

# steute Supplier Code of Conduct

Code of Conduct for Suppliers  
to steute Technologies GmbH & Co. KG

This Supplier Code of Conduct follows a basic understanding of socially responsible corporate governance in accordance with the following guidelines. This basic understanding and the contents of this Supplier Code of Conduct are in line with the ZVEI-VDMA Code of Conduct, which is recognised as the industrial standard for responsible corporate policy. Companies which implement the ZVEI-VDMA Code of Conduct or an equivalent commitment therefore meet the requirements of this Supplier Code of Conduct.

**As a supplier to steute Technologies GmbH & Co. KG, you commit to the following principles:**

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# 1 Compliance with legislation

It is a matter of course for you that you will comply with current laws and other legal requirements in the countries in which you operate. In cases where local laws and regulations are less restrictive, your actions are guided by the principles of this Code of Conduct. Where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, the local laws shall take precedence. Nevertheless, you endeavour to comply with the content of this Code of Conduct.

## 2 Integrity and compliance

You have implemented suitable compliance measures so that the following areas are covered appropriately:

### 2.1 Prevention of corruption

You do not tolerate corruption, bribery or blackmail; they impede fair competitive conditions. Gifts made with the intention of influencing business decisions or which could give the appearance of doing so or to obtain some other undue advantage are neither promised, offered, granted, requested nor accepted in your business relationships. Nor do you allow these to be promised to you. Especially strict standards must be applied when dealing with people for whom particular rules apply under criminal and liability law (e.g. public officials).

### 2.2 Fair competition

You operate in compliance with national and international competition and anti-trust legislation and do not participate in price agreements, sharing markets or collusion in respect of customers, markets and bids.

### 2.3 Prevention of money laundering

Money laundering is the term used for bringing money obtained illegally or from illegally acquired assets into the legal financial and economic system. You comply with your legal obligations to prevent money laundering and do not participate in transactions that serve to disguise or integrate criminal or illegally acquired assets.

### 2.4 Protection of information and intellectual property

You protect confidential information and respect intellectual property; transfers of technology and know-how must be made in a way that protects intellectual property rights, customer information, business secrets and information that is not in the public domain. You observe the current laws to protect business secrets and treat your business partners' confidential information accordingly.

## 2.5 Data protection

You process, store and protect personal data in compliance with statutory regulations. Personal data is therefore treated confidentially and only collected for legal, previously defined purposes in a transparent manner. You only process personal data if it is protected against loss, modification and unauthorised use or disclosure using appropriate technical and organisational measures.

## 2.6 Export controls

You undertake to comply with legal standards relevant to export controls – including but not limited to approval requirements, export bans and support bans – in the course of shipping and exporting your goods.

## 2.7 Avoidance of conflicts of interest

You avoid internal and external conflicts of interest which could illegitimately influence business relationships. Where this is not successful, you disclose these conflicts.

# 3 Health and safety

You protect your employees' health by taking suitable measures in relation to health and safety at work. You ensure that your employees have received adequate instruction.

# 4 Remuneration and hours of work

Remuneration is based on current laws and, if applicable, current binding collective agreements and is supplemented by the relevant national legislation on minimum wages. Employees are given clear, detailed and regular information on the composition of their remuneration. You comply with current laws and (international) working standards in respect of the maximum permissible working hours.

# 5 Observance of human rights

You pay attention to and support compliance with internationally recognised human rights and

- respect the personal dignity, privacy and personal rights of each individual;
- protect and uphold the right to freedom of speech and freedom of expression;
- do not tolerate unacceptable treatment of employees such as physical and psychological hardship, sexual and personal harassment or discrimination.

## 5.1 Prohibition of child labour

You do not tolerate any child labour. You do not employ any employees who cannot prove that they are at least 15 years old, and you require proof of age to be submitted. For countries which fall within the exception for developing countries according to ILO Convention No. 138, the minimum age can be reduced to 14 years. You do not hire employees for dangerous work who, according to ILO Convention No. 182, cannot prove that they are at least 18 years old.

## 5.2 Prohibition of forced labour

Forced labour, modern slavery or comparable acts that involve the deprivation of liberty are forbidden. All work must be voluntary, and it must be possible to end the employment relationship.

## 5.3 Freedom of association and collective bargaining

You respect the right of employees to freedom of association, freedom of assembly and to engage in collective bargaining and pay negotiations, providing this is legally permissible and possible in the relevant country in which you are operating. If this is not permissible, you look for appropriate compromises for your employees.

## 5.4 Promotion of diversity, equal opportunities

You encourage equal opportunities and do not tolerate discrimination. You treat all people equally regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, worldview or other personal attributes.

# 6 Environment, energy and climate protection

You act in compliance with current legislation and are guided by international standards in order to minimise negative impacts on the environment and continuously improve your activities in respect of environment and climate protection. All employees are made aware of environmental issues and the necessary training is offered.

# 7 Dealing with conflict minerals

You exercise the necessary care to take measures to avoid using conflict minerals in your products in order to prevent human rights violations, corruption and financing armed groups or similar via this route.

## 8 Supply chain / suppliers

You expect your suppliers to comply with the principles of this Code of Conduct or to apply comparable codes of conduct. Furthermore, you encourage them to implement the criteria in this Code of Conduct in their own supply chains.

### 8.1 Consumer interests

Where the interests of consumers are affected, you follow consumer protection provisions and appropriate sales, marketing and information practices. Special attention is paid to groups that require particular protection (e.g. young people or pregnant women).

## 9 Execution and implementation

You make suitable and reasonable efforts to continuously implement, document and apply the principles and values in this Code of Conduct.

### 9.1 Communication

You communicate openly in dialogue with employees, customers, suppliers and other interest and stakeholder groups regarding the requirements of this Code of Conduct and its implementation.

### 9.2 Information on infringements

You offer your employees and business partners access to a protected mechanism that will allow them to confidentially report possible violations of the principles of this Code of Conduct.