



# **Stahl Parent B.V.**

## **BUSINESS PARTNER CODE OF CONDUCT**

**November 2024**

# 1. Introduction

STAHL is committed to the highest standards of social and environmental responsibility and ethical conduct as described in the Stahl Parent B.V. (“STAHL”) Code of Conduct. STAHL requires its business partners to comply with and to operate in accordance with the principles in this Code of Conduct (‘Code’) (or demonstrate equivalent policies and standards) and in full compliance with all applicable laws and regulations.

STAHL expects suppliers and/or business partners to use a proactive approach in establishing and maintaining the standards set forth in this Code and to conduct them with responsibility and integrity. The business partner is obliged to agree to the conditions in this Code and acknowledge that any deviations found can have an adverse effect on the relationship with STAHL, including a potential (immediate) discontinuation of the business relationship. The business partner commits, upon signing this Code, to all applicable legislation and regulations. This Code therefore forms an integral part of the agreement between the business partner and STAHL. To verify compliance with the Code, STAHL shall consult periodically with the business partner either directly or through independent verification systems such as Ecovadis. STAHL has the right to speak with and train business partner employees directly in order to fully comply with the Code. When appropriate, STAHL can request an audit be conducted by a third party service provider to be appointed by STAHL. The Code obliges the business partner to fully cooperate in this investigation.

STAHL expects its business partners to comply with the national regulations and to conduct its activities in accordance with the Universal Declaration of Human Rights by the United Nations, the International Labour Organization's standards and the UN Global Compact Guiding Principles. STAHL emphasizes the following specific areas of interest.

## 2. General Business Principles, Ethical Behavior & Integrity

**REGULATIONS:** The business partner operates in full compliance with international and national laws and regulations applicable to their business operations, and to obtain all necessary permits.

**BUSINESS INTEGRITY:** STAHL applies zero-tolerance towards corruption. The business partner shall not engage in any form of corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. The business partner shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates including all applicable international anti-corruption conventions. STAHL does not contribute to any form of ‘tied selling’ or ‘tying’, initiated by a media outlet.<sup>1</sup> STAHL expects business partners to be transparent about potential conflicts of interest which could influence a STAHL business decision or business partner relationship.

**FREE AND FAIR COMPETITION:** STAHL behaves transparently and fairly in the marketplace. The business partner must value free and fair competition throughout the world and comply with anti-trust and competition laws.

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<sup>1</sup> Tying exists among others when a media outlet makes the publication of an editorial article of a customer of the supplier dependent on the advertising purchase by (among others) this supplier.

**CONFIDENTIALITY/DATA PROTECTION:** The business partner protects all confidential information and data provided by STAHL and its respective business partners. Such information and data must be used according to the agreed purpose. Confidentiality of information exchanged during business must also be respected. In the event of personal data handling, STAHL expects personal rights and privacy of those concerned to be protected. The business partner must comply with data protection and information security laws and regulatory requirements, including best practices, when collecting, storing, processing, transmitting, destroying and disclosing personal information. The business partner shall take adequate security measures both at technical and organizational level to protect personal data.

**PROTECTION OF INTELLECTUAL PROPERTY:** The business partner shall respect intellectual property rights and safeguard customer information. The business partner shall manage technology, artificial intelligence tools/programs and know-how in a manner that protects intellectual property rights.

**PRODUCT QUALITY AND PRODUCT SAFETY:** The business partner must guarantee the quality and safety for the materials and products supplied, including the use of raw materials, as approved by the legislation of the relevant countries.

## 3. Environment

**GENERAL:** STAHL is committed to protecting the environment, and environmental responsibility is at the core of how we operate. The business partner shall develop, implement, and maintain environmentally responsible business practices.

**ENVIRONMENTAL REGULATIONS:** The business partner shall respect the environment and comply with all (supra) national environmental, health and safety legislation and regulations. The business partner shall conduct its business processes in such a manner that compliance is guaranteed.

**GREENHOUSE GAS EMISSIONS (GHG) AND CLIMATE CHANGE:** In addition to legislative requirements, STAHL strongly encourages its business partners to support and promote good practices and high standards of environmental stewardship, in order to collectively reduce environmental footprint, fight climate change and achieve more transparency in our supply chains. The measurement of environmental impact using the Life Cycle Assessment (LCA) methodology is also considered to be good practice. STAHL encourages its partners to use LCA to estimate the impact of their products on the environment, and to transparently share information on carbon associated with their products and services when requested by STAHL.

**HANDLING OF WASTE AND HAZARDOUS SUBSTANCES:** The business partner follows a systematic approach to identify, handle, reduce, and responsibly dispose of or recycle waste. The relevant prohibitions on the export of hazardous waste must be observed. Specific chemicals or materials that pose environmental hazards based on current standards must be identified and managed to ensure safety during handling, transportation, storage, use, recycling, or disposal.

**COLLABORATIVE PLATFORMS:** Chemical compliance initiatives like bluesign®, the Zero Discharge of Hazardous Chemicals (ZDHC) and the Renewable Carbon Initiative, which promotes de-fossilization in the chemical industry, are examples of initiatives and standards to which STAHL encourages its business partners to be aligned, when relevant. These initiatives promote collaborative approaches that will enable STAHL and business partners to work closely together to achieve STAHL's environmental targets.

