



THE SOURCE OF YOUR
CONNECTION



STOCKO DIVISION
CODE OF CONDUCT

CODE OF CONDUCT



HOME APPLIANCE



HVAC



AUTOMOTIVE



INDUSTRY

PREAMBLE

This Code of Conduct is based on a common basic understanding of socially responsible corporate governance in accordance with the following guidelines. Compliance with the following standards of behaviour is a top priority for us.

As a long-established company headquartered in Wuppertal, Germany, we take responsibility within the scope of our respective possibilities and areas of activity by considering the consequences of our business decisions and actions in legal, economic, technological as well as social and ecological terms. We expect all our employees and business partners to live by this self-image. In this way, we contribute to the social and economic development of the countries in which we operate.

Our actions are in accordance with the relevant statutory regulations. We are guided by ethical values and principles, in particular integrity and honesty as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the core labour standards of the International Labour Organization (ILO) as well as the United Nations Guiding Principles on Business and Human Rights.

This Code of Conduct sets out the basic principles of our actions, which we actively require our employees and business partners worldwide to observe. The contents apply to all subsidiaries and business units of our company. We expect the same basic understanding from our business partners in order to ensure the sustainable and successful development of our products in the future. This is expressly not intended to create rights in favour of third parties.

THIS CODE OF CONDUCT
SETS OUT THE BASIC PRINCIPLES OF OUR ACTIONS!



STOCKO DIVISION¹

CODE OF CONDUCT²

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¹ The STOCKO Division comprises STOCKO CONTACT GmbH & Co. KG and its affiliated companies.

² Code of Conduct; fulfils the requirements of the declaration of principles in accordance with the Supply Chain Duty of Care Act (LkSG).

Subject to change without notice.



CODE OF CONDUCT

of STOCKO Contact



HUMAN RIGHTS

1. Human rights strategy

1.1. Observance of human rights

We respect and support the observance of internationally recognised human rights and

- respect the personal dignity, privacy and personal rights of each individual;
- protect and grant the right to freedom of opinion and expression;
- do not tolerate any unacceptable treatment of employees, such as physical and psychological hardship, sexual and personal harassment and discrimination;
- respect the rights of minorities and indigenous peoples.

For us, this means that we uphold the following standards in particular within our human rights strategy:

1.1.1. Ban on child labour

We do not tolerate child labour³. We do not hire any employees who cannot show that they are at least 15 years old and we ask for proof of age. In countries that fall under the exception for developing countries in accordance with ILO Convention No. 138, the minimum age can be reduced to 14 years. We do not hire employees for hazardous work who cannot prove that they are at least 18 years of age in accordance with ILO Convention No. 182.

1.1.2. Ban on forced labour

Forced labour, modern slave labour or comparable actions that deprive people of their liberty are prohibited⁴. All labour must be voluntary and it must be possible to terminate the employment relationship.

1.1.3. Freedom of association and collective bargaining

We respect the right of employees to freedom of association, freedom of assembly, as well as the right to freedom of negotiation and collective agreements⁵ insofar as this is legally permissible and possible in the respective country in which we operate. If this is not permissible, we seek appropriate compromises for our employees.

1.1.4. Promotion of diversity and equal opportunities

We promote equal opportunities and do not tolerate discrimination⁶. We treat all people equally, regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious confession, ideology or other personal characteristics. This principle also applies to all HR-related decisions, such as when it comes to recruitment, which is always dealt with on the principle of ethical recruitment, and when it comes to promotions, remuneration, additional benefits, further training and disciplinary measures. With regard to our employees, we place a particular focus on diversity, respect for women's rights and inclusion.

We are convinced that we will increase our performance and innovative strength if all employees welcome this diversity and contribute their individual experiences, perspectives, talents and strengths. With this in mind, we offer a working environment in which diversity is valued and each and every individual has the opportunity to develop their skills and interests. Unfairness, discrimination and bullying are expressly not tolerated. Violence in any form, sexual harassment, in particular assault in the workplace—including threats and intimidation—are expressly prohibited.

³ ILO Convention No. 79, 138, 142 and 182

⁴ ILO Convention No. 29 and 105

⁵ ILO Convention No. 87, 135 and 154

⁶ ILO Convention No. 111

HUMAN RIGHTS

1.1.5. Social sustainability

We take social responsibility, are committed to social and humanitarian issues and promote culture, education and sport.

