

## Behaviour in the business environment

### Law-abiding behaviour

Complying with applicable laws and regulations is a matter of course for us. We are responsible for complying with the laws in our business area and are requested to continuously monitor our work activities in terms of lawfulness, responsibility and fairness. We observe the applicable legal obligations and comply with them at all times. If we are unsure about a decision, we contact our managers or the Legal and Compliance contact person. In our operations, we mainly adhere to the principle of compulsory prosecution, independent of whether or not this results in an advantage or profit for STEINERT GmbH or individual persons. Conflicts of interest with private relevance or other economic or alternative activities are to be avoided from the outset. If they nevertheless arise, they must be resolved in accordance with the law and the applicable internal policies.

In addition, STEINERT maintains a cooperative and lawful relationship with governmental and supervisory authorities and public institutions.

We properly comply with the policies for financial accounting and reporting. In doing so, we conduct our business, the storage of documents and financial reporting in a proper and transparent manner. Recordings and reports must be correct and truthful.

We comply with the policies for communication and advertising and do not make any intentionally misleading or false statements in marketing or advertising our products. Our product quality is a key component of our business and process-oriented management, error prevention and improvement as well as extensive quality management are therefore essential. All employees are responsible for maintaining product safety and quality and for always providing truthful information.

### Prohibition of corruption and compliance with competition and antitrust laws

Corruption and antitrust violations are not tolerated. For us, bribes or cartel agreements are not an option for obtaining orders. The basis of trust and cooperation with our customers, suppliers and cooperation partners is a key component of our success. Therefore, we want to continue to contribute to fair competition. Under any circumstances, we thus avoid exerting unfair influence on politics and law. STEINERT does not partake in money laundering activities or financing of terrorism. In case of doubt, every employee is requested to have unusual financial transactions, particularly those involving cash money, checked by the Financial Accounting department or by the Legal and Compliance contact person.

Furthermore, we also do not deceive customers, authorities or the public and also do not contribute to such a deceit through third parties.

Violations are not tolerated and lead to sanctions provided by law and to disciplinary measures up to termination of deployment and claim of compensation.

## **Behaviour towards employees, the society and the environment**

### **Compliance with human rights and prohibition of forced labour and child labour**

We respect and value internationally recognised human rights, personal rights and the dignity of our employees and third parties. We strictly reject any form of forced labour or child labour, slavery or exploitation, and we expect our suppliers and business partners to share these values and commit to complying with them.

### **Equal treatment, equal opportunities and prohibition of discrimination**

We equally respect and protect the personal dignity of every individual and do not tolerate any form of discrimination or harassment of our employees. Mutual trust and respect are of major importance to us. We treat all employees equally, irrespective of their gender, age, skin colour, culture, ethnic origin, sexual identity, disability and religious or ideological beliefs. At STEINERT, we maintain a respectful, cooperative relationship with each other and diversity is promoted in all areas.

### **Acting in an ecologically responsible and resource-efficient manner**

We promote careful treatment of the environment and contribute to reducing influences that harm the environment and preparing materials in their purest form. Sustainable environmental and climate protection as well as resource efficiency are important business objectives for us. Both during the development and production of our products, we make sure that all resulting impacts on the environment and climate are kept as low as possible. Every individual employee is responsible for treating resources in an efficient manner and contributing to climate and environmental protection through their individual behaviour. It is our job to keep the impacts on the environment as low as possible and to use resources sparingly. Our products make a positive contribution to environmental and climate protection for our customers.

### **Social commitment and charitable activities of the company**

We consider ourselves an active member of society and are therefore involved in various ways. Donations and other forms of social commitment are solely made in the interest of the company. Furthermore, we work in close cooperation with universities and institutions to support young people during their training and studies.

### **Public image and communication**

We respect the right to freedom of speech and the protection of personal rights and privacy. Each employee shall be aware that they may be perceived as a part and representative of the STEINERT Group in their private life. Therefore, we ask to protect the company's image and reputation by behaving and appearing appropriately in public. When expressing private opinions, we take care not to refer to the respective function or activity in the company.

## **Behaviour in everyday business and work**

### **Occupational safety and protection of health**

The safety and health of our employees is a major concern for us and an important business objective at the same time. We promote occupational safety and health protection in our working environment; every employee is therefore required to comply with the applicable regulations on occupational and health safety. Managers are obliged to instruct and support their employees in fulfilling this responsibility. The same safety standards apply to employees of subcontractors. It is our job to avoid risks to people. Processes, business premises and consumables must thus comply with legal and internal regulations on occupational safety, health, fire and environmental protection.

### **Data protection - Handling of personal data and confidential information**

Data protection and in particular protection of personal data of employees, customers, business partners and suppliers are of high importance for STEINERT. The collection, storage or processing of personal data is not permitted without the consent of the data subject or any other lawful reason. We keep confidential information of the company secret. This obligation also applies after termination of the employment contract.

### **Protection of intellectual property and business secrets**

We use tangible and intangible property of STEINERT GmbH exclusively for business purposes and protect it from loss, theft or misuse. Intellectual property includes commercial property rights as well as works of third parties that are protected by copyright. We respect intellectual property of third parties and only use it if the corresponding rights of use are granted to us. If the intellectual property has been disclosed to us under a confidentiality agreement, it may only be disclosed in compliance with the provisions of this confidentiality agreement.

### **IT security**

We use the IT systems provided by our company to fulfil our tasks and contribute to the protection of these systems and devices against internal and external misuse. For protection against cyberattacks, we pay careful attention to the content of emails, attachments or other files. This requires suitable safety measures such as passwords or licensed software to guarantee the protection of intellectual property or personal data. We commit to use the IT systems provided by the company to fulfil the business tasks and not to use it for inappropriate or unauthorised private purposes.

## Implementation and contact person

### Reports of possible violations

We are requested to inform our managers of possible violations against the provisions in this Code of Conduct. Furthermore, we can always contact the Compliance contact person. We have the option of providing information by stating our name or anonymously via the STEINERT whistleblower system. We investigate all reports and violations. Violations are remedied and appropriate consequences are drawn. All reports are handled with confidentiality. We encourage our employees to address issues openly and without concern about disadvantages.

### Internal control system

STEINERT has an effective risk management that is appropriate in terms of nature and scope of our business activities and is constantly adapted to also counteract future risks in a targeted manner. Every employee is requested to actively contribute to the implementation of the STEINERT compliance program in their area of responsibility.

### Communication and training

STEINERT employees receive regular information and training on current issues in connection with this Code of Conduct. Compliance issues and risks are communicated openly within our company.