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1. Introduction

1.1. cylib – Technology for Sustainable Battery Recycling

cylib GmbH ("cylib") is a leading German technology company specializing in sustainable and holistic battery recycling. Its proprietary end-to-end process enables the efficient, resource-conscious and climate-friendly recovery of all valuable materials from lithium-ion batteries — from pack level to cell level, as well as from battery production scrap.

1.2. Definition

Suppliers within the meaning of this policy are both legal entities (e.g., companies, organizations) that provide goods or services to cylib and natural persons who act as suppliers in the same way. This includes all natural persons regardless of gender as well as legal entities equally.

A cylib supplier is a third party with whom cylib has a business relationship for the procurement of goods or services. This includes, but is not limited to, suppliers of raw materials and machinery, providers of other goods and services, contractors, consulting firms, stockbrokers, or agencies.

2. Purpose and Scope

This Code of Conduct outlines the principles and ethical standards that guide the conduct of all suppliers associated with cylib. It reflects our commitment to integrity, respect, and responsibility in every aspect of our business. The Code of Conduct is based on the cylib Code of Conduct and other important public principles such as the United Nations Global Compact (UNGC). It is consistent with the ethical goals and conduct of all cylib suppliers worldwide and complies with the standards that cylib also applies to its own employees.

cylib reserves the right to expand or amend this Code of Conduct at any time. Suppliers are required to comply with the current version, which is published on the cylib website (<https://www.cylib.de>) or made available directly upon request at . Compliance with this Code is mandatory regardless of role or location. cylib's management fully supports this policy, which is formally reviewed annually.

3. Core Principles for Supplier Relationships

At cylib, we believe that strong partnerships are built on shared values and ethical conduct. Our core principles form the foundation of responsible business practices and set clear standards for our suppliers. They ensure compliance with laws, respect for human rights, responsible environmental stewardship, and integrity across our entire supply chain. Together, we can create a sustainable and ethical business environment that benefits all stakeholders. All suppliers are required to adhere to the following core principles.

3.1. Compliance with Laws

Suppliers are required to comply with all applicable laws, regulations, directives, and decisions of their competent authorities in both their wording and broader interpretation when conducting their business activities.

3.2. Human Rights and Working Conditions

Suppliers have to be committed to upholding human rights and fostering fair, inclusive, and safe working conditions across their operations and supply chain.

- Prohibiting exploitation: Ensuring the elimination of child labor, modern slavery, forced labor, and human trafficking and protecting young workers.
- Fair employment practices: Providing fair wages, social benefits, ethical recruitment, and adherence to reasonable working hours.
- Safety and health: Maintaining occupational health and safety standards and ensuring safe working environments for all.
- Equality and respect: Promoting diversity, equity, and inclusion, safeguarding against discrimination and harassment, and respecting the rights of all individuals, including marginalized groups such as minorities and indigenous peoples. Additionally, gender equality and the protection of specific women's rights, including maternity, are particularly emphasized.
- Empowering workers: Supporting freedom of association and collective bargaining to ensure fair representation and open communication.

3.3. Ethical Business Practices

Suppliers must conduct their business with integrity, transparency, and accountability, ensuring compliance with ethical standards and legal requirements across all operations.

- Integrity and compliance: Adhering to anti-corruption and anti-money laundering laws, avoiding conflicts of interest, and complying with export controls and economic sanctions.
- Transparency: Maintaining accurate financial records and ensuring the timely disclosure of truthful information to stakeholders.
- Fair competition: Promoting fair business practices and compliance with antitrust laws to ensure a level business.
- Data and intellectual property: Protecting data privacy, maintaining security, and respecting intellectual property rights.
- Originality: Upholding originality and avoiding plagiarism in all work and communications.

3.4. Sustainability and Environmental Protection

Suppliers are required to minimize their environmental footprint and promote sustainable practices in all aspects of their business activities and supply chains.

- Climate protection: Reducing greenhouse gas emissions, improving energy efficiency, and switching to renewable energy sources to promote decarbonization.
- Resource responsibility: Responsible management of water and air quality, optimization of resource use, and prioritization of sustainable procurement of raw materials.
- Waste management: Prioritizing waste prevention, waste reduction, reuse, and recycling to promote a circular economy.
- Protection of ecosystems: Preserving biodiversity and sustainable land use, preventing deforestation, and promoting soil quality and animal welfare in all business activities.
- Sustainability in operations: Ensuring sustainable resource management, responsible use of chemicals, and minimizing noise emissions.

