

Code of Conduct



Introduction

STEA Stahl- und Metallbau GmbH (=STEA) has been active in steel and metal construction for 30 years. Our range of services includes steel constructions from planning to delivery and assembly, e.g. in industrial, plant and hall construction. We are a family-run, medium-sized company with over 80 employees. As a value-oriented company, we are aware of our responsibility towards people and the environment and are committed to complying with ethical and sustainable practices in everyday business.

For STEA, sustainability in the supply chain is an important part of its corporate responsibility. It extends to the procurement process of materials, products and services. We have set out our expectations of suppliers with regard to environmental protection, working conditions, compliance with human rights and business ethics in this code of conduct. We want to assume our responsibility for people and the environment and ensure that our actions and the actions of our suppliers are ethically correct, ecologically sustainable and socially acceptable.

Scope

This Code of Conduct applies to all STEA suppliers and business partners to the extent reasonably possible. It sets our minimum standards and expectations for environmental, social and ethical performance. These are based, among other things, on the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact, the principles of the International Labor Organization (ILO) and the OECD guidelines on fulfilling due diligence requirements for responsible corporate conduct. All of our suppliers are strongly recommended to apply the same or similar standards and impose the same requirements on their suppliers - STEA's sub-suppliers.

1) Human Rights

a) Child labour

Our suppliers reject any form of child labor. This applies in particular to the worst forms of child labour, such as hazardous activities which may be harmful to the health, safety or morals of children. The recruitment age must be in accordance with the labor legislation of the respective country.

b) Forced Labor

Our suppliers reject any form of forced or compulsory labour. So is every form of debt bondage, indentured labor, military labor, modern day slavery and human trafficking. Work must always be done voluntarily. In accordance with the law, our suppliers will not tolerate forced or unlawful compulsory labor in the course of their business.

c) Diversity, inclusion, harassment and discrimination

Our suppliers promote a work environment that enables inclusion and values the diversity of their employees. They are committed to equal opportunities and reject any form of discrimination or harassment, for example on the basis of gender, skin color, ethnic origin, nationality, social background, religion, world view, age, disability, sexual orientation, health status, political or other beliefs or other legally protected features.

d) Ethnic recruitment

When hiring employees, our suppliers expect the legal requirements, as well as the ethical standards, fairness and integrity. Abuse, threats and other illegal activities will not be tolerated. The basis for the selection and promotion of employees is qualification, performance, individual skills and experience.

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e) Freedom of Association

Our suppliers respect the right to freedom of association and collective bargaining. Employee representatives must not be discriminated against. Your employment contract may not be terminated in retaliation for exercising employees' rights, reporting wrongdoing, participating in union activities, or reporting suspected violations.

f) Compensation

Our suppliers must follow a fair remuneration policy that complies with all national remuneration laws. Equal pay is also paid for work of equal value, regardless of gender or other discriminatory distinctions.

g) Working hours

Our suppliers comply with all applicable local laws regarding working hours, including overtime, rest periods and paid vacation time. In addition, they work within the framework of the applicable law to ensure that work breaks, reasonable limitation of working hours and regular paid vacation are guaranteed.

h) Labor protection

Our suppliers must comply with the applicable legal requirements for health protection and safety at work. They follow internationally recognized standards and work actively to identify and correct safety deficiencies in order to improve workplace conditions in a way that ensures and protects health and safety.

i) Deployment of security forces

When using internal and external security forces to protect their business activities, our suppliers must ensure that they are obliged to respect internationally recognized human rights.

j) Local communities and indigenous peoples

Our suppliers are aware that their operations may impact local communities and indigenous peoples. They respect their rights and strive to keep the disruption to the local population and their livelihoods to a minimum.

2) Business ethics

a) Compliance with Laws

Our suppliers must comply with applicable international, national and local laws in their business activities. The necessary permits must be obtained and presented to STEA upon request.

b) Corruption

Our suppliers comply with national and international anti-corruption regulations, laws and standards. In conducting business, you will consistently reject any form of bribery, unlawful acceptance or granting of benefits, and all forms of corruption, including extortion and embezzlement. You refrain from giving gifts, invitations and hospitality that go beyond the usual occasional gifts of little value or that go beyond what is customary in business.

c) Free competition

In the interest of free competition, our suppliers completely refrain from any anti-competitive behavior such as price fixing, dividing up market segments, fixed prices, etc.

