

## Code of Conduct for STRATEC Suppliers

This STRATEC Group Code of Conduct stipulates and defines the fundamental requirements which STRATEC expects its Suppliers of goods and services to comply with regarding their responsibilities to people and the environment. STRATEC reserves the right to reasonably change the requirements of this Code of Conduct due to changes of the STRATEC Compliance Program. In such event STRATEC expect the Supplier to accept those reasonable changes. All people involved in the procurement process in particular must act responsibly toward their own companies, customers and suppliers, the environment and society. The actions of the companies and their employees particularly focus on integrity and fairness. The ethical guidelines stated in this Code of Conduct are primarily based on the principles of the UN Global Compact, the ILO conventions, the UN's general declaration of human rights, the UN conventions on children's rights and the OECD guidelines for international companies.

### Suppliers herewith declare that they will comply with the following:

#### The law

- Suppliers must comply with the relevant and applicable laws of the countries in which they operate in all business transactions and decisions. Business partners must be treated fairly.

#### Corruption / anti-trust laws / bribery

- Corruption: When dealing with business partners (customers, suppliers) and government institutions, the company's interests and employees' personal interests must be strictly separated on both sides. Actions and decisions (to buy) must not be influenced by unrelated deliberations and personal interests. Applicable criminal laws on corruption and bribery must be adhered to at all times. These are some of the points that must be complied with.
- Dealing with competitors (anti-trust law): Suppliers must ensure that competition remains fair. They must consequently comply with all applicable laws that protect and promote competition, particularly the applicable anti-trust laws and other laws on the regulation of competition.

#### Human rights

- Suppliers must respect internationally recognised human rights and support their compliance, including the rejection of forced labour.

#### Child labour

- Suppliers must agree in particular not to employ any persons who are unable to prove a minimum age of 15. In countries that are subject to the exceptions for developing countries in accordance with ILO convention 138, the minimum age may be reduced to 14.

#### Discrimination

- Suppliers must discourage any form of discrimination within the scope of the applicable laws. This primarily applies to the disadvantaging of employees on account of their gender, race, disability, ethnic or cultural background, religion or ideology, age and sexual preferences.

#### Working conditions

- Suppliers must pay all employees in accordance with the tariffs as stipulated by the applicable laws, including minimum wages, overtime and statutory social benefits. Suppliers also must respect employees' rights to freely join associations and unions, act as employee representatives and become members of works councils in accordance with local laws.

#### Health and safety at work

- Suppliers must ensure that health and safety conditions at work meet national requirements and support the ongoing improvement of the working environment.

#### Fighting product counterfeiting

- STRATEC expects from its suppliers that they will inform the company without delay if they receive offers to purchase counterfeited, illegally re-imported or stolen products or if they obtain knowledge of such products in any other way.

#### Environmental protection

- Suppliers must comply with all statutory norms and international standards regarding environmental protection. Environmental pollution must be kept to a minimum and environmental protection must be continuously improved.

#### Management systems

- Suppliers are advised to introduce a management system whose scope reasonably reflects the contents of this Code of Conduct. The management system must ensure the following: a) compliance with applicable laws, regulations and customer requirements regarding suppliers' operations and products, b) compliance with this Code of Conduct, and c) determination and limitation of operating risks in connection with this Code of Conduct. The system should also support an ongoing improvement process.

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### Supply chain

- We expect from our suppliers and contractual partners that they show willingness and commitment – also on behalf of their subsidiaries – to comply with this Code on a global and/or local basis and also that they demand the same from their suppliers.

**We herewith confirm the receipt of the “Code of Conduct for STRATEC Suppliers” (hereinafter: “Code of Conduct”) in the version dated December 2018 and agree to comply with its fundamental requirements.**

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Place, date

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Signature

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Name (in block capitals)

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Position, company stamp (if available)

This document must be signed by a duly appointed company representative and returned to STRATEC within 20 working days upon receipt:  
By mail to STRATEC SE, Einkauf, Gewerbestr. 37, 75217 Birkenfeld, Germany  
via e-mail, including electronically scanned signature, to [supplier@stratec.com](mailto:supplier@stratec.com) or to your usual purchasing address.