



Code of Conduct

SAT Anlagentechnik GmbH

Status 01/2022



Preamble

All employees of SAT - Anlagentechnik GmbH are bound to the regulations of this "Code of Conduct".

With this Code of Conduct we pursue the intention to comply with and further develop our social and environmental standards together with our employees, suppliers and subcontractors.

Our basic rule is that our suppliers must comply with the standards set out here in all their activities.

In the event of non-compliance, business relationships are not automatically terminated, but are subject to critical review and work with the supplier towards unconditional compliance. In the event of repeated non-compliance with our required standards, SAT will terminate the business relationship. SAT reserves the right to terminate the business relationship immediately in case of severe cases of non-compliance.

In case of non-compliance with the specified standards, the suppliers have to inform SAT - Anlagentechnik GmbH immediately.

The continuity and constant development of our company depends significantly on our commitment to social responsibility and our reputation as a trustworthy business partner.

This Code of Conduct has been adopted by the management of SAT-Anlagentechnik GmbH.

All standards listed below are self-evident for us and must also be fulfilled by our suppliers.

Dr. Kai Stürken
Chief Executive Officer



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Laws and Regulations

"We comply with applicable law at the local, national and international level."

Compliance with all applicable laws and regulations is a matter of course for us - at local, national and international level. This is the only way to secure our business success worldwide. Any violation of applicable laws or regulations can have serious consequences, such as criminal penalties, damages or damage to our reputation.

In individual countries, business areas or markets, or vis-à-vis business partners, stricter regulations may exist than those described in this Code of Conduct. In such cases, the stricter regulations must always be applied.



Communication

"We bear our responsibility as a team and communicate in all directions and at all levels"

All managers are required to know the fundamental laws, regulations and internal company rules relevant to their area of responsibility. Comprehensive knowledge is required in particular for those executives who, by virtue of their function or position on a corporate body, bear special responsibility for ensuring compliance (e.g. managing directors, executives in the areas of compliance, finance, human resources, legal, auditing, risk management).

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Forced labor

"We do not accept and tolerate no forced labor"

There shall be no forced labor in any form whatsoever. This includes forced labor of prisoners, servitude, and other forms of forced labor.

Employees shall not be required to post a bond or personal documents when hired by the supplier.

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Child labor

"We do not tolerate child labor - not at SAT and not for SAT."

There shall be no child labor. No person subject to compulsory education or younger than 15 years of age may be employed, unless a higher age limit is specified in local legal provisions and applicable laws or regulations permit an exception.

Workers under 18 years of age may not undertake hazardous work and may be exempted from night shifts, taking into account their educational needs.

No discrimination

"Our decisions are based on objective criteria"

In all personnel decisions, especially hiring, promotion, pay, benefits, training, layoffs and terminations, all employees are to be treated solely on the basis of their skills, qualifications and conduct.

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Harassment

"We do not tolerate harassment or aggression"

No corporal punishment shall be applied to employees and there shall be no physical, sexual, psychological or verbal harassment or abuse.

Neither personal insult nor forms of sexual harassment shall be tolerated in the workplace. Sexual harassment includes all forms of unwelcome verbal, nonverbal or physical conduct of a sexual nature.

DemEANING comments about a person's appearance, questions about one's sex life, sexual coercion or unwanted sexual acts are prohibited.

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Working times

"We comply with the statutory regulations on working hours"

Employees' weekly regularly scheduled working hours shall not exceed 48 hours of work in a normal workweek or 60 hours (including overtime) in an entire workweek, unless national regulations provide for lower maximum working hours or there are exceptional business circumstances. In each seven-day period, workers shall be granted at least one day off, unless there are exceptional business circumstances.

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Payment

"Our employees receive fair wages / salaries for the work they work they do"

Wages, including payment for overtime and special benefits, shall be at or above the level established by applicable laws and regulations.

Employees shall have the right to a written employment contract that regulates at least the following points: Start of work, working hours, remuneration, vacation entitlement, protection against dismissal, maternity protection.

The supplier must ensure that the wages paid for a standard working week at least meet the legal standards.

The supplier must ensure that there are no wage deductions for disciplinary reasons and that the exact composition of wages and fringe benefits is regularly made clear to workers in detail. Supplier must also ensure that wages and fringe benefits are paid in full compliance with all applicable laws and that remuneration is paid either in cash or in check form, in a manner favorable to workers.

The Supplier shall ensure that there is no subcontracting of labor and feigned apprenticeships for the purpose of avoiding its obligations to personnel under applicable labor and social security laws and regulations.

Health and safety

"We ensure a healthy and hazard-free hazard-free working environment"

To prevent accidents and injuries, employees shall be provided with a safe and healthful work environment and, where appropriate, safe and healthful accommodations. Minimum requirements are derived from applicable local laws.

Employees may withdraw from hazardous situations or refuse to perform activities if there is danger to life and limb without fear of consequences under labor law.

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Political Activities

"We do not engage in political opinion making"

The conduct of partisan political activity on company-owned premises, with funds or in the name of the company is prohibited.

The necessary exchange with official representatives of the federal, state and local governments is not affected.

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Bribery and Corruption

"We condemn all forms of corruption and bribery. bribery"

All forms of bribery and corruption are prohibited, whether by public officials or in business dealings.

Benefits, for example in the context of invitations or in connection with advertising measures, which serve the purpose of promoting business relationships or presenting products or services, are permissible - insofar as they are moderate.

However, such benefits may only be accepted or granted if they serve a legitimate business purpose and are not accepted or granted in return for an unlawful advantage. The benefit may not be of an unreasonably high value and may not disproportionately exceed the limits of customary business practice or the recipient's normal standard of living. As a general rule, donations to public officials should be avoided.

Requests for sponsorship or "donations for charitable purposes" or their offer should be handled with extreme caution. Careful scrutiny must ensure that this is not a covert attempt at bribery.

With respect to competitors, the focus is on professional conduct - high standards of work quality are the benchmark. Clean and recognized business practices in fair competition lead to success.

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Menschenrechte

"We bear our social responsibility"

The supplier undertakes to promote human rights. He respects human rights, in particular integrity, honesty, respect for human dignity, openness and no discrimination based on religion, ideology, gender or ethnicity.

We already take into account applicable laws and regulations, such as the Supply Chain Act, regardless of the legal need for SAT to ensure that there are no violations of human rights throughout the supply chain.

Freedom of association and Collective bargaining

"We value the open dialogue and cooperation and cooperation with trade unions and employee representatives."

Every employee has the right to freely associate, form or join unions and employee representative bodies.

In addition, every employee has the opportunity to speak openly with management about working conditions without threat of reprisal, intimidation or harassment.

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Environmental protection

"We respect, protect and preserve our environment"

All applicable environmental laws and regulations of the country in which activities are conducted must be complied with.

Business must be conducted in such a way that natural resources are used as efficiently as possible.

Hazardous substances should be used in a limited manner wherever possible. They may only be used if they are used correctly and the environment is not harmed by their use.

Environmentally sound disposal of waste and containers must be guaranteed and proven upon request. All waste generated during production must be disposed of in the correct manner.

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Conserving resources use of energy for the benefit of the environment

"We pay attention to the environmental performance of our suppliers"

The supplier undertakes to treat the environment responsibly and to make an active contribution to environmental protection. For this purpose, he undertakes to comply with all applicable laws and regulations. Furthermore, it is desirable that the supplier permanently improves its environmental performance as well as its energy performance within the framework of the introduction of a management system. These aspects are taken into account when selecting suppliers.

Energy consumption and greenhouse gas emissions

The supplier undertakes to monitor and document its energy consumption. Appropriate targets for minimizing energy consumption are to be introduced and monitored for their effectiveness. The same applies to greenhouse gas emissions.

Air quality

The supplier undertakes to implement measures for the sustainable improvement of air quality. Management of natural resources and waste avoidance The supplier undertakes to use suitable management systems to conserve natural resources and avoid waste as far as possible.

Natural resource management and waste prevention

The supplier undertakes to use suitable management systems to conserve natural resources and to avoid waste as far as possible.

Water quality and use

The supplier undertakes to implement measures for the sustainable protection and safeguarding of water quality.

Chemical Management

Systematic recording of "hazardous working materials" including current labeling and safety data sheets available at all times. The company is environmentally certified according to DIN EN ISO 14001.

Responsible Raw material procurement

"We ensure responsible sourcing of raw materials"

Suppliers shall support activities that ensure responsible procurement of raw materials. The procurement and use of raw materials obtained illegally or through ethically reprehensible or unreasonable measures shall be avoided. The use of raw materials such as conflict minerals that are affected by embargoes or other import restrictions shall be excluded. Suppliers are therefore obliged to identify these raw materials in manufactured products in the supply chain and to disclose the origin and sources of the raw materials they use.

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Export control

"We pay attention to compliance with all regulations for the import and export of goods, services and information."

Cross-border economic transactions are subject to prohibitions, restrictions, licensing requirements or other monitoring measures within the scope of export control.

In addition to goods, technologies, technical drawings and software are also affected by export control regulations. Irrespective of a scope of supply, transactions with persons or companies on sanctions lists are also generally prohibited.

When importing or exporting products and services, every employee is requested to point out possible problems specifically and independently of the official SAT - export control.

In cases of doubt, the responsible export control department must be actively informed and asked for advice.

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Conflicts of interest

"We make our decisions exclusively on the basis of criteria and do not allow ourselves to be not be influenced by personal interests and relationships"

A potential conflict of interest exists when employees' private interests collide or may collide with SAT's interests. In particular, a conflict of interest may arise from sideline activities or from the operational function if the employee's personal interests are placed above SAT's interests.

The employee avoids even the appearance of a conflict of interest by disclosing apparent or actual conflicts to the supervisor without being asked.

If conflicts of interest are identified by the employee, they must be reported and handled in accordance with SAT "Compliance - Management".

Data protection and Information Security

"We protect the data of customers, suppliers, employees and former employees in accordance with DSGVO and internal policies based on confidentiality, availability and integrity"

To protect privacy, special legal regulations exist for handling sensitive data that requires protection. In principle, the collection, storage, processing and other use of personal data requires the consent of the data subject, a contractual provision or another legal basis.

The employee is obliged to work in accordance with the valid and applicable SAT guidelines for the processing of personal data.

In cases of doubt, the employee shall contact the supervisor or the data protection officer or data protection coordinator.

All aspects relating to data protection and information security are described in the management system and are binding for the employee.

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