

CORPORATE RESPONSIBLE POLICY

#2026 #STI GROUP

This policy applies to all companies within STI Group and to their employees worldwide. Compliance with the principles specified is mandatory. Business partners are required to comply with equivalent standards.

STI Group reviews this policy regularly and continuously develops it further, considering legal requirements and international standards.

FOREWORD

As Pioneers in Packaging, we are leading the way towards a more sustainable packaging landscape. Our packaging solutions are rooted in innovation, the careful use of resources, recyclability and climate protection. Our value creation is based on sustainable business practices and the principles of responsible corporate governance, human rights and environmental protection.

True sustainability can only be achieved when we all work together; we consider our suppliers, customers and other stakeholders with whom we have a business relationship to be business partners. We expect the values and principles in the **STI Group Responsibility Policy** to shape not just our own entrepreneurial actions but also those of our business partners whom we expect to implement and to live these values and principles in their organisations.

Three areas—Company, People and Ecology—form the framework of the STI Group **Responsibility Policy**, ensuring it is aligned with our Corporate Social Responsibility approach.

Company

We are committed to conducting business with integrity, consistently adhering to high global standards and fighting corruption in all its forms. Our business activities comply with the UN Global Compact principles.

Responsibly sourcing products and materials is just as vital to us as respecting confidentiality and intellectual property and protecting personal data.

People

Our human rights principles are based on the International Bill of Human Rights, International Labour Organisation Declaration and OECD Guidelines for Multinational Enterprises.

As a medium-sized, family-owned company with production facilities in Germany and Europe, we take our responsibility towards the people who work with us very seriously. Our clear focus on occupational safety and prevention helps to protect the health of our employees in the best possible way.

Ecology

We continuously strive to minimise the impact of our business activities on the environment. As a manufacturer of paper-based packaging and displays, we are committed to improving the circular economy. Our goal is to replace plastic with sustainable, fibre-based packaging solutions and meet the needs of an ever-widening range of applications.

We also pursue ambitious climate protection goals and support the Paris Climate Agreement 1.5-degree target.

Our **STI Group Responsible Policy** represents a voluntary commitment and realising its principles requires comprehensive efforts along the entire value chain. We are committed to this as part of our corporate activities.

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COMPANY





1. LEGAL COMPLIANCE AND ANTI-CORRUPTION

We undertake to comply with all relevant and applicable laws, regulations and other legal provisions. Corruption, fraud or anticompetitive practices are not tolerated in any form.

REQUIREMENTS

Legal compliance

- 1.1** STI Group undertakes to comply with all relevant statutory provisions and regulations as well as applicable EU directives or regulations and national legislation. All necessary approvals for business activities have been obtained. We expect the same from our business partners.
- Cost, quality, reliability, innovation and sustainability are key factors in our selection and evaluation of business partners, alongside values including human rights, working conditions and the prevention of corruption, fraud and anticompetitive practices..
- Our business activities comply with relevant national and local laws, the UN Global Compact principles and the STI Group Code of Conduct.

Fighting corruption

- 1.2** All forms of corruption, including bribery, fraud, anticompetitive practices, extortion and embezzlement, are prohibited and will be prevented through appropriate and proportionate procedures. All STI Group employees are obliged to do everything possible to prevent corruption in their area of responsibility.
- We expect our business partners to have zero tolerance for corruption and to comply with UN and OECD conventions. Our business partners ensure that they do not offer, promise or grant advantages to STI Group employees in order to obtain a contract or other preferential treatment in business dealings.
- 1.3** Business partners must report any attempt by STI Group employees to solicit bribes through the relevant STI Group reporting channel: <https://www.sti-group.com/en/whistleblower-protection.html>

Invitations and gifts

- 1.4** Benefits for STI Group employees do not play a role in evaluating business partner performance or in awarding contracts. The STI Group also expects its business partners not to misuse invitations or gifts to try and influence others.
- STI Group employees may only accept invitations or gifts if the occasion and scope are appropriate. Their value must be low and, if regarded as an expression of local generally accepted business practice, they must be compatible with local legal regulations.
- Similarly, STI Group business partners must not demand undue advantages or offer gifts and invitations of value in order to obtain business in an unfair manner. Borrowing products or other items for an indefinite period of time, or accepting products or other items, may also be considered to be an advantage and is therefore not allowed.

Avoiding conflicts of interest

- 1.5** All business transactions must be free from conflicts of interest. STI Group expects business partners to make all decisions about their business activities with STI Group solely on the basis of objective criteria. Conflicts of interest with private interests or other economic or other activities, including those of relatives or related persons or organisations, are avoided from the outset.
- 1.6** Any conflict of interest of which the business partner is aware must be disclosed to STI Group so that appropriate action can be taken.
- Combating money laundering, tax evasion, anti-competitive behaviour, mistreatment of confidential information and international trade breaches*
- 1.7** STI Group expects business partners to comply with relevant legal obligations to combat violations of international trade, money laundering and tax evasion and in particular, not to engage in money laundering activities.

- 1.8** STI Group complies with all prohibitions and embargoes in force under national or international law that may restrict or prohibit the import, export or domestic trade of goods relating to commodities, technologies and software, the provision of technical assistance and brokering services, and capital and payment transactions with certain countries, persons or organisations. These restrictions and prohibitions may stem from the nature of the goods, the intended use, the country of origin or destination, or the business partner themselves. Of particular importance is compliance with applicable national and international customs and export regulations, as well as sanctions. All STI Group employees must observe these control regulations when purchasing, brokering, manufacturing or placing goods or services on the market or when transferring or receiving technologies. STI Group determines the necessary organisational precautions and defines responsible persons to ensure compliance with the aforementioned regulations.
- 1.9** STI Group business partners must comply with all applicable import and export control laws, regulations and sanctions of the country in which they are located and all countries in which their transactions are conducted. Transactions may include importing, exporting, re-exporting, transferring or disclosing and all types of transactions of goods, software, technology or technical support that may be subject to trade restrictions, regardless of the nature of the transfer. Business partners should cooperate with STI Group in determining applicable export control restrictions and must fully comply with these and any other applicable trade and customs laws.
- 1.10** STI Group observes fair conduct in competition and complies with applicable antitrust laws; it expects the same from its business partners. They will neither participate in agreements with competitors that violate antitrust law, nor abuse any existing dominant market position.
- 1.11** Existing risk analysis procedures to enable preventative or defensive measures must take into account the size of the STI Group entity concerned, the country in which it operates, its business activities and external environment.
- 1.12** Protecting non-public information and intellectual property is a basic success criterion for STI Group and its business partners. Both parties must therefore always treat all such information as strictly confidential, in particular inventions, research results and

technical data, formulas, discoveries, designs, improvements, ideas, manufacturing guidelines, computer programs, trademarks, patents, copyrights, unpublished financial or pricing information, other confidential information and any related documentation.

- 1.13** Confidential information also includes customer data, sales and marketing information including related databases, marketing plans, personnel records, business proposals and strategies and any information acquired through collaboration between STI Group and business partners.
- 1.14** Due to the high importance of confidentiality for STI Group, business partners may sometimes be required to sign non-disclosure agreements relating to the use of confidential information and intellectual property of STI Group and/or its customers.
- 1.15** Any suspicion of a breach in connection with illegal transactions must be reported to STI Group immediately. Irrespective of this, effective steps will be taken to mitigate any risks.

Activities

- 1.16** Employees and managers are kept up to date on topics such as corporate integrity, ethics and compliance through regular education and training, including via digital learning platforms. This awarenessraising among STI Group staff minimises risks and embeds a culture of integrity.
- 1.17** Development of internal policies and guidelines take risks into account and are appropriately shared with staff.
- 1.18** All relevant laws are observed when STI Group operates in or delivers to foreign jurisdictions, thus opening up the respective scope of application. This also includes valid and future developments in due diligence regulations, in particular the Act on Corporate Due Diligence Obligations in Supply Chains, as far as and for as long as STI Group falls within its application area.
- 1.19** STI Group has defined clear responsibilities for the control and implementation of sustainability and compliance matters. The top management bears overall responsibility. Responsibilities, roles and reporting lines are clearly defined and ensure effective implementation.



- 1.20** STI Group is committed to responsible and transparent corporate governance. In particular, this includes:
- compliance with all tax legislation and the rejection of aggressive tax avoidance practices
 - fair competitive behaviour in accordance with competition law
 - the responsible handling of political influence, donations and sponsorship, which must be conducted transparently, in accordance with the law and free from unauthorised influence
- 1.21** STI Group regularly identifies, evaluates and monitors risks relating to environmental, social and management aspects. This process takes into account both STI Group's own business activities and its supply chain, with a view to identifying and minimising potential negative impacts at an early stage.





2. RESPECTING CONFIDENTIALITY, INTELLECTUAL PROPERTY AND DATA PROTECTION

We protect non-public information and intellectual property and treat personal data responsibly.

REQUIREMENTS

- 2.1** STI Group invests considerable human and financial resources in developing innovative products and services to ensure its competitive success. Protecting this confidential information and intellectual property is therefore critical for STI Group and its business partners.
- 2.2** All STI Group employees and bodies are obliged to prevent commercially sensitive information from becoming known outside the company. This concerns company or business secrets, which may not be published, for example, through the unauthorised dissemination of sensitive data in discussions with third parties, in trade journals or on the Internet. Furthermore, all STI Group employees involved in such matters are obliged to inform themselves about the responsible handling of sensitive information. Any company or business secrets of STI Group business partners must also be protected from unauthorised disclosure.
- 2.3** Protecting non-public information and intellectual property is a basic prerequisite for STI Group's success and that of its business partners. Both parties should therefore always treat this information as strictly confidential. This applies in particular to inventions, research results and technical data, formulas, discoveries, designs, improvements, ideas, manufacturing guidelines, computer programs, trademarks, patents, copyrights, unpublished financial or pricing information, other confidential information and all related documentation. Confidential information also includes customer data, sales and marketing information, including databases, marketing plans, personnel records, business proposals and strategies, and any information acquired while STI Group is collaborating with its business partners.
- 2.4** STI Group expects its business partners to treat customer and employee data confidentially, respecting employees' rights and protecting their personal data in

compliance with data protection regulations. The collection, processing and use of personal data, within the company and via its website, is carried out in accordance with respective national (BDSG), European (EU-GDPR) and international laws, regulations and protection standards.

ACTIVITIES

- 2.5** Due to the high importance of confidentiality for STI Group, business partners are required to sign non-disclosure agreements relating to the use of confidential information and intellectual property belonging to STI Group or its customers.
- 2.6** All STI Group employees are required to maintain appropriate and necessary security standards for personal contact and electronic communication with third parties. The same applies to information made available to STI Group by third parties in confidence. All STI Group's IT security guidelines must be observed. Binding requirements and systems implemented within the company exist for this purpose.
- 2.7** STI Group employees, in their capacity as members of the company, are instructed not to participate in public discussions such as lectures, internet forums, etc. or to publish company-relevant information in public (e.g. on the internet) without permission.
- 2.8** STI Group takes appropriate technical and organisational measures to ensure that its information systems are protected against unauthorised access, loss or misuse. This particularly includes cybersecurity measures as well as measures to ensure the integrity, availability and confidentiality of information.





