

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**") is committed to environmentally and socially responsible corporate governance and strives to continuously optimize its business activities and products in line with sustainability principles. With the following Code of Conduct, we declare that we understand the Guiding Principles of the United Nations (UN Guiding Principles on Business and Human Rights (UNGP)) and the 17 Sustainable Development Goals (SDGs) as the basis for our actions.

The Code of Conduct is a voluntary commitment by STEINCO in its dealings with all employees, customers, and suppliers and serves as an internal and external guide for dealing with our company. All STEINCO employees are bound by the principles of ecological, social, and ethical behavior summarized in the Code and integrate these into our corporate culture.

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1. Social responsibility

1.1 Human rights and labor standards

STEINCO respects and ensures compliance with internationally recognized human rights. We fully comply with national regulations and United Nations regulations on children's rights and the prohibition of forced labor. STEINCO is particularly committed to complying with the ILO Convention on the minimum age for employment of children.

1.2 Fair remuneration and working hours

STEINCO not only complies with the statutory or, where applicable, collective agreement provisions on the remuneration of work, but also considers itself obliged to pay its employees at least a living wage. A living wage is paid when an employee receives remuneration that is sufficient to enable the employee and their family to enjoy a reasonable standard of living in their place and at their time. We regularly review the salary situation of our employees via the National Wage Board (www.wageindicator.de) and ensure that our wages are always above the living wage. In addition to fair remuneration, we comply with the statutory regulations on working hours and breaks.

1.3 Freedom of association

STEINCO respects the right to freedom of association in order to enable its employees to exercise their collective bargaining rights. We work closely with the elected employee representatives.

1.4 Prohibition of discrimination

STEINCO opposes all forms of discrimination and in particular does not tolerate any discrimination against employees on the basis of gender, race, skin color, disability, political beliefs, origin, worldview, religion, age, pregnancy, or sexual orientation. We respect the personal dignity, privacy, and personal rights of each individual.

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1.5 Health and safety at work

STEINCO ensures a safe and healthy working environment and takes the necessary precautions against accidents and damage to health that may arise in connection with work. We prevent excessive physical or mental fatigue through appropriate measures. All employees have access to drinking water and clean sanitary facilities at all times.

1.6 Preservation of natural resources

STEINCO complies with the prohibitions on unlawful eviction and unlawful deprivation of land, forests, and water whose use secures the livelihoods of people, and refrains from harmful soil changes, water and air pollution, noise emissions, and excessive water consumption, insofar as this damages the health of persons, significantly impairs the natural basis for food production, or prevents persons from accessing clean drinking water or sanitary facilities.

1.7 Handling of conflict minerals

STEINCO complies with the guidelines of the Organization for Economic Cooperation and Development (OECD) for conflict minerals such as tin, tungsten, tantalum, and gold, as well as other raw materials such as cobalt. Smelters and refineries without appropriate, audited due diligence processes are avoided.

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2. Environmental responsibility

2.1 Treatment and discharge of industrial wastewater

STEINCO is committed to using water as efficiently as possible, promoting water reuse, and treating all wastewater from wet processes in accordance with applicable legal requirements before discharging it into water bodies.

2.2 Handling of waste and hazardous substances

Solid waste is identified, reduced, and responsibly disposed of or recycled by STEINCO. We take care to identify chemicals or other materials that pose a hazard when released into the environment and to ensure safety when handling these substances. STEINCO complies with the prohibitions on the export of hazardous waste in the Basel Convention of March 22, 1989, in its current version, and uses mercury and persistent organic pollutants exclusively in accordance with the prohibitions of the Minamata Convention of October 10, 2013. 1989, as amended, and uses mercury and persistent organic pollutants exclusively in accordance with the prohibitions of the Minamata Convention of October 10, 2013, and in accordance with the Stockholm Convention of May 23, 2001.

2.3 Consumption of raw materials and energy efficiency

STEINCO takes care to reduce or avoid the use and consumption of resources during production and the generation of waste of any kind, including water and energy. We strive to find economical solutions to continuously improve energy efficiency and minimize energy consumption.

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3. Ethical business conduct

3.1 Fair competition

STEINCO complies with applicable antitrust laws and standards of fair business conduct, fair advertising, and fair competition. We refuse to enter into agreements with competitors regarding pricing and terms and conditions, or agreements with customers that restrict their freedom to determine their prices and other terms and conditions for resale.

3.2 Confidentiality and data protection

STEINCO respects the protection of private information of its suppliers, customers, and employees and complies with the relevant laws and official regulations on data protection and information security when collecting, storing, processing, transmitting, and disclosing personal data.

3.3 Intellectual property

STEINCO respects the intellectual property of other parties and ensures that intellectual property rights and customer information are always protected when transferring technology and know-how.

3.4 Integrity

STEINCO always bases its business activities on generally accepted ethical values and principles, including integrity and respect for human dignity. STEINCO rejects any form of bribery and corruption. To this end, we avoid any appearance of such conduct, whether in the form of granting or accepting unfair advantages. STEINCO acts in accordance with the applicable import and export control regulations and complies with the legal requirements for the prevention of money laundering.

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4. Expectations of our supply chain

The principles of this Code of Conduct also reflect our expectations of our suppliers and other contractual partners in our supply chain. In this respect, we expect them to adhere to the contents of our Code of Conduct or to apply an equivalent code of conduct, and we encourage them to demand that their contractual partners in their supply chain also comply with these expectations. STEINCO reserves the right to take appropriate contractual action in the event of serious violations of the principles of our Code of Conduct and expects that any violations identified will be responded to with appropriate preventive or remedial measures.

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5. Whistleblower system

We enable all employees to report discrimination, concerns, and other indications of possible violations of the Code of Conduct anonymously to a neutral cooperation partner (external law firm).

Email: hinweisgeber-steinco@breidenbach-ra.de

Phone: +49 202 49374 222

Post Breidenbach Rechtsanwälte GmbH
Whistleblower office
Friedrich-Engels-Allee 32
42103 Wuppertal

This is a professional who is bound to secrecy and an organ of the administration of justice, so that confidentiality and data protection are particularly well ensured. After reviewing the information in accordance with legal requirements, it will be communicated to management and the works council, taking into account confidentiality and data protection. In the event of justified complaints, STEINCO will take the necessary measures to adjust the relevant processes or conduct in accordance with the provisions of the Code of Conduct.

Wermelskirchen, 07.01.2026



Ralf Goos

Managing Director