

## Code of Conduct for Suppliers of STOPA Anlagenbau GmbH

### **A Introduction**

We at STOPA Anlagenbau GmbH (hereinafter "STOPA") are committed to high standards of social responsibility, environmental protection, compliance and ethical behavior. With our headquarters in Achern, Germany, we stand for quality, innovation and sustainable solutions. Our philosophy not only to be economically successful, but also to assume social responsibility and make a positive contribution to the environment and future generations.

This Code of Conduct defines the minimum requirements that we place on our suppliers and their upstream suppliers in order to ensure trusting, efficient and sustainable cooperation. Our requirements apply to all suppliers, regardless of their geographical location or area of activity, especially for companies with international operations or production abroad.

In addition to complying with national and international standards, we promote pioneering technologies and smart factory solutions through strategic partnerships, such as with TRUMPF. These collaborations illustrate how important a shared set of values is for long-term success and innovation. Our vision is to increase the competitiveness of our customers through technical excellence and networked solutions, while at the same time establishing sustainable practices.

Our aim with this Code of Conduct is to ensure that all our business partners share our values and implement them in their daily work to ensure sustainable and ethical business operations.

# B Overriding principle: law-abiding behavior

Our suppliers undertake to comply with all relevant laws, regulations and legal provisions of the countries in which they operate. This includes in particular the following international standards:

- UN Guiding Principles on Business and Human Rights
- Ten principles of the UN Global Compact
- Core labor standards of the International Labor Organization (ILO)

In addition, we expect our suppliers to proactively identify risks that may arise from non-compliance with legal or ethical standards and to implement suitable countermeasures. Legal compliance forms the basis of every successful partnership.

# C Requirements for suppliers

# C 1 Social responsibility

**C 1.1 Human rights:** Our suppliers uphold internationally recognized human rights and actively promote their observance. This includes the protection of personal rights, the support of marginalized groups and the creation of a respectful working environment.

**C 1.2 Exclusion of forced labor:** Our suppliers reject any form of forced, slave or involuntary labor. The free choice of employment is guaranteed. Our suppliers ensure that no employment relationships are enforced through unreasonable contractual conditions or physical violence.

- **C 1.3 Prohibition of child labor:** Our suppliers do not employ persons under the age of 15 (or higher minimum age according to national law and ILO standards) and respect children's rights. Training programs must comply with local laws and international standards and contribute to the promotion of youth.
- **C 1.4 Fair working conditions:** Remuneration and social benefits are at least in line with national legal standards. Working hours, breaks and vacation regulations are adhered to. We expect our suppliers to offer transparent employment contracts and to create a working environment that promotes the motivation and well-being of employees.
- **C 1.5 Freedom of association:** Freedom of association and the right to form interest groups are respected without disadvantages for employees. Suppliers encourage open communication and cooperation between management and employees.
- **C 1.6 Equal opportunities:** Our suppliers do not tolerate discrimination on the basis of gender, skin color, nationality, religion, age, disability, sexual orientation or other. The dignity of each individual is respected. We value inclusion and diversity as drivers of innovation.
- **C 1.7 Health and safety:** Our suppliers ensure a safe and healthy working environment and take measures to prevent accidents and health hazards. This includes regular training, risk analyses and the use of state-of-the-art safety equipment.
- **C 1.8 Protection of natural resources:** Our suppliers avoid environmentally harmful practices and protect natural resources, including drinking water and agricultural land. We expect them to develop and implement long-term strategies for sustainable business practices.
- **C 1.9 Land grabbing:** Our suppliers comply with the prohibition of unlawful eviction and unlawful seizure of land, forests and water. They ensure that the rights and livelihoods of affected persons are protected when acquiring or using land.
- **C 1.10 Use of security forces:** Our suppliers undertake to ensure that security forces deployed to protect their production and operating sites are appropriately trained and comply with the prohibition of torture and cruel, inhuman or degrading treatment. Freedom of association and the rights of employees must not restricted.
- **C 1.11 Grievance mechanisms:** Our suppliers are responsible for setting up an effective grievance mechanism at company level. They ensure that whistleblowers are protected from retaliation and that complaints are handled transparently.

#### C 1.12 Handling of raw materials from high-risk areas:

Our suppliers ensure that no human rights violations or illegal financing are supported in the procurement of raw materials.