Stahl | Business Partner Code of Conduct | For Stahl Parent B.V. and affiliated companies | internal use only. Stahl Parent B.V. reserves the right to amend, update or withdraw its corporate policies without prior notice. Version: November 2024.

## 4. Social

**GENERAL:** The business partner shall conduct their activities in a manner that respects human rights as per The United Nations Universal Declaration of Human Rights.

**DISCRIMINATION:** The business partner shall unconditionally respect all anti-discrimination conditions in (supra) national legislation and regulations and shall not be involved in any form of discrimination or unjustified unequal treatment regarding hiring, compensation, training, promotion, termination, or retirement based on ethnicity, national origin, colour, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. Business partners should ensure that employees can work in a working environment free from physical, sexual, psychological or verbal harassment or abuse.

**MODERN SLAVERY:** Modern slavery, or any form of forced or compulsory labour, is a violation of human rights. STAHL takes a strong stance against modern slavery and works to ensure high labour rights standards. STAHL condemns any form of modern slavery and child labour, and shall not participate in the trafficking, recruitment, or receipt of any persons, by means of threat or abuse of power. Stahl allows employees to resign from their position at any time. By behaving ethically and honestly with all its partners, STAHL is committed to ensuring that modern slavery does not occur elsewhere and strives only to do business with organizations who uphold similar principles.

**CONFLICT MINERAL MANAGEMENT:** For conflict minerals such as tin, tungsten, tantalum, and gold, as well as other raw materials such as cobalt, the business partner establishes processes in accordance with the guidelines of the OECD to fulfill due diligence for responsible supply chains for minerals from conflict and high-risk areas.

**FAIR WAGE AND WORKING HOURS:** The business partner shall comply with all (supra) national legislation and regulations concerning working hours, minimum wages, overtime wages and social benefits. STAHL expects suppliers to provide all workers with written information about employment conditions. Compensation should at least meet applicable national minimum wages. Working hours shall not be excessive and should be in accordance with local legislation.

**FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAIN:** STAHL expects its business partners to uphold workers' fundamental rights to form, join, or consider joining labor unions and to engage in collective bargaining. Non-discrimination and non-retaliation should be guaranteed for workers involved in labour unions.

**CHILD AND FORCED LABOUR:** The business partner shall respect all (supra) national legislation and regulations applying to child labour in line with Convention 138 (Minimum Age) and Convention 182 (Worst forms of Child Labour) of the International Labour Organisation. The business partner shall not use work that is performed involuntarily under threat of penalty.

**HEALTH AND SAFETY:** The business partner shall implement strict policies with the aim of creating an incident and injury free work environment for all employees and contractors working on-site. Workers should be protected from over-exposure to chemical, biological and physical hazards, and should receive appropriate safety information and protective equipment to prevent occupational incidents, injuries and illness. At all levels, the business partner will play an active role in identifying and rectifying unsafe (health)

situations. Working facilities should be properly maintained and comply with applicable fire protection and safety-related regulations.

## 5. Governance and Implementation

The business partner's highest governance body (e.g. the board of directors) is ultimately responsible for adherence to this Code and for compliance to relevant governance codes and guidelines. This body should also be transparent about the corporate governance structure of their organization and provide, when needed, sound reasons for any non-compliance to this Code (using the 'comply or explain' principle).

STAHL expects that the business partners identify compliance risks within their supply chains and take appropriate measures. In case of suspicion of violations, the business partner will promptly inform STAHL about identified relevant violations and risks as well as the measures taken.

STAHL expects its business partners to work with their own suppliers and partners in order to enforce similar values as described in this Code of Conduct across their own supply chain.

## 6. Speaking up

STAHL wishes to make a positive contribution to the lives of our employees, customers, business partners, investors, and society at large. To do so, STAHL seeks to maintain a healthy, open dialogue with all its stakeholders around the world and to develop a mutual understanding with them on relevant topics.

STAHL encourages stakeholders to proactively come forward with their concerns about compliance topics as mentioned in this Code of Conduct. Our formal Grievance Mechanism/Whistleblower policy is open to all STAHL employees as well as anyone outside STAHL. It is a way to raise and discuss compliance issues and complaints in total confidence. Reporting can be done anonymously. Protection applies to the whistleblower.

STAHL expects business partners to encourage all its employees and workers to proactively report their compliance concerns through STAHL's Grievance Mechanism/Whistleblower. Whistleblowers who have, in good faith, made a report about compliance topics shall not be affected in any way as a result of making that report, and STAHL will not tolerate any retaliation against them.

Grievances and/or suspension of non-compliance to this code can be expressed through STAHL's whistleblower communications line: [whistleblower@stahl.com](mailto:whistleblower@stahl.com) or reported through the internet form which can be found on STAHL's website (see <https://www.stahl.com/sustainable-development/policies-statements-reports/policies-statements>).

**SIGNATURE FOR COMPLIANCE**

Business partner CoC

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Organization:

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Name:

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Title:

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Place and date:

Signature:

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