourage the development and diffusion of environmentally friendly technologies.

Anti-corruption

Principle 10. Businesses should work against corruption in all its forms, including extortion and bribery.

Our people

CIREX is an internationally operating manufacturer with the main office in the Netherlands and production locations in the Czech Republic and Slovak Republic. CIREX has about 430 employees.

CIREX does business with various clients, suppliers and external parties throughout the world. CIREX thanks its success and relations to its personnel.

To maintain this success we do everything possible to create a safe and pleasant work environment for our personnel and we encourage their personal development. CIREX's goal is that all activities are carried out with the greatest possible care for working conditions. In this respect we consider it important that all employees are aware of the fact that our goal is continuous improvement.

Human rights and other relevant legislation

- CIREX acts in accordance with human rights, health and safety legislation and other relevant legislation.
- CIREX strongly disapproves of forced labour and child labour both within our company and externally. Should it nevertheless transpire that forced labour or child labour takes place at one of the parties then CIREX will actively exert pressure to abolish this. If the desired effect is not achieved then CIREX will end the relationship with the party concerned.
- CIREX strives to realise a workplace where everybody feels valued and respected.
- CIREX strives to realise a company culture in which everybody is open to different cultures, everybody is equal and everybody receives equal opportunities. Discrimination is not tolerated.

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Health and safety

- The CIREX board of directors gives the same priority to the safety, health and well-being of all employees as it does to other objectives of the organisation.
- The realisation of the policy is based on prevention: preventing unsafe work situations and damage to the health. The aim here is to give continuous attention to prevention and to include the realisation of this policy in the work preparation, work realisation and work consultation.
- Realising good working conditions is a joint responsibility of the board of directors, management, supervisors and employees.
- Where work activities involving risk are unavoidable, the risks will be limited as much as possible by means of organisational measures, training, instructions and the supply of personal protection equipment.
- The offices, company buildings and company grounds will be set up in such a way, and the equipment needed for the work will be chosen in such a way that risks are limited as much as possible.
- The policy will at least satisfy the relevant legal requirements. General guidelines are internally recorded in the Regulation internal safety and environment and in specific safety instructions.
- By means of regular consultation within the departments, the online learning and knowledge platform and the provision of information, employees are motivated and regularly involved in possible improvements with respect to safety, health and well-being.
- For support and advice with respect to safety, health and well-being use is made of certified external experts.
- It is ensured that parties which carry out work on behalf of CIREX pay attention to safety, health and well-being in the same way as CIREX does. This is recorded in a safety and environment regulation for third parties and the work licences attached to this.
- Within CIREX various people have been trained as in-house emergency staff
- All incidents, near incidents and other concerns should be reported to the line manager or the QSHE manager.

Personal development

- CIREX invests in personal development and each year it draws up a training plan for its employees. This includes both the training needs of CIREX as well as those of the employee.
- When they are appointed and throughout their period of service all employees are regularly informed, instructed or trained with respect to safety, health and well-being in relation to their work. Knowledge and skills are maintained and are regularly tested.

Society

CIREX highly values the environment, society and its surroundings. CIREX has set up its production process in such a way that this has no negative effect on the environment, society and the surroundings. Within its possibilities, CIREX contributes in various ways to the environment, society and the surroundings.

The environment

- The environmental policy is aimed at ensuring that at the very least any statutory requirements as well as the interests of other stakeholders are satisfied.
- CIREX aims to minimise the impact of its activities, production process and final products on the environment.
- CIREX strives to continuously improve in the area of the environment and to limit the environmental burden.
- Within CIREX all employees are responsible for the environment. All incidents, near incidents and other concerns should be reported to the line manager or the QSHE manager.
- CIREX employs a QSHE manager who monitors the impact on the environment.
- CIREX has ISO 14001 – environmental care system.

Corporate responsibility

- CIREX offers work and workspace to people with a learning disability in collaboration with De Twentse Zorgcentra.
- CIREX is a recognised training company that provides opportunities for internships, traineeships and guided tours.
- CIREX supports various social and societal activities.
- CIREX does everything possible to minimise the negative impact or burden for the immediate neighbourhood.

Communication with the surroundings

- CIREX believes in open and honest communication with its stakeholders, such as suppliers, clients, media and the neighbourhood in which it is located. Personal and company-sensitive information is of course treated with due care.
- CIREX strives to build up and obtain a good relationship with competent authorities, the immediate neighbourhood, clients and other stakeholders.

10 Principles of the UN Global Compact

Environment

- Principle 7.** Businesses should support a precautionary approach to environmental challenges;
- Principle 8.** Undertake initiatives to promote greater environmental responsibility; and
- Principle 9.** Encourage the development and diffusion of environmentally friendly technologies.

Our approach

CIREX is one of the largest 'lost wax model' foundries in the world. CIREX develops and produces high-value components that are cast in almost every type of steel alloy. The company delivers these components ready for installation to clients that are mainly in the Automotive Industry and to a lesser extent in General Industry.

CIREX has a unique process. By combining our engineering expertise with an automated moulding and casting process, components of high quality are cast for a strongly competitive price level.

Quality

- CIREX places considerable emphasis on the quality and safety of its products and the production process.
- CIREX tries to minimise waste during the process.
- CIREX assumes responsibility for an optimal realisation of our clients' expectations. We realise this by building up and maintaining long-term and stable relations with our clients on the basis of good service. Keywords for this include: co-development, rapid prototyping, good supply performance and the right price/quality relationship in accordance with client and legal requirements. Furthermore, by implementing and maintaining a high standard of quality assurance we do our utmost to comply with the client specifications.
- All employees are responsible for safeguarding quality. If there is a deviation or if something is at risk of deviating from the standard then this should be reported to the line manager.
- CIREX has the following quality certifications: ISO 9001 and IATF 16949.
- In the case of unresolvable conflicts within the organisation concerning quality/environment the problem will be submitted to the board of directors. They will always choose the solution that agrees either literally or in keeping with the spirit of the actual quality management system.

Continuous development

- The continuity of the company is insured by responsibly striving for a positive result with respect to profit, growth and company climate.
- CIREX aims to constantly improve the product range, infrastructure, working environment, competence, awareness and training.
- CIREX invests in the creation and facilitation of a company culture with a continuous improvement process in all departments and areas of the company.
- CIREX aims to realise a continuous improvement in the quality management, environmental management, sales process, production process and organisation, in line with ISO 9001, IATF 16949 and ISO 14001, for the production locations in the Netherlands, the Czech Republic and the Slovak Republic.

Anti-corruption

- CIREX strongly disapproves of any form of corruption both within and outside of the company. Should it nevertheless transpire that there is corruption within one of the parties then CIREX will actively exert pressure to abolish this. If the desired effect is not achieved then CIREX will end the relationship with the party concerned.
- CIREX maintains a zero tolerance policy with respect to corruption.
- All incidents, near incidents and other concerns should be reported to the line manager or the board of directors

10 Principles of the UN Global Compact

Anti-corruption

Principle 10. Businesses should work against corruption in all its forms, including extortion and bribery.

Clients and competitors

- CIREX offers a fair price and competes in an honest and legally permitted manner.
- CIREX will not take any dishonest or misleading actions with respect to clients and competitors.
- CIREX will handle company-sensitive commercial and technical information of its clients and competitors carefully and in confidence.

Suppliers and external parties

- CIREX only conducts business with parties who strive to comply with the '10 Principles of the UN Global Compact' and who subscribe to the Suppliers' Code of Conduct.
- CIREX does not do any business with suppliers or external parties whose actions are in conflict with international human rights.
- Where this is required, CIREX only does business with suppliers and external parties who possess the relevant certification.
- CIREX will handle company-sensitive commercial and technical information of its clients and competitors carefully and in confidence.

Company performance

- CIREX strives to correctly and accurately register all business and commercial transactions.
- CIREX carries out internal quality, safety and environmental audits. These internal audits (system, process and product) are realised by our own certified auditors with the aim of analysing and continuously improving the management systems. The results of these audits are reported to the board of directors and are translated into action programmes for the purpose of realising improvements.
- CIREX acts in an open and honest manner with external auditors.
- CIREX is opposed to the falsification of documents or being dishonest about the genuine origin of the transaction.

Personal and company sensitive information

- CIREX treats personal information carefully and this is only used for company and contractual purposes.
- All employees are responsible for carefully dealing with company-sensitive information.
- If you have doubts about the use of personal or company sensitive information then you should inform the Board of Directors about this.

Responsibility for the Code of Conduct

The Code of Conduct becomes powerful if it is complied with by the Board of Directors, the management, supervisors and all employees within CIREX. Every member of the Management Team is obliged to uphold the quality, health and safety and environmental management information systems within the departments 'for which they are responsible'. They are also responsible for ensuring that each employee within the Departments is properly informed about the relevant procedures and instructions.

It is a joint responsibility of every CIREX employee to comply with the Code of Conduct and to ensure that your colleagues do this as well. It is the duty of everybody within CIREX to report incidents and near incidents that are in conflict with the Code of Conduct. Any suspicious cases, infringements or violations of this Code of Conduct must be reported.

If certain matters in this Code of Conduct are not clear then you can always ask for an explanation or pose questions.