

# Code of Conduct of STOPA Anlagenbau GmbH

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## Introduction

**STOPA Anlagenbau GmbH** (hereinafter referred to as "STOPA") is a global company operating in numerous markets and therefore faces a wide range of requirements and challenges. Our employees and business partners come from different countries and cultures.

For this reason, it is very important for us as a company to clarify what expectations we have of our employees, managers and directors.

Designation of the social gender

To improve readability, this Code of Conduct does not use both feminine and masculine forms of language. The generic masculine is used, including for titles, whereby all genders are meant equally.

## A. Policy statements Binding nature and guidance

### 1. Orientation guide

This Code of Conduct sets out the most important principles for acting in accordance with the law and regulations as well as for morally and ethically impeccable behavior in business transactions and in dealings with colleagues. It serves as a guide for our daily work with colleagues, suppliers, customers and competitors and helps us to act correctly, honestly and responsibly. We are jointly responsible for compliant behavior.

### 2. Declaration of principle

STOPA bases its business processes, actions and decisions on legal principles and ethical values, in particular the integrity of and respect for human dignity. We promote fairness, transparency, responsible leadership and trusting cooperation in all areas of business.

We are committed to our social responsibility towards our employees, business partners and society. Sustainability and resource conservation are of great importance to us.

This Code of Conduct sets out the standards on which our business activities are based.

We are committed to [the principles of the UN Global Compact](#):

- To support and respect the protection of international human rights.
- To ensure that STOPA not complicit in human rights violations.
- Uphold the freedom of association and the effective recognition of the right to collective bargaining.
- To advocate the elimination of all forms of forced labor and the abolition of child labor.
- advocate the elimination of discrimination in employment and occupation.
- Dealing prudently with ecological challenges.
- take initiatives to greater environmental awareness.
- To promote the development and dissemination of environmentally friendly technologies.
- against corruption in all its forms, including extortion and bribery.

### 3. Binding nature of the Code of Conduct and implementation

This Code of Conduct is binding for all STOPA employees worldwide. Employees the meaning of this Code of Conduct are all employees, including management and employees of STOPA.

STOPA managers, regardless of whether they are full-time, part-time, self-employed, student assistants or interns.

Managers have a special role model function and responsibility in implementing and complying with the Code of Conduct.

## B. Management culture and employees

### *1. Respect for human rights*

We respect internationally recognized human rights and support compliance with them. Through open communication in the supply chain, we help to ensure that our products are as free as possible from raw materials from conflict regions. We comply with the bans on child and forced labor and observe the minimum age for employment.

We expect that no human rights violations will be committed by us. Deviant behavior is prohibited.

### *2. Social responsibility*

For STOPA, social responsibility is an indispensable part of value-oriented corporate management and a key factor for sustainable success. STOPA ensures fair working conditions and contributes to the social and economic development of the respective region.

### *3. Discrimination and equal opportunities*

We do not tolerate discrimination, harassment, bullying or stalking. We are committed to equal treatment and equal opportunities for all employees, regardless of race, ethnic and social origin, gender, skin color, religion, ideology, disability, age, sexual orientation, genetic characteristics or wealth.

Our diversity is crucial to our success as a global player. We to hire, retain and promote competent employees with fair recruitment practices. Career advancement is based on skills, performance and equal opportunities.

### *4. Occupational health and safety*

STOPA ensures occupational health and safety in the workplace in accordance with the applicable national regulations. STOPA promotes the health, performance and job satisfaction of its employees through continuous improvements to working conditions as well as prevention and health promotion measures. We expect our employees to comply with our occupational safety guidelines.

### *5. Employee rights, fair pay*

We comply with national laws and labor standards regarding maximum working hours and appropriate remuneration. Remuneration is based on legally guaranteed minimum wages, employee performance and the respective labor market. All employees receive remuneration commensurate with their work.

### *6. Leadership culture*

Sustainable corporate success is based on reliable and committed employees. STOPA bears great responsibility for its employees. Our management culture is based on shared values, the promotion of performance and personal responsibility as well as fair treatment of one another.

## **Our values**

### **RESPECT**

- We show and expect attention and appreciation towards people and things.

### **RESPONSIBILITY**

- We think and act in the interests of the company.

### **FURTHER DEVELOPMENT**

- We shape our future with creativity, courage and the joy of change.

#### COMMITMENT

- We make clear agreements and stick to them.

#### PARTNERSHIP

- We live the customer/supplier relationship both internally and externally. Our actions are geared towards mutual success.



In line with our values, we promote the professional and personal development of our employees, invest in their qualifications and attach importance to achieving a good work-life balance. Performance and commitment are particularly encouraged and recognized.

We maintain an open and fair relationship with each other. Problems, conflicts and undesirable developments can be addressed openly. Managers should actively live these values and set an example through exemplary behavior. They should treat employees with respect and responsibility and listen to their concerns.

#### *7. Conflicts of interest - social commitment, political activities*

Conflicts of interest must be avoided. They arise when private interests and work duties or the interests of STOPA collide.

We support the social commitment of our employees in associations, organizations or public functions. This involvement must not compromise the interests of the company.

Economic interests in business partners can lead to conflicts of interest. Employees or their close relatives who are involved in the activities of business partners or have major shareholdings in them (excluding free float shares) should report this to their line manager. Such shareholdings must also be reported to the management.

#### *8. Protection of company property*

It is the duty of every individual to handle company property such as furniture, plant, equipment and company vehicles responsibly, to treat it with care and to protect it from loss, damage, misuse, theft or destruction. This rule also applies to intellectual property such as patents, copyrights and know-how.

### *9. Confidentiality and data protection*

Company and business secrets are valuable assets. We observe our duty of confidentiality and maintain secrecy about internal matters. Such information may only be passed on to authorized employees.

