

Stahlton Bauteile AG

Code of Conduct for Suppliers

1. Introduction

Stahlton Bauteile AG (hereinafter referred to as Stahlton) is committed to sustainability in all areas of its business and endeavours to apply high ethical standards. Our external business partners (suppliers) play a decisive role in this respect.

This Code of Conduct for external business partners (suppliers) reflects the purpose and values of Stahlton. We strive to be a sustainable and innovative company.

We strive to extend our commitment to ethical behaviour and good corporate governance to our relationships with our suppliers. We do this because we believe that these values are fundamental to long-term, sustainable development. This is in the interest of all our stakeholders, especially our employees, shareholders, customers and suppliers. This Code embodies the core beliefs of our company, serving as the driving force behind our purpose.

This Code is based on the following principles:

- Compliance with the law
- Ethical business conduct
- Fair, safe and respectful treatment of people working in the supply chain
- Protection and respect for the environment
- Safeguarding privacy through the proper handling of confidential information to ensure the protection of the personal rights of employees and business partners.

We expect this Code to apply to our suppliers, including their employees.

This Code is based on the following principles:

- The values of Stahlton
- The United Nations Universal Declaration of Human Rights
- The United Nations Convention on the Rights of the Child
- The ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights.

2. The obligations of Stahlton

Stahlton undertakes to comply with the principles of this Code and expects its suppliers to do the same. Stahlton is also committed to actively working with our suppliers and communicating transparently to promote these principles.

3. The obligations of our suppliers

Stahlton expects its suppliers to comply with the following points:

Compliance with laws and regulations

In addition to the provisions of this Code, suppliers must comply with all local, national and international laws relevant to their business. They must also ensure that their employees are informed of their obligations in this regard.

Ethical business practices

Stahlton expects its suppliers to conduct their business practices in an ethical manner. Suppliers shall deal fairly and honestly with all business partners, customers and competitors. They will not take unfair advantage through manipulation, bribery, concealment, misuse of privileged or confidential information or trade secrets, misrepresentation of material facts or other unfair business practices. This includes in particular:

- **Anti-corruption:** Our suppliers must not engage in active or passive corruption, including accepting or giving material gifts, money or other items to individuals or companies, material gifts, donations, hospitality or holidays, etc. with whom the suppliers do business or seek to do business with.
- **Free competition:** Our suppliers must comply with antitrust laws and refrain from anti-competitive behaviour – in particular, not entering into agreements, arrangements or alliances that restrict or seek to restrict competition; not entering into illegal tying or bundling arrangements; not using artificial pricing to suppress competition.
- **Truthful marketing:** Suppliers-advertising and marketing practices should be designed to provide honest, substantiated information; marketing or sales practices that are unlawful or dishonest must be excluded.
- **Protection of intellectual property and confidential information:** Our suppliers must respect international intellectual property rights and not disclose confidential information about Stahlton or other business partners to unauthorised persons.
- **Compliance with government investigations:** Our suppliers must cooperate fully with government investigators.

In the event of reasonable suspicion of non-compliant behaviour by our suppliers, our suppliers agree to fully comply with any request for information, documents or assistance resulting from an investigation by Stahlton.

In the event that Stahlton is the subject of an official investigation, our suppliers will comply fully and completely with all requests for information, documents or assistance arising from the investigation.

Fair and safe working conditions

Stahlton is committed to working with suppliers who respect human rights and provide equal opportunities in all aspects of employment. Stahlton does not tolerate illegal discrimination and we require our suppliers to behave responsibly and fairly towards their employees. This includes:

- **Protection against discrimination and sexual harassment:** Our suppliers must ensure that no employees are discriminated against on the basis of gender, race, origin, religion or sexual orientation and ensure that all employees are protected from sexual harassment.
- **Exclusion of child labour, forced labour, modern slavery and human trafficking:** Our suppliers must have no reasonable suspicion that child labour or forced labour exists in their organisation or supply chain. In addition, we expect our suppliers to comply with administrative processes to exclude activities in their organisation or supply chain that are associated with slavery or human trafficking.
- **Respect for the right to freedom of association:** Our suppliers are expected to respect freedom of association. This includes the right to collective bargaining and trade unions, in accordance with the relevant laws and regulations.
- **Appropriate remuneration:** Our suppliers are expected to offer their employees a "living wage" and compensation in accordance with legal requirements. Wages are paid in legal tender and on a regular basis.
- **Safe workplaces:** Our suppliers must ensure that their employees are provided with a safe and healthy working environment. Appropriate sanitary conditions, health and safety policies and procedures must be implemented and followed.
- **Protection of whistleblowers:** Wherever legally permissible, our suppliers should ensure the protection of employee and whistleblower confidentiality and the prohibition of retaliation against employees who participate in such programmes.

Protection of the environment

Stahlton endeavours to protect the environment in its supply chain. We also expect this from our suppliers:

- **Compliance with environmental regulations:** All applicable laws and regulations relating to environmental protection must be complied with.
- **Proactive environmental management:** Environmental protection should be considered an integral part of business operations, with all reasonable efforts being made to minimise the environmental impact of activities, products and services as far as practicable in the interests of continuous improvement.

4. Implementation and monitoring

Stahlton expects its suppliers to comply with the provisions set out in this Supplier Code of Conduct, as this is a prerequisite for doing business with Stahlton.

Stahltons key suppliers must sign this Supplier Code of Conduct.

5. Supplier signatures

We hereby confirm that we have read and understood the contents of this Code of Conduct and that our company agrees to act accordingly:

Company (with company stamp)
Name(s) and function(s)

Date and signature(s)
