

Supplier Codex

Our shared commitment to integrity, fairness, and responsible business conduct.

Effective Date: 22 July 2026 | Version: 1.0 | Applies To: Any Supplier providing goods or services to Black Semiconductor— globally

1 A MESSAGE FROM OUR LEADERSHIP

Dear Supplier and Business Partner,

At Black Semiconductor, we are building the next generation of graphene-based photonic and electronic technologies. Our success — and the trust placed in us by our customers, investors, regulators and the communities in which we operate — depends not only on what we do inside our own facilities, but also on the standards upheld across our entire supply chain.

You are an essential part of that chain. The materials, components, equipment, and services you provide directly influence the safety of our people, the integrity of our products, and our shared impact on society and the environment. This **Supplier Codex** (“**Codex**”) sets out the principles and minimum requirements we expect every supplier, contractor and business partner to follow when working with Black Semiconductor GmbH and any of its affiliated companies.

In particular, we expect our Suppliers to ensure safe working conditions, treat employees with respect, operate business operations in an environmentally friendly manner and conduct all activities in full compliance with all applicable local and international laws and regulations.

We see compliance with this Codex as a mandatory baseline, not an aspiration. We are looking for partners who share our commitment to integrity, responsibility, and continuous improvement — and who are willing to be transparent about their performance, their challenges, and the steps they are taking to do better.

We will treat you fairly. We expect the same in return. Where we identify shortcomings, we will engage constructively — but we will not compromise on fundamentals such as human rights, safety, anti-corruption, export controls, and product integrity.

This Codex may be revised by Black Semiconductor from time to time according to changes in law and regulations and/ or Black Semiconductors supplier management policy.

Thank you for working with us, and for helping us build a semiconductor supply chain we can all be proud of.

The Management Board

Black Semiconductor GmbH

2 OUR COMPANY VALUES

Our five company values are practical commitments that shape how we make decisions, treat each other, and represent Black Semiconductor:

- **Integrity** — We act honestly, ethically, and transparently in everything we do.
- **Accountability** — We take ownership of our actions, decisions, and their consequences.
- **Growth** — We pursue continuous improvement, learning, and innovation.
- **Authenticity** — We are genuine, open, and true to our commitments — to each other, our partners, and the world.
- **Execution** — We deliver on our promises with discipline, precision, and reliability.

3 OUR REQUIREMENTS FOR SUPPLIERS

3.1 LEGAL AND REGULATORY COMPLIANCE

- We expect each Supplier to comply with all applicable national and local laws and regulations, such as those covering labour, health and safety, international trade, anti-corruption and environment.

3.2 PEOPLE & ENVIRONMENT

- Zero tolerance for discrimination, harassment, bullying, or victimisation of anyone in any form.
- Compliance with all health & safety laws, including those on hazardous substances, waste, emissions, water and resources; special duty of care in cleanroom and laboratory environments.
- Environmental responsibility: minimise waste, emissions, and hazardous substance use; REACH/PFAS compliance.
- No impairment at work from alcohol, drugs, or any substance; fitness-for-duty required at all times.

3.3 INTEGRITY & FAIRNESS

- Full compliance with competition and antitrust law; no price-fixing, market-sharing, or bid-rigging.
- Zero tolerance: Reject bribery, extortion, corruption, including facilitation payments or embezzlement.
- Avoid offering or accepting gifts, hospitality or anything of value to influence business relationships/ decisions.
- Disclose all actual, potential, or perceived conflicts of interest promptly and in writing.
- No political contributions using company resources or in the company's name.

3.4 EXPORT CONTROLS & TRADE SANCTIONS

Certain wafers, related technologies and technical data/ know-how may be controlled goods under EU, German or other applicable export control and sanctions laws. Every

outbound shipment, every transfer of technical data to a foreign recipient, and every collaboration with an international partner carries potential export control implications.

- Sanctions screening is required for all counterparties; stop and escalate immediately if any concern arises.
- There is zero tolerance for circumvention, evasion, or facilitation of sanctions breaches.
- Supplier has to comply with all applicable export control regulations, including the EU Dual-Use Regulation (2021/821), German AWG/AWV, US EAR (where applicable), and country-specific sanctions programmes (EU, UN, OFAC). **Promptly notify** Black Semiconductor of any change in control, classification, end-user, or end-use that could affect export control status.

3.5 HUMAN RIGHTS & SUPPLY CHAIN

- Respect for UN Guiding Principles, ILO Core Conventions, and OECD Guidelines for human rights and all applicable local laws and regulations, depending on Suppliers location and business environment.
- Prohibit forced, bonded, involuntary, or trafficked labour.
- Prohibit child labour.
- Negotiation of fair wages; freedom of association guaranteed.
- Limit working hours to comply with local law.
- Supply chain due diligence aligned with German Supply Chain Act (*Lieferkettensorgfaltspflichtengesetz - LkSG*) and the European Corporate Sustainability Due Diligence Directive (EU CSDDD), and other applicable (local) law and regulations.
- Third-party partners, contractors, and suppliers must meet equivalent standards.

3.6 DATA PROTECTION; INTELLECTUAL PROPERTY RIGHTS; CONFIDENTIAL INFORMATION

- Respect intellectual property rights of Black Semiconductor and third parties. Use confidential information solely for the purposes for which it was provided. Return or securely destroy confidential information upon contract termination or on request.
- Comply with the EU General Data Protection Regulation (GDPR) and all other applicable data protection laws and regulations when processing personal data on behalf of or in connection with Black Semiconductor. Conclude data processing agreements (Art. 28 GDPR) where required.
- Notify Black Semiconductor of any personal data breach without undue delay and in any case within 48 hours of becoming aware of it.
- Maintain an information security management system aligned with ISO/IEC 27001 or equivalent. Promptly notify Black Semiconductor of any actual or suspected security incident affecting Black Semiconductor data, systems, or supply chain integrity.

4 RAISING CONCERNS & ACCOUNTABILITY

4.1 MONITORING & AUDIT RIGHTS

- Black Semiconductor reserves the right — directly or through independent third parties — to assess your compliance with this Codex through self-assessment questionnaires, documentation reviews, announced on-site audits with reasonable prior notice, and unannounced on-site audits where there is credible suspicion of a serious breach. You agree to grant reasonable access to relevant facilities, records, systems, and personnel, subject to legitimate confidentiality and data protection safeguards.
- If there is questionable behaviour or violations of this Codex, please **report accordingly** to Black Semiconductor.
- Reports may be submitted to your Black Semiconductor contact, to purchasing@blacksemi.com, or via the anonymous whistleblowing channel published on the Black Semiconductor website.
- Set up or join a whistleblowing tool so that supplier's employees can also report violations.

4.2 CONSEQUENCES OF NON-COMPLIANCE

- Where you fail to meet the requirements of this Codex, Black Semiconductor may, depending on the severity and circumstances of the breach:
 - (i) issue a formal written warning and require a corrective action plan;
 - (ii) reduce order volumes, suspend new orders, or remove you from approved supplier lists;
 - (iii) terminate purchase orders, framework agreements, or master service agreements, in whole or in part;
 - (iv) recover damages, costs, and losses arising from the breach; or
 - (v) report the matter to competent authorities where required by law.
- Severe breaches — including forced or child labour, large-scale corruption, deliberate falsification of records, export control violations, or knowingly shipping counterfeit or non-compliant material — may result in immediate termination of all business with Black Semiconductor and exclusion from future engagement.

5 ACKNOWLEDGEMENT

- All Suppliers of Black Semiconductor are required to formally acknowledge this Codex and confirm their understanding of, and commitment to, its principles.
- By signing below, the Supplier of Black Semiconductor acknowledges that it has received, read, and understood the Black Semiconductor Supplier Codex (effective 22 July 2026), and commits to:

- Comply with this Codex in all dealings with Black Semiconductor GmbH and its affiliates.
- Apply equivalent standards within its own operations and across its supply chain.
- Cooperate transparently with Black Semiconductor on monitoring, audits, and corrective actions.
- Promptly report any actual or suspected breach of this Codex

Signed for and on behalf of the Supplier:

Company Name

Legal entity name

Authorized Signatory

Full name

Title / Position

Job title

Date

DD / MM / YYYY

Signature

Authorised signature

Place

City, Country

Please return a signed copy to: purchasing@blacksemi.com