



# Supplier Code of Conduct

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**Störk-Tronic, Störk GmbH & Co KG,  
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is committed to ecologically and socially responsible corporate governance. We expect the same behaviour from all our suppliers. We also expect our employees to observe the principles of ecological, social and ethical behaviour and to integrate them into our corporate culture. We also endeavour to continuously optimise our business activities and our products in terms of sustainability and ask our suppliers to contribute to this in the sense of a holistic approach.

In order to ensure that our values are maintained in the future, we have defined four main areas that are key to this: service, quality, the independence of our company and social and environmental responsibility.

For future co-operation, the contractual partners agree to the validity of the following regulations for a joint code of conduct. This agreement shall form the basis for all future deliveries. The contracting parties undertake to fulfil the principles and requirements of the Code of Conduct and to endeavour to contractually oblige their subcontractors to comply with the standards and regulations set out in this document. This agreement comes into force upon signing. A breach of this Code of Conduct may ultimately be cause and reason for the company to terminate the business relationship, including all associated supply contracts.

The Code of Conduct is based on national laws and regulations such as the Supply Chain Due Diligence Act (LkSG) and international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the international labour standards of the International Labour Organization and the United Nations Global Compact.

**The supplier and/or business partner hereby declares:**

## **1 Compliance with the law**

To comply with the laws and regulations of the applicable legal systems.

## 2 Social responsibility

Ensure that all internationally proclaimed human rights are respected by avoiding causing and participating in human rights violations. Increased attention must be paid to respecting the human rights of particularly vulnerable rights holders or groups of rights holders, such as women, children, migrant workers or (indigenous) communities.

### 2.1 Ban on forced labour

- Neither use nor contribute to slavery, servitude, forced or compulsory labour or human trafficking.
- All work must be voluntary and without threat of punishment.
- Employees must be able to terminate their work or employment relationship at any time.

### 2.2 Ban on child labour

- Child labour must not be used at any stage of production.
- Adhere to the recommendation in ILO Convention 138 on the minimum age for the employment of children. Accordingly, the age should not be less than the age at which compulsory schooling ends according to the law of the place of employment and in any case not less than 15 years.
- If children are found at work, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school.
- The rights of young workers under the age of 18 must not be employed for work that is harmful to the health, safety or morals of children. Special protective regulations must be observed.
- Not to hire workers for risky labour who are not at least 18 years old according to ILO Convention 182.

### 2.3 Non-discrimination of and respect for employees

- Discriminatory unequal treatment of employees in any form is not permitted unless it is justified by the requirements of the employment.
- To promote equal opportunities and equal treatment of its employees regardless of their skin colour, race, nationality, pregnancy, political affiliation, ethnic or social origin, any disability, sexual identity and orientation, disability, health status, religious and political beliefs, world views, gender or age.
- Not to tolerate inappropriate treatment of workers, such as psychological hardship, sexual harassment or discrimination, including gestures, language and physical contact that is sexual, coercive, threatening, abusive or exploitative.
- The personal dignity, privacy and personal rights of each individual are respected.
- Security forces must not be commissioned or used if persons are treated or injured in an inhumane or degrading manner during their deployment or if freedom of association is impaired.
- The employee representatives of employee organisations must be protected from discrimination. Employees may not be discriminated against on the basis of founding, joining or membership of such an organisation.
- Employee representatives must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

## 2.4 Working hours, remuneration & additional benefits for employees

- Recognise the right of employees to form and join trade unions and to participate in collective bargaining.
- neither favour nor discriminate against members of employee organisations or trade unions.
- Comply with the applicable working time regulations worldwide.
- The remuneration for regular working hours and overtime must correspond to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher.
- In the case of cross-border personnel deployment, to comply with all applicable legal provisions, in particular with regard to minimum wages.
- To provide employees with all legally prescribed benefits.
- That employees receive clear, detailed and regular written information about the composition of their remuneration.
- Wage deductions are not permitted as punitive measures.
- The working hours comply with applicable laws or industry standards.
- Overtime is only permitted if it is worked on a voluntary basis and in accordance with national statutory regulations.

## 2.5 Employee health & safety

- To act in accordance with applicable legal and international standards relating to health and safety in the workplace and to ensure safe working conditions.
- Provide regular training and ensure that all employees are informed and trained on health and safety issues in accordance with applicable standards.
- To establish and apply an appropriate health and safety management system in order to take the necessary precautions against accidents and damage to health that may arise in connection with the activity.
- Appropriate measures must be taken to prevent excessive physical or mental fatigue.
- Providing employees with access to sufficient quantities of drinking water and access to clean sanitary facilities.

## 2.6 Complaints mechanism

- To provide employees with access to a protected procedure for reporting possible violations of the principles of this Code of Conduct.