3.5. Sustainable Procurement of Raw Materials

Suppliers are required to disclose the potential sources of origin associated with the products or services supplied to cylib. Upon request by cylib, suppliers must provide a complete map of the supply chain. This obligation applies, for example, to conflict minerals in accordance with EU regulations. In addition, suppliers must prioritize the responsible and sustainable procurement of raw materials in order to minimize environmental and social impacts. This includes:

- Sustainable procurement of relevant materials for battery production: This includes, in particular, graphite, lithium, cobalt, nickel, manganese, aluminum, copper, phosphorus, and iron.
- Ensuring transparency in supply chains: avoiding materials associated with deforestation, habitat destruction, or human rights violations, and promoting the use of recycled or renewable resources wherever possible.

3.6. Communities and Land Rights

Suppliers are obliged to respect the rights of communities and ensure the responsible use of land, forests, and water. At the same time, forced evictions must be prevented and fair treatment of all parties must be guaranteed.

- Land and resource rights: Protecting the land, forest, and water rights of local communities and preventing any form of forced eviction or displacement.
- Security and protection: Ensuring that private or public security forces are deployed in a manner that respects human rights and complies with legal and ethical standards.

3.7. Reporting and Accountability

Suppliers are required to promote transparency and accountability in all their business activities by encouraging the reporting of unethical behavior and ensuring that all suppliers adhere to similar standards of conduct.

- Whistleblowing and protection: Providing safe channels for whistleblowing and protecting individuals from negative consequences when reporting misconduct or violations.
- Supplier accountability: Tier 1 suppliers are required to define and implement comparable ethical standards and ensure that these standards are passed on in a binding manner throughout their supply chains. Upon request, this information must be disclosed to cylib.

cylib recommends that suppliers implement appropriate policies, management systems, procedures, and human resources to meet the requirements of this Code of Conduct. cylib expects suppliers to effectively communicate the standards and relevant laws, regulations, and safeguards to their personnel to ensure compliance with their obligations.

4. Final Clauses

cylib reserves the right to request proof of compliance with the supplier code of conduct (or an equivalent provision of the supplier's code of conduct). This may include requesting a compliance certificate form, reviewing supporting documents and records from the supplier, or using other appropriate formats for evaluation. If the supplier fails to comply with the Code, cylib reserves the right to review the non-compliance with the supplier and request corrective actions to achieve compliance.

4.1. Consequences of Violations

Violations of this policy may, depending on the nature and severity of the breach, lead to a review of the business relationship. cylib reserves the right to take appropriate measures in the event of non-compliance, including the suspension or termination of the collaboration.

4.2. Contact points

For regulatory or legal questions, please contact the Policy Team at legal@cylib.de.

4.3. References

This policy is related to the Financial & Supply Chain policy cluster—in particular, cylib's Code of Ethics—as well as relevant external regulations. These include, for example: the Supply Chain Due Diligence Act, the EU Battery Regulation, the Battery Act, the Circular Economy Act, and the OECD Guidelines for Multinational Enterprises. This list is not exhaustive; other relevant national and international regulations must be consulted depending on the area of application.

References to these regulations clarify relationships and avoid overlaps.

4.4. Revision

This policy must be reviewed annually to ensure that its content remains up to date and reflects relevant legal, organizational, or technical developments.

All versions must be documented in a version table. Previous versions are to be archived to ensure traceability and to prevent unauthorized modifications.

Version	Date of entry into force	Validation by	Approval by	Date of approval
Ver1	12/23/23	H. Laufenberg	Dr. G. Schwich	12/23/23
Rev2/ Ver1.1	11/28/24	M. Bethke	Dr. G. Schwich	11/28/24
Rev3/ Ver1.2	12/12/24	M. Bethke	Dr. G. Schwich	12/12/24
Ver2	11/17/25	H. Laufenberg	Dr. G. Schwich	10/30/25

4.5. Legal effect and conflicts of interpretation

In case of doubt, this policy shall be interpreted in accordance with all applicable legal and regulatory requirements, including those that come into force after its publication. If there is a conflict between this policy and binding legal or regulatory provisions, the latter shall take precedence. In the case of non-binding legal rules (dispositive law), the provisions of this policy shall apply. If there are overlaps or contradictions with other internal regulations, the more specific and detailed provision shall take precedence.

This policy was originally drafted in German, which is the legally binding version. It is governed by the laws of the Federal Republic of Germany. The English translation is provided for convenience only and has no legal effect.