

Typical family-owned company, S.T.T.S aims to improve people's quality of life and safeguard current and future generations livelihoods by acting in an economically, ecologically and socially responsible manner.

Our suppliers, contractors, subcontractors, consultants, sellers or other partners (hereinafter referred to as business partners) are an integral part to our activity and our purposes and play a significant role in achieving these goals. We regard a shared appreciation of ethical values and sustainable practices to be a mainstay of these relationships.

The requirements and principles of this code of conduct are an integral part of the contractual obligations and collaboration between S.T.T.S and its business partners. The latter therefore undertake to respect and promote the principles of this code of conduct and to provide regular and appropriate training to their workforce to this end.

The content of the code of conduct shall also apply in its entirety to third parties used by our business partners to fulfil any contract with S.T.T.S. Accordingly, our business partners shall incorporate the requirements corresponding to the content of this Code of Conduct into their respective contracts. We expect them to do their utmost to oblige their suppliers and third parties to do the same.

QUALITY

S.T.T.S ensures that quality is and remains at the heart of its business. We are committed to continuous improvement by working together and complying with agreed company processes. S.T.T.S also expects its business partners to demonstrate a commitment to quality and to comply with S.T.T.S purchasing requirements as well as any individual customer specific requirements. We encourage our business partners to work with S.T.T.S in an open and collaborative manner to ensure the continuous improvement of our business.

PRINCIPLE OF LEGALITY

S.T.T.S respects the principle of strict legality in its activities, actions and contracts and asks its business partners to follow the same principle. This includes paying taxes and customs duties, observing fair competition and anti-trust laws, prohibiting corruption and money laundering, obtaining all official authorisations, complying with local, national, international and export laws and regulations and not infringing the legal rights of third parties as well as laws protecting social and environmental standards.

WORKERS' RIGHTS

S.T.T.S shares the principles set out in:

- The International Bill of Human Rights.
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.
- The United Nations Guiding Principles on Business and Human Rights (UNGPs).

HUMAN RIGHTS

We expect all our trading partners to consistently respect internationally recognized human rights and to actively contribute to their protection. The United Nations Guiding Principles on Business and Human Rights form the basis of these commitments. This includes the preservation of local communities, the protection of indigenous peoples and support for human rights defenders.

CHILD LABOUR

Our business partners undertake to employ only persons who have reached the age of 15 (or 14 if permitted by national law), the age of completion of compulsory education or the minimum legal age to work in accordance with the country's legislation, whichever is the most demanding. No form of child labour is tolerated. In addition, our trading partners must ensure that the dignity, rights and well-being of children are respected in all their activities.

They also undertake not to entrust any work likely to compromise the health, safety or physical and moral integrity of workers under the age of 18.

FORCED LABOUR

We expect our business partners to strictly reject all forms of forced labour, including but not limited to human trafficking, torture, slavery or compulsory labour of any kind.

The principle of freely chosen work must be respected and observed.

FREEDOM OF ASSOCIATION

The fundamental right of employees to form and join trade unions on their own initiative must be respected by our business partners. Members of a trade union or staff representatives shall not constitute a reason for unjustified discrimination. The right to collective bargaining for the settlement of internal disputes, for working conditions and the right to strike shall be granted within the framework of legal provisions.

EQUAL OPPORTUNITIES AND FAIR TREATMENT

We expect our business partners to exclude any discrimination based on skin colour, ethnic origin, gender, age, nationality, social background, illness, sexual orientation, religious affiliation, ideologies, or trade union or political activities. This also applies to any form of harassment or psychological abuse. Based on comparable requirements and tasks, the principle of equal pay for work of equal value must apply regardless of gender.

FAIR WORKING CONDITIONS

Our business partners are committed to enforcing the right to fair working conditions. This includes a decent wage and social benefits equivalent to or higher than the rates prescribed by regional or national authorities, legislative standards or other labour agreements. The legal minimum wage provisions of the respective countries must be observed in addition to the regulations in force on working hours, breaks and holidays.

OCCUPATIONAL SAFETY AND HEALTH

At the minimum, we require our business partners to put in place an appropriate and sufficient health and safety management system. This should set out requirements for assessing workplace risks, controls to eliminate or reduce these risks, appropriate instructions and training for those who may be affected.

Our business partners must also comply with national occupational health and safety standards and must commit to meeting health and safety requirements to ensure good working conditions.

PROTECTION FROM EVICTION AND LAND DEPRIVATION

Our business partners undertake to refrain from any illegal evictions. They shall also refrain from any illegal deprivation of land, forests and water through acquisition, development or any other resulting use.

THE USE OF PUBLIC OR PRIVATE SECURITY FORCES

Our business partners refrain from hiring or using private or public security personnel if, due to a lack of instructions or control on the part of the company, there is a risk of breaching from the prohibition of torture and cruel, inhuman or degrading treatment, of danger of death or injury or risk of infringing the freedom of association.

ENVIRONMENTAL STANDARDS

ENVIRONMENTAL PROTECTION

In keeping with the precautionary principle, our business partners undertake to make every effort to minimise risks to people and the environment and to protect natural resources. Our business partners are expected to operate a suitable and sufficient environmental management system, which includes the requirement to assess environmental risks, implement controls to eliminate or reduce those risks and to provide adequate information to those who may be impacted.

All processes, operating sites, and production resources employed by our business partners must meet applicable statutory requirements and standards for environmental protection.

CLIMATE ACTION

We expect our business partners to commit to active and sustainable climate action, for example, by improving their energy efficiency, or by producing or using energy from renewable sources. They must have a transparent view of their carbon emissions and set ambitious targets for reducing their carbon footprint, with the ultimate goal of zero carbon by 2050.

WATER CONSUMPTION AND QUALITY

Our business partners undertake to use water carefully. In regions where water is scarce, they must limit consumption and provide access to drinking water and sanitation. Wastewater quality standards must be defined and monitored within the framework of applicable regulatory requirements.

AIR AND SOIL QUALITY

At a minimum, our business partners shall comply with applicable legal provisions and the requirements of the legal authorities.

Disposal of materials and waste: we expect our business partners to minimise the impact their operations may have on the environment and to use resources sparingly.

Materials, products and articles should be reused wherever possible.

As far as waste management is concerned, our commercial partners undertake to follow the principle of first avoiding waste, then recycling, and finally disposing of it as a last resort.

SUBSTANCES OF CONCERN

Our business partners are required to observe the rules of materials compliance - that is, the statutory substance prohibitions, restrictions, and declaration requirements and any applicable standards. This means observing the ban on the production of products containing mercury, the prohibition of using mercury and mercury compounds in manufacturing processes and treating mercury waste.

COMMERCIAL RELATIONS

AVOIDING CONFLICTS OF INTEREST

We ask our business partners to make decisions based on objective considerations and not to be guided, inappropriately, by personal interests. A business partner who becomes aware of a potential conflict of interest must take the necessary internal measures to remedy the conflict and inform S.T.T.S. immediately.

FREE COMPETITION

Our social partners are obliged to observe the rules of fair competition and comply with all regulations in force. They shall refrain from discussing or signing agreements that restrict competition, favour abuses of dominant positions, certain concentrations and acquisitions that give rise to a significant reduction in competition, as defined by competition rules.

ANTI-CORRUPTION

Our business partners are committed to complying with anti-bribery laws. They shall ensure that their employees, subcontractors or representatives do not offer, promise or grant advantages to S.T.T.S associates in order to obtain a contract or other preferential treatment. Business partners may only offer gifts or hospitality in an open and transparent manner; this must not be intended or construed as an attempt to improperly influence business decisions.

The same rules apply to third-party agreements entered into in the course of a contract with S.T.T.S.

MONEY LAUNDERING

Our business partners are required to comply with laws preventing money laundering and duly fulfil their obligations in this respect.

PRIVATE DATA AND DATA SECURITY

Our partners undertake to enforce the right to informational self-determination, the privacy of personal data, and the security of all business information and personal data in all business processes in compliance with statutory provisions and the applicable privacy and information security laws.

Business partners shall also safeguard our resources and information and ensure that all data and documents are kept secure. Furthermore, the use of appropriate nondisclosure or confidentiality agreements to protect confidentiality and proprietary information shall be employed when deemed fitting.

POLITICAL SUPPORT

Our business partners should act lawfully, honestly, with integrity and openness in all dealings with governments, their agencies and representatives.

CUSTOMS AND EXPORT CONTROL REGULATIONS

Our trading partners are committed to complying with international customs systems and export control regulations, and to proactively sharing all information relating to foreign trade in order to secure the supply chain.

CONFLICT MINERALS

S.T.T.S supports the aim of regulations concerning the supply and use of “conflict minerals”. We support an end to violence and an end to the violation of human rights in mining operations in regions described as “Conflict-affected and High-Risk Areas” (CAHRAs).

S.T.T.S does not, knowingly source specific metals from these conflict regions, and we expect our suppliers to conduct due diligence on their supply chain to ensure compliance with this request. In addition, every year suppliers will be required to submit to S.T.T.S a new CMRT declaration and

accompanying (so-called extended or “EMRT” or other) versions confirming compliance with this rule.

We ask our commercial partners to refrain from any activity which, directly or indirectly, contributes to the formation of armed groups. To this end, they shall comply with the S.T.T.S policy on the purchase of raw materials in so-called conflict zones and comply with the applicable regulatory provisions.

WHISTLEBLOWING SYSTEM

All our business partners, their employees, their own suppliers and all stakeholders are encouraged to report any suspicious cases or suspected violations of the Code of Conduct. The aim is to mitigate the consequences of such incidents and prevent the recurrence of non-compliant behaviour.

Our business partners undertake to put in place the necessary means to enable their employees, but also those of their suppliers and subcontractors, to report any concerns, irregularities or violations of the Code, and to transmit this information to S.T.T.S. They must establish, maintain and communicate a clear mechanism to ensure that everyone has the opportunity to voice their concerns safely and without fear of reprisals.

All information transmitted will be treated with the strictest confidentiality, and the identity of the persons who have made a report will be fully protected, both by our business partners and by S.T.T.S.

CRISIS MANAGEMENT

If an incident, event or grievance related to corporate social responsibility occurs, the supplier undertakes to inform S.T.T.S. as soon as possible. It will also be responsible for conducting a thorough root cause analysis and implementing appropriate corrective measures to remedy the situation. Proposals for improvement actions will have to be formulated and effectively implemented.

Finally, the supplier must provide S.T.T.S. with tangible proof of the corrective actions taken and the improvements obtained.

MONITORING

S.T.T.S. reserves the right to request self-assessment questionnaires, to carry out on-site visits or to commission independent and duly authorised third parties to audit its business partners on its behalf. These steps are aimed at verifying their level of social and environmental compliance in accordance with the minimum requirements set out in this Code of Conduct.

If on-site audits are necessary, the partner will be informed well in advance. S.T.T.S. will also ensure that these audits are conducted in a professional manner and that they do not unnecessarily disrupt the partner's operations.

REPERCUSSION CLAUSE

Non-compliance with this CSR Code may have a negative impact on S.T.T.S. or on the relationship with the business partner. S.T.T.S. reserves the right to reassess its commercial position with any commercial partner which, itself or in a part of its value chain, has materially violated this CSR Code.

SUPPLIER COMMITMENT

I HEREBY CONFIRM ACCEPTANCE AND UNDERSTANDING OF THE ABOVE-MENTIONED S.T.T.S. CODE OF CONDUCT AND THE RESPONSIBLE SOURCING STANDARDS AND REQUIREMENTS.

Company name:

Date and place:

Name and Function (in capital letters):

Signature and stamp: