

CODE OF CONDUCT FOR BUSINESS PARTNERS

Purpose

We at STARTEAM Global strive to be a successful and sustainable premium provider for its customers. We can only achieve this goal by embedding due diligence in our processes and by building on a reliable business partner network that shares and supports our values.

Our STG Code of Conduct describes STARTEAM Global's commitment. As our business partner, we expect you to meet the same ethical and integrity standards by which we measure ourselves.

This Code of Conduct for Business Partners substantiates the guiding principles for the global business partner network set out in STARTEAM Global Code of Conduct. This Code of Conduct defines the minimum requirements you must observe and fulfil as a business partner to STARTEAM Global, as well as our clear expectations.

We require you to address these appropriately to your downstream partners in the supplier network.

A. LABOR AND WORKING CONDITION

Our business partners commit themselves to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The recognized standards, as set out in the annex, were used as references in preparing the Code and may be a useful source of additional information.

The labour standards are:

1) Freely Chosen Employment

Our business partners shall assure that forced, bonded (including debt bondage) or indentured labour, involuntary or exploitative prison labour, slavery or trafficking of persons is not used. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities. Work shall be performed voluntarily, and workers shall be free to leave work at any time or terminate their employment with Employers.

2) Young Workers

Child labour is prohibited during any stage of the manufacturing processes. "Child" is any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that might impact their physical or mental health or safety.

3) Working Hours

In order to prevent reduced productivity, increased turnover and increased injury and illness due to strain of the employees working hours shall not exceed the maximum set by local law.

4) **Wages and Benefits**

Compensation paid to the employees of our business partners shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. According to local laws employees shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted.

5) **Humane Treatment**

There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

6) **Non-Discrimination**

Our business partners shall be committed to establish a working environment free of harassment and unlawful discrimination. Discrimination based on race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training shall be prohibited.

7) **Freedom of Association**

In conformance with local law, our business partners shall respect the right of all workers to form and join unions of their own choosing and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Employees and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

B. HEALTH and SAFETY

Our business partners recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Our business partners also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

Therefore, our business partners undertake to comply with following health and safety standards:

1) **Occupational Safety**

Risks of exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are to be identified, assessed and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards.

2) **Occupational Injury and Illness**

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

3) **Health and Safety Communication**

Our business partner shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns.

C. ENVIRONMENTAL

Our business partners recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. The environmental standards are:

1) **Environmental Permits and Reporting**

All required environmental permits (e.g., discharge monitoring), approvals and registrations are obtained by our business partners, maintained and kept current, and their operational and reporting requirements are to be followed.

2) **Hazardous Substances**

Chemicals and other materials posing a hazard to humans, or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

3) **Water Management**

Our business partners shall implement a water management program that ensures characterization and monitoring of water sources, use and discharge. A proper documentation must be set up to provide transparency. Our business partners shall seek opportunities to conserve water and control channels of contamination. All wastewaters shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal. A routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance shall be conducted by our Suppliers.

4) **Solid Waste**

Our business partners shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

5) **Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Our business partners shall conduct routine monitoring of the performance of its air emission control systems.

6) **Material Compliance**

Our business partners are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labelling for recycling and disposal.

7) **Material Reporting**

Provide Environmental Product Declarations and Life Cycle Assessments when requested.

D. ETHICS

To meet social responsibilities and to achieve success in the marketplace, our business partners and their agents are to uphold the highest standards of ethics including:

1) **Business Integrity**

The highest standards of integrity are to be upheld in all business interactions. Our business partners shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

2) **No Improper Advantage**

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

3) **Intellectual Property**

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and customer and supplier information is to be safeguarded.

4) **Fair Business, Advertising and Competition**

Standards of fair business, advertising and competition are to be upheld.

5) **Responsible Sourcing of Minerals**

Our business partners shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Our business partners shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

6) **Counterfeit policy**

Suppliers are expected to never utilize counterfeit components in any product supplied to STARTEAM Global. To manage the risk of counterfeit material adequate arrangement with our Suppliers are in place requiring them to minimize the risk of introducing diverted parts and materials into deliverable products and adhere to relevant technical regulations in the product design process.

E. MANAGEMENT SYSTEMS

Our business partners shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to our business partner's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

The management system should contain the following elements:

1) **Company Commitment**

A corporate social and environmental responsibility policy statements affirming our business partner's commitment to compliance and continual improvement, endorsed by executive management and posted in the facility in the local language.

2) **Management Accountability and Responsibility**

Our business partner clearly identifies senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

3) **Legal and Customer Requirements**

A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

4) **Information Security**

STARTEAM Global expects from its Business partners to apply the principle of confidentiality and security when dealing with business information and to be committed to the security and protection of sensitive and personal data.

The business activity requires the exchange of information. We are aware of the potential risks which come along with the exchange of information. The protection of any kind of information exchanged are highly important to us. We established safety measures to prevent any kind of unauthorized access to business data and steadily strive to improve the security of all sensitive or personal data.

As a committed partner, STARTEAM Global adheres to the highest standards of information security management and is proud to be ISO 27001 certified, ensuring the protection of all shared and managed data.

4) **Risk Assessment and Risk Management**

A process to identify the legal compliance, environmental, health and safety and labour practice and ethics risks associated with our business partner's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5) **Improvement Objectives**

Written performance objectives, targets and implementation plans to improve our business partner's social and environmental performance, including a periodic assessment of our business partner's performance in achieving those objectives.

6) **Training**

Programs for training managers and workers to implement our business partner's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

7) **Worker Feedback, Participation and Grievance**

Ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement.

8) **Audits and Assessments**

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

9) **Documentation and Records**

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

10) **Whistleblowing Procedures**

The commitment of STARTEAM Global to ethical business practices and respect for human rights extends to ensuring that all stakeholders, including suppliers, have access to effective grievance mechanisms. We recognize the importance of identifying and addressing any adverse impacts that may arise from our business activities.

For any information or complaint, your known contact persons are at your disposal. If practical or ethical reasons prevent this, you can alternatively use anonymous our whistleblowing tool, which you can find at the following link: <https://report.whistleb.com/en/starteamglobal>

11) **Supplier Responsibility**

Our business partners shall establish a process to communicate Code requirements to his business partners and to monitor their business partners' compliance to the Code.

F. ACKNOWLEDGEMENT

Our business partners shall comply with the respective applicable national and international laws and regulations when performing their contractual obligations for STARTEAM Global. In the event of conflicting obligations, the stricter requirements shall apply in each case. Our business partners are committed to the principles of the Universal Declaration of Human Rights, the UN Global Compact and the ILO core labour standards.

STARTEAM Global reserves the right to conduct audits or assessments to ensure that you are complying with the laws, rules and standards, and will take appropriate action with respect to the business relationship if there is cause for concern. STARTEAM Global further reserves the right to terminate any relationship if internationally recognized principles are violated and no measures are taken to remedy such violations or systematic violations are apparent.

We hereby wish to expressly confirm that we, as STARTEAM Global's business partner, will comply with the aforementioned requirements and that we acknowledge the consequences of non-compliance already herewith.

Place and Date

Signature

Name

Position