

CONTRACTOR CODE OF CONDUCT

Steuler Anlagenbau GmbH & Co. KG

Creation date 03.03.2022
Last update 01.05.2024

Created	Reviewed	Released	Document no. Ticket no.
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CHANGE HISTORY

Version	Name	Date	Status	Description	Informed
1	Arndt	01.05.2024	Release	Editorial changes (spelling)	SAB, SSV

1 INTRODUCTION

1.1 FOREWORD

Economic success and social responsibility cannot be separated from each other. Responsible and ethical behaviour towards employees, business partners, society and the environment is an integral part of Steuler Anlagenbau. We understand sustainability as an essential part of our business processes. As a technology company, we procure raw materials, goods and services from contractors worldwide in order to ensure the sustainable success of our customers with innovative product and service solutions. The basis for this is responsible corporate governance geared towards long-term value creation. For this reason, we involve contractors directly in our sustainability strategy. In our purchasing activities, we pay attention not only to process-related, economic and technical criteria, but also to social and ecological aspects as well as human rights, working conditions, corruption prevention and environmental protection.

In the area of conflict between products, performance, market, region and process, costs, quality, reliability, innovation and sustainability are essential factors for us to select and evaluate contractors. Steuler Anlagenbau (hereinafter referred to as "Steuler") feels bound to the following rules too.

1.2 EXPECTATIONS AND VALIDITY OF THE STEULER CONTRACTOR CODE OF CONDUCT

Steuler expects its contractors to comply in their activities with the applicable national laws, the principles of the United Nations Global Compact and this Steuler Contractor Code of Conduct. Furthermore, they are expected to have implemented appropriate processes that support compliance with applicable laws in their companies and promote continuous improvement with respect to the principles and requirements of the Steuler Contractor Code of Conduct. Furthermore, Steuler expects its contractors to ensure that their affiliates also comply with and acknowledge all of the principles and requirements described herein. For the purposes of this declaration, „affiliated companies“ shall mean companies which are beneficially owned, directly or indirectly, by the principal company to the extent of at least fifty per cent (50%) of the voting share capital.

Business partners within the meaning of this Contractor Code of Conduct, from whom we expect compliance with our standards set forth herein, are all third parties acting for, on behalf of or jointly with Steuler. These include contractors, distributors, consultants, brokers, minority shareholders, commercial agents and freelancers.

2 INTEGRITY

2.1 COMPLIANCE WITH APPLICABLE LAW

Compliance with all applicable laws and regulations is a matter of course for us. We expect the same from our business partners. This is the only way to ensure a trusting and long-term business relationship.

In individual countries, business areas or markets, stricter regulations may exist than those described in this Contractor Code of Conduct. In such cases, the stricter rules shall apply.

2.2 FOREIGN TRADE LAW

National and international laws regulate the import, export or domestic trade of goods, technologies or services, the handling of certain products, and capital and payment transactions. Appropriate measures must be taken to ensure that transactions with third parties do not violate applicable economic embargoes or regulations on trade, import and export control or on combating the financing of terrorism.

2.3 PROTECTION AGAINST CORRUPTION AND BRIBERY

Steuler expects its contractors not to tolerate corruption and to ensure compliance in their companies with the United Nations (UN) and Organisation for Economic Co-operation and Development (OECD) conventions on combating corruption and the relevant anti-corruption laws. In particular, they shall ensure that their employees, subcontractors or representatives do not offer, promise or grant any advantages to Steuler employees or related third parties with the aim of obtaining a contract or any other preferential treatment in business dealings.

2.4 INVITATIONS AND GIFTS

Steuler expects its contractors not to misuse invitations and gifts to influence. Invitations and gifts to Steuler employees or persons close to them will only be granted if the occasion and extent are appropriate and they are considered and tolerated as a permissible expression of locally recognised business practice. Similarly, contractors do not demand unreasonable benefits from Steuler employees.

2.5 CONFLICTS OF INTEREST

Steuler expects its contractors to make decisions related to their business with Steuler exclusively on the basis of objective criteria. Conflicts of interest with private interests or other economic or other activities, including those of relatives or otherwise related persons or organisations, are avoided from the outset.

Business partners who are affected by a potential or actual conflict of interest in their activities relating to Steuler are obliged to disclose and resolve it immediately.

2.6 FAIR COMPETITION

Steuler expects its contractors to behave fairly in competition and to observe the applicable competition and antitrust laws. Contractors neither participate in agreements with competitors that violate antitrust law nor do they abuse their market position. They refrain from restrictive agreements with competitors, contractors, distributors, dealers and customers as well as other restrictive practices. These include, for example, price fixing with competitors, the sharing of customers or sales territories between competitors, anti-competitive boycotts and the unlawful exchange of competitively sensitive information with competitors.

2.7 PROTECTION OF ASSETS AND PROPERTY

Any form of fraud or asset-damaging offences (e.g. fraud, embezzlement, theft, misappropriation, tax evasion or money laundering) is prohibited, irrespective of whether Steuler company assets or the assets of third parties are damaged as a result. Steuler expects its contractors to comply with the relevant legal obligations to prevent money laundering and not to engage in money laundering activities.

2.8 PROTECTION OF INTELLECTUAL PROPERTY

Intellectual property refers to rights to intangible creations (products of intellectual work), regardless of their commercial value. Intellectual property is protected by law (e.g. by copyright, trademark, design or patent rights) as trade secrets or know-how.

The protection of intellectual property is essential to Steuler's business policy as a company and is therefore also expected from our business partners.

2.9 PRIVACY

When collecting, storing, processing or transmitting personal data (e.g. name, address, telephone number, date of birth, health information) from employees, customers or other third parties, our business partners must exercise the utmost care and strict confidentiality and comply with applicable laws and rules.

2.10 FINANCIAL INTEGRITY

Business transactions, assets and liabilities are recorded and documented in accordance with legal requirements. Documents relevant to financial accounting must not be deliberately provided with false or misleading entries. Any form of balance sheet manipulation is prohibited. Business transactions shall be documented or posted under all circumstances.

2.11 CONFIDENTIALITY AND BUSINESS INFORMATION

Our business partners shall ensure that confidential information and data are carefully stored, not forwarded to or made accessible to unauthorised persons and used exclusively for the agreed business purposes. Discussing confidential information in public and social media or unauthorised disclosure of information about the company or its customers to third parties, such as the media or competitors, is a breach of confidentiality and may constitute breaches of competition law and give rise to substantial claims for damages.

2.12 INFORMATION SECURITY

In everyday business, information worthy of protection is regularly used and processed with IT systems. This requires appropriate safeguards (processes, approved technologies and licensed software) to ensure the protection of intellectual property and personal data. Contempt of necessary security measures can lead to serious consequences, such as loss of data, theft of personal data or infringement of copyright.

Our business partners undertake to use the information provided by Steuler only for the fulfilment of the agreements existing with Steuler and not for improper own or personal purposes or for unethical or illegal activities.

It is the responsibility of our business partners to ensure that all necessary measures are taken to protect sensitive information from internal and external misuse and threats.

3 HUMAN AND LABOUR RIGHTS

3.1 COMPLIANCE WITH APPLICABLE STANDARDS AND LAWS

Steuler expects its contractors to comply with the fundamental labour rights of the respective applicable national and international laws and to recognise the core labour standards of the International Labour Organisation (ILO) and the International Human Rights Charter of the United Nations, taking into account the laws and legal forms applicable in the various countries and locations. Steuler expects its contractors to respect the rights of third parties and to keep any impairments as low as possible in compliance with international standards.

3.2 CHILD LABOR

Steuler expects contractors to prohibit and refrain from any kind of child labour within the meaning of ILO Conventions 138 and 182 and national laws in their companies. The minimum age of a child or adolescent for employment or work shall not be less than the age at which compulsory education ends in the country where the business partner is engaged in business.

3.3 FORCED LABOR

Steuler expects its contractors not to allow or engage in any form of forced labour or human trafficking in their companies. Forced labour, i.e. any work required of a person against their will and under threat of punishment, as well as modern forms of slavery and human trafficking are also not tolerated by our business partners.

3.4 DISCRIMINATION

Steuler expects its contractors to promote equal opportunities and equal treatment and to prevent discrimination in the recruitment of employees and in the promotion or granting of training and further education measures. No employee may be discriminated against on the grounds of gender, age, marital status, skin colour, nationality, ethnic, political or social origin, sexual orientation, disability, religion or world view or political opinion.

3.5 FREEDOM OF ASSOCIATION

Steuler expects its contractors to respect the rights of employees to form an employee representation and engage in collective bargaining in accordance with national legislation.

3.6 WORKING HOURS AND REMUNERATION

Steuler expects its contractors to comply with the respective applicable national legislation on working time. Furthermore, it is expected that the contractors' employees receive remuneration that is in compliance with the respective applicable national laws.

3.7 CONFLICT MINERALS

Steuler expects its contractors to comply with all applicable conflict minerals legislation. In the event that a product contains one or more of the so-called conflict minerals (tin, tantalum, tungsten, gold or the corresponding ores), Steuler expects its contractors to be able to ensure transparency about their supply chain up to the smelter upon request.

4 HEALTH PROTECTION AND OCCUPATIONAL SAFETY

HEALTH AND SAFETY

Steuler expects its contractors to comply with the respective applicable national legislation on health protection and occupational safety. Furthermore, contractors are expected to establish and apply an appropriate occupational safety management system (e.g. according to SCC** or ISO 45001). This includes, on the one hand, the containment of actual and potential occupational safety risks and, on the other hand, the training of employees to prevent accidents and occupational diseases in the best possible way.

5 ENVIRONMENTAL PROTECTION

RESPONSIBLE USE OF NATURAL RESOURCES

Steuler expects its contractors to comply with applicable national environmental laws, regulations and standards in order to minimise environmental impacts and hazards and to ensure and improve environmental protection in daily business operations.

Steuler expects its suppliers to comply in particular with the European Chemicals Regulation REACH („Registration, Evaluation, Authorisation and Restriction of Chemicals“) as well as the European Directive RoHS on the Restriction of certain Hazardous Substances („RoHS“) or the locally valid equivalents in the respective applicable version and to send corresponding safety data sheets without being requested to do so.

Steuler expects from its suppliers that they take fundamental care, especially in the development of new products and services as well as in the operation of production facilities, to ensure that any negative impacts on the environment and climate are kept as low as possible. Steuler understands this to mean the following in particular

- the reduction of waste
- the economical use of natural raw materials
- the reduction of greenhouse gas emissions
- the reduction of the use of energy from fossil fuels
- that climate-neutral solutions are preferred

6 CONTRACTOR RELATIONS

SUBCONTRACTOR

Steuler expects its contractors to communicate all of the principles and requirements described here to their subcontractors and to also take them into account when selecting them. Contractors shall encourage their subcontractors to comply with the described standards on integrity, human and labour rights, health and safety and environmental protection in the context of fulfilling their contractual obligations. Furthermore, Steuler expects its contractors to use only materials from legal sources and to be able to prove this upon request.

7 COMPLIANCE WITH THE STEULER CONTRACTOR CODE OF CONDUCT

7.1 COMPLIANCE

Compliance with the principles and requirements of this Steuler Contractor Code of Conduct by the contractors shall be verified by means of a contractor self-assessment. In addition, on-site audits can be carried out by Steuler or a third party commissioned by Steuler in coordination with the contractor.

7.2 VIOLATIONS

Any breach of the principles and requirements set out in the Steuler Contractor Code of Conduct will be considered as a material impairment of the contractual relationship on the part of the contractors. In the event of suspected non-compliance with the described principles and requirements of the Steuler Contractor Code of Conduct, Steuler reserves the right to demand information about the relevant facts. Furthermore, Steuler shall have the right to extraordinarily terminate without notice individual or all contractual relationships with contractors who demonstrably do not comply with the Steuler Contractor Code of Conduct or who do not strive for and implement improvement measures after they have been given a reasonable period of time to do so by Steuler.