

Code of Conduct

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Code of Conduct of STEINCO Paul vom Stein GmbH

Preamble

STEINCO Paul vom Stein GmbH (hereinafter referred to as "**STEINCO**") exposes ecological and socially responsible corporate governance and strives to continuously optimize its corporate actions and products in terms of sustainability. With the following Code of Conduct, we declare that we understand the UN Guiding Principles on Business and Human Rights (UNGP) and the 17 Sustainable Development Goals (SDGs) as the basis of our actions.

The Code of Conduct is a commitment by STEINCO in dealing with all our company's employees, customers, and suppliers and at the same time serves as an internal and external orientation in dealing with our company. Everyone at STEINCO is bound by the principles of ecological, social, and ethical conduct and must integrate these principles into our corporate culture.

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1. Social Responsibility

1.1. Human Rights and Labour Standards

STEINCO respects and ensures compliance with internationally recognized human rights. We fully observe the national laws as well as the regulations of the United Nations on children's rights and the prohibition of forced labour. In particular, STEINCO undertakes to comply with the ILO Convention on the Minimum Age for Admission to Employment.

1.2. Fair Pay and Working Hours

STEINCO complies with the statutory provisions or binding collective bargaining provisions when remunerating work performance. We ensure that the wages paid by us do not fall below the applicable statutory or collectively agreed minimum wage or the minimum wage customary in the industry. STEINCO complies with the statutory regulations on working hours and break times.

1.3. Freedom of Association

STEINCO recognizes the right of employees to organize in trade unions or comparable associations and to negotiate and set tariffs with STEINCO. We work with employees and employee representatives in a trusting, constructive, and goal-oriented manner.

1.4. Prohibition of Discrimination

STEINCO opposes any form of discrimination and does not tolerate any discrimination against employees based on gender, race, skin colour, disability, political conviction, origin, ideology, religion, age, pregnancy, or sexual orientation. We respect everyone's personal dignity, privacy, and personal rights.

1.5. Health Protection and Safety at Work

STEINCO provides a safe and healthy working environment and takes the necessary precautionary measures against accidents and damage to health that may occur in connection with work. We prevent excessive physical or mental fatigue by taking appropriate measures. Employees have at all times access to drinking water and clean sanitary facilities.

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1.6. Preservation of Natural Resources

STEINCO complies with the prohibitions of unlawful eviction and unlawful taking of land, forests and waters, the use of which secures a person's basis of existence, and refrains from harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this harms the health of persons, significantly impairs the natural basis for the production of food or prevents the access of persons to safe drinking water or sanitary facilities.

1.7. Dealing with Conflict Minerals

STEINCO recognizes the Due Diligence Guidance of the Organisation for Economic Cooperation and Development (OECD) for the conflict minerals tin, tungsten, tantalum and gold as well as for other commodities such as cobalt. Smelting and refining will be avoided without appropriate, audited due diligence processes.

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2. Ecological Responsibility

2.1. Treatment and Discharge of Industrial Wastewater

STEINCO is committed to using water as efficiently as possible, as well as promoting the reuse of water. Wastewater from operational and manufacturing processes and sanitary installations is treated in accordance with applicable legal requirements before being discharged or disposed of.

2.2. Dealing with waste and hazardous materials

Solid waste shall be identified, reduced and disposed of responsibly or recycled by STEINCO. We take care to identify chemicals or other materials that pose a risk when released into the environment and handle these materials in such a way that safety is guaranteed. STEINCO complies with the prohibitions on the export of hazardous waste in the Basel Convention of March 22, 1989, as amended, and uses mercury and persistent organic pollutants only in accordance with the prohibitions of the Minimata Convention of October 10, 2013, and in accordance with the Stockholm Convention of May 23, 2001.

2.3. Consumption of Raw Materials / Energy Efficiency

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, shall be reduced or avoided by STEINCO. We strive to find economic solutions to continuously improving energy efficiency and minimizing energy consumption.

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3. Ethical Business Conduct

3.1. Fair Competition

STEINCO adheres to the norms of fair business activity, fair advertising and fair competition. We refuse to enter into agreements and other activities with competitors that influence prices or conditions and prohibit agreements that are intended to restrict customers in their freedom to determine their prices and other conditions for resale autonomously.

3.2. Confidentiality and Data Protection

STEINCO respects the privacy of its suppliers, customers and employees and adheres to the applicable data protection and security requirements and regulations when collecting, storing, processing, transmitting and disclosing personal data.

3.3. Intellectual Property

STEINCO respects intellectual property rights. When transferring technology and know-how, we ensure that intellectual property rights and customer information are always protected.

3.4. Integrity

We apply the highest standards of integrity in all our business activities and pursue a zero-tolerance policy when it comes to banning all forms of bribery, corruption, extortion and embezzlement.

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4. Expectations of our Supply Chain

The Code of Conduct also reflect our expectations of our supply partners and other contractual partners in our supply chains. In this respect, we expect them to comply with the contents of the Code of Conduct or to apply a comparable code of conduct and encourage them to demand this expectation from the contractual partners in their supply chain. STEINCO reserves the right to appropriate contractual consequences in case of serious violations of the principles of our Code of Conduct and expects that any violations that are identified will be dealt with by appropriate preventive or remedial measures.

5. Whistleblower System

We allow all employees to report discrimination, concerns, and other indications of possible violations of the Code of Conduct via the anonymous to a neutral cooperation partner (external law firm). This is a professional and organ of the administration of justice that is obliged to secrecy, so that confidentiality and data protection in particular are very well ensured. After reviewing the information in compliance with the legal requirements, it will be communicated to the management and the works council, taking into account confidentiality and data protection. In the event of justified complaints, STEINCO will promptly review incoming complaints and take the necessary measures to adjust the processes or conduct in question in accordance with the requirements of the Code of Conduct.

Wermelskirchen, June 03, 2024

Ralf Goos
Managing Director