

STIWA GROUP CODE OF CONDUCT



FOREWORD

Since our founding in 1972, we have built our entrepreneurial success on a stable foundation of core values. We place our customers at the heart of our thoughts and actions, and cultivate long-standing, mutually beneficial relationships with our regular customers. We plan to continue following this philosophy in the future as well.

The constant growth in past years and international expansion pose a wide range of challenges for us – not only commercially, but also in terms of social, political, and last but not least, legal matters. These complex conditions must be handled professionally, which is why we have decided to define a Code of Conduct. This Code sets out on paper what has been a given for us since our founding: the principles for responsible, lawful conduct. Together with the ethical principles and values, the Code of Conduct forms the basis for all of our business actions and decisions.

Quality awareness is one of our top values. However, we want to strive for the highest quality not only in our products and processes, but also in our conduct toward our colleagues and business partners. Our reputation and the trust that is placed in us are greatly dependent upon how we conduct ourselves. It is for this reason that we find it all the more important to set out in this Code of Conduct the moral, ethical, and legally sound principles that serve to guide us in our day-to-day conduct.

It is up to all of us to make the Code of Conduct a central, integral part of our corporate culture by setting a good example of how to follow it. In this way, we not only become role models for our colleagues but also our business partners.

A handwritten signature in black ink, appearing to read 'P. Sticht', with a large, stylized 'P' and a long, sweeping horizontal stroke at the end.

Peter Sticht
CEO STIWA Holding GmbH

SCOPE OF APPLICATION/BASIC PRINCIPLES

Scope of Application

This Code of Conduct applies to all employees of the STIWA Group and to all individuals who are employed in roles that are equivalent to in-house staff (hereinafter referred to as „Employees“). Each and every employee is responsible for observing and implementing the Code of Conduct. Everyone is encouraged to actively implement this Code and the rules of conduct therein in their dealings with colleagues and business partners. Management in particular is tasked with ensuring through training that their employees understand the terms of the Code of Conduct.

Furthermore, all business partners will be made aware of the Code of Conduct, with the expectation that they will respect and absolutely enforce the terms set out in this document in all business activities with the STIWA Group.

The Code of Conduct applies to all STIWA Group employees and to all individuals who are employed in roles which are equivalent to in-house staff

Basic Principles

Employees should exercise common sense when applying the Code of Conduct. The question behind all actions and decisions should be whether these can be carried out or made, when compared against reasonable ethical and moral standards. Above all, the normal local standards and customs must be taken into account. If local terms are stricter than the Code, then these terms must be followed. There is no discretionary leeway where existing legal regulations are concerned.

Violating the terms of the Code of Conduct, other internal guidelines and regulations, or especially legal regulations, can have detrimental financial effects on the STIWA Group and can cause long-term damage to the company image. Any employee who violates these terms, guidelines, or regulations will face disciplinary consequences. Furthermore, misconduct may also have criminal or other legal consequences (such as compensation claims for damages) for the employee in question.

We should exercise common sense in all of our actions

Misconduct can have detrimental effects on the STIWA Group

If there are questions or doubts, every employee has the opportunity to seek advice and counsel from their direct supervisor. In cases that cannot be settled by a manager, please contact Compliance Officer Gerhard Hannerer (Head of HR).



1 We observe legal standards and base our thoughts and actions on ethical standards.

Observing the legal regulations of all countries in which we operate is an essential and integral part of the STIWA Group's corporate policy. In our daily activities, we base our thoughts and actions on ethical standards. Our business relationships are based on appreciation and fairness. We always listen to different perceptions and opinions with interest. The STIWA Group does therefore not tolerate discrimination of any kind whatsoever. No employee, business partner, or applicant shall face discrimination or disadvantages because of their gender, skin color, age, culture, sexual identity, ethnicity, any disability, religious belief, or world view. This includes discrimination of any type, be it in the form of bullying, offensive jokes, put-downs, insinuating gestures, or the placement of inappropriate graphical material on display in business establishments and production halls. This type of conduct may be offensive even if it is not intended to be.

We consider human rights to be fundamental values that must be respected and observed by all employees. We hire our employees solely on the basis of their qualifications and suitability for the role in question and always strive to create a safe and healthy working environment for them. Protecting the health and well-being of our employees is of the utmost importance to the STIWA Group and accordingly, plays a key role in our processes. Every employee is responsible in part for helping cultivate safe working conditions by observing the corresponding safety guidelines of the company.

Our business relationships are based on appreciation and fairness

Protecting the health and well-being of our employees is of the utmost importance to us

2 We are committed to the principles of fair competition.

We want our presence on the market to be associated with quality, true customer satisfaction, and innovative products and services. We do not tolerate corruption and bribery and strongly disapprove of these because they openly call into question the principles of free and fair competition.

We do not offer our direct or indirect business partners any personal advantages in connection with our business activities. Giving gifts to officials is always strictly prohibited. Likewise, we ourselves do not accept any gifts from business partners (see „Guidelines for Accepting Gifts“).

We have no tolerance for corruption and bribery



3 We avoid conflicts of interest.

We act only in the interests of the STIWA Group and keep our personal and professional interests strictly separate. Situations in which personal interests may conflict with those of the company must be avoided at all costs. If such conflicts of interest do arise, they must be resolved transparently in the interests of the STIWA Group, observing the law and applicable guidelines.

Using business activities to procure personal advantages is prohibited and is a clear violation of the STIWA Group's corporate values. Business partners must never be given preferential treatment over others because of personal interests.

We keep personal and professional interests strictly separate

4 We care for the environment.

Responsible and sustainable care of the environment is an important and integral part of our corporate policy. For this reason, the STIWA Group uses environmentally friendly production methods. In the development of new products, we always strive to prevent risks to people and to the environment. We place great value on handling waste carefully and make efforts to reuse and recycle materials and products. By consistently following these principles, we can achieve ecological sustainability.

Our work is environmentally friendly and we avoid risks to people and the environment

5 We protect our intellectual and material property.

As a technology company, we especially rely on our know-how and are therefore all the more intent on protecting our intellectual property. We take the necessary steps to protect the confidentiality, availability, and integrity of sensitive information of any kind. All of our employees are obligated to observe legal and company regulations concerning information security to protect our internal data, our customers' data and our suppliers' data from unauthorized use.

This also includes an obligation to handle personal information with care. We take care to ensure that the privacy and confidentiality of personal data relating to our employees, customers, and suppliers are always protected. Sensitive information about individuals is only collected, stored, and processed to the extent that is absolutely necessary to perform our job duties.

We handle the STIWA Group's assets in a responsible and cost-efficient way. Unjustified and unnecessary costs must be avoided. Equipment is treated with care and used only in accordance with its intended purpose. We make sure that unauthorized third parties are not given access to equipment and that it does not fall into their custody. Every employee is responsible for maintaining the order and cleanliness of their workplace and must contribute to the cleanliness of the overall company.

We take the necessary steps to protect sensitive information

We protect the privacy of our employees, customers, and suppliers

We handle the STIWA Group's assets in a responsible and cost-efficient way



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