

# **Code of Conduct**

## **Sto Group**

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## Foreword from the Executive Board

Dear colleagues,

The Sto Group is committed to achieving financial success, but it combines this with upholding a sense of social responsibility and a desire to protect the environment. It is a Group that focuses on quality and operates on an international scale. With this in mind, it maintains a consistent set of standards for how the people at Sto worldwide should act, based on a global Code of Conduct.

If we want to achieve success and pursue our mission of “Building with conscience.” together, it is vital that every employee in the