

Code of Conduct For Business Partners

StarragTornos Group AG

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Version 1.0



1. Fundamental principles

1.1 Foreword

At StarragTornos Group AG all Group companies (collectively “**StarragTornos**”) have a long-standing commitment to doing business responsibly and to applying the highest standards of integrity, compliance, ethical conduct and sustainability.

Our Growing sustainable strategy describes the StarragTornos vision-mission statement and goals that drive our business practices and relationships with our stakeholders. Among our strategic targets we aim to implement a robust and company-wide responsible procurement framework.

To achieve this goal we need the commitment of all our business partners. Therefore, we expect them to adhere to and to act in accordance with the principles of this Code of Conduct for Business Partners (the “**Code**”), just as we are committed to clear principles of responsibility and ethics for our employees, customers and suppliers.

This Code is an integral part of the business relationship. Within this partnership, we are committed to continuously increasing the transparency of our supply chain and working with our business partners to elevate environmental, social and ethical standards for both ourselves and them.

1.2 Scope of application

This Code applies to all suppliers, (sub-) contractors and other service providers of StarragTornos throughout the world, including their group or affiliated companies, if any and their employees, collectively referred to as “**Business Partners**”. When reference is made in this Code to employees of Business Partners, this shall include temporary employees.

StarragTornos requires from its Business Partners to adhere to this Code and to ensure that their operations comply with the relevant principles. It is also their responsibility to communicate and require their suppliers, sub-suppliers, service providers and any other stakeholders within their supply chain, to comply with this Code and to adopt appropriate systems and practices to ensure compliance.



1.3 International regulations and legal requirements

StarragTornos acknowledges and expects its Business Partners to strictly respect the ethical values and principles, in particular integrity, compliance and respect of human dignity, as set out in the:

- Universal Declaration of Human Rights (UDHR)
- United Nations Global Compact (UNGC)
- Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD)
- Conventions of the International Labour Organization (ILO)
- International Standard for socially responsible corporate governance SA8000
- Regulations and directives stipulating rules for usage of and/or disclosure of specific chemicals or raw materials in products, including but not limited to Dodd-Frank Act on conflict minerals, the EU RoHS¹ Directive and the EU REACH² Regulation

In all of the countries Business Partners operate or markets to which they provide goods or services at all times, they shall observe all locally applicable laws and regulations and minimum industrial standards.

If the legislation of any country sets lower requirements in comparison to the ones outlined in this Code, Business Partners agree to follow the highest standards set out herein. In case of direct contradictions mandatory local law takes precedence although Business Partners should make every effort to comply with the principles of this Code.

Business Partners ensure the General Data Protection (GDPR) with its binding level of protection especially where data of natural persons from the EU are transferred to non-EU countries.

1.4 Reading instructions

StarragTornos requests its suppliers to carefully read this Code. If Business Partners have any question relating to how to apply the principles of this Code, they can contact their relationship manager or the Corporate Sustainability representative at sustainability@starragtornos.com. Once Business Partners have taken notice of the applicable requirements, they must acknowledge the terms on the last page of this Code.

¹ RoHS: Restriction of Hazardous Substances

² REACH: Registration, Evaluation, Authorisation and Restriction of Chemicals



2.

Business ethics

2.1 Business integrity

StarragTornos corporate actions are based on the belief of integrity, loyalty and respect.

StarragTornos encourages its Business Partners to establish their own policies that share its values and ethics principles. Business Partners shall always act with integrity in every aspect of their business, including relationships, practices, sourcing and operations.

2.2 Rejection of corruption and bribery

StarragTornos does not tolerate any form of corruption, firmly rejects any type of bribery and strictly adheres to the UN Convention against Corruption. For this reason, but without limitation, its Business Partners shall:

- Reject and refrain from offering, promising or granting benefits to third party, the staff or representatives of third party, office holders, politicians or relatives or associates of any of these groups in return for preferential treatment when procuring goods or services;
- Not offer, make request or accept direct or indirect gifts and other advantages relating to their entire business activities. This shall not apply to occasional hospitality and gifts which are of no significant financial value and conform to the usual level of business etiquette and local culture, as far as legally allowed. The offering and acceptance of hospitality and gifts of this kind shall, however, at all times be subject to the requirement that there is no contravention of legal regulations and that the possibility of influence on business decisions can be excluded from the very outset. Requesting and accepting gifts of money shall be forbidden in all cases;
- Offer remunerations particularly in the form of commissions, paid to third parties, especially salespersons, distributors, brokers, consultants or other intermediaries, that must be proportionate to the work provided and shall be documented in writing in full, particularly in terms of the subject of the remunerated activity and the settlement date. These payments must be of such a size that they do not even create an assumption that the existing rules are bypassed;
- Comply with all applicable anti-corruption and money laundering laws and regulations of the countries in which the Business Partners operate, including, without limitation, the guidelines of the International Chamber of Commerce (ICC) for combating corruption in business, the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010 as well as any applicable international anti-corruption conventions.

2.3 Fair competition & antitrust

StarragTornos expect its Business Partners to strictly comply with international and local laws protecting and promoting fair competition as well as applicable antitrust laws. Business partners shall refrain from engaging in any anti-competitive behavior, such as price-fixing cartels, market



allocation, bid-rigging, exchange of competitively sensitive information with competitors or other forms of collusion or unfair trade practices, etc.

2.4 Trade compliance & payments

StarragTornos adheres to all international trade regulations and rules including but not limited to foreign trade, transportation conventions, customs duties, non-tariff barriers, embargoes and counter-terrorism measures as well as the regulations established in this context relating to payment processes which are applicable in the countries in which it conducts business. StarragTornos expects from its Business Partners to similarly adhere to and respect these regulations. To ensure compliance, appropriate due diligence on third parties must be conducted.

Payments for deliveries and services received shall be made directly to the relevant contractual partner only (in the absence of legally valid transfer agreements or mandatory redemptions) and always in the country of the contract partner's registered office.

2.5 Protection of data and intellectual property

The protection of data and intellectual property as well as data security are critical for maintaining the trust and ensuring the long-term success of business relationships. For this reason, but without limitation, Business Partners shall:

- Protect the confidentiality, integrity and availability of the intellectual property of StarragTornos, such as, but without limitation, patents, designs, trade secrets, models and know-how;
- Make sure that intellectual property rights of third parties are respected and only used if and to the extent authorized to do so. Business Partners must not in particular use counterfeit parts or components in any product supplied to StarragTornos.

2.6 Product compliance and safety

StarragTornos is committed to protect the safety of its customers and employees and fulfill all obligations to protect the environment. Business partners shall in particular, but without limitation:

- Ensure that all products provided to StarragTornos are in compliance with all requirements covered under the scope of all relevant regulations and the agreed specifications related to product compliance and safety;
- Make available on demand, when applicable, the related proofs of conformity and other supporting documents associated with the product safety and quality (e.g. Certificates, Declarations of conformity, Test reports, Bill of materials, User guide, Information on safe usage).

2.7 Responsible procurement, transparency and traceability

StarragTornos is committed to complying with regulatory and customer requirements regarding the prohibition and restriction of substances, including conflict minerals and materials, hazardous substances and waste. Business Partners shall in particular, but without limitation:

- Support all responsible procurement practices of raw materials and avoid acquiring raw materials unlawfully or through unethical means;
- Source critical raw materials, especially conflicts minerals (3TG) from audited sources, preferably certified by independent third parties;
- Fully adhere to regulations such as the Dodd-Frank Act on conflict minerals and the EU Conflict Minerals regulations, as well as other relevant local laws and directives;
- Implement policies, tools or best practices to ensure traceability all along the supply chain and respond in a timely manner to StarragTornos' requests for evidence of compliance.



3.

Protection of human and labor rights

3.1 General considerations

Human and labor rights are fundamental rights inherent to every individual, regardless of race, gender, nationality, ethnicity, language, religion, or any other classification. Human rights include the rights to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and others. Labor rights include the right to fair and productive employment, under conditions of freedom, dignity, equity and safety.

Business Partners shall uphold the highest standards of human and labor rights and regularly monitor human rights conditions throughout their supply chain, especially in high risks areas and locations.

3.2 Prohibition of child labor

StarragTornos does not tolerate any form of child labor within its operations or its supply chain. As a consequence, Business Partners must not tolerate any form of child labor within their own operations and supply chain and respect applicable national laws, or the ILO core labor standards as a minimum. Business Partners shall in particular, but without limitation:

- Ensure that the minimum age of an employee is not less than the age of completion of compulsory schooling and, in any case, not less than 15 years or the minimum age stipulated by local law, whichever is higher;
- Ensure that the minimum age for admission to any type of employment involving hazardous work conditions or the operation of heavy machinery or night work or overtime, shall not be less than 18 years;
- Implement internal policies and procedures equivalent to or exceeding the expectations and principles of this Code, including when dealing with suppliers, agents, contractors and temporary labor agencies.

3.3 Prohibition of forced labor and modern slavery

Forced labor or modern slavery is defined as any work or service required of any person under threat of retribution or punishment, and for which the person has not volunteered. This includes, without limitation, debt bondage, servitude, human trafficking or any other form of domination or oppression in the workplace environment like use of force or humiliation. StarragTornos does not tolerate any form of forced or compulsory labor within its operations and supply chain.

Business Partners shall in particular, but without limitation:

- Implement employer practices aligned with ILO core labor standards, in particular, ensure that



all employees work voluntarily and have the freedom to terminate their employment relationship at any time with appropriate notice;

- Refrain from requiring employees to surrender passports, identification documents, work permits or similar items as a condition for employment or with the intent of restricting free movement;
- Refrain from requiring applicants to pay recruitment fees or bear unreasonable expenses, considering international norms and practices;
- Ensure that contracted private or public security forces are not engaged if they may lead to human right violations (e.g. through torture, use of force or injury of life or limb). If internal employees are used for security services, Business Partners shall ensure they receive training on human rights related to the working environment;
- Implement internal policies and procedures equivalent to or exceeding the expectations and principles of this Code, including when dealing with suppliers, agents, contractors and temporary labor agencies.

3.4 Non-discrimination and equal opportunities

As a globally active company, StarragTornos collaborates with employees and business partners from diverse nationalities and cultures. Working together is guided by values such as respect, tolerance, mutual appreciation, fairness and openness.

StarragTornos does not tolerate any form of discrimination or harassment, be it based on gender identity, ethnic origin or race, and any membership of a specific population group such as, but without limitation, nationality, religion, age, disability, sexual orientation, social background, political affiliation or union membership. Business Partners shall, in particular, but without limitation:

- Ensure compliance with ILO core labor standards;
- Not tolerate any form of discrimination or harassment physical or psychological violence in all processes and situations;
- Implement policies and practices to promote equality of opportunity and inclusion for all employees;
- Ensure that inclusion and diversity principles are clearly communicated and valued within the organization;
- Ensure that investigation processes and grievance procedures are in place and communicated to all employees.

3.5 Rights of local communities

Business partners shall commit to protecting the rights, health, safety and environment of local communities and indigenous people, who may be affected by their activities or operations. In particular, Business partners must refrain from any forced eviction or relocation potentially connected to their operations.

3.6 Occupational health and safety

As an industrial manufacturing company, employees' health and safety are top priorities for StarragTornos, both within its own operations and throughout its supply chain. StarragTornos has established an internal culture focused on fostering a healthy environment and achieving a zero-accident goal, and it expects its Business Partners to align with this vision. Business Partners are therefore required to provide a healthy and safe working environment for all of their employees at their facilities, in compliance with all applicable laws and regulations. Business Partners shall in particular, but without limitation:



- Have a process in place to identify and evaluate the health and safety risks associated with their operations and implement a management system for hazard elimination or mitigation before personal protective equipment becomes a mandatory measure;
- Ensure that all their employees are informed about these significant risks and receive health and safety trainings on a regular basis, in the local language or another suitable language if employees do not speak the local language;
- Implement a healthy and safe workplace for all their employees and workers that guarantees emergency plans and response procedures that minimize harm to life, environment and property;
- Provide all employees, where necessary for job-related, free personal protective equipment and instruction on its proper use;
- Provide employees and workers with reasonably accessible and clean facilities, including access to potable water and adequate sanitation;
- Address efforts to continuously improve working conditions at their facilities regarding occupational health and safety, keep them up-to-date with local applicable laws and regulations and make sure they are communicated to all their employees.

3.7 Fair working conditions

StarragTornos is committed to employing all work force under fair conditions, ensuring compliance with at least all national legal requirements in the country of employment and expects all of its Business Partners to guarantee the same. Business Partners shall, in particular, but without limitation:

- Compensate all employees fairly under consideration of local wage regulations and/or collective agreements and/or industry benchmarks standards, including those relating to minimum wages and legally mandated social benefits. In their absence, wages shall always be high enough to meet basic needs and to provide some discretionary income;
- Review and update wages and social benefits on a regular basis to ensure compliance;
- Refrain from deductions on wages as a disciplinary measure unless otherwise foreseen in local law;
- Ensure working hours, including overtime and days of rest, that are in compliance with applicable national legislation. In their absence, StarragTornos recommends that the weekly working hours shall not exceed 60 hours, including overtime, except in proven exceptional situations, such as unexpected production peaks, accidents or emergencies;
- Provide employees with at least one day off every seven days and ensure that medical or maternity leave or other absences are granted in compliance with the applicable law;
- Provide all their employees and workers, before they enter employment, with written and understandable contractual agreements, including sufficient information on wage and compensation for work performed;
- Refrain from employing any workers who do not have the right to work.

3.8 Freedom of association and right to collective bargaining

StarragTornos recognizes freedom of association and collective bargaining as fundamental human rights. StarragTornos expects its Business Partners to enable and support the development of an open and constructive dialogue with all their employees and workers. Employees shall be able to freely choose to form, run or join any employee organizations or work councils, to bargain collectively and seek representation in accordance with local laws. These rights must be respected without any form of interference, discrimination, reprisal, harassment or the involvement of security forces.



4. Protection of the environment

4.1 General considerations and environmental compliance

StarragTornos acknowledges the urgent environmental challenges that the world confronts today and aims to contribute to mitigating the effects of climate change and preserving natural resources. StarragTornos is committed to reducing the environmental impact of its operations and activities. Additionally, StarragTornos encourages its Business Partners to continuously improve their environmental practices.

Compliance with all applicable environmental laws and regulations, including the local provisions of the respective countries, is a self-evident obligation for both StarragTornos and its Business Partners, regarding operations as well as services supplied.

Business Partners must systematically identify and assess environmental risks for their own operations and their supply chain and establish suitable measures to prevent and mitigate any environmental risks and impacts. Business Partners should be able to respond in a timely manner to StarragTornos' requests for evidence of compliance.

4.2 Pollution prevention and reduction

StarragTornos requests its Business Partners to take proactive measures to prevent pollution and identify key sources of (hazardous) waste and emissions within their operations. This includes closely monitoring and controlling discharges of pollutants or harmful emissions into soil, water and air, as well as addressing concerns related to odor and noise pollution.

Whenever possible, efforts should be made to minimize or eliminate emissions and the generation of pollutants directly at the source. This can be achieved through various means, including but not limited to the implementation of pollution control equipment and the optimization of production and maintenance processes.

Business Partners shall comply with the applicable local laws or where such laws do not exist, with international standards.

4.3 Handling hazardous substances

Hazardous substances are chemicals, materials or any substances that, if present or released, pose a threat to humans or the environment. StarragTornos requests its Business Partners to:

- Identify and manage potentially hazardous substances to guarantee safe handling, transportation, storage, recycling and disposal thereof;



- Whenever possible, avoid the use of hazardous substances by adopting new processes;
- Comply with all applicable laws, regulations and standards on critical, prohibited or hazardous substances contained in the end product or production process. This compliance should apply with the statutory requirements in the regions where products are manufactured or sold, such as the EU RoHS or REACH regulations.

4.4 Greenhouse gas (GHG) emissions and energy usage

StarragTornos requests its Business Partners to support the decarbonization efforts and targets throughout their supply chain and the entire lifecycle of their products. Business Partners shall:

- Regularly monitor and report related emission data to StarragTornos upon request;
- Establish plans and targets to continuously reduce the greenhouse emissions of their activities;
- Whenever possible, implement continuous energy efficiency programs and increase the use of renewable energy for the production of the materials, components and provided services.

4.5 Responsible use of resources and water

Business Partners must implement a systematic approach for waste management, emphasizing identification, control, reduction, and responsible disposal or recycling of non-hazardous waste. It is crucial to prevent any illegal waste disposal.

Furthermore, Business Partners should focus on resource efficiency by minimizing energy, water, natural resource, and raw material consumption. Innovation plays a key role in achieving continuous improvement in these areas.

Wherever feasible, Business Partners are encouraged to adopt strategies aligned with circular economy principles such as eco-design and eco-efficiency, when designing their products, packaging and services. Products should be designed to facilitate reuse, recycling or upcycling while avoiding planned obsolescence.

Business partners operating in regions affected by water scarcity and/or water stress should practice water conservation and safeguard access to water sources. Additionally promoting the reuse, recycling of water and the use of rainwater should be actively encouraged.

4.6 Biodiversity

Business Partners must implement reasonable measures to prevent their involvement in or benefit from illegal activities leading to the conversion or loss of natural ecosystems, including illegal deforestation.



5. Implementation of the code

5.1 Selection of business partners

StarragTornos selects its Business Partners on the basis of objective and economic criteria and examines all offers from its suppliers fairly and impartially. Unprofessional preference or disadvantaging of suppliers, especially for private reasons, is prohibited as a matter of principle. In case of invitations to tender, contracts shall be awarded to the most cost-effective tender unless other reasons (quality, service, long-standing business relation, creditworthiness, etc.) justify a different decision. In these cases, the decisive considerations shall be documented, without enabling third parties to derive claims from this action.

In addition, StarragTornos attaches importance to the principles that, wherever possible, the requirements of this Code are to be incorporated by its Business Partners into their contractual agreements, particularly with suppliers, but also with customers and/or other third parties.

5.2 Audit and information rights

To ensure compliance with this Code, Business Partners must maintain records of relevant documentation and provide supporting documents to StarragTornos upon request. Business Partners also agree to truthfully complete questionnaires on relevant topics when requested by StarragTornos.

StarragTornos reserves the right to audit and inspect Business Partners' operations and facilities with reasonable notice.

Business Partners have to ensure that the standards outlined in this Code are implemented across their supply chain. They must ensure that their suppliers, sub-suppliers, service providers, and all other stakeholders within the supply chain, including company owners, board members, or management personnel, comply with and implement systems and practices to adhere to this Code. Compliance shall be diligently monitored, and upon request, relevant evidence must be furnished to StarragTornos.

5.3 Reporting of violations

Unless prohibited by applicable law, Business Partners shall immediately inform StarragTornos about situations or incidents that are contrary to the principles of this Code and collaborate with StarragTornos in any subsequent investigations and immediate implementation of remedies. Employees of Business Partners or any other concerned parties are encouraged to report any concerns regarding this Code or suspected violations, even anonymously, through our Compliance



Helpdesk at compliance@starragtornos.com Information provided via the Compliance Helpdesk will be treated confidentially.

Business Partners are also responsible for informing their employees and other stakeholders about the option to report violations in accordance with the above guidelines or by providing similar means of reporting.

5.4 Non compliance

StarragTornos reserves the right to terminate relationships with suppliers violating this Code, prioritizing collaboration for remediation initially. Termination is considered a last resort after attempts to mitigate negative impacts have failed. Any breach of this Code is deemed a fundamental contract violation, allowing for remedial measures within a specified timeframe. Failure to comply or severe violations may lead to immediate termination without notice.

StarragTornos emphasizes adherence to its Code while offering opportunities for improvement before resorting to termination.



Code of Conduct for Business Partners Acknowledgement of terms

Company name _____

Full address of company _____

Street _____

Zip code & City _____

Country _____

Contact name (Full name in capital letters) _____

Position _____

Please tick the box before signing

I hereby agree to have read and accepted the terms of the StarragTornos Code of Conduct for Business Partners. This acceptance applies to the undersigned partner, its parent company, and its subsidiaries, if any.

Signature by authorized signatories

_____ Date _____