3. RESPONSIBLE PROCUREMENT

Our products and materials are properly sourced and tested and meet agreed specifications.

REQUIREMENTS

- 3.1** All products, materials and services procured by STI Group comply with relevant or agreed specifications as well as industry-standard (or other agreed) quality and safety standards. They also comply with all applicable legal and regulatory requirements.
- 3.2** STI Group business partners are responsible for complying with relevant or agreed specifications, with quality and safety standards, and with laws and regulations. This is regardless of whether they supply goods or services directly to STI Group or subcontract delivery to a third party. Business partners are obliged to inform STI Group immediately, in advance of goods delivery, in the event of any changes or adjustments to specifications.
- 3.3** Business partners shall conduct research and development activities responsibly, following good professional practice and generally accepted scientific, technological and ethical principles.

ACTIVITIES

- 3.4** STI Group agrees a Code of Conduct with all business partners as part of its corporate compliance procedures; all Purchasing employees are regularly trained in this regard. Business partners must undertake to implement all such requirements with their own business partners.
- 3.5** Our business partners must also comply with their human rights and environmental due diligence obligations, as does STI Group. This is to identify, prevent and mitigate potential or actual negative impacts that are directly or indirectly caused by our business partners' activities, products or services through their business relationships.
- 3.6** STI Group regularly assesses its business partners regarding compliance with environmental, social and ethical standards. The assessment is risk-based and forms an integral part of the procurement processes.

- 3.7** If any deviations from the requirements of this policy are identified, STI Group will strive to remedy the situation by taking appropriate measures. In cases of serious or repeated breaches, STI Group reserves the right to restrict or terminate the business relationship.
- 3.8** STI Group is committed to the responsible sourcing of raw materials. This particularly includes:
 - avoiding illegal or unsustainable sources
 - promoting certified and responsibly managed raw materials
 - considering ecological and social impacts throughout the value chain





PEOPLE



PACKAGING



POS SOLUTIONS



SERVICES





4. FREELY AGREED TERMS AND CONDITIONS OF EMPLOYMENT

Work is performed on the basis of voluntarily agreed and documented work contracts.

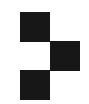
REQUIREMENTS

- 4.1** All workers are given freely agreed employment contracts that respect their legal and contractual rights.
- 4.2** The main elements of the relationship between employer and employee, including working hours, overtime, pay, benefits and leave, are freely agreed, recorded in writing and formally recognised by the employer and the employee before the employment relationship begins.
- 4.3** Employment terms and conditions are written in a language that is understandable to employees, are explained verbally when necessary and are available throughout the employment relationship.
- 4.4** All workers shall receive a copy of their terms and conditions of employment in a language they understand for their records. Their copy of the terms and conditions of employment shall be identical to the employer's copy.
- 4.5** Any necessary changes to employment terms and conditions shall be agreed in writing by employee and employer.
- 4.6** Workers are entitled to maternity, paternity, adoption or parental protection, leave and benefits as required by law.

ACTIVITIES

- 4.7** There are clear legal frameworks for recruitment and contracting, grievance management, disciplinary action, promotion and termination of employment, all of which we comply with. We also expect this from our business partners.
- 4.8** We implement a clear and transparent system of communication and open dialogue between the management team and employees. All employees are informed of decisions that change or affect their working conditions.
- 4.9** Legally required training is provided to all workers to improve and enhance their skills and enable them to continue developing professionally.
- 4.10** Families, of any format, are given priority in arrangements for leave.





5. NO DISCRIMINATION

All workers are treated with respect and dignity and equally, without any form of discrimination.

REQUIREMENTS

- 5.1** STI Group does not tolerate discrimination and expects the same from its business partners: during the recruitment process, in subsequent employment, in all aspects of training, personal and professional development, remuneration, promotion, working conditions, termination and retirement.
- 5.2** Discrimination on the grounds of racial attributes, ethnic origin, age, role, gender, gender identity, religious beliefs, country of origin, sexual orientation, marital status, pregnancy, dependants, disability, social origin, trade union membership, health, political views or any other grounds specified in local laws is prohibited and will not be tolerated under any circumstances.
- 5.3** Prohibiting discrimination also means not supporting or tolerating discriminatory behaviour. Every employee is actively required to report any possible type of discrimination that may nevertheless be taking place, through the company's complaint management (whistleblowing) system; it is possible to do this anonymously.
- 5.4** STI Group does not tolerate mandatory pregnancy testing, contraception or any other form of healthcare that could lead to discrimination. Where health tests are required by local laws, the results will not be used to dismiss, discriminate against or treat the employee unfavourably.

ACTIVITIES

- 5.5** Legislation prohibits any form of discrimination relating to recruitment, remuneration, access to training, promotion, termination of employment or retirement. This is clearly and regularly communicated to all employees, including managers.
- 5.6** Job opportunities shall be advertised openly, in a way that is accessible to all groups of persons. No persons shall be excluded unless they do not meet the skills, occupational requirements or training required to do the job.
- 5.7** Those responsible for hiring, compensating, training, promoting, disciplining and terminating the employment of workers shall be trained to avoid discrimination in the performance of these duties.
- 5.8** All employees, especially management, leaders and safety officers, are trained to avoid discrimination.
- 5.9** STI Group actively promotes diversity, opportunity equality and inclusion. The aim is to create a working environment that values different perspectives and offers all staff equal opportunities for development.



6. NO HARASSMENT

All workers are protected from physical, verbal or sexual violence at work.

REQUIREMENTS

- 6.1** All employees are treated with dignity and respect. Physical, sexual, verbal or psychological abuse, any form of harassment, hate speech, intimidation, bullying, violence and corporal punishment will not be practised or tolerated.
- 6.2** Disciplinary measures are proportionate and do not involve physical or mental punishment.
- 6.3** Any employee, especially management, leaders and safety officers, who harass or mistreat other employees shall be subject to appropriate disciplinary action.
- 6.4** Abuse, threats, intimidation or reprisals against human rights defenders will not be tolerated.
- 6.5** When using our own or external security personnel to protect our operations, we do not tolerate unlawful behaviour by security personnel towards employees or third parties. We ensure that they respect human rights and the associated environmental rights and do not act unlawfully. This includes, among other things, the right to the integrity of life and limb and the prohibition of humiliating treatment.

ACTIVITIES

- 6.6** Policies and procedures prohibit any form of harassment or abuse and are clearly communicated to all employees. Employees are also regularly trained on how to recognise and prevent harassment and other forms of intimidation.
- 6.7** Written disciplinary procedures are clearly communicated and explained to all employees. Records of all disciplinary actions are documented and retained for the duration required by law.
- 6.8** Policies and procedure that prohibit any form of harassment or abuse are clearly communicated to all internal or external security personnel.





7. VOLUNTARY NATURE OF THE WORK

Any work is done on a voluntary basis: forced labour and slavery are completely unacceptable to STI Group.

REQUIREMENTS

- 7.1** Forced labour shall not be used under any circumstances, whether in the form of trafficking, servitude, debt bondage or other forms, including mental and physical coercion and slavery.
- 7.2** Employees enter the employment relationship freely: they do not have to hand over their identity papers or personal documents, nor do they have to pay any deposit to secure employment.
- 7.3** Employees are free to terminate their employment without penalty after a reasonable notice period, as agreed in their employment terms and conditions.
- 7.4** Employees can move freely and are not bound to any premises belonging to the employer, including any dormitories or accommodation provided.
- 7.5** Employees are not obliged to pay any fees or deposit STI Group, nor to any other person, agency or company involved in the recruitment process.
- 7.6** Employers are responsible for paying all fees and expenses incurred in connection with recruiting employees and the performance of their duties.

ACTIVITIES

- 7.7** Clear recruitment policies and staff trained in personnel procedures ensure that workers are free to enter into employment and are not prevented from leaving the company if they wish to do so.
- 7.8** Employees who relocate, abroad or domestically, for a job are made aware of their working conditions and their rights through pre- and post-departure training, or other acceptable means, in a language they understand.
- 7.9** Employees may move freely and are not restricted to company premises, including their accommodation and transport to or from work, where both are provided. This also applies to any external security staff.
- 7.10** By selecting and monitoring recruitment agencies and/or employment intermediaries, STI Group avoids the need for employees to pay any recruitment fees that may be incurred.





8. MINIMUM AGE FOR EMPLOYEES

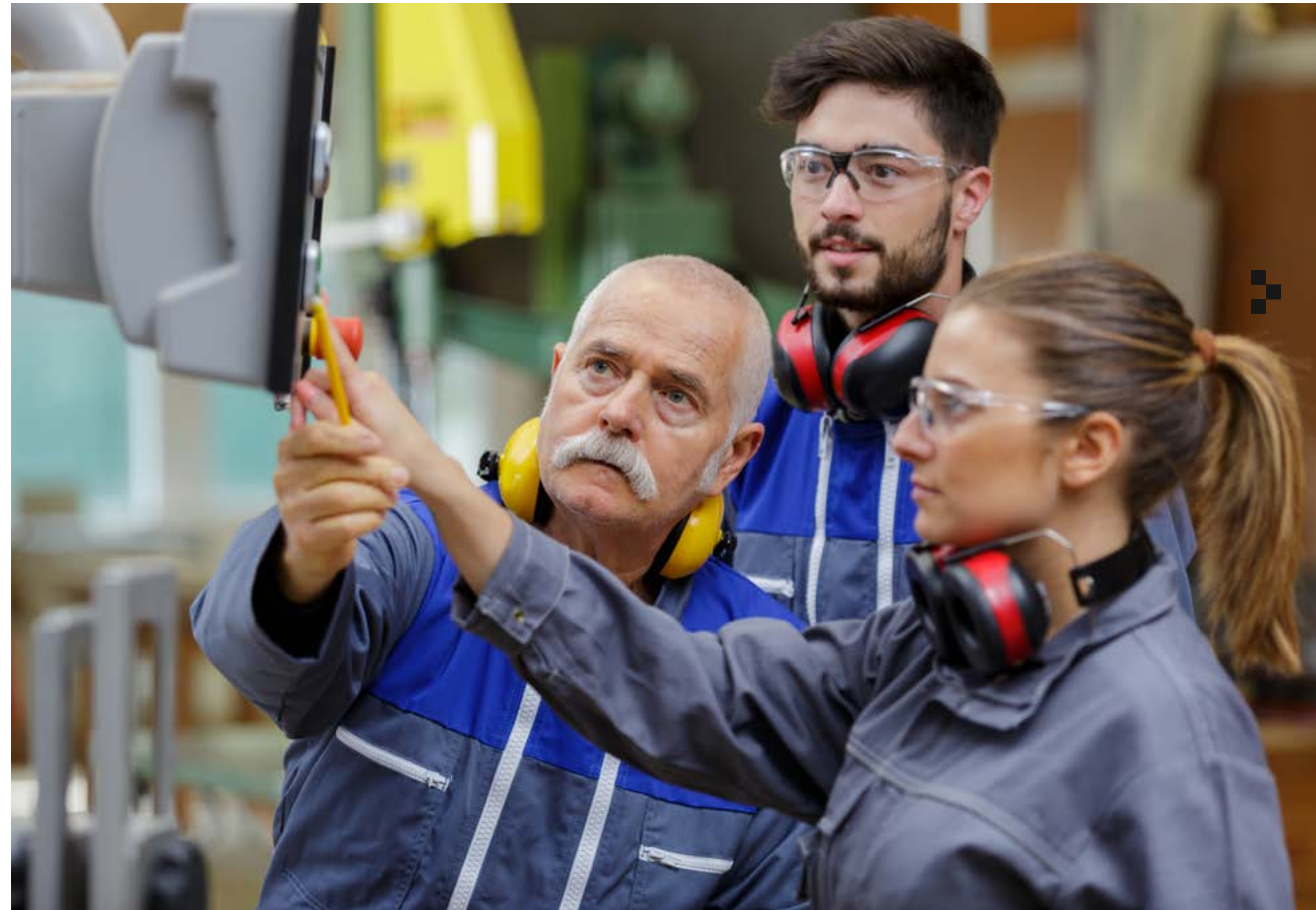
All workers are at least 15 years old. Young workers are subject to special protection.

REQUIREMENTS

- 8.1** Under no circumstances will any persons under 15 years of age – or under the minimum legal age for work or compulsory education, whichever is higher – be employed for pay.
- 8.2** For young workers aged 15 – 18, their health and safety shall particularly be considered and protected, which should exclude them from certain work under the law, such as dangerous work or night work. Employing young workers requires special care to ensure that they do not perform work that is mentally, physically, socially or morally dangerous or harmful.
- 8.3** The objectives and requirements set out in the International Labour Organisation's Worst Forms of Child Labour Convention are met.

ACTIVITIES

- 8.4** Minimum age legislation for the respective countries is followed by STI Group policies and applies to all employees, whether hired directly or through a third party. Policies set out the minimum age for all workers and the remedies in the case of child labour. The policy should also specify those conditions under which young workers can be employed.
- 8.5** Before taking up work, age verification is carried out on the basis of the potential employee's social data. This data is properly documented and verifiably recorded in STI Group's master data system.
- 8.6** All employees are kept informed so that they comply with the regulations for young workers, including apprentices and trainees, with particular regard to working during school hours, total working hours, night shifts and heavy or dangerous work.





9. FAIR PAYMENT

All workers receive fair pay and earn a living wage or income.

REQUIREMENTS

- 9.1** All employees are paid according to agreed weekly working hours. Legal minimum standards for wages, overtime pay, benefits and paid leave are met or exceeded to ensure that all employees earn a living wage or income. Remuneration conditions set out in legally binding collective agreements are implemented and complied with.
- 9.2** Wages and salaries are paid regularly, on time and in full.
- 9.3** Employees shall receive a pay statement for each pay period, showing the components of their pay with exact amounts. This must include the regular hours worked and any overtime – if paid by the hour – as well as benefits, incentives/bonuses and any agreed deductions.
- 9.4** If an employee is paid on the basis of quantities, quotas, or similar, the rate of pay must be such that, during normal working hours, they can earn the equivalent of living wage or any collectively agreed higher wage.
- 9.5** All overtime or work on public holidays shall be remunerated at the appropriate premium rate in accordance with local statutory provisions and/or collective agreements.
- 9.6** The statutory amount for any legally required deductions, such as taxes and social security or health insurance contributions, is paid in each pay period.
- 9.7** Apart from the deductions required by law, any other wage deductions shall be made only with the express written consent of the employee in a language they understand.
- 9.8** STI Group pays statutory contributions towards an accident insurance scheme, which offers employees financial protection in the event of work-related injury, accident, illness, disability or death.
- 9.9** STI Group expects all its business partners to comply with applicable national legislation on working time. Furthermore, it is expected that the employees of business partners

or suppliers receive remuneration in line with applicable national law.

- 9.10** All employees of business partners who supply goods and services directly to STI Group must earn at least a living wage, achievable within normal working hours without overtime. This applies regardless of whether the employee is paid on a wage, hourly or volume basis.

ACTIVITIES

- 9.11** A recording system is in place to implement legal regulations for wages and salaries, overtime pay, social benefits, holidays and deductions, and to monitor changes in these regulations.
- 9.12** Records are kept to show that workers have been paid correctly for hours worked and any overtime, based on an agreed system of hours and wages.
- 9.13** For all employees covered by collective agreements there is a remuneration system, which classifies them according to their qualifications, skills and experience. Their performance is recognised through wage and fringe benefits.
- 9.14** STI Group already ensures that its employees receive remuneration that provides a living income. This standard is to be maintained in future as well. To ensure compliance with this obligation, reputable external reference values and regional living costs are regularly – at least once a year – consulted and assessed. Based on this, any necessary adjustments are identified and implemented at an early stage in order to take account of changes in the general conditions.





10. REASONABLE WORKING HOURS

The working hours of all employees are reasonable and in accordance with the law.

REQUIREMENTS

- 10.1** Employees are not obliged to work more than their regular working hours, in accordance with local statutory provisions.
- 10.2** All overtime is worked on a voluntary basis. If the employment contract provides for contractual overtime, workers expressly agree to it.
- 10.3** Employees are entitled to at least 24 consecutive hours of rest in each seven-day period and to their statutory annual leave.
- 10.4** Where employees are needed to work on a rest day because production or service continuity requires it, they must be given an equivalent compensatory rest period immediately afterwards, to ensure they have at least two rest days every 14 days.
- 10.5** Employees are entitled to adequate meal and rest breaks in accordance with applicable laws.
- 10.6** The maximum weekly working hours for STI Group employees will not be exceeded, even if this would be permitted under local legislation, to avoid excessive physical and mental fatigue.

ACTIVITIES

- 10.7** Written agreements exist for working hours and for flexi-time regulations, which are also implemented. These policies clearly state overtime is voluntary.
- 10.8** Expected working hours and schedules are communicated to all employees in a language and format they can understand.
- 10.9** The consent of employees, or their representatives, to work overtime shall be documented.
- 10.10** There are defined and effective mechanisms for recording, documenting and monitoring working hours and overtime for all employees, regardless of the wage system (e.g. piecework) or type of contract.
- 10.11** No employee shall exceed the statutory maximum working time of 48 hours per week, including overtime.
- 10.12** Working time arrangements allow employees to meet family and personal needs (e.g. time off for medical appointments or flexibility in working hours/shift coverage) without being penalised. Employees who take advantage of reduced working hours or a job-sharing arrangement will not be at a disadvantage in terms of personal development in their work environment.





11. FREEDOM OF ASSEMBLY

All workers are free to exercise their right to form works councils, join trade unions and bargain collectively.

REQUIREMENTS

- 11.1** All employees are free to exercise their right to join a trade union of their choice without fear of intimidation or harassment and without requiring prior authorisation, unless required by law.
- 11.2** Employees know and understand their rights, including the legal right to strike. No other employees, managers or other company representatives prevent them from exercising their rights.
- 11.3** Union representatives are not discriminated against and do not face unfair labour practices because of their role as employee representatives. They are not prevented from exercising their representative functions in the workplace in accordance with the law.
- 11.4** Employees' representatives are involved in developing new policies and procedures, where possible and where regulated by law.
- 11.5** Social dialogue and exchange with employee representatives are regularly organised to promote constructive labour relations.

ACTIVITIES

- 11.6** Employee representatives can meet, discuss and make decisions in their committees during working hours, for which they are released from their working hours.
- 11.7** Committees are provided with premises and necessary equipment to enable them to implement their obligations relating to the legal duty of co-determination.
- 11.8** Employee representatives are part of the company decision-making process and are involved in developing company agreements.
- 11.9** As part of their monitoring duties, employee representatives shall observe compliance with and implementation of collective agreement standards.





12. HEALTH AND SAFETY

The working environment is safe, with no negative impact on health. We identify and reduce risks to prevent accidents, injuries and illness.

REQUIREMENTS

- 12.1** STI Group expects itself and its business partners to comply with applicable national health and safety legislation, and to establish and apply an appropriate occupational safety management system. This includes minimising actual and potential occupational safety risks, combined with employee training to prevent accidents and occupational illnesses in the best possible way.
- 12.2** STI Group complies with all applicable national environmental laws, regulations and standards. It uses an environmental management system to minimise environmental impacts and hazards and improve environmental protection in its daily operations. It expects the same from all its business partners.
- 12.3** All STI Group employees are provided with a safe workplace that does not endanger health. STI Group also expects this from its business partners. This requirement prevents accidents, injuries or physical and mental illness arising out of, related to, occurring in the course of or as a result of, work for the employer.
- 12.4** Processes, operating sites and resources must comply with applicable legal and internal requirements for occupational safety as well as health, fire and environmental protection.
- 12.5** All employees are expected to comply with relevant safety regulations, be aware of hazards and actively reflect on all safety-related activities. This applies to all hazards that may arise in the workplace at STI Group or at business partner premises, or when using STI Group products.
- 12.6** Identified accidents, potential hazards and stresses, and 'near accidents', must all be reported immediately. Managers are responsible for the protection of the employees he/she manages and must instruct, train and supervise them accordingly.
- 12.7** The provision of a safe, healthy and ergonomic workplace, including the provision of

- appropriate personal protective equipment for affected workers, is a matter of course.
- 12.8** Continuously improving our occupational safety and health protection – based on our own experience and on constantly improving scientific knowledge – is an obligation.
- 12.9** The health and safety of all employees on the company sites is our top priority. All specifications and regulations for our employees also apply to subcontractors and service providers. All external employees, visitors and persons who enter STI Group premises to provide operational services or handle products are appropriately trained, and informed about correct behaviour in the event of a health and safety incident.
- 12.10** All employees have easy access to free drinking water.
- 12.11** The toilets are clean and fully maintained, their hand washing facilities have soap and running water, and are accessible to all workers.



ACTIVITIES

- 12.12** Clear, effective and up-to-date health and safety policies and procedures are in place and implemented by staff.
- 12.13** Occupational health and safety policies and procedures are communicated widely and effectively throughout the organisation. This ensures all staff and visitors are provided with the relevant information.
- 12.14** Regular safety training and evacuation drills are held for all employees, managers, contract workers and security personnel. All STI Group employees are clearly informed of the hazards inherent in their workplace and are provided with personal protective equipment to avoid such hazards.
- 12.15** There is an effective health and safety committee, whose responsibilities are clearly understood by workers and management. The committee works to improve health and safety and reduce risks.
- 12.16** The effectiveness of safety plans is regularly checked through exercises and other means.
- 12.17** Within the legal framework, STI Group offers employees health examinations by company doctors or external care centres.
- 12.18** Fire safety in the workplace is specifically and regularly assessed and any risk factors are eliminated.
- 12.19** Work processes are regularly inspected and evaluated for safety, «including equipment and accommodation areas, if any. Regular equipment inspection and maintenance is carried out by internal inspection teams or by external certifiers.
- 12.20** STI Group monitors the company-wide goal of preventing occupational accidents and promotes the transparent reporting of all incidents.
- 12.21** STI Group's crisis management plan provides for emergency planning and prioritising employee health and safety in appropriate situations.
- 12.22** In a crisis the company also convenes a crisis team composed of people from relevant functional and specialist areas.
- 12.23** STI Group ensures good health and safety practices for the mental and physical wellbeing of all employees. These practices shall be applied and lived in everyday work.

- 12.24** In addition to workplace safety, STI Group actively promotes the mental health and wellbeing of its staff through suitable measures and a health-promoting working environment.





13. ACCESS TO GRIEVANCE MECHANISMS AND REMEDIES

All workers and external third parties have access to a grievance mechanism in the form of a whistleblowing protection mechanism with fair procedures and remedies.

REQUIREMENTS

- 13.1** The whistleblowing protection mechanism with fair procedures and remedies. ensures that only responsible persons can access reports received from employees or business partners.
- 13.2** The whistleblowing system protects the company, the persons concerned and the whistleblowers within the framework of a fair and transparent procedure. Individuals who report violations of any of the principles set out in STI Group's Guidelines for Business Partners will not be disadvantaged in any way. The strictest confidentiality is maintained.
- 13.3** STI Group complies with applicable data protection regulations, in particular the rights of the whistleblower and accused. The complaints office is only authorised to process personal data if this is necessary to fulfil its tasks.
- 13.4** In addition to reporting via the whistleblowing protection mechanism, concerns can also be reported directly to the STI Group Chief Compliance Officer and addressed openly.
- 13.5** STI Group must confirm receipt of any whistleblowing notification or grievance within (7) days. A status update and details of the measures taken to rectify the situation must be provided within (3) months.
- 13.6** STI Group expects its business partners to prohibit and refrain from any kind of child labour in their companies, just as it categorically excludes child labour itself.

ACTIVITIES

- 13.7** STI Group upholds employee rights within applicable national legislation and recognises the core labour standards of the International Labour Organisation (ILO) and the UN nternational Human Rights Charter, taking into account the laws and legal forms applicable in different countries. STI Group respects the rights of third parties and minimises any impairment while observing international standards. It expects the same from its business partners.
- 13.8** Equal opportunities and equal treatment must be promoted by all STI Group's business partners. There must be no discrimination in recruiting or promoting employees or in granting them access to further education and training. No employee may be discriminated against on the grounds of gender, age, skin colour, ethnic or social origin, sexual identity, disability, religion or world view or political opinion.
- 13.9** Reprisals against workers or whistleblowers who report abuses are prohibited.
- 13.10** All staff members are trained in the procedures for dealing with complaints or indications of rule violations. Managers are specifically trained to avoid mutual accusations and reprisals.
- 13.11** Anonymised data regarding receipt and handling of concerns are kept and analysed to ensure the effectiveness of the grievance and whistleblowing policy and procedures.
- 13.12** Causes of complaints or grievances are identified so that preventative measures can be taken where necessary.
- 13.13** Grievance mechanisms are fully communicated and accessible in local language so that local companies within the group and business partners can report any violations to STI Group in accordance with the UN Guiding Principles on Business and Human Rights.



14. LAND RIGHTS

We respect the rights and entitlement to property and land of individuals and local communities.

REQUIREMENTS

These requirements only apply to business partners involved in acquiring, leasing or disposing of land and/or where land use changes may affect the rights of individuals or communities.

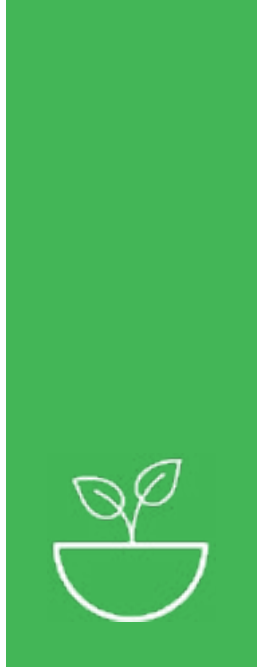
- 14.1** Involvement in any form of land grabbing is prohibited. STI Group has a zero tolerance policy towards land grabbing of any land acquired, leased or used.
- 14.2** The legitimate land tenure rights, including customary and informal rights, of individuals, communities and indigenous peoples, are recognised. Due diligence is exercised to ensure that established rights to property, land and land use are respected.
- 14.3** Where a change in land use is planned, the environmental and social impacts are assessed, adequately addressed with the participation of affected communities, and published in a format and language accessible to those affected communities.
- 14.4** Individual rights to land ownership and access to land must be recognised and respected.
- 14.5** Business partners actively seek, and document the effective implementation of, Prior Free and Informed Consent (FPIC) whenever land acquisition, land use planning and change or land development may affect the legitimate land tenure rights of local communities or land otherwise subject to collective legitimate land tenure.





ECOLOGY





15. ENVIRONMENTAL PROTECTION AND ENVIRONMENTAL STANDARDS

We continuously strive to minimise the impact of our business activities on the environment.

REQUIREMENTS

- 15.1** Our environmental standards form the basis for using energy and resources responsibly. Our environmental protection activities focus on a production process that conserves resources and avoids hazards to nature as far as possible. We work as energy-, material- and water-efficiently as we can, and train our employees accordingly. We comply with all applicable legal requirements and permits relating to planning, development and business operations with regard to protecting the environment, nature and biodiversity. We expect the same from all our business partners.
- 15.2** This approach includes valid legal requirements and permits relating to water, including water abstraction, water use, surface water management and wastewater discharge.
- 15.3** Water is considered a valuable resource and is therefore used sparingly. Wasting water is not tolerated.
- 15.4** STI Group purchases materials, raw materials and goods exclusively from responsible and legal sources. This ensures that the materials used – especially fibre-based raw materials – are not linked to deforestation or forest degradation.
STI Group ensures that relevant legal requirements for preventing deforestation are complied with and that appropriate due diligence measures are embedded in its procurement processes. This particularly includes risk-based assessments of supply chains and consideration of the applicable legal framework in the country of origin.

ACTIVITIES

- 15.5** The production sites are regularly assessed with regard to water intensity and water stress.
- 15.6** Regular evaluation of our production sites on the basis of the WDPA (The World Database on Protected Areas) with regard to protected areas or areas of high biodiversity value.

- 15.7** Due diligence policies and procedures for national and international sourcing are implemented within the company, in accordance with applicable laws and regulations and STI Group's pre-purchase requirements, or as otherwise contractually agreed.
- 15.8** All employees involved in the sourcing process are trained to ensure they know and comply with all required legal approvals.
- 15.9** Relevant policies and procedures are also communicated throughout the organisation to ensure general understanding.
- 15.10** STI Group is committed to the responsible handling of chemicals and hazardous substances. This includes:
 - compliance with all relevant legal requirements
 - the identification and minimisation of hazardous substances in processes and products
 - the promotion of substitution with less hazardous alternatives
- 15.11** Alongside reducing greenhouse gas emissions, STI Group minimises other air-related emissions from its processes as technically and economically possible.
- 15.12** Wastewater is treated responsibly and in accordance with the applicable legal requirements. The goal is to prevent any adverse effects on water bodies and ecosystems.
- 15.13** STI Group considers the potential impact of its business activities on biodiversity and ecosystems and is committed to protecting them.



16. CLIMATE PROTECTION MEASURES

We reduce greenhouse gas (GHG) emissions in line with the goals of the Paris Climate Agreement.

REQUIREMENTS

- 16.1** STI Group aims to continuously increase the proportion of renewable energy within the company, through in-house generation and by sourcing energy from renewable sources.
- 16.2** STI Group's CO2 targets are based on Science Based Targets Initiative (SBTi) requirements. Greenhouse gas (GHG) emissions are determined with an external partner using verified methodology. We take appropriate reduction measures and monitor the results to achieve our CO2 targets. We expect the same from our business partners.
- 16.3** STI Group's Corporate Carbon Footprint (CCF) is collected annually, in accordance with the requirements of the GHG Protocol.
- 16.4** We can provide upon request a Product Carbon Footprint (PCF) for any materials sold by STI Group. We expect this from our business partners for any materials sold to us.

ACTIVITIES

- 16.5** STI Group is implementing measures that include energy and climate-related optimisation, a measurement infrastructure that can be linked, frequency-controlled drives and use of electric pumps instead of pneumatics.
- 16.6** Our regularly updated management system identifies GHG emissions and implements solutions to reduce them.
- 16.7** Climate protection considerations are systematically integrated into relevant business processes, investment decisions and product development.





17. WASTE PREVENTION, REDUCTION AND RECYCLABILITY

We support the transition to a sustainable circular economy by eliminating waste or reducing it as much as possible.

REQUIREMENTS

- 17.1** STI Group's zero-waste approach aims to fully recycle all waste, avoiding non-recyclable rejects.
- 17.2** Design for recycling criteria are implemented during the early phase of product development. We look not only at individual product recyclability from a laboratory perspective but also at compatibility with established industrial recycling streams (Recyclability @ Scale). To this end, we are developing approaches for constructing circular economy models for integration into product development. Recyclability is to be increased to a maximum, with high-quality material recovery in the recycling process as the top priority.
- 17.3** We comply with applicable laws and permits for storing, handling and disposing of waste, whether directly by STI Group or through subcontractors.
- 17.4** Waste is stored, handled, transported and disposed of with due regard for human health and safety and environmental protection.
- 17.5** No non-hazardous waste is disposed of in landfill, or by incineration without energy recovery.

ACTIVITIES

- 17.6** Effective strategies for using, reducing, collecting and recycling raw materials are implemented throughout the value chain.
- 17.7** Cooperation and partnerships with companies involved in value creation are established to increase the recyclability of processed raw materials as well as end products.
- 17.8** STI Group's Circular Innovation program bundles all sustainable initiatives across the corporate group to bring to market targeted product innovations, which are optimally recyclable, resource-friendly and climate-friendly.

- 17.9** STI Group aims to reduce packaging to the minimum necessary for its intended function. Unnecessary packaging is avoided without compromising protection, transport or quality requirements.
- 17.10** Packaging is designed with its entire life cycle in consideration. Environmental aspects relating to manufacture, use and disposal are systematically taken into account.
- 17.11** Packaging is developed in accordance with current regulatory requirements, especially regarding recyclability, circularity and the protection of people and the environment.
- 17.12** STI Group designs packaging to avoid or minimise the use of potentially harmful substances as far as possible. The aim is to ensure that the packaging is both recyclable and environmentally friendly.
- 17.13** STI Group designs packaging in order to ensure that it can be collected, sorted and recycled not only in theory, but also under actual conditions.



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YOUR FEEDBACK IS IMPORTANT TO US

We welcome all questions, suggestions and constructive criticism.
Your feedback helps us to further improve our CSR communication.

Thank you for your support!

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CONFIRMATION

We hereby confirm that we have understood the contents of the Responsible Policy and will follow and implement them accordingly.

Company:

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Signature:

Name and function:

Date:

