

STRÄHLE+HESS

Code of Conduct

Dear Supplier,
Dear Business Partner,

STRAEHLE+HESS combines economic success with social responsibility and environmental protection. We act as an international company. That is why our standards of conduct are in principle the same worldwide and are based on a global code of conduct.

Nothing is more important than our integrity as a company and as individuals. STRAEHLE+HESS is strictly committed to complying with legal regulations and ethical principles, and expects all suppliers and/or business partners to comply with them. Such commitment must be firmly anchored throughout the supply chain. Compliance compliant behavior always has priority for us. There can be no compromises here. We therefore expect you and your company to take personal responsibility for compliance with all

- applicable laws,
- basic international standards as well as
- internal company guidelines and regulations.

The STRAEHLE+HESS code of conduct summarizes important laws and regulations that regulate the behavior of all suppliers and/or business partners in the dealings with business partners, officials, etc. and society. It will help us make the right decision but cannot describe every situation you may face. Special laws and regulations may apply to certain functions or activities or at individual locations.

Ensuring compliance is an essential part of our daily work. We must nurture and develop a culture of honesty, where leaders are role models in promoting business ethics and lawful conduct, and where compliance with the law is the personal responsibility of each individual.



Peter Mazzucco
Chairman of the Management Board STRÄHLE+HESS Group

21.02.2024

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Human rights, Labor and Social Standards

STRAEHLE+HESS is particularly committed to the abolition of all forms of child and forced labor, the principle of non-discrimination, and the recognition of freedom of association, collective bargaining and social partnership, fair payment and additional benefits in accordance with local market conditions, reasonable working hours and paid vacation, and proportionality regarding disciplinary and security measures.

STRAEHLE+HESS is committed to equal opportunities on the labor market and complies with all relevant laws that prohibit discrimination based in particular on age, race, skin color, gender, sexual orientation, identity or expression, origin, religion, or disability. We expect compliance with these principles from all of our suppliers and/or business partners.

Ethical Recruitment, Women, Indigenous People

Any form of harassment or discrimination, e.g. based on nationality, ethical reasons, indigenous peoples, origin, religion, gender (woman, man, diverse), age, sexual orientation, etc. is prohibited.

Quality and environmental protection

Highest quality and continuous quality improvements are essential for the growth and success of the company. All suppliers and/or business partners are required to meet the expectations of both internal and external customers, and to constantly improve the quality of our products and services.

Environmental protection and careful use of natural resources have high priority for us. STRAEHLE+HESS wants to organize its business in an environmentally friendly manner through corresponding leadership responsibility on the part of management and through the commitment of the employees and is constantly working on improving eco-efficiency. All suppliers and/or business partners of STRAEHLE+HESS also ensure compliance with the law and high standards

Every supplier and/or business partner of STRAEHLE+HESS must make a lasting contribution to achieving these goals through their own conduct.

Antitrust law

It is our business policy to promote fair competition. We therefore expect all suppliers and/or business partners strictly adhere to the applicable antitrust laws.

Violations are associated with severe penalties or fines and can lead to the nullity of the concerning agreement.

Agreements and coordinated practices between competitors ("horizontal agreements") are prohibited if they aim or result in preventing or restricting competition. These include, for example, agreements on prices, offers, customer allocations, sales or purchasing conditions, production or sales quotas or the division of geographical markets. Not only explicit contractual agreements, but also coordinated actions as a result of unilateral declarations (e.g. announcements of price increases with the aim of eliciting similar reactions from competitors) are prohibited.

Many types of vertical agreements, i.e. agreements between suppliers, business partners and customers or patent holders and licensees, are prohibited in the EU, the USA and other countries. They may result in fines or the invalidity of the relevant agreement. These include restrictions on customers' freedom to set prices or delivery terms for their business partners (geographical restrictions, customer or product application restrictions), certain most-favored-nation clauses, exclusivity obligations such as aggregated needs or exclusive supply, and non-competitor clauses.

Corruption

Our business partners, especially our suppliers and customers, are to be treated fairly. STRAEHLE+HESS expects the same from its business partners, Our relationships with all business partners should be based solely on objective criteria, in particular quality, reliability, competitive prices and compliance with ecological

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and social standards and the principles of good corporate governance. Anti-bribery laws in most countries around the world prohibit the bribery of domestic and foreign public officials and employees of domestic and foreign public officials and employees of domestic and foreign private sector companies.

STRAEHLE+HESS prohibits its employees, commercial agents and others acting on behalf of STRAEHLE+HESS from any form of bribery. When dealing with business partners or officials, you must never solicit or accept material advantages (e.g. cash, gifts, entertainment, or other personal advantages) that could give the impression of (attempted) influencing business decisions. Equally, employees of other companies or public officials must never be promised or granted personal benefits with the intention of obtaining an order, securing business, or giving STRAEHLE+HESS an unjustified advantage. We also expect the same from our suppliers and/or business partners.

Claiming and Accepting benefits

All decisions in the company are made independently of personal interests on the basis of the company's goals. Corporate decisions serve exclusively to increase customer benefit and to achieve sustainable corporate success. In order to maintain their independence, suppliers and/or business partners may not solicit gifts or other benefits, personal services or favors. STRAEHLE+HESS suppliers and/or business partners are prohibited from accepting benefits that impair an objective and fair decision. In the event of rejection, the respective business partner must be informed of the STRAEHLE+HESS code of conduct.

Data Privacy

STRAEHLE+HESS is committed to respecting the privacy and integrity of its employees, suppliers and/or business partners. We adhere to strict standards when further processing personal data of our employees, suppliers and/or business partners. All personal data that STRAEHLE+HESS collects, and saves is only processed for a specific purpose, comprehensively, carefully and in accordance with the applicable data protection laws.

Confidential data must not be disclosed to anyone outside the company without proper authorization or a legal basis.

In cases of doubt, the data protection officer or the legal department must be asked for advice. We also expect our suppliers and/or business partners to comply with data protection regulations.

Compliance with the STRAEHLE+HESS Code of Conduct

Compliance with the STRAEHLE+HESS code of conduct and other applicable instructions is binding for all suppliers and/or business partners. Contrary behavior is not tolerated by the company and may result in legal action!

We hereby confirm that we, as a supplier and/or business partner, know and comply with the STRAEHLE+HESS code of conduct.

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