

Supplier Code of the STAR Group

1. Basis for the collaboration

This Supplier Code is derived from the STAR Group's Code of Conduct and is based on the principles of the United Nations (UN) Global Compact and the Global Automotive Sustainability Practical Guidance.

Sustainable and socially responsible business is the basis of all our activities and a universal foundation for good, long-term business relationships.

This Supplier Code defines all the demands placed on the STAR Group and sets out what its suppliers are required to comply with.

This Supplier Code applies worldwide to all suppliers of the STAR Group and its affiliated companies.

To ensure that our high ethical and environmental standards are met along the entire supply chain, we expect our suppliers to pass on all the requirements contained in this document to their suppliers, intermediaries, sub-contractors, and other business partners in a binding manner. We expect our suppliers to establish clear requirements and guidelines for the actors in their supply chain and to conduct regular reviews and audits to ensure compliance with the standards or comparable standards. We also require our suppliers to communicate openly and transparently and to support us in monitoring and improving the standards.

It is the responsibility of the suppliers of the STAR Group to develop their own code to pass on and promote the listed principles in their own supply chain in the best possible way.

2. Proper business practices, business ethics and integrity

2.1. Lawful conduct

We expect our suppliers to place lawful conduct above profit interests and guarantee this throughout the supply chain.

The respective, applicable, national, and international laws and regulations must be complied with. Violations of the law will not be tolerated.

2.2. Financial responsibility (accurate records)

We expect our suppliers to accurately record, maintain and report business documents, including, but not limited to, financial statements, quality reports, time records, expense reports and submissions to customers or regulatory agencies as applicable. Books and records shall be maintained in accordance with applicable law and generally accepted accounting principles to present transactions accurately at all times and not misleadingly.

2.3. Disclosure of information

We expect our suppliers to disclose financial and non-financial information in accordance with applicable regulations and standard industry practice. Where appropriate, this includes information about the workforce, health and safety practices, environmental practices, business activities, financial condition, and performance.

2.4. Secrecy and data protection

We expect our suppliers to take due care when, and a sensitive approach to, handling confidential information. Data protection and information security laws and regulations must be complied with.

Protection of all parties' privacy in respect of how the personal data are used and the security of all business data are guaranteed. Personal data shall not be used beyond the purposes agreed in the contractual relationship, or misused.

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Company and business secrets shall be treated discreetly and confidentially and shall neither be disclosed nor made accessible to unauthorised third parties. Appropriate measures shall be developed and implemented for this purpose.

All documents and records shall be stored appropriately or as agreed and shall not be unfairly amended or destroyed.

The protection of intellectual property of third parties shall be respected.

2.5. Fair competition and antitrust law

We expect our suppliers to act fairly and with integrity worldwide.

Within the framework of fair and free competition, only reputable and recognised business practices are to be applied, in compliance with the respective antitrust and competition laws.

A free market and open competition shall be maintained and enforced. It is prohibited to aim at, cause or in any way engage in improper hindrance of competition and concerted practices. This includes inappropriate exchange of information, price fixing, bid rigging and abuse of a dominant position in other forms.

2.6. Plagiarism

We expect our suppliers to minimise the risk of introducing plagiarism by developing, implementing, and maintaining appropriate methods and processes. Effective procedures shall be implemented that detect counterfeit parts and materials. Any counterfeits detected shall be isolated and the original manufacturer and law enforcement agency shall be informed immediately.

2.7. Product Integrity

The supplier will develop, manufacture and supply products complying with the respective requirements regarding state-of-the-art Product Integrity, including but not limited to:

Product Safety: products do not lead to any unreasonable risk for people's health and safety and the environment. This applies to both the intended use and foreseeable misuse of the products as well as the usage of restricted materials,

Product Compliance: products comply with the applicable legal and technical regulations in the country of manufacturing, country of assembly and as well in the country of use. This explicitly includes actively prohibiting the usage of any counterfeit parts (plagiarism) or material from unapproved sources along the supply chain,

Product Cyber Security: protection against unauthorised manipulation which could potentially affect Product Safety or Product Compliance.

Any potential infringement to Product Integrity must be notified to the Star Group immediately in writing.

2.8. Conflicts of interest and corruption

Corruption is not tolerated in any form, whether in the form of bribery, receiving bribes, extortion, embezzlement, accepting benefits, granting advantages or any other form of undue influence. The applicable laws are to be complied with,

Any direct or indirect gifts, invitations or the like given to business partners directly associated with the procurement, awarding, delivery, processing, or payment of orders are prohibited.

Other gifts and invitations may only be given or received if they are measured in such a way that, based on their value, their financial scope or in other respects, they are not suitable for improperly influencing the actions or decisions of the recipient or placing the recipient in an obligatory dependency. In this context, the temporal

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proximity of benefits in conjunction with current project decisions must be considered as well as the frequency of the benefits and extent to which they are appropriate.

Giving gifts and extending invitations to public officials are prohibited.

Private and business interests must be strictly separated. All actions must be free of extraneous considerations and personal interests. Conflicts of interest are to be avoided.

2.9. Compliance with trade control rules

We expect our suppliers to guarantee compliance with applicable export, customs, and tax laws in a global context.

Applicable regulations regarding the import, export and transfer of goods, technologies, and services, as well as capital and payment transactions, must be complied with nationally and internationally.

Trade bans (embargoes) and trade restrictions must be observed or reported. Appropriate policies and procedures must be put in place to ensure compliance with restrictions on the export of goods, software, services and technology to certain destinations and the prohibition of transactions with certain countries, companies, and individuals.

The respective applicable and current regulations in conjunction with money laundering and terrorist financing are to be complied with.

2.10. Safeguarding identity and protection against retaliation

We expect our suppliers to develop and implement complaints mechanisms. These are designed to ensure that employees or business partners are not subject to termination, threats, harassment, or other adverse treatment because of filing a complaint. Attempts to retaliate against another person shall be sanctioned with appropriate disciplinary action.

2.11. Business Continuity

With regards to the business continuity and supply chain, the supplier performs constantly comprehensive activities of identifying and assessing risks.

For identified risks mitigation measures as well as backup and continuity plans are carried out and tested on a regular basis to minimize the impact of interruptions and disruptions for operations supporting the Star Group's business.

3. Environmental protection, sustainability, and energy management

The German companies of the STAR Group are certified according to DIN EN ISO 14001 and 50001. The international companies of the STAR Group are also required to comply with these certification standards. For this reason, we also expect our suppliers to strive to minimise the sustainable ecological impact of their activities, products, and services.

3.1. Responsible sourcing

We expect our suppliers to support activities that ensure responsible sourcing of raw materials. Knowingly sourcing and using raw materials that have been obtained illegally or via ethically reprehensible or unreasonable means shall be avoided.

Use of raw materials affected by embargoes or other import restrictions shall be excluded wherever possible. Suppliers therefore undertake to identify these raw materials in manufactured products in the supply chain and

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disclose the origin and sources of supply of the raw materials they use. The procurement of conflict minerals (tin, tungsten, tantalum, and gold) is to be handled by validated suppliers.

Measures to reduce the use of resources and improve resource efficiency shall be implemented continuously. Raw materials shall be used sparingly.

We place a high value on sustainability and environmental awareness and expect our suppliers to use environmentally friendly packaging and materials that can be reused or recycled wherever possible.

3.2. Supply Chain Due Diligence and Minerals from Conflict Affected and High-Risk Areas

Suppliers must implement due diligence processes in order to identify, prevent and mitigate risks for negative human rights and environmental impacts in their supply chains, including appropriate grievance mechanisms and reporting.

The supplier must comply with all applicable laws concerning supply chain due diligence. As part of overall supply chain due diligence, the supplier is expected to support due diligence and traceability throughout its supply chains for all minerals. The supplier is expected to be aware of applicable legal requirements in relation to minerals from conflict-affected and high-risk areas and shall ensure compliance with such laws, in line with the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas”.

Thereby the supplier will perform due diligence on its supply chains to determine whether products sold to the Star Group contain critical minerals or materials, and complete the most recent versions of the relevant reporting templates such as “Conflict Minerals Reporting Template” (CMRT) & “Cobalt Reporting Templates” (CRT) provided by the “Responsible Minerals Initiative” (RMI) based on accurate and truthful information from the supplier’s own suppliers, be ready to provide current and updated information such as CMRTs & CRTs to the Star Group and work towards eliminating non-conformant smelters in its respective supply chains.

3.3. Biodiversity, land use and deforestation

We expect our suppliers to commit to the protection and preservation of biodiversity and sustainable land use in all their activities and to implement appropriate measures. This includes, for example, the protection of important biodiversity areas and the promotion of sustainable cultivation methods. In addition, our suppliers should minimize deforestation and promote reforestation measures to compensate for forest loss and contribute to the reduction of greenhouse gas emissions.

3.4. Avoiding environmental pollution

The minimum legal requirements for environmental protection must be complied with.

We expect our suppliers to reduce emissions in the production process, control polluting emissions and treat them as far as possible before they are released into the environment.

Waste is avoided, reduced, or recycled as far as possible. Attention is paid to procedures that provide for the transport, storage and safe and environmentally friendly treatment and disposal of waste.

Impacts on the environment in respect of energy, water pollution and consumption, and soil contamination, are to be kept as low as possible.

3.5. Soil quality

We expect our suppliers to protect and improve soil quality by complying with environmental laws and regulations. Suppliers shall also take appropriate measures to ensure that soil quality is maintained and their negative impacts on it are limited as far as possible.

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3.6. Avoiding hazardous substances

Substances the release of which poses a risk to people and the environment are to be avoided. We expect our suppliers to maintain a hazardous materials management system that ensures safe use and transport as well as safe storage, reprocessing, reuse, and disposal. Any hazardous substances in the production process must be identified and documented. The applicable law shall be observed.

3.7. Land, forest, and water rights

Our suppliers should adhere to sustainable and ethical business practices in all their activities, particularly regarding respecting the land, forest and water rights of affected communities and avoiding land grabbing and forced evictions. We expect our suppliers to ensure that they obtain the free, prior, and informed consent of affected communities for all activities and to ensure that their activities do not have a negative impact on the environment. In addition, our suppliers should not engage in land grabbing practices and ensure that their activities do not lead to the dispossession of communities or the violation of land rights.

3.8. Environmentally compatible products

We expect our suppliers to ensure that products and services are designed to be economical in their use of energy and natural resources. Products should be suitable for reuse or safe disposal wherever possible. Products supplied to STAR do not contain any substances of concern covered by the REACH regulation. If necessary, affected ingredients must be reported to the STAR Group in advance. Materials or purchased parts that do not comply with the RoHS (Restriction of Hazardous Substances) specifications shall be substituted by the supplier in consultation with STAR.

The development and dissemination of environmentally friendly technologies, products and working environments must be consistently promoted. These issues are of great importance to us when evaluating and selecting our suppliers.

4. Recognition of human rights and appropriate working conditions

We expect our suppliers to recognise human rights and ensure that they are not involved in human rights abuses.

The fundamental rights of all people, the dignity and privacy of everyone, are to be protected and respected.

All workers entitled to freedom of expression, association, and assembly in accordance with the respective national regulations.

This applies to all employees, full-time and part-time, temporary workers, migrants, student workers and all other employees.

4.1. Preventing discrimination

Discrimination, harassment, belittlement, or disadvantage based on race, origin, gender, disability, skin colour, sexual orientation, political or religious conviction, age or ideology will not be tolerated.

Objectively unjustified and inadmissible unequal treatment shall be avoided. The principle of equal opportunities shall be observed. Mutual respect, appreciation and dealing responsibly with one another shall characterise all co-operation.

4.2. Rights of minorities and indigenous peoples

Our suppliers should comply with internationally recognized human rights standards, particularly regarding respect for the rights of minorities and indigenous peoples. We expect our suppliers to ensure that their activities do not negatively impact these groups and that they take their rights and needs into account through consultation and consent.

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4.3. Women's rights

We expect our suppliers to adhere to sustainable and ethical business practices in all their activities, especially regarding promoting gender equality and respecting women's rights. Our suppliers agree not to discriminate against women and to comply with all relevant laws, including sexual harassment laws. We also expect our suppliers to ensure that women have equal rights in employment and management and that their working conditions are fair and safe. Our suppliers must also ensure that their working environment is free from sexual harassment and that complaints are handled in a fair and effective manner.

4.4. Sexual harassment

Employees shall be protected from physical punishment and from physical, sexual, psychological, and verbal harassment or abuse.

Clear guidelines must be defined and communicated to employees.

4.5. Child and forced labour

Child labour shall not be tolerated. The prohibition of child labour and the protection of young workers must not be circumvented. The minimum age of young workers shall be in accordance with applicable laws. Young workers may not perform hazardous work, and night work or overtime, which is contrary to the law, shall not be permitted.

Any kind of forced labour, involuntary prison work or work of victims of slavery or human trafficking is prohibited.

All workers are granted the freedom to terminate their employment with reasonable notice.

4.6. Working conditions, hours, and wages

A hygienic workplace, access to drinking water, adequate sanitation, regular safety training and emergency preparedness must be standard for all workers. Pay and benefits must be at least equal to the respective national and local legal standards or the level of the national economic sectors, industries, and regions. All workers shall be paid at least enough to meet their basic needs.

Temporary workers are only employed within the framework of the legal regulations.

Guarantees are in place so that the working hours do not exceed the respective legally permissible maximum limits. Employees shall also be allowed reasonable breaks and rest periods and be granted paid leave in compliance with legal requirements.

4.7. Health protection and occupational safety

We expect our suppliers to comply with the applicable national legislation on health protection and occupational safety. This includes, on the one hand, the mitigation of actual and potential occupational safety risks and, on the other, the training of employees to best prevent accidents and occupational diseases.

We expect our suppliers to demonstrate responsible labour policies and take active safety and health precautions.

A safe and healthy working environment is provided to prevent accidents and detrimental effects on health.

Emergency exits and a fire alarm and firefighting system are always in place and operational. Fire safety drills are performed in accordance with legal regulations.

Occupational safety and health protection are components of all operational processes and are included in the technical, economic, and social considerations.

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4.8. Use of private or public security forces

We expect our suppliers to comply with all applicable laws and regulations when employing private or public security forces and to ensure that security forces have the necessary qualifications and training. There is a prohibition on hiring or using private or public security forces if, due to a lack of instruction or control, the prohibition of torture and cruel, inhuman, or degrading treatment is disregarded, life or limb is injured, or freedom of association and freedom of association are impaired.

5. Compliance with the Supplier Code

Our suppliers must monitor compliance with the principles described in this Supplier Code. On request, they shall provide STAR Group with self-disclosure and all necessary documentation demonstrating compliance with the standards set out in this Supplier Code. They shall inform STAR of any events that conflict with the principles of this Supplier Code.

Our suppliers shall ensure and track compliance with the principles of this Supplier Code in their own supply chain.

The STAR Group reserves the right to verify compliance with the standards set out in this Supplier Code. To that end, STAR may conduct audits and random checks at the suppliers' premises.

Should a supplier fail to comply with the standards set out in this Supplier Code, it undertakes to inform STAR immediately and to take immediate remedial action and provide evidence of such action.

STAR reserves the right to promote remedial measures in the event of non-compliance with the Supplier Code and, if necessary, to terminate the co-operation.

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