We also promote the (further) training of our employees. This means that our company has set itself the goal of active and fair training and skills management in times of a rapidly changing labour market—and thus also changing requirements. We believe that training programmes are the most effective means of providing employees with non-discriminatory and comprehensive support in enhancing their own job profiles and retaining them as employees in the long term.

1.1.6. Use of private or public security forces

The hiring or use of private or public security forces must be avoided if, due to a lack of instruction or checks on the part of the business partner, the prohibition of torture and cruel, inhuman or degrading treatment is disregarded when deploying the security forces, if life or limb is injured or the freedom of association and union is impaired.

1.2. Risk management

Human rights are at the core of our business strategy. We therefore have a company-wide risk awareness that incorporates requirements from internationally recognised standards and this Code of Conduct and is adapted to applicable laws and regulations. We fulfil our human rights due diligence obligations through an appropriate risk management system, taking into account not only the interests of our employees, but also those of other people who may be directly affected by our business activities in a protected legal position.

We carry out a risk-based and systematic review of whether and how we and our supply chains respect human rights and implement a variety of measures to prevent, eliminate or minimise negative impacts on human rights within our business activities worldwide.

We follow the risk-based approach of ISO 9001 and IATF 16949: processes in the company are analysed and evaluated on a risk basis. Where acute risks emerge, "ad hoc" risk analyses are carried out in order to avoid dangers or minimise damage that has already occurred. The main aim here is to identify the effects of business uncertainties, including industry-specific ones, and to determine the risks as a basis for planning.



CYCLE FOR THE PROTECTION OF HUMAN RIGHTS

LAWS AND COMPLIANCE



2. Compliance with laws

Compliance with the applicable laws and other legal provisions of the countries in which we operate is a matter of course for us. If local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct. In cases where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, local law has priority; however, we will endeavour to comply with the contents of this Code of Conduct.

3. Integrity and compliance

We have taken appropriate compliance⁷ measures to ensure that the following topics are adequately addressed:

3.1. Corruption

We do not tolerate corruption, bribery or extortion. In our business relationships, we neither promise, offer, grant, demand or accept inducements that are connected with the intention of influencing business decisions or could give the impression of doing so, nor do we allow ourselves to be promised such inducements. A particularly strict standard must be applied when dealing with persons to whom special criminal and liability regulations apply (e.g. public officials).

3.2. Fair competition

We act in accordance with national and international competition and antitrust law and do not participate in price fixing, the allocation of markets, customer and market agreements or bid rigging.

3.3. Prevention of money laundering

We fulfil our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

3.4. Financial responsibility and disclosure of information

We comply with applicable regulations and are aware of our financial responsibility (accurate record-keeping). All business processes are carried out transparently and are correctly reflected in the books and records.

3.5. Protection of information and intellectual property

We protect confidential information and respect intellectual property; technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information, business secrets and non-public information are protected. We observe the applicable laws for the protection of business secrets and treat confidential information relating to our business partners accordingly. The use, further processing or marketing of counterfeit products is not authorised. To ensure the confidentiality, integrity and availability of information, an information security management system has been set up in accordance with ISO 27001 and is subject to a continuous improvement process.

⁷ Compliance stands for adherence to legal requirements, regulatory standards, voluntary commitments and internal guidelines.

LAWS AND COMPLIANCE

3.6. Data protection

We process, store and protect personal data in compliance with legal and contractual regulations. Consequently, personal data is collected confidentially, only for legitimate, predetermined purposes and in a transparent manner. We only process personal data if it is protected against loss, alteration and unauthorised use or disclosure using appropriate technical and organisational measures.

3.7. Export control

We undertake to comply with the relevant legal standards for export control – in particular permit requirements, export and assistance bans, economic sanctions – in the context of the shipment and export of our goods.

We refrain from making transactions that are classified as unauthorised by national or international export control regulations. Before we enter into a business relationship with a new business partner, we check whether there is an entry in national or international sanctions lists. Before exporting goods, software or technology, either physically or electronically, it must be ensured that the product in question is not subject to any restrictions and that no export licence is required from the authorities. Some intended destinations are subject to extensive foreign trade restrictions, namely embargoes or sanctions, and require additional checks before proceeding any further.

