

The STULZ logo consists of a solid red rectangle at the top, followed by the word "STULZ" in white, bold, sans-serif capital letters. Below the text is a thin red horizontal line.

STULZ



STULZ Code of Conduct for Suppliers

Our guide for suppliers



Preamble

STULZ GmbH is a company with a global reach. Our actions around the world are anchored in the respectful and sustainable treatment of people and nature. STULZ GmbH undertakes to its customers to comply with defined standards, and also expects this from its suppliers. The rules contained in this Code of Conduct for Suppliers apply to all suppliers, business partners and other third parties that act on our behalf.

The STULZ Code of Conduct for Suppliers is based on the United Nations Universal Declaration of Human Rights and Convention Against Corruption, the OECD Guidelines for Multinational Companies, the Conventions of the International Labour Organization (ILO), the principles of the UN Rio Declaration and the Ten Principles of the UN Global Compact. The Code of Conduct offers guidance and explains the values, principles and behavior that directs our responsible conduct as a company. It describes our responsibilities as a member of society and as a business partner. The aim of the company management is to comply with ethical standards and to create a business environment that promotes integrity, respect and fair conduct. A business policy that adheres strictly to the law and fundamental principles is in the company's long-term interests.

STULZ suppliers are guided by this and undertake to acknowledge the established rules within their sphere of influence and to take suitable measures to implement and comply with them. Subcontractors involved in the production process must also adhere to this Code of Conduct.

The STULZ Code of Conduct for Suppliers is laid down by STULZ GmbH management and is checked and updated on a regular basis.

February 2025

Jürgen Stulz

Marc-Oliver Stulz

Christoph Stulz

Thorsten Weiss

As a supplier to STULZ GmbH, you undertake to adhere to the following minimum standards

Human rights

As a supplier to STULZ GmbH, you undertake to

- respect the personal dignity, privacy and rights of the individual.
- refrain from work that results from any form of coercion (prohibition of forced or compulsory labor).
- refrain from ever employing children below the local statutory minimum age; if no minimum age is legally established, no children under 15 may be employed.
- fundamentally only employ persons under 18 in compliance with the local legal requirements applicable to persons of this age.
- strictly observe human rights, such as the ban on torture and cruel, inhuman or degrading behavior, when employing or using private or public security forces, so as to prevent any danger to life and limb.
- refrain from any form of discriminatory behavior in terms of race, ethnic origin, gender and sexual identity, religion, faith, ideology, disability, age, trade union membership, etc.
- abstain from any form of sexual harassment.

Labor conditions

As a supplier to STULZ GmbH, you undertake to

- provide remuneration, pay and also social benefits, in accordance with applicable local laws and collective agreements.
- comply with the maximum working hours dictated by law or in collective agreements.
- provide work-free days and vacations at least in the quantity dictated by law.
- create a work environment that enables employees to voice their concerns about their working conditions either individually or collectively within the framework of the applicable legislation on collective representation and trade union membership, without fear of discrimination in any form whatsoever.
- respect employees' right to terminate their employment, giving reasonable notice.
- establish suitable organizational and other measures with the aim of managing health and safety risks at the workplace.
- as a minimum and in all cases, monitor compliance with the applicable legal provisions for occupational health and safety.
- ensure that employees are aware of risks at the workplace and have received sufficient training on how to prevent them.

Environmental protection

As a supplier to STULZ GmbH, you undertake to

- handle natural resources carefully and sustainably. Optimum environmental protection must be guaranteed throughout all phases of the production process. This includes the prevention of accidents that could adversely affect the environment, and the general reduction of emissions, in particular, the reduction of greenhouse gases, air and ground water pollution, and harmful noise.
- systematically identify and eliminate potential environmental hazards.
- endeavor to reuse and recycle materials.
- fully comply with applicable national laws on animal protection and animal welfare.
- respect and protect biodiversity. Land must always be used in conformity with applicable environmental protection laws, with the aim of maintaining and, where possible, improving soil quality. Deforestation will not be tolerated. Water use, water quality and air quality are particularly important here.

Materials

As a supplier to STULZ GmbH, you ensure compliance with the requirements of the EU REACH regulation on chemicals and the EU RoHS (Restriction of Hazardous Substances in Electrical and Electronic Equipment) Directive. You are aware that products cannot be used if these requirements are not fully satisfied.

Conflict minerals

As a supplier to STULZ GmbH, you undertake to refuse to permit the use of conflict minerals.

Conflicts of interest

Here at STULZ, we expect loyalty to the company. All employees must prevent situations in which their personal or financial interests come into conflict with those of STULZ GmbH. Therefore, you are forbidden, in particular, from acquiring interests in competitors, suppliers or customers or to enter into business relationships with them in a private capacity, if this could lead to a conflict of interest. Conflict situations must not be permitted to adversely affect the interests of STULZ GmbH. We also expect our suppliers and all business partners to commit to observing these rules. We must be notified of any actual or potential conflict of interest.

Ban on bribery and corruption

STULZ GmbH is against corruption and bribery. Any dishonest business dealings will not be tolerated. Employees of STULZ GmbH must not offer benefits of any kind to business partners, nor may they receive or accept benefits from them that could impair an objective and fair business decision or even give the appearance of such. As a supplier to STULZ GmbH, you undertake to observe these rules.

Fair competition and antitrust legislation

Competition and antitrust laws serve to protect free competition. They prohibit business conduct that intends or brings about the prevention, restriction or distortion of competition. This includes price collusion or the sharing of market segments or customers. Infringements of competition law are subject to severe penalties. In addition to STULZ GmbH's responsibility as a company, suppliers who are also responsible for violations of competition law may also suffer penalties. As a supplier to STULZ GmbH, you undertake to observe these rules.

Financial responsibility

Suppliers to STULZ GmbH undertake to provide exhaustive, traceable and correct documentation in accordance with statutory and official requirements, to ensure orderly accounting and financial reporting.

We value transparency, accuracy, and compliance with deadlines and expect the same from our business partners.

Export controls and economic sanctions

As a supplier to STULZ GmbH, you undertake to provide exhaustive, traceable and correct documentation in accordance with statutory and official requirements, to ensure orderly accounting and financial reporting. We value transparency, accuracy, and compliance with deadlines and expect the same from our business partners. Customs and export control laws and regulations, particularly economic and trade

sanction regulations, embargoes against certain countries, companies or persons, and bans on certain exports and imports, shall be complied with.

Our shared responsibility

The rules in this Code of Conduct form the core of STULZ GmbH's corporate culture. Uniform compliance with these principles is indispensable. To ensure this, we encourage everyone to individually take responsibility and report any violations. This means violations against laws, regulations and internal guidelines originating from our company, our managers, or other suppliers or sub-contractors. Reports help to detect violations and prevent or at least mitigate damage.

You can submit reports at

<https://stulzlksg.integrityline.com>.

All reports are made anonymously and confidentially. STULZ GmbH follows up all reports and employs a fair and careful process to examine them. Violations of the principles of our Code of Conduct will not be tolerated and will result in consequences. STULZ GmbH does not permit any reprisals due to complaints that were raised in good faith under this Code of Conduct. Protection against retaliation is guaranteed.



Closing provision

1. The supplier undertakes, for its part, to implement comparable principles vis-à-vis its suppliers and service providers.
2. STULZ GmbH reserves the right to use suitable measures to monitor compliance with this Code of Conduct for Suppliers.
3. This Code of Conduct for Suppliers is an integral part of the General Terms & Conditions and the individual framework supply agreement.
4. Non-compliance with this Code of Conduct by the supplier constitutes good cause for STULZ GmbH to terminate existing contracts with the supplier without notice.

The latest version of this Code of Conduct takes effect with the acknowledgment of the documents mentioned in Item 3 and shall remain valid for the duration of the business relationship between STULZ GmbH and the supplier.

Company name

Date, signature

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You can find further information on our website at www.stulz.com