### C 2 Ecological responsibility

- **C 2.1 Compliance with environmental regulations:** Our suppliers comply with all relevant environmental laws, regulations and legislation. We recommend the introduction of environmental management systems to support continuous improvement and compliance with standards, where appropriate to the particular operation.
- **C 2.2 Dealing with waste and emissions**: Waste and emissions are minimized and disposed of properly. Hazardous substances are handled in accordance with international standards. Waste water from operational processes is typified and monitored as required. Our suppliers waste reduction and recycling measures along the value chain. In addition, our suppliers undertake to comply with the requirements for controlling the transboundary movement of hazardous waste and its disposal.

- **C 2.3 Handling of mercury and persistent organic pollutants:** Our suppliers comply with international standards for handling mercury and persistent organic pollutants.
- **C 2.4 Resource efficiency:** Our suppliers optimize the use of energy, water and raw materials and strive to reduce greenhouse gas emissions. Innovative technologies for saving energy and the use of renewable energies are of particular importance here.
- **C 2.5 Protection of biodiversity:** Our suppliers minimize negative impacts on biodiversity and actively contribute to climate protection. Projects for reforestation or restoration of ecological habitats are encouraged.

### C 3 Ethical business conduct

- **C 3.1 Fair competition:** Our suppliers comply with the applicable competition and antitrust laws and do not engage in anti-competitive practices. Transparency and fairness are key to successful cooperation.
- **C 3.2 Anti-corruption:** Corruption and bribery contradict our principles and are unacceptable in any form. We expect all business practices to be based on integrity and transparency. Suppliers should introduce suitable measures and mechanisms to prevent corruption and ensure compliance with ethical standards.
- **C 3.3 Compliance with foreign trade regulations:** Our suppliers comply with all foreign trade, customs and sanction-related regulations. We expect them to comply conscientiously with all relevant regulations in order to ensure legally compliant and responsible international trade in goods.
- **C 3.4 Data protection:** Our suppliers protect personal data and respect intellectual property. Responsible handling of sensitive information is essential. All applicable laws and regulations on data protection are scrupulously observed.

In addition, our suppliers ensure that confidential information from STOPA is protected at all times and not disclosed to third parties without authorization. This obligation applies both during and after termination of the business relationship. Appropriate protection of business secrets is essential for a trusting cooperation.

**C 3.5 Prevention of money laundering:** Our suppliers fulfill all legal requirements for the prevention of money laundering and terrorist financing. They implement clear guidelines to prevent illegal business practices.

# D. Implementation and control

- **D 1 Communication:** We expect our suppliers to communicate the principles of this Code of Conduct within their organization and to their upstream suppliers and to promote compliance with them.
- **D 2 Control rights:** We reserve the right to check compliance with the Code. This is done in compliance with business secrets and applicable data protection laws. Suppliers must work cooperatively and openly with us.
- **D 3 Duty to inform:** Our suppliers to us immediately in writing if there is a breach of the Code of Conduct within their business operations or if such a breach is suspected. This applies in particular if the violation is in connection with the provision of services for STOPA.

In addition, suppliers shall inform us immediately if there is a suspicion that an upstream supplier is violating comparable values and principles. Upon request, they will carefully clarify the facts and keep us informed of the progress and outcome of the investigation.

**D 4 Right of termination and withdrawal:** If a supplier repeatedly or seriously violates our Code of Conduct and, despite being requested to do so, fails to take appropriate measures to remedy the situation within

If the customer fails to take action within a set period, we reserve the right to terminate the business relationship with immediate effect.

In exceptional cases in which a continuation of the business relationship no longer appears reasonable, we reserve the right to have the situation legally examined and, if necessary, to take further measures, up to and including termination of the contract. Suppliers shall be liable for all damages incurred by us as a result of a breach of the Code of Conduct, insofar as they responsible for this. Further claims and rights remain unaffected.

**D 5 Remedial action:** In the event of a breach of this Code, we will work with the supplier to develop a remediation strategy. In the event of serious violations, we reserve the right to terminate the business relationship. The aim is to achieve sustainable improvements through measures.

### **E. Final provisions**

We reserve the right to amend this Code of Conduct if necessary, in particular due to changes in the law or new business areas.

Suppliers who have questions or information about standards of conduct or potential violations can contact us in confidence.

If you have any concerns about unlawful conduct or misconduct, please contact: compliance@stopa.com