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d) Money laundering

Our suppliers comply with applicable money laundering laws and regulations and do not engage in money laundering activities.

e) Conflicts of Interest

Our suppliers make their decisions solely on the basis of factual criteria. They are not influenced by personal interests or relationships.

f) Privacy, intellectual property, trade secrets

Our suppliers observe all applicable laws for the protection of personal data of employees, customers, suppliers and other affected parties. Intellectual property, trade and business secrets, etc. of STEA and third parties must be respected and may not be passed on without the express written consent of STEA.

3) Environmental protection

a) Environmental protection

Our suppliers take proactive measures to be environmentally responsible. The applicable national environmental laws, regulations and standards must be observed. They undertake to set up systems that prevent or at least minimize unintentional discharges or releases into the environment. Employees are to be instructed on how environmental risks can be actively avoided.

b) Energy and resource efficiency

Our suppliers are expected to use natural resources sparingly, including raw materials, water and energy, and to reduce or avoid pollution of the air, land and water. You make an active contribution to reducing or avoiding greenhouse gas emissions, noise emissions and energy consumption. If possible, switch to renewable energy in the company.

c) Waste and Recycling

Our suppliers are expected to take into account waste prevention, reuse, recycling and the safe, environmentally friendly disposal of residual waste in the development, manufacture and for the use phase of products and other activities.

d) Conflict minerals

Upon request, our suppliers provide information about the country of origin of raw materials. Products are expected not to use raw materials mined in conflict-affected and high-risk areas, or finance armed groups that violate human rights.

e) Chemicals/Hazardous Substances

When manufacturing or importing chemical substances into the European Union in quantities of more than one ton per year, our suppliers are expected to enter these substances in a central database of the REACH authority (=Registration, Evaluation, Authorization and Chemicals) can be verifiably registered.

Responsible handling of storage and disposal is also expected.

f) Animals and plants

Our suppliers are expected to comply with all applicable animal and plant protection laws and regulations. They prevent emissions that are harmful to the environment and/or health and avoid the manufacture of products with ingredients that are harmful to the environment and/or health. They contribute to the protection and preservation of biodiversity.

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g) Natural foundations of life (ground, water, air)

Our suppliers are expected not to take land, forests or bodies of water, the use of which ensures the livelihood of people, animals and plants, in violation of the legitimate rights of third parties. They must refrain from harmful soil changes, water and air pollution, deforestation, noise emissions and excessive water consumption if this damages people's health, significantly impairs the natural basis for food production or prevents people from accessing safe drinking water and sanitary facilities.

Violation of this Code of Conduct

STEA expects its suppliers and their employees to act responsibly, to adhere to this code of conduct and to work according to its guidelines and principles. In the event of violations of the above-mentioned requirements in your own business area and in the supply chain, STEA offers the opportunity to submit relevant complaints or tips. STEA Stahl- und Metallbau GmbH has joined the common reporting office of the guilds at the Cham District Crafts Association, in accordance with Section 14 HinSchG, for better protection of people who provide information. Information or complaints can be submitted via the following reporting channels:

- a) Messages in text form:
One specifically set up to receive and process reports in accordance with the HinSchG
E-mail address: **Hinweisgeber-meldestelle@khs-cham.de**

- b) Messages in written form:
In writing to the following address:
Kreishandwerkerschaft Cham
Hinweisgeberschutzgesetz-Meldestelle
Frühlingstraße 13
93413 Cham

- c) Verbal reporting channel:
Hinweisgeber-Hotline: +49 (0)9971-200 480

- d) Personal reporting channel:
Kreishandwerkerschaft Cham
Gemeinsame Hinweisgeber-Meldestelle der Innungen Cham
Frühlingstraße 13
93413 Cham

Further information on the Whistleblower Protection Act (HinSchG) can be found on our homepage
<https://stea.de/hinweisgeberschutzgesetz/>

STEA Stahl- und Metallbau GmbH protects persons who provide information from discrimination and punishment as a result of a complaint.

STEA is entitled to demand appropriate measures in individual cases in the event of violations of this code of conduct. Failure to implement the corrective actions may result in suspension or termination of the supplier contract/business relationship.