### 3 Ecological responsibility

- To act in accordance with applicable legal norms and international standards relating to the environment, to minimise environmental pollution and continuously improve environmental protection.
- Establish and apply an appropriate environmental management system.
- Do not deprive people of land, forests or waters whose use secures their livelihoods in violation of legitimate rights.
- Wastewater from operational procedures, production processes and sanitary facilities must be standardised, monitored, checked and, if necessary, treated prior to discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.
- The use and consumption of resources during production and the generation of all types of waste, including water and energy, must be reduced or avoided. This is done either directly at the point of origin or through procedures and measures, e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, by economising, by recycling or by reusing materials.
- The supplier shall follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. The prohibitions on the export of hazardous waste in the Basel Convention of 22 March 1989, as amended, must be observed.
- Chemicals or other materials that pose a risk when released into the environment must be identified and handled in such a way that safety is ensured when handling, transporting, storing, using, recycling or reusing and disposing of these substances. Mercury shall be used in accordance with the prohibitions of the Minamata Convention of 10 October 2013 and persistent organic pollutants in accordance with the Stockholm Convention of 23 May 2001, as amended.
- Energy consumption must be monitored and documented. Economic solutions must be found to improve energy efficiency and minimise energy consumption.
- For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the company establishes processes in accordance with the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and expects its suppliers to do the same. Smelters and refineries without appropriate, audited due diligence processes should be avoided.
- General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be standardised, routinely monitored, verified and treated as necessary prior to release. The supplier is also responsible for monitoring its emission control systems and is required to find cost-effective solutions to minimise any emissions.

## **4 Ethical business behaviour**

### **4.1 Anti-corruption and bribery**

- Not to tolerate any form of corruption or bribery and not to participate in it either directly or indirectly and not to offer, grant or promise any benefits to government officials or private sector counterparties in order to influence official actions or gain an unfair advantage. This also includes refraining from granting and accepting unauthorised facilitation payments.
- The highest standards of integrity must be applied to all business activities.
- The supplier must pursue a zero-tolerance policy with regard to the prohibition of all forms of bribery, corruption, extortion and embezzlement.
- Procedures for monitoring and enforcing standards shall be implemented to ensure compliance with anti-corruption laws.

### **4.2 Fair competition, antitrust law and intellectual property rights**

- To act in accordance with national and international competition laws and not to participate in price fixing, market or customer allocation, market collusion or bid rigging and to apply antitrust laws.
- Respect the intellectual property rights of others.

### **4.3 Product safety**

- To ensure the safety and reliability of its products.
- To apply the implemented quality management as an integral part of all company activities.
- To fulfil or exceed all legal requirements for quality and safety.

### **4.4 Accounting, truthful reporting and financial integrity**

- Maintain books, records, accounts and financial reports in reasonable detail and report transactions truthfully and accurately.
- To condemn all forms of money laundering.
- To do business only with partners who are involved in legitimate business activities and whose funds come from legitimate sources.
- A commitment to fair taxation and to avoid all tax evasion practices, including the non-issuance of receipts or the filing of falsified expense reports.
- Compliance with and assurance of accounting procedures, proper recording and documentation of all business transactions and completeness, honesty, accuracy, timeliness and comprehensibility of all information in financial reports by all employees. All employees must not unduly influence, manipulate or mislead an audit

### **4.5 Conflicts of interest**

- To avoid and/or disclose - internally and in relation to Störk-Tronic - all conflicts of interest that could influence business relationships and to avoid even the appearance of such conflicts of interest.

## 4.6 Terrorist financing

- Neither directly nor indirectly promote terrorist financing.

## 4.7 Intellectual property

- Intellectual property rights must be respected.
- Technology and know-how transfer must be implemented in such a way that intellectual property rights and customer information are protected.
- To meet the reasonable expectations of its client, suppliers, customers, consumers and employees with respect to the protection of private information.
- Comply with data protection and information security laws and regulatory requirements when collecting, storing, processing, transmitting and sharing personal information.

## 4.8 Confidentiality/data protection

- Process personal data confidentially and responsibly, respect the privacy of all and ensure that personal data is effectively protected and used only for legitimate purposes.
- The supplier undertakes to fulfil the reasonable expectations of its client, suppliers, customers, consumers and employees with regard to the protection of private information. The Supplier shall comply with data protection and information security laws and regulatory requirements when collecting, storing, processing, transferring and disclosing personal information.

## 4.9 Export control and customs

- Comply with applicable export control and customs regulations.

## 5 Supply chain

- To make reasonable efforts to ensure that its suppliers comply with the basic principles of this Code of Conduct.
- To comply with the principles of non-discrimination in the selection of suppliers and in dealings with suppliers.
- The risks within the supply chain are identified and appropriate measures are taken.
- In the event of suspected violations and to safeguard supply chains with increased risks, Störk-Tronic is informed promptly and, if necessary, regularly about the violations and risks identified and the measures taken.
- The company checks compliance with the standards and regulations listed in this document using a self-assessment questionnaire and risk-based audits at suppliers' production sites.
- to give its consent for the Client to carry out such audits once a year or for a specific reason to verify compliance with the Code at the Supplier's premises during normal business hours after reasonable advance notice by persons authorised by the Client.
- The right to object to individual audit measures if these would violate mandatory data protection regulations.
- If a breach of the provisions of this Code of Conduct is identified, the Supplier must immediately notify its supplier in writing within one month and set it a reasonable grace period to bring its behaviour into line with these provisions.  
If a remedy is not possible in the foreseeable future, the supplier must report this immediately and, together with Störk-Tronic, draw up a concept with a timetable for ending or minimising the breach. If such a breach is culpable, the grace period expires fruitlessly or the implementation of the measures contained in the concept does not remedy the situation after the expiry of the schedule and a continuation of the contract until ordinary termination is unreasonable for Störk-Tronic and no milder means are available, Störk-Tronic may terminate the business relationship and cancel all contracts after the expiry of the set deadline if he has threatened to do so when setting the grace period.  
A statutory right to extraordinary cancellation without setting a grace period, in particular in the case of very serious breaches, remains unaffected, as does the right to compensation.

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Date, signature supplier