

YOUR PARTNER IN INDUSTRIAL EVOLUTION

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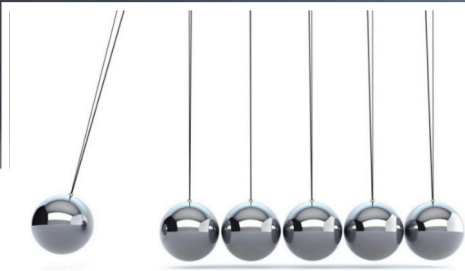
CODE OF CONDUCT

VERSION: 4.0

APPROVED: 02.04.2025

APPROVER: MANAGEMENT TEAM

OWNER: CEO



STERA

RESPONSIBILITY AND CONTINUOUS IMPROVEMENT



Responsibility and continuous improvement are an important part of our daily work. Stera's way of working is guided by the laws and regulations in force. By adhering to Stera's values and Code of Conduct, we create added value for our employees and our stakeholders.

The Code of Conduct ensures the basis for responsible operations. At Stera we have selected six goals from Agenda 2030: goals 3, 4, 8, 9, 10 and 12.

Laying the foundations for ethical rules: ISO45001, ISO14001, Agenda 2030 targets, ILO Declaration on Fundamental Principles and Rights at Work and ILO Core Conventions. We review this document every two years and update it as necessary.

STERA VALUES

CUSTOMER FOCUS

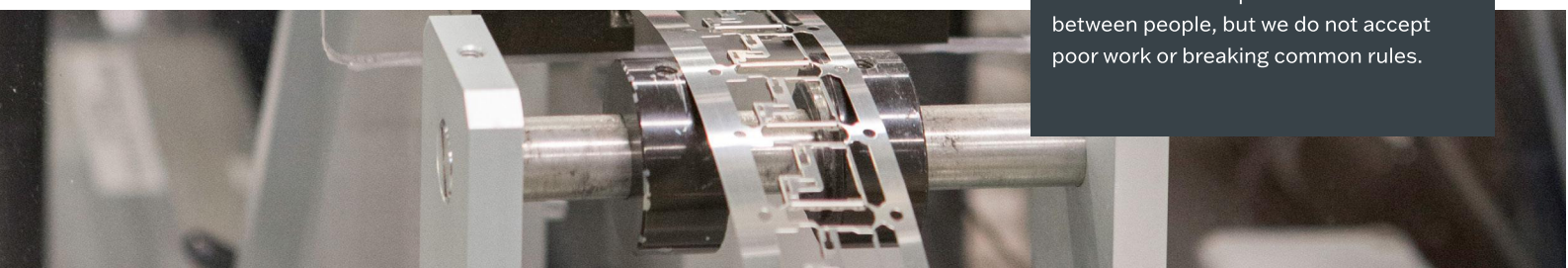
We want to deepen our cooperation with our customers to find new and increasingly competitive solutions to their needs. We keep our promises, we are flexible, and we can adjust whatever changes the customer's may require. We analyse our operations and make continuous improvements.

EFFECTIVENESS

We invest in continuous development of productivity. We set challenging goals together and move towards them systematically and successfully. We are constantly developing our operations, productivity, and expertise, and devising new solutions.

EMPLOYEE SATISFACTION

We value and encourage each other as well as trust each other and share the knowledge and skills we need to work with each other. We provide constructive feedback. We accept the differences between people, but we do not accept poor work or breaking common rules.



CODE OF CONDUCT

COMPLYING WITH THE LAW

- Stera is committed to complying with laws, regulations and rules.
- Honesty is the foundation for all of Stera's business, statements, and reports, and the lifeblood of sustainability. We keep our promises and commitments.
- We support fair competition and free markets and refuse to discuss or agree with competitors over pricing matters, market shares or other similar activities. Stera complies with the competition laws of the countries in which it operates.
- Our operations are transparent and open. We report on our operations in an open and honest manner in accordance with the applicable laws and the commonly accepted practices of the capital and financial markets. Stera engages in continuous interaction with authorities and non-governmental organizations to develop open and direct dialogue with the surrounding society.
- Stera follows local laws and regulations in all its operations in the countries it operates. These laws and regulations include occupational health and safety, labour, environmental, human rights, privacy, and equality legislation.
- We consider the creation and protection of intellectual property an important aspect. For this reason, we take care of our intellectual property and will not transfer it over to external parties. Similarly, we also respect the intellectual property of external parties and will not attempt to obtain it illegally.
- We have an anonymous reporting channel for potential grievances, as required by the legislation, and a defined process for handling reports.

DATA PROTECTION AND PRIVACY

- Stera treats all information confidentially and carefully, and in addition information may only be used for the agreed activities.
- Stera monitors and complies with the requirements of the GDPR, ensuring the protection of personal data.
- Regular security risk assessments shall ensure the functionality and reliability of the system.

HUMAN RIGHTS

- Stera respects and promotes in its activities the universal human rights as defined in the United Nations Declaration of Human Rights. These include freedom of thought, opinion, expression, religion, peaceful assembly and the right to belong to a trade union.
- No one is discriminated against on the basis of race, age, nationality, gender, or sexual orientation.
- Stera does not accept the use of forced or child labour in the supply chain.
- Working conditions are in accordance with the law and collective agreements.
- Stera ensure that working hours, wages, benefits, and overtime pay all are in compliance with the law and collective agreements.
- Stera does not tolerate harassment or other inappropriate behaviour.
- Employees are treated and evaluated based on their professional skills related to their job duties. As an employer, Stera is committed to treating its employees fairly, impartially and equally.

FAIRNESS AND CONFIDENTIALITY

- Stera employees must avoid any activity that could lead to a conflict of interest.
- Stera prohibits corruption and bribery in all its operations. Stera and its employees shall not pay or offer bribes or illegal payments to government officials or other parties in an attempt to obtain or retain business or for any other similar reason.
- Stera employees may not accept personal benefits or gifts from Stera's stakeholders or suppliers that do not comply with applicable laws or local business practices.
- Benefits and gifts may only be accepted if they are given in the normal course of business and are of minor value.
- The conduct of business is confidential.
- The employee must inform Stera of any potential conflict of interest.

HEALTH AND SAFETY

- At Stera, we have ensured safe working conditions for our employees.
- All Stera factories have rescue plans and tested emergency preparedness procedures.
- As an employer, Stera has ensured that the necessary protective clothing and other protective equipment are available to employees and that instructions for their use have been provided.
- Hazard identification and risk assessments are carried out and are kept up to date. Risk assessments cover the entire company, production workplaces, machinery, and chemicals. Identified issues will be addressed.
- Chemical safety data sheets and the required protective equipment are made available to workers.
- At Stera we strive to create a safe working environment for everyone working in our premises.

ENVIRONMENT

- Stera's goal is to work together with customers, suppliers, and partners to ensure that materials fulfil the requirements set by laws, regulations, and other provisions.
- At Stera, we strive to increase the recycling and reuse rate of materials.
- Waste and hazardous waste is sorted appropriately to improve the efficiency of further processing and increase recycling.
- At Stera, we measure our carbon footprint and have set targets for greenhouse gas emission limits in order to help prevent global warming.

COMPLIANCE WITH INSTRUCTIONS

- The management team of the Stera Group has approved these guidelines as principles for the entire Stera Group. We expect all our employees to comply with these principles.
- Any actions that go against these guidelines will lead to action and, if needed, termination of employment. Employees are encouraged to report any actions that go against these guidelines to company management. The person reporting the action will not be punished in any way.

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