We treat personal information about employees, customers, business partners and suppliers carefully and confidentially. Confidentiality obligations must be observed at all times, including those imposed by business partners.

We guarantee compliance with data protection regulations. Personal data may only be collected, processed and used in accordance with the law. Documents containing personal data are treated confidentially and against unauthorized access.

All components of information processing are secured in such a way that confidentiality, integrity, availability and traceability are guaranteed and unauthorized use is prevented.

### *10. Cyber Security*

We protect our systems, information and products from cyber attacks to prevent damage and ensure secure operation. We handle information about STOPA, our customers and partners responsibly and implement suitable technical and organizational measures to maintain the highest security standards.

## **C. Behavior in everyday business life**

### *1. Fair competition*

We respect the rules of fair and open competition and do not enter into any unlawful agreements. Prohibited business activities must be refrained from. For example, the following actions are prohibited:

- Price, quantity and condition agreements with competitors
- Exchange of secret market information with competitors
- Calls to boycott market participants
- 2nd hand price fixing
- Territorial and customer restrictions at the expense of the customer

### *2. Anti Corruption & Bribery*

We do business exclusively through legal channels and behave in accordance with the law. Any form of corruption, bribery, theft, embezzlement or extortion is prohibited. Our employees must avoid the appearance of trying to influence the decisions of our business partners through unfair business practices.

No employee may take advantage of their position to demand or accept inappropriate or illegal benefits for themselves or third parties. We do not tolerate any behavior by our employees that is relevant under criminal law.

### *3. Donations and sponsoring*

Donations are only made by the managing directors and shareholders on a voluntary basis and without any expectation of consideration. Donations to political parties, party-like organizations, office holders and candidates for office are not permitted.

Sponsorship services are based on consideration and require a sponsorship agreement. They must be related to STOPA's core business. Donations and sponsorship services must not be aimed at covertly promoting decisions in the interests of the company.

### *4. Invitations, gifts and travel*

Any appearance that we are susceptible and corruptible to personal gain should be avoided. Gifts should therefore be rejected as a matter of principle. However, STOPA allows the exchange of socially customary courtesies and appropriate courtesies that serve the partnership relationship without creating personal dependencies.

Invitations to business meals or events that comply with recognized business practices may be accepted if they do not serve the purpose of undue preferential treatment.

The same applies to gifts that are defined as cash or non-cash gifts, benefits, rewards, invitations or other advantages.

#### *5. Export control and customs*

We respect all national and international regulations that restrict or prohibit the import, export or domestic trade of goods, technologies or services. We observe the applicable foreign trade law, applicable customs regulations and required approval procedures. We also observe embargoes and globally applicable restrictions.

We oppose the financing of terrorism or other illegal interests and carry out personal sanctions checks. We refuse to do business with persons, companies or groups subject to sanctions.

#### *6. Money laundering*

We support the international fight against money laundering and take our legal obligations very seriously.

#### *7. Environmental protection and energy management*

Environmental protection and the careful use of natural resources are a high priority for us. We comply with the applicable environmental protection standards and laws. Our aim is to design products and services that are environmentally and energy-friendly and to continuously improve eco-efficiency.

Environmentally friendly design and technical safety are already fixed targets in product development. We also use natural resources sparingly internally and pay attention to the responsible use of water, electricity and paper in our day-to-day work.

#### *8. Documentation and reporting*

Business transactions must be correctly documented and reported. All business transactions to be documented in accordance with internal or external regulations must be recorded accurately, comprehensively, promptly and in the intended place. Documentation should be electronic and stored in accordance with legal and internal requirements and deadlines.

We are obliged to report truthfully and completely, orally and in writing, within the specified framework.

#### *9. Product Compliance*

The safety of our products is our top priority. We always develop them according to the latest state of the art and with the highest safety standards. In addition, we monitor their use on the global markets and react immediately to any anomalies with suitable measures to minimize potential risks to health, safety and the environment.

## **E. Implementation and handling of this Code of Conduct**

### *1. Responsibility*

It is the responsibility of every manager to inform the employees assigned to them about the validity and content of this Code of Conduct.

As violations of the Code of Conduct can lead to considerable economic damage and loss of reputation for STOPA, the company management does not tolerate any violations.

Every employee is responsible for complying with all relevant laws, rules and standards of conduct. In the event of culpable violations, they must expect disciplinary measures and claims for damages.

This Code of Conduct is an internal code of conduct and does not justify any claims by third parties.

## *2. Implementation*

We actively promote the distribution and communication of this Code of Conduct and ensure its effective implementation. STOPA and all employees are responsible for compliant behavior. Business partners are obliged to comply with the principles of the Code of Conduct. If employees have any questions, they should contact their line manager, HR advisor or works council. Matters will be treated confidentially.

Violations of this Code of Conduct may have consequences and, depending on the individual case, may result in measures under labor law.

## *3. Supplemented by guidelines*

This Code of Conduct can be specified and supplemented by internal guidelines on selected topics. All guidelines must be consistent with this Code of Conduct. This also applies to existing guidelines that are in force at the time this Code of Conduct comes into force. The guidelines are just as binding for all employees as this Code of Conduct.

## *4. Notices & reports of violations*

STOPA strives to continuously improve compliance with internal guidelines and applicable laws and attaches great importance to preventive measures. Information from employees is valuable in this respect. STOPA encourages its employees to report violations of guidelines or laws immediately. The reporting employee should not fear any disadvantages, provided the report is made to the best of their knowledge and with honest intent. Reports can be made in person to the management or via the whistleblower platform: [Safety for whistleblowers | For trust & integrity](#)

## *5. Changes to the Code of Conduct*

STOPA is entitled to amend this Code of Conduct at any time.

Management