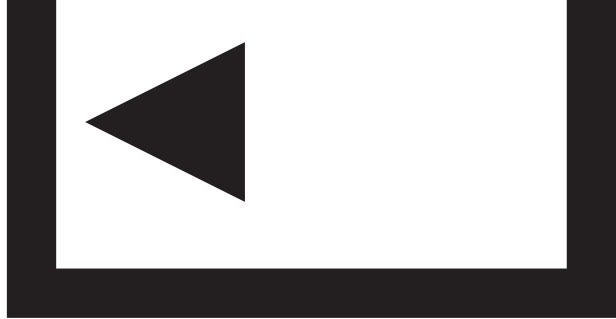


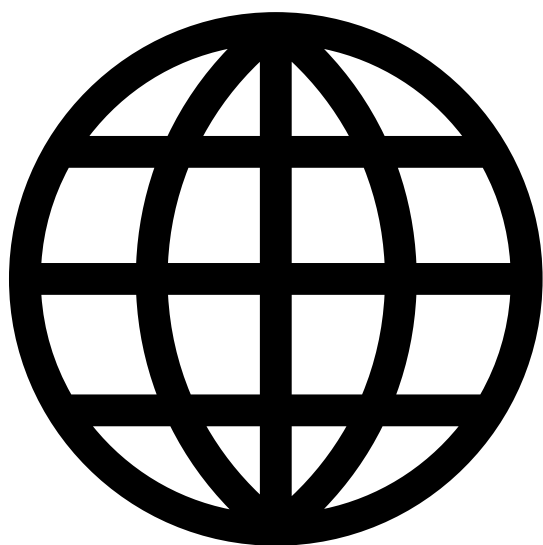


sto



Building with conscience.

Supplier Code of Conduct



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Foreword

Dear Business Partners,

The Sto* business model is oriented towards long-term success. We are convinced that the essential foundations for this are sustainable, solid business management, constant technological progress, and a strong financial footing. We pursue the goal of global technology leadership in the sustainable design of living space tailored to human needs. We achieve this corporate vision by realising our mission of “Building with conscience”. Sto is aware of the responsibility it holds within its own organisation, towards customers and suppliers (subsequently also referred to collectively as “business partners”), and towards the climate and society. With this in mind, we have defined sustainability as one of our core competences in our corporate strategy. Adopting a sustainable approach to business activities is one of the keys to achieving long-term success.

Accordingly, Sto supports initiatives and principles such as the Ten Principles of the UN Global Compact, the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and many others.**

In doing so, Sto explicitly commits to continually improving how it performs in relation to occupational safety and health, safety, climate protection, and product responsibility.

Sto intends to work together with its suppliers to further develop its sustainability performance in the supply chain. The success of the cooperation between Sto and its business partners is based on mutual trust, transparency, reliability, and fairness. This Code of Conduct defines Sto’s requirements with respect to responsible business practices, human rights, labour standards, environmental protection, and product safety. Sto takes responsibility for implementing ethical, social, and ecological standards within the company and expects its suppliers to comply with the principles established in this Code of Conduct and to give the principles due consideration in their own supply chain.

Business partners undertake to abide by applicable national laws and internationally accepted standards, directives, and principles in all business activities and decisions, particularly the initiatives and principles that Sto also supports.

If national and international regulations are not in agreement, business partners should abide by the standard that affords the greater protection to those it affects.

Many thanks for your support in implementing this Code of Conduct!



Environment

We are committed to sustainable development and protection of the environment. We expect our business partners to assume the same level of responsibility and make an active contribution to minimising environmental effects. To ensure this, the environmental standards outlined below are to be observed.

2.1 General expectation

Sto expects business partners to take appropriate measures to reduce the climate-related effects of their business activities, to actively pursue climate and environmental protection in line with international standards and legal requirements, and to continually improve the effectiveness of their efforts in this regard. This includes avoiding emissions (especially the emission of greenhouse gases such as CO₂) and waste as far as possible and continually increasing resource efficiency. Business partners shall take suitable and verifiable measures and establish effective management systems (e.g. in accordance with ISO 14001) to ensure climate protection. Sto expects its business partners to promote the safe and environmentally friendly development and manufacture of its products, their packaging, and logistics.

2.2 Protection of living environments

Business partners undertake to avoid harmful changes to the soil, air, noise, and water pollution, harmful noise emissions, or excessive water consumption that could jeopardise the resources needed to preserve and produce food, as well as any actions that hinder access to drinking water and sanitary facilities or damage the health of individuals.

Business partners shall act responsibly in the local community, be mindful of the concerns of residents, and ensure healthy and safe living conditions. Business partners shall respect the rights of

indigenous people to the land, territories, and resources that they have traditionally owned, occupied, or otherwise used or acquired.

Business partners shall not restrict access to adequate food, clothing, water, and sanitary facilities in the workplace. If the company provides housing, business partners shall ensure access to appropriate housing.

When acquiring, developing, or using land, business partners shall ensure that they observe any bans on illegal clearance and dispossession of land, forest, and bodies of water, especially if the use of such land, forest, or bodies of water secures the livelihood of a person.



Human rights

Business partners must ensure that work is performed on the basis of a recognised employment relationship which is established by means of national laws and practices. Obligations to uphold human rights arising from the regular employment relationship must not be circumvented by the use of other types of contractual agreements.

3.1 Child labour

The exploitation of children and young people shall not be tolerated in any form. Business partners are expected to prevent any and all forms of child labour in their operating processes. Business partners must also observe the minimum age requirements for admission to employment. Where national law prescribes stricter criteria regarding the regulation of child labour or minimum age requirements for admission to employment, said law shall take priority.

3.2 Wages and additional benefits

Business partners shall ensure that the wages they pay their employees are adequate. An adequate wage is at least the applicable statutory minimum wage or the defined minimum wage for the industrial sector. In addition, business partners shall grant their employees social benefits that are in line with applicable national or local standards. In each and every case, wages should always be sufficient to meet a person's basic needs and ensure they have a certain amount of money freely at their disposal. Wages shall be paid on time and comprehensible, written information about wages shall be provided.

3.3 Working time

The working time structures introduced by business partners must be in harmony with applicable national laws, industry standards, and applicable ILO conventions.

3.4 Forced labour and modern slavery

No form of forced and/or compulsory labour shall be tolerated. This means that business partners must not impose any form of forced employment or employment under the threat of punishment or other sanctions, including obligatory overtime, obligations to work, forced labour of prisoners, slavery, or bonded labour. In addition, business partners hereby commit to take measures to eradicate forced labour or any form of modern slavery.

3.5 Occupational safety and health

A key corporate objective of Sto is to avoid accidents in the workplace and work-related illnesses. It is our ongoing objective to ensure the well-being and happiness of employees, which in turn contributes to the success of our company. We therefore expect our business partners to ensure a safe, healthy, and hygienic working environment and to take the necessary measures to prevent all forms of work-related accidents and ill health. As part of these efforts, business partners undertake to comply with internationally accepted occupational safety standards. In addition, business partners are

expected to promote the continual improvement of the working environment and prioritise the safety-related training of employees.

3.6 Anti-discrimination

Sto expects its business partners to treat its employees with dignity and respect. Sanctions, fines, other penalties, or disciplinary measures must only be imposed in strict accordance with applicable national and international laws and standards as well as internationally accepted human rights.

Business partners shall ensure that measures are implemented to avoid physical abuse or disciplining, the threat of physical abuse, sexual or other harassment, verbal abuse, or other forms of intimidation.

Sto expects all its business partners and suppliers to incorporate the equal treatment of all employees as a central principle in their corporate policy (including in relation to recruitment, remuneration, benefits, promotion, and termination of an employment contract). Business partners must therefore eradicate and prevent any form of discrimination on the basis of (but not restricted to) ethnic, national, or social origin, skin colour, gender, age, religion, belief, political orientation and/or activity, membership of a trade union or employee representative body, disability, sexual identity or orientation, or other personal characteristics or preferences. Business partners shall promote equal opportunities in relation to employment and ensure that applicable legal requirements are observed at all times. Equal treatment also includes equal pay for work of equal value. In each and every case, wages should always be sufficient to meet a person's basic needs and ensure they have a certain amount of money freely at their disposal. Wages shall be paid on time and comprehensible, written information about wages shall be provided.

3.7 Freedom of association

Business partners shall ensure that they uphold the fundamental right of their employees to freedom of association and the right to collective bargaining within the framework of national laws. Business partners shall take an open-minded approach towards the activities of trade unions and their organisational activities. Employee representatives shall not be discriminated against and shall have access to exercise their representative functions in the workplace. In the event that national laws restrict the right to freedom of association and/or the right to collective bargaining, business partners shall make every effort to ensure that the free and independent association of employees for the purposes of collective bargaining is possible and actively granted.

3.8 Training and qualification

Business partners are expected to provide suitable training and professional development measures to ensure the development of their employees in order to promote compliance with the human rights and environmental requirements addressed in this Code of Conduct.

Business ethics

We expect our business partners to meet the highest standards in relation to business ethics. This includes compliance with statutory regulations, transparency, and ethical business practices.

4.1 Anti-corruption

Business partners hereby undertake to comply with international and local anti-corruption laws and standards. When dealing with business partners (customers, suppliers) and governmental institutions, the interests of the company and the private interests of employees on both sides shall be strictly separated from one another. Actions and decisions shall be taken independently of irrelevant considerations and personal interests.

4.2 Non-disclosure of information

Sto expects its business partners to comply with statutory and agreed non-disclosure obligations regarding the data provided. In addition, business partners shall provide assistance in collecting the data Sto needs to produce environmental declarations and/or have products certified.

4.3 Data protection

Business partners hereby undertake to comply with the regulations of the applicable data protection laws. Personal data may therefore only be collected, processed, or used insofar as this is necessary for the defined and legally permissible purposes. The use of such data must be transparent for the data subject (the person to whom the data relates); business partners undertake to comply with all laws that govern the communication and reporting of personal data as well as the withdrawal of consent to use, blocking, and erasure of personal data. In addition, business partners shall respect the individual in a way that is compatible with the right to privacy and shall ensure that they will not encroach upon the privacy of a person in an unlawful and/or indiscriminate manner.

4.4 Fair competition and antitrust

Business partners shall ensure that they comply with corresponding national and international antitrust laws as well as laws against unfair competition, including agreements to fix prices or terms with competitors or other forms of agreements that restrict competition, especially agreements with competitors whose concealed aim is to share the market or customers.

4.5 Export controls and sanctions

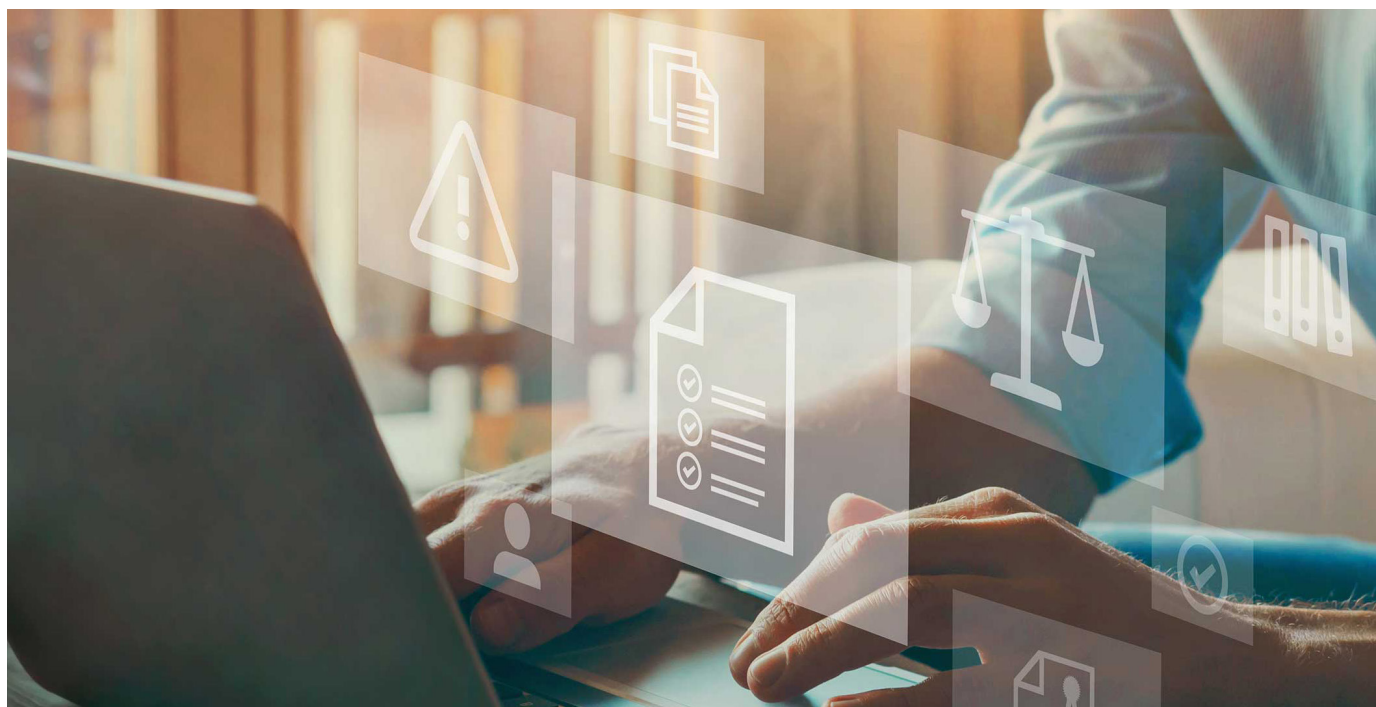
Business partners undertake to comply with applicable import and export laws, in particular to comply with regulatory sanctions, embargos, and other applicable laws, regulations, governmental and national directives, and principles that govern the transfer, provision, or supply of goods and/or technology.

4.6 Product safety

Business partners must comply with all relevant country-specific and state-specific laws and legislation regarding product safety.

4.7 Implementation of standards and risk management

Business partners must actively inform their direct suppliers about the requirements of this Code of Conduct and ensure it is observed. Business partners undertake to implement effective risk management processes in all areas addressed in this Code of Conduct and in relation to all applicable legal requirements. Business partners are expected to inform Sto about any observations that are relevant to the company.



Communication

Business partners can contact Sto via e-mail (support.purchase@sto.com) if they have any questions concerning this Code of Conduct. Information on possible or actual infringements of this standard can be communicated via the external reporting system (www.sto.de/hinweisgebersystem).

Access the reporting system via the QR code.



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