BJS Ceramics

BJS Composites

Anti-Slavery, Anti-Human-Trafficking, and Anti-Child-Labour Policy

0. Introduction

In line with our Code of Conduct, customer requirements and despite the fact that we are too small for the application of the "Lieferkettensorgfaltspflichtengesetz", our small enterprises, BJS Ceramics GmbH and BJS Composites GmbH, are committed to upholding fundamental human rights and ethical business practices worldwide. This Anti-Slavery, Anti-Human-Trafficking, and Anti-Child-Labor Policy reflects our dedication to preventing and eliminating any form of modern slavery, human trafficking, and child labor within our operations and supply chains with the little means we have as small enterprises and start-up companies.

1. Definitions

BJS Companies: This term includes BJS Ceramics GmbH and BJS Composites GmbH.

Company: This term is used for a Business Partner of one of the BJS Companies or both of the BJS Companies. It includes all subsidiaries and affiliates of Company in accordance with the regulations of the §§ 49 HGB (German Code of Commerce).

Child Labor: Any work performed by children below the minimum age for employment or work that is harmful to their physical or mental development.

Human Trafficking: The recruitment, transportation, transfer, harboring, or receipt of individuals through force, fraud, or coercion for the purpose of exploitation.

Modern Slavery: The severe exploitation of individuals through coercion, forced labor, debt bondage, servitude, or human trafficking.

2. Scope and Applicability

This policy applies to all employees of the BJS Companies, their contractors, suppliers, and other business partners engaged in activities on behalf of the BJS Companies, irrespective of geographical location. It extends to our entire supply chain, including sourcing, manufacturing, distribution, and sales.

3. Commitment to Human Rights

The BJS Companies are dedicated to respecting and promoting human rights, including the elimination of modern slavery, human trafficking, and child labor. We commit to complying with all applicable laws and regulations related to these issues.

4. Risk Assessment and Due Diligence

a. Risk Assessment:

We conduct regular risk assessments to identify and evaluate potential risks of modern slavery, human trafficking, and child labor in our operations and supply chains.

This risk assessment will be based on the geographic locations, industries, and sectors in which our BJS Companies operate to identify high-risk areas.

b. Due Diligence:

We implement due diligence processes to assess the ethical practices of suppliers, contractors, and business partners. Due to the fact that we are small enterprises still in the start-up mode, the due diligence process will be kept simple by a questionnaire in which the suppliers, contractors and business partners that supply a net value of > 100 T€/annum/BJS Company will be asked whether they have a ABC- and Anti-Slavery, Anti-Human-Trafficking, Anti-Child-Labor Policy in place and in which they confirm not to infringe on any applicable laws and regulations thereto resp. not to being sued thereto (see Attachment No. 1).

If they sign this questionnaire, we will continue to do business with them. If they do not sign this questionnaire, we will try to find an alternative supplier who is compliant. If this is not possible, and if we cannot find alternative products/suppliers, we will continue this relationship until we find such solution. This questionnaire has to be provided once per Company. Based on this questionnaire, we will evaluate their compliance with anti-slavery, anti-human trafficking, and child labor laws and regulations. At this point, we will not conduct any audits by ourselves. We will prioritize business relationships with suppliers and partners who share our commitment to human rights and ethical practices.

The turnover values will be adapted as the BJS Companies will grow until the BJS Companies reach the critical size for the application of the Lieferkettensorgfaltspflichtengesetz. In such case, the BJS Companies will comply with the stipulations of the applicable laws and regulations accordingly.

5. Supply Chain Transparency

a. Supplier Requirements:

We will communicate our expectations to suppliers and business partners regarding their commitment to eradicating modern slavery, human trafficking, and child labor. We will incorporate anti-slavery, anti-human trafficking, and child labor clauses in contracts and agreements with suppliers. We will also adapt our General Terms and Conditions for Purchases accordingly.

b. Supplier Audits:

Once, the BJS Companies will reach the size so that the Lieferkettensorgfaltspflichtengesetz applies, we will conduct regular audits of suppliers and business partners to verify their compliance with this policy. Such audits will include an assessment of their labor practices, recruitment procedures, and worker welfare programs to identify any potential risks or non-compliance.

6. Employee Awareness and Training

We will provide comprehensive training to employees on the issues of modern slavery, human trafficking, and child labor – along with our annual "Sicherheitsunterweisung". This training aims at raising awareness of the signs, risks, and reporting mechanisms related to these issues.

We encourage our employees to report any concerns or suspected instances of modern slavery, human trafficking, or child labor internally to the Managing Directors of the BJS Companies who will then take action within the framework of this policy as applicable and appropriate.

7. Reporting and Whistleblower Protection

The establishment of confidential hotline or a single designated contact person, for employees and stakeholders to report concerns related to modern slavery, human trafficking, or child labor is not foreseen at this time due to the size of our company. Any (potential) incident is to be reported to the Managing Directors of the BJS Companies. The reports will be handled confidentially and investigated promptly and thoroughly and in good faith with the partners concerned.

The BJS Companies prohibit retaliation against individuals who report in good faith and provide protection to whistleblowers.

8. Continuous Improvement and Review

We will regularly review and update this policy to reflect emerging risks, legal requirements, and best practices.

We collaborate with our industry partners, and relevant stakeholders to enhance our efforts in combating modern slavery, human trafficking, and child labor.

9. Compliance and Consequences

Non-compliance with this policy may result in disciplinary action, including termination of employment or business relationships, as appropriate.

We will cooperate with relevant authorities and support any investigations or legal actions related to modern slavery, human trafficking, or child labor.

By adopting and implementing this Anti-Slavery, Anti-Human Trafficking, and Anti-Child Labor Policy, we reaffirm our commitment to ethical business practices and the protection of human rights globally.

BJS Ceramics

BJS Composites

Date of Effect: 27.10.2026

Approved by:

Managing Directors of BJS Ceramics GmbH:

Armin Bruch

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BJS Ceramics

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Legal (once an inhouse legal counsel is established):

BJS Ceramics BJS Composites

Attachment 1 – Supplier Questionnaire

Supplier Questionnaire

Compliance with Anti-Bribery, Anti-Corruption, Anti-Slavery, Anti-Child-Labour, Anti-Human-Trafficking

BJS Ceramics GmbH and BJS Composites GmbH are committed to upholding fundamental human rights and ethical business practices, integrity, and transparency. This Compliance Questionnaire on Anti-Bribery, Anti-Corruption, Anti-Slavery, Anti-Child-Labor, Anti-Human-Trafficking was developed to ensure that also our suppliers act with integrity in all business operations, and in line with all applicable laws and regulations. It reflects our dedication to preventing and eliminating any form of unethical business practices, modern slavery, human trafficking, and child labor within our operations and supply chains.

This questionnaire will form an integral part of our business relationship with [Company & Address]. We reserve the right to conduct audits thereto.

1. Does your Company have a Code of Conduct in place? (Yes/No) (Please provide the document or link to the document if available online.)

2. Which of the following policies has your Company in place:

   - Anti-Bribery (Yes/No)
   - Anti-Corruption (Yes/No)
   - Anti-Slavery (Yes/No)
   - Anti-Child-Labor (Yes/No)
   - Anti-Human-Trafficking (Yes/No)

3. Do you or your customers or neutral third parties conduct regularly audits on these policies? In particular on which of the following policies:

Policy	Company Audits (yes/not)	Customer Audits (yes/no)	Other third party audits (yes/no)
Anti-Bribery			
Anti-Corruption			
Anti-Slavery			
Anti-Child-Labor			
Anti-Human-Trafficking			

4. When was the last Audit and on which policy(ies) performed by which party (your Company, your Customer or a neutral third party)?

5. Were there any substantial infringements found? (Yes/no)

If yes, please specify:

Have you implemented measures to avoid/eliminate these infringements? (Yes/No)

If yes: please specify by when.

If no: please specify why.

6. Are there any complaints or lawsuits filed against your Company/Company Officers in regards to infringements of these policies, and related applicable laws and regulations? (Yes/No)

If yes, please specify and mention when you expect that such complaint/lawsuit will be ended:

[Company] herewith declares and warrants that its officers and legal representatives as well as the [Company] itself with all its affiliates and subsidiaries are not listed on any sanctions lists of the United Nations, the EU or EU National Lists, the UK.

[Company] herewith declares and warrants that all statements herein are true and complete and do not misrepresent anything of essence in this regard.

[Company] agrees and supports BJS conducting audits on these matters.

Location & Date:

Name of Company:

Name of Signee & Function:

Signature & Company stamp: