



## Code Of Conduct

### A message from the CEO

At STARTEAM Global we care about reliable connections, and we strive to exceed our customers' expectations by using sustainable and advanced solutions for everything that we do.

We aim to continue being a global leader in PCB manufacturing, which has been possible only due to our incredible team that upholds our mission, vision and values every day.

Our resilience is built on a solid foundation that is anchored by core values and principles of respect and integrity for each other and for all our stakeholders.

Sustainability commitment has formed a core element of our company-wide vision for many years. To solidify our commitment, we are updating a set of ethical guidelines and principles for how we do business and what we expect from our employees and vice versa.

Please take your time to read the regulations, together, we build resilient, successful and sustainable business in STARTEAM Global following the principles contained in our code of conduct.

Delighting with Sustainability,

Daniel Jacob  
Owner and CEO

## Scope

This guideline and associated procedures apply to all directors, staff and contractors working for the company.

## Policy

Our core values of Determination, Honesty, Responsibility and Teamwork provide the fundamental and guide our actions for achieving our environmental, social and business responsibilities. The essential elements of our commitment for excellence regarding ethical and integral business include:

### *A. Business Ethics*

The management in STARTEAM Global actively promotes the extensive communication of the code of conduct and ensures the implementations in the companies.

#### *1. Lawful Conduct*

It is STARTEAM Global's fundamental principle to respect the countries laws and legal system in which we conduct business. Each employee of the companies shall obey the laws and regulations of the legal systems in which he/she is acting. STARTEAM Global has a zero-tolerance and prohibits all forms of extortion and embezzlement. This also includes corrupt behaviour and money laundering. When dealing with STARTEAM Global's business partners and state or public institutions, the interests of companies and the private interests of their employees or representatives on both sides of a transaction must be strictly separated. Actions and purchasing decisions are made independently of personal interests or considerations that have no connection with the business in question. Applicable anti-corruption laws will be observed at all times.

The principles of entrepreneurial and responsible management, such as accountability, transparency and integrity are observed in all areas of the business relationship between STARTEAM Global and its business partners. Business partners will implement structural and operational preventive measures to avoid all forms of corruption and promote anti-money laundering.

STARTEAM Global will take immediate and unannounced action to remedy corruption and money laundering if it becomes aware of such activities.

#### *2. Mutual respect, honesty and integrity*

We respect personal dignity, privacy and the personal rights of each individual. We work together with personalities of different origin, cultures and religions, regardless of disabilities, skin colour, sexual orientation and gender. We do not tolerate discrimination based on these characteristics or personal attacks. These principles apply to our cooperation within and among the companies as well as the behaviour towards our business partners.

### *3. Leadership and responsibility*

Integrity and adherence to the legal requirements begin within the management of the company. Each manager of STARTEAM GLOBAL is responsible for their employees. The manager must make sure that the compliance with formalities and ethical behaviour is demonstrated through his own management style and that she/he encourages training courses.

### *4. Information Security*

STARTEAM GLOBAL applies the principle of confidentiality and security when dealing with business information. We are 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.

### *5. Accepting and granting of benefits and gifts*

No employee of the company is allowed to use his position to accept any benefits and gifts or grant suchlike. This does not apply to occasional gifts with a symbolic value, invitations to business lunch / dinners or invitations to other events with reason depending on the occasion. The transparency of each procedure through adequate documentation is essential.

### *6. Trade control*

All employees of the companies who deal with the import and export of PCBs are obliged to ensure compliance of the valid export and import regulations.

### *7. Intellectual Property*

Intellectual property rights are to be respected. The transfer of technology and know-how shall be done in a manner that protects intellectual property rights. Customer and supplier information will be consequently safeguarded.

### *8. Conflict of Interest*

STARTEAM GLOBAL requires all employees to avoid any conflict between their personal interests and the interests of our company in dealing with principals, vendors, suppliers, customers and all other organizations doing or seeking to do business with us.

Employee members are not permitted to engage in any work or be involved in any business, either alone or jointly with any other person(s) or with a company, directly or indirectly for reward or receipt of commission or fee, without obtaining prior written permission from our company.

## *9. Business relations with suppliers*

STARTEAM GLOBAL requests from our suppliers to share our values and principles:

- the compliance of all valid and applicable law and guidelines;
- refrain from corruption and bribery;
- the recognition of the human rights of all employees and business partners;
- the compliance of laws against child labour, prohibition of the worst forms of child labour, forced labour and slavery, freedom of association and discrimination;
- the responsibility for the health and safety of their employees;
- the compliance of relevant laws and guidelines for the protection of the environment;
- the monitoring that all these value commitments are adhered to within their own supply chain.

## *B. Human Rights*

STARTEAM GLOBAL commits to uphold the human rights and freedoms of workers, and to treat them with dignity and respect as requested in the Universal Declaration of Human Rights, and other human rights declaration such as the European convention for the Protection of Human Rights and Fundamental Freedoms and UN Guiding Principles on Business and Human Rights. We are committed to prevent, mitigate and remediate any human rights violations that are connected to our business activities, operations, products or services.

## *10. Conflict Minerals*

Minerals from the Democratic Republic of the Congo (DRC) and surrounding countries might serve as funding sources for armed groups causing human rights abuse, environmental destruction and conflicts in the area that encourage their activities. Thus, we require that no conflict minerals are being used in our production and to avoid encouraging conflicts through our procurement activities. To ensure the full compliance of the Conflict Minerals policy, we act in accordance with the OECD Due Diligence Guidance.

## *11. Protection from child labour*

STARTEAM GLOBAL prohibits the employment of child or young person and the worst forms of child labour (such as slavery, prostitution, drug trafficking and unhealthy work). We do not establish or maintain business relationship with Partners that use child labour, provided that the age of employment is not less than 15 years of age, except where the local law states a higher age of compulsory school or minimum working age, in which case the higher age shall apply in that jurisdiction, unless it is considered acceptable under the ILO Minimum age Convention 1973 (Convention N. 138). Young person means anyone under 18 years of age.

## *12. Protection from Forced Labour and Slavery*

STARTEAM GLOBAL prohibits the use of and any complicity in all forms of forced labour and human trafficking in our as well as in our business partners' production; this includes prison labour, indentured labour, bonded labour, modern form of slavery and any human trafficking.

We respect our employees' rights to agree to terms and conditions of employment voluntarily without coercion, and freely terminate their employment on appropriate notice.

## *13. Freedom of association and collective bargain*

STARTEAM GLOBAL respects the freedom of employees in join, form or not join a labour organisation or trade union that's consistent with local labour laws without fear of reprisal, intimidation or harassment. We commit to and open and constructive dialogue with our employees and, when applicable, with their representative regarding wages and working conditions, working time, training, occupational health and safety and equal treatment.

## *14. Workplace Health and Safety*

STARTEAM GLOBAL commits to providing a safe and healthy workplace, safe working methods, and the provision of safe equipment. Workplace health and safety is considered by management to be an integral and vital part of the successful performance of any job. We commit to comply with all applicable health and safety laws and regulations, policies and internal requirements.

## *15. Harassment and Discrimination*

STARTEAM GLOBAL prohibits nor allow harassment and discrimination. All employees have a responsibility to comply with our corporate culture cornerstones and to treat colleagues with dignity and respect, regardless of their gender, sexual orientation, politic opinion, marital status, age, religion, nationality, race, colour, ethnic origin health status or disability.

Harassment is not only unwanted physical contact, assault or threats. It includes suggestive remarks or gestures, pin-ups, graffiti, offensive comments, jokes and banter. The working environment must be untainted by harassment. Prompt action will be taken by our company to stop any harassment as soon as it is identified.

## *16. Working hours, Fair Wage and Benefits*

Compensation paid to the employees 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.

## *C. Environmental*

### *17. Environmental Compliance*

STARTEAM GLOBAL recognizes 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.

All employees are responsible for ensuring that we conduct our business in compliance with applicable laws and in a manner that is protective of the environment. Employees are required to notify management if hazardous materials come into contact with the environment or are improperly handled or discarded.

Furthermore, using our expertise in PCB applications, we educate our customers and engage them in various programs to significantly reduce the environmental-related impact from our business activities, products and services. As well as engagement of our employees and business partners with the aim to prevent and reduce questions concerning the environment.

## *D. Compliance Monitoring and Consequences of Misconduct and Grievance Management*

### *18. Compliance Monitoring*

All directors, staff and contractors working for the company undertake to strictly comply with all the basic principles and standards as well as the prohibitions and restrictions contained in this STARTEAM Code of Conduct

### *19. Consequences of Misconduct*

Adherence to the Code of Conduct is essential for maintaining a respectful and ethical environment. Violations will be taken seriously and may result in disciplinary actions such as written warnings up to and including termination/expulsion and legal consequences.

### *20. Grievance Management / 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>



## Responsibility and Review

This code of conduct is the responsibility of the Management of STARTEAM Global, the last update was in April 2024 and will be reviewed annually.