3.8. Avoidance of conflicts of interest

We avoid internal and external conflicts of interest that could illegitimately influence business relationships. If we are unable to do this, we disclose these conflicts. A conflict of interest exists in particular if personal interests or activities conflict with the interests of the company or if the business activities could influence these. We avoid situations in which personal interests conflict with those of the company or where it appears (perception matters) that this is the case. We should not participate in any decisions that could bring our own interests into conflict with those of the company (conflict of loyalty). We apply suitable preventive measures to avoid the risk of influence based on personal motives.

**WE AVOID INTERNAL AND EXTERNAL
CONFLICTS OF INTEREST**



WORK CONDITIONS



4. Health and safety in the workplace

At STOCKO, the quality of the working conditions is a basic requirement for the high standard of faultless performance. In addition to factors such as spatial design and location, professional skills and image, personnel is seen as a key factor in profitability. The aim of our modern occupational health and safety system is to secure, promote and permanently maintain the health and motivation of our employees as an important resource for the success of the company.

We protect the health of our employees by taking appropriate health and safety measures (e.g. implementing a company health and safety management system) that adequately cover the following topics:

- Compliance with applicable laws and orientation towards international occupational health and safety standards⁸;
- Suitable workplace design, safety regulations and provision of suitable personal protective equipment;
- Implementation of preventive checks, emergency measures, an accident reporting system and other suitable measures to ensure continuous improvement;
- Enabling access to drinking water in sufficient quantities as well as access to clean sanitary facilities for employees

We ensure that all our employees are trained and instructed accordingly and that this training is repeated at regular intervals. Particularly vulnerable groups (e.g. young people or pregnant women) enjoy increased protection and attention at our company.

5. Remuneration and working hours

Remuneration is based on the applicable laws and any existing binding collective agreements and is supplemented by the relevant national minimum wage laws and social benefits. Employees are informed clearly, regularly and in detail about how their remuneration is composed.

We comply with the applicable laws and (international) labour standards⁹ with regard to the maximum permitted working hours and ensure that

- working hours, including overtime, do not exceed the respective maximum limits permitted by law;
- the weekly working hours, including overtime, do not amount to more than 60 hours, even in exceptional cases, if there are no such provisions;
- employees have at least one full day off per calendar week.

6. Quality management

We have high standards for our products, which are developed and manufactured under strict application of our quality management system (ISO 9001 and IATF 16949). From the very first contact, we want our customers to know that they are in safe hands and we uphold this principle throughout the planning and development phase. As part of our quality management, we constantly monitor and check quality and ensure that our products comply with the applicable laws, regulations and guidelines, and that all employees adhere to them.

Our common aim is to work flawlessly in the technical, logistical and administrative areas and to ensure customer satisfaction as a result.

⁸ Cf. ILO labour and social standards (wcms_107727.pdf (ilo.org)); ILO guideline on health and safety in the workplace; SA8000 Social Accountability or ISO 45001 Occupational Health and Safety Management System etc.

⁹ ILO Convention No. 1 (Hours of Work (Industry) Convention), 1919)





7. Environment, energy and climate protection

We take ecological responsibility by committing ourselves to acting in accordance with the ISO 14001 and ISO 50001 standards. We also work hard to promote the climate protection goals of the European Green Deal and make our contribution to this. Annual audits monitor the requirements and identify potential for improvement, which are then checked for feasibility and implemented accordingly. In order to minimise negative effects on the environment and continuously improve our environmental and climate protection activities, we raise our employees' awareness of these issues. We have taken appropriate environmental protection measures (e.g. the implementation of an operational environmental protection management system) that adequately cover the following topics:

7.1. Treatment and discharge of wastewater

We are committed to pursuing a concept for the sustainable management of natural resources and the avoidance of wastewater. We comply with the legal obligations regarding the handling of wastewater from operational procedures, production processes and sanitary facilities. In addition, we are committed to introducing measures to reduce the generation of wastewater in the interests of sustainable management.

7.2. Dealing with emissions

We standardise general emissions from operational processes (air and noise emissions) and greenhouse gas emissions before they are released, and monitor and check them routinely. An effective means of managing and reducing our greenhouse gas emissions is the annual greenhouse gas balance and the corresponding reduction initiatives implemented. Our constant aim is to find economical solutions to minimise any emissions.

7.3. Waste and hazardous substances

Following a systematic approach, solid waste is identified, handled, reduced and responsibly disposed of or recycled. We always comply with the bans on the export of hazardous waste in accordance with the Basel Convention of 22 March 1989 in its current version. Chemicals or other materials that pose a risk if released into the environment are identified and handled in such a way that absolute safety is ensured when transporting, storing, using, recycling or reusing and disposing of these substances. Mercury is only used in accordance with the prohibitions of the Minimata Convention of 10 October 2013 and persistent organic pollutants only in accordance with the Stockholm Convention of 23 May 2001 in its current version.

**WE TAKE ECOLOGICAL
RESPONSIBILITY**

ENVIRONMENTAL PROTECTION

7.4. Consumption of raw materials and natural resources

Our primary aim is to reduce or avoid the use and consumption of resources throughout production as well as the generation of all types of waste, including water and energy. This is done either directly at the point of origin or through processes and measures, for example by changing production and maintenance processes or procedures within the company, by using alternative materials, by making savings, by recycling or by reusing materials.

7.5. Energy consumption/efficiency

We monitor and document our energy consumption. Our aim is to constantly find economical solutions to minimise energy consumption and thus improve our energy efficiency.

7.6. Land, forest and water rights and compulsory eviction

We respect the prohibition of compulsory eviction and the prohibition of unlawful seizure of land, forests and bodies of water when acquiring, building on or otherwise utilising land, forests and bodies of water. The applicable land, forest and water rights are to be regarded as the basis.

8. Dealing with conflict minerals

In accordance with our duty of care, we take measures to avoid the use of conflict minerals (tin, tantalum, tungsten, their ores and gold as well as cobalt and MICA) in our products in order to act in accordance with the law and subsequently prevent human rights violations, corruption and the financing of armed groups or the like.

We expressly support all regulations aimed at preventing the illegal trade in conflict minerals from the Democratic Republic of Congo and neighbouring crisis regions. To this end, we regularly ask our suppliers to review their supply chains and to avoid smelters and refineries without appropriate, audited due diligence processes as soon as they become aware of any abnormalities.

**WE EXPECT OUR SUPPLIERS TO COMPLY
WITH THE PRINCIPLES OF THIS
CODE OF CONDUCT**



IMPLEMENTATION AND COMMUNICATION

9. Supply chain

We expect our suppliers to apply the principles of this Code of Conduct or equivalent codes of conduct and to comply with the statutory provisions (particularly those in the Supply Chain Duty of Care Act). We also encourage them to enforce the contents of this Code of Conduct in their own supply chains.

We reserve the right to check systematically and on an ad hoc basis that this Code of Conduct is being applied at our suppliers. This can take the form of questionnaires, assessments or announced audits, for example. If there are any subsequent doubts regarding compliance with this Code of Conduct, the supplier is requested to take appropriate countermeasures and report the matter to the responsible contact person at our company. If necessary, if countermeasures prove to be futile in individual cases, the co-operation will be terminated.

10. Implementation and enforcement

We make appropriate and reasonable efforts to continuously implement, document and apply the principles and values described in this Code of Conduct. We require our managers to expressly commit to the content of this Code of Conduct.

All employees are made aware of the content of the Code of Conduct and receive training on relevant topics as required. Violations of the Code of Conduct are not tolerated and may lead to consequences under labour law.

To support our business partners in complying with the requirements, we offer targeted information and training on request.

10.1. Communication

We communicate openly and in a dialogue-oriented manner about the requirements of this Code of Conduct and its implementation to employees, customers, suppliers and other stakeholders.

10.2. Reporting violations

Compliance with applicable laws and regulations is in line with our values. To support this, we offer our employees or those who work with us the opportunity to report their concerns about non-compliance with existing laws and regulations and unethical practices or forms of behaviour that are not in line with our standards and therefore the standards of this Code of Conduct¹⁰. With the whistleblower system, we want to give our employees, customers, suppliers and the public the opportunity to report compliance violations directly and in a safe environment, without fear of reprisals or retaliation.

We also give internal and external persons the opportunity to notify us of human rights or environmental risks or violations in our own business area and in the supply chain via a complaints procedure¹¹.

This complaints procedure offers us the opportunity to receive feedback on the effectiveness of our risk management system and individual due diligence processes and thus also the chance to continuously improve our processes and to adapt and implement preventive and corrective measures.

It is possible to access this via <https://www.bkms-system.com/stocko>

Wuppertal, July 2024

The management

¹⁰ Whistleblower system in accordance with the "EU Whistleblower Directive" 2019/1937.

¹¹ Complaints procedure according to the German Supply Chain Duty of Care Act (LkSG).

**WE ARE A COMMUNITY -
A TEAM!**



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