

Code of Conduct

Preface:

Our Code of Conduct is based on our corporate values.

Responsible and lawful conduct is an integral part of the STM corporate culture and forms the basis for the trust that customers, business partners and the public place in us. This Code of Conduct applies to all employees, managers, other bodies and owners of all companies in the STM Group located in the D-A-CH region. Everyone is obliged to act in accordance with the corporate values and the Code of Conduct of the STM Group. In addition to this Code of Conduct and independently of it, the respective applicable laws apply. Furthermore, we support and encourage all business partners and suppliers to also take these principles into account.

Code of Conduct

1. Quality Management

The STM Group produces and distributes products and services that meet the requirements of the client and statutory regulations.

In doing so, STM uses state-of-the-art technology and strives to provide lasting support for people and the environment within the scope of its influence. In order to maintain the quality of the products and services offered at a constantly high level, a Quality Management system has been introduced that covers all work steps and meets all company requirements. All company employees are required to adhere to, apply, and constantly optimize this system. Annual objectives and the monitoring of their achievement are a further component of Quality Management.

2. Basic behavior: STM employees

The actions of all persons within the STM Group are guided by universally valid ethical values and principles. In particular these include integrity, righteousness, respect for human dignity, openness and non-discrimination of religions, world views, gender and ethnicity. These values are an important part of our corporate culture.

In doing so, we respect the privacy of our employees. We are committed to promoting equal opportunity and diversity and, to ensuring that, all employment decisions (e.g. hiring, promotion, training and development) are made solely on the basis of the individual's skills and qualifications.

The STM Group rejects any form of sexual harassment of employees and takes all legal measures against such behavior.

Good cooperation includes honest, open and nevertheless polite communication at all levels of the company. We take this into account both internally and externally with respect to business partners, authorities and government agencies or the public.

As a matter of principle, all employees of the STM Group assume responsibility for their own actions and conduct. In doing so, the values and principles of conduct of the STM Group must always be taken into account to the best of their knowledge and belief.

Code of Conduct

People who behave illegally or even enrich themselves at the expense of the company harm everyone in the company, the management and the employees. Such behavior reduces the company's economic success, its ability to invest and grow and can ultimately also endanger jobs.

The Code of Conduct serves as a guideline for our decisions and actions and specifies standards for responsible behavior towards business partners and the public, but also for our conduct within the company.

All STM employees are sensitized to legal risks and are obliged to comply with the principles set out here. Compliance with all applicable laws for the D-A-CH region is a matter of course for STM.

In the event of a violation of laws or internal policies, employees must expect appropriate consequences, up to and including disciplinary measures under applicable labor law. Such violations may also have consequences under criminal and liability law.

Executive managers have a special role model function in this respect. Embodying our values in a credible manner, exemplifying our corporate culture and taking consistent action against any behavior that is not in line with the law or the company's core values – these tasks are part of the responsibility of every manager at STM.

Furthermore, every manager should create a climate in which issues can be addressed openly and without concern for reprisals.

All employees

- are carefully selected on the basis of their personal and professional suitability.
- are to be assigned tasks and goals in a comprehensible, precise and binding manner.
- are to be instructed in such a way that they comply with this Code of Conduct as well as applicable statutory requirements.

Trust is an important component of good teamwork. In order to achieve trust at all levels of the company, we build on honesty and respectful interaction with each other. Targeted misinformation or the deliberate or careless dissemination of untrue statements about colleagues or facts will not be tolerated in the STM Group.

Confidentiality

STM's internal affairs that have not been disclosed to the public by the company's management must be kept confidential. In particular this applies to strategic or organizational details, any production processes and innovations under development or internal reporting figures. This principle also applies to all employees after termination of their employment at STM.

3. Behavior towards business partners

Fair dealings with business partners

Our business partners (e.g. customers, suppliers, agents and consultants) expect to be able to rely on STM as a legally compliant business partner.

We maintain fair dealings with all business partners as well as third parties and support respectful cooperation.

Relevant law and legal regulations

We expect our business partners to comply with the law in their business practices and adhere to the specified principles just as the STM Group does.

All business activities follow the applicable competition law provisions, laws and regulations. Anti-competitive agreements between competitors are not permitted. All employees of the STM Group are obliged to follow these regulations, because only fair competition enjoys the right to develop freely.

Fair competition and antitrust law

We espouse the principle of fair competition. We are committed to compliance with applicable antitrust and competition law and seek the advice of the Legal Department on antitrust and competition issues.

Foreign economic activities

In our international activities, we comply with all applicable rules of foreign trade, tax and customs law of those countries in which we do business.

4. Dealing with finances

STM strives to continue developing the company as an independent family business. For this purpose, it is very important to us to deal with monetary resources in a sustainable way and to avoid wasting money.

Financial responsibility

The STM Group conducts business, record keeping and financial reporting in a proper and transparent manner. Business transactions and records of our company must be correct and proper. We record and document all business transactions, assets and liabilities in accordance with legal requirements. To ensure proper documentation and record keeping, the highest level of accuracy and completeness as well as a sense of responsibility are indispensable in all business processes.

Corruption, extortion and bribery

STM rejects all forms of corruption, including bribery and extortion. By contrast, we promote transparency and responsible management and control. Employees may not offer, promise, grant or approve any benefits (such as money, gifts, gratuities or other services) in direct or indirect connection with their business activities, nor accept or demand such benefits from others. Invitations, gifts and gratuities, if they exceed a reasonable level or symbolic value, must be politely but firmly declined. In case of doubt, the recipient's supervisor must be asked for permission in advance. Disclosure shall not result in any disadvantages for the person concerned.

Gifts of any kind must not be made to civil servants or other state officials.

Employees make their full working capacity available to the company and may not engage in any activity that competes with any member of the STM Group. Direct and indirect shareholdings in a competitor company or a company of a business partner are prohibited.

5. Handling information

We are aware of the high sensitivity of the personal data of our customers, employees and suppliers as well as the company's own data and protect such data by careful and trustful handling. The STM Group ensures to the best of its ability that the data is only used within the permitted scope.

If any information is passed on, it must be checked whether the recipient is entitled to receive it. This applies both within and outside the company.

In addition, the requirement of confidentiality applies in order to prevent internal information from leaking to the public.

Preventing external threats, such as general crime or industrial espionage within one's own sphere of influence, is the task of every employee, and especially of managers.

Within the scope of their duties and beyond, all employees are obliged to comply with the provisions of data protection law as well as the statutory and company regulations on information security. The misuse of confidential data is strictly prohibited.

Data privacy

The STM Group observes the principle of data avoidance and data economy. It collects only those data that are really necessary to provide its products and services. The STM Group takes all appropriate technical and organizational measures to ensure the security of its customers' data. It ensures, to a reasonable extent, that this data is not released or further processed without due authorization. When processing personal data, it complies with the applicable data privacy requirements and regulations. Furthermore, the STM Group ensures that the information security requirements for processing information of its customers, suppliers and employees are met.

Conflicts of interest

In our daily work, we may have to face business decision-making situations in which the interests of the company conflict with our personal interests. Conflicts of interest can mean that decisions are no longer made impartially in the interests of the company. Employees who are affected by a possible or actual conflict of interest are obliged to promptly inform their superiors or the management in order to bring about a rapid clarification.

Intellectual property and plagiarie

Intellectual property is essential. We expect every employee to protect our intellectual property without fail. In particular, every employee is responsible for making absolutely sure that no information about our intellectual property is disclosed to third parties. In the same way in which we protect our own intellectual property, we also respect the intellectual property of others. Business secrets shall be treated confidentially; they may be disclosed to employees only within the framework of their business activities.

Plagiarized products may not be used, further processed, or placed on the market.

Disclosure of information

Unauthorized disclosure, duplication or dissemination of confidential data or intellectual property belonging to or entrusted to the STM Group is not permitted. Information on business activities, company performance and financial situation must be maintained and disclosed in accordance with generally accepted accounting principles.

6. Environmental protection

We are aware of our responsibility towards the environment and the generations that follow us. Within the scope of our influence, we strive to provide lasting protection for the natural environment and to conserve its resources.

At all company sites, we implement the best possible environmentally friendly practices, which we continuously improve. Environmental protection regulations and standards must be met at all operating sites. The STM Group aims to continuously improve the environmental compatibility of its business activities, and in doing so, to use raw materials and the environment carefully and responsibly. Furthermore, we set ourselves the corporate goal of making an effective contribution to reducing CO₂ emissions. The STM Group has been audited and certified according to the environmental standard DIN EN ISO 14001:2015 since December 2021.

Code of Conduct

For us, it is a matter of course to handle natural resources with utmost responsibility and foresight. Furthermore, we support the use of modern, efficient and environmentally friendly technologies.

The STM Group contributes to the appropriate extent to:

- keep the air clean and thus increase **air quality**.
- avoid **waste**:
The handling, storage, transport and disposal of waste must not have any harmful effects on air, soil, water or the health of employees, and must be carried out by qualified persons.
- maintain **water quality** and the economical use of water:
All types of wastewater, for example from production processes, operating procedures, sanitary facilities, etc. are disposed of in accordance with regulations.
- conduct responsible **chemical management**:
A safety data sheet is available for each chemical present. Safety data sheets contain information on handling, storage, transport, disposal, critical and important material data, possible hazards and first aid measures.

7. Social responsibility

We ensure the continuation of the family business since 1977. The well-being of every person within the sphere of influence of our company is close to our hearts. We expect the same from our suppliers and partners. Respect for internationally recognized human rights is the basis of all our business relationships. Regular audits and protocols by external safety officers and company physicians ensure optimal working conditions. The HR department conducts regular audits of our employment contracts.

Child labor and young workers

The STM Group respects internationally recognized human rights and supports their observance. In addition, the company strictly rejects any form of forced labor and child labor. The STM Group only employs personnel who are of the minimum age required by law.

Appreciation

We value each and every employee as an individual personality. This appreciation goes far beyond the economic benefits for the company. We treat our employees and business partners with fairness and tolerance. Any form of discrimination, sexual harassment, or personal attacks is contrary to our corporate principles and will not be tolerated.

Employee development

The know-how, skills and commitment of our employees are the basic prerequisites for the success of our company group. Taking into account the economic possibilities, we want to qualify and develop our employees personally and professionally. Our personnel development is geared to the long term. This involves reconciling the preservation of jobs, the promotion of young skilled workers, the needs of our employees and the prevailing general economic conditions.

Health protection and occupational safety

Occupational safety and health management have the highest priority in the STM Group.

We consider it a central concern to offer our employees a healthy and safe working environment. We are committed to minimizing the risks to which our employees are exposed by taking appropriate measures to prevent health impairments and accidents. The working conditions of our employees are designed to meet their needs and are subject to a continuous improvement process. All applicable statutory requirements for health protection, workplace

ergonomics and occupational safety are observed. Managers have an important and necessary role model and instruction function. Regular audits and protocols by external safety officers and company physicians ensure optimal working conditions.

Preservation of fair working conditions

The STM Group pays attention to fair working conditions for all employees in all associated companies. This includes compliance with the respective national regulations as well as the right to appropriate remuneration, which is based at least on the respective statutory minimum wages. Likewise, all contractually agreed salaries, benefits and nationally prescribed social benefits are paid or deducted. In addition, the STM Group supports the further qualification of its employees.

Wages and benefits

The Company guarantees not to pay wages below the legally applicable minimum wage. The remuneration paid to employees must comply with all applicable laws on wages and salaries, including the provisions on minimum wages, overtime and benefits established by law.

Prohibition of forced and compulsory labor (modern slavery)

The STM Group does not use forced or compulsory labor, which means any work or service performed under the threat of punishment or for which someone has not volunteered to perform. It is also forbidden to withhold personal identification documents from employees upon commencement of employment.

Working time

The STM Group ensures that the applicable legal working time restrictions are observed. The maximum permitted working hours per week are regulated by national laws and in accordance with the conventions of international labor organizations. The limitation of overtime is regulated in accordance with regional legal or contractual obligations. Employees are entitled to at least one day off per calendar week, except in exceptional circumstances and for a limited period of time. The department heads shall ensure that the necessary work breaks are taken so as not to endanger the safety and health of the employees.

Freedom of association and collective bargaining

The STM Group respects the right of employees to freedom of association and collective bargaining. The STM Group complies with all legal regulations related to employee representation.

Harassment and non-discrimination, see also Point 2.

Employees shall be treated with respect and dignity. No employee shall be the victim of humiliating or physical punishment, the victim of physical, sexual, psychological or verbal threats or abuse. The STM Group will not allow or commit any discriminatory actions. Discrimination means any distinction, exclusion or preference that limits equal treatment or access to work and employment, and that may be based on skin color, gender, religious belief, political opinion, age, national/social/ethnic origin, family responsibilities or similar considerations of this nature. The right to freedom of opinion and expression shall be protected and guaranteed.

8. Violations (Whistleblowing)

Conduct that may be unethical, illegal, violate professional standards, or otherwise inconsistent with the Code of Conduct, may be reported to the Management or Quality Management at any time.

For all employees it is possible – via the platform Personio – to report violations legally compliant and anonymous. Violations can also be reported by e-mail: whistleblower@stm-stahl.de.

9. Supply Chain Care

Currently the STM Group is not directly affected by the regulations of the Supply Chain Due Diligence Act. Nonetheless the STM Group is aware of its responsibility.

The STM Group tries to implement the requirements which arise from the Supply Chain Due Diligence Act with greatest care. The Corporate Due Diligence is ensured by the STM Group throughout the whole supply chain. The essential core elements of the duty of care according to the human rights are taken into account in particular.

The following criteria are basic requirements:

- Statement of principles
- Risk determination
- Implementation of the resulting measures
- Implementation of a complaint mechanism
- Reporting to management

The duty of care throughout the supply chain is ensured by a supplier questionnaire and the implementation of the issue into the general terms and conditions of purchase.