



Commitment Statement and Code of Conduct

Quality - Human Rights - Environment - Ethics - Responsible Sourcing

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Purpose. This document sets out the commitments of Robert Laminage SA (RLSA) and the minimum expectations applicable to its employees, suppliers, subcontractors and business partners.

1. Scope and principles

RLSA conducts its activities in compliance with applicable laws, its contractual commitments and the requirements agreed with its customers. This Code applies to RLSA's activities and serves as a reference for selecting and monitoring its business partners.

RLSA supports the social, environmental and ethical principles of the Responsible Business Alliance (RBA) Code of Conduct, version 8.0. This reference does not constitute RBA membership, certification or audit validation.

2. Quality and customer responsibility

- Maintain and continually improve an ISO 9001:2015-certified quality management system;
- control processes, dimensional and metallurgical inspections, and the internal traceability of received, processed and delivered lots;
- address non-conformities, investigate causes and implement proportionate corrective actions;
- communicate product characteristics accurately, without extending a declaration beyond the documented alloy, lot, order or scope.

3. Human rights and working conditions

- prohibit forced labour, human trafficking and child labour;
- ensure equal treatment and reject all discrimination, violence and harassment;
- comply with applicable legislation on remuneration, working time, rest, freedom of association and worker representation;
- protect persons who raise concerns in good faith and handle reports confidentially, within the limits of the law.



4. Occupational health and safety

RLSA identifies hazards, assesses risks and gives priority to eliminating or reducing them at source. It trains employees, provides the necessary equipment and prepares for emergency situations. RLSA is a member of APIAH and applies the sector occupational health and safety solution recognised by SUVA/CFST.

5. Environment and energy

- prevent pollution, manage chemicals and sort production waste, giving priority to recovery and recycling;
- use purchased electricity from renewable sources for production equipment, in accordance with the 2026 supply certificate;
- pursue the target of reducing total energy consumption by 10% by 2027, in accordance with the agreement concluded with the Swiss Confederation;
- publish recycled-content or carbon-footprint reduction claims only when they are established for the relevant product using traceable data and a clearly stated method.

6. Business ethics and governance

- reject corruption, illicit payments and benefits that could improperly influence a decision;
- identify and manage conflicts of interest;
- comply with applicable competition rules, sanctions and trade controls, and respect intellectual property rights;
- protect confidential information, personal data and assets entrusted by business partners.

7. Responsible sourcing

RLSA applies a risk-based due diligence approach inspired by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and, where applicable, Swiss law.

- request traceability information and current CMRT/EMRT templates from suppliers when the relevant minerals are present;
- consider the RMAP status of smelters and refiners as one item of evidence among others, without presenting it as an absolute guarantee of origin or compliance;
- assess risk indicators, request corrective measures and suspend or terminate a relationship where a serious risk remains unmanaged.



Due diligence aims to identify and manage risks. It does not imply the automatic exclusion of supplies originating from the Democratic Republic of the Congo or other high-risk areas.

8. Product compliance and transparency

Information relating to REACH, RoHS, Proposition 65, responsible minerals and other market requirements is established from the alloy specification, supplier documents, safety information sheets and, where applicable, test results. It is communicated for a clearly identified product or product family.

The sheets published on the RLSA website are voluntary safety information sheets for metallic articles. They do not replace a product-specific regulatory declaration or the customer's assessment of the finished product.

9. Implementation and review

Business partners are expected to apply equivalent principles and provide the necessary evidence upon reasonable request. RLSA may require a corrective action plan and tailors its measures to the severity of the risk.

This document is reviewed at least annually and whenever a significant regulatory or operational change occurs. Concerns may be sent to info@robertlaminage.com.

Main references

RBA - Code of Conduct, version 8.0: <https://www.responsiblebusiness.org/code-of-conduct/>

OECD - Due Diligence Guidance, 3rd edition (2016): https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_9789264252479-en.html

Swiss Confederation - DDTro: <https://www.fedlex.admin.ch/eli/cc/2022/151/fr>

RLSA - Quality, environment and safety information: <https://www.robertlaminage.com/qualite-et-environnement>

Le Locle, 3 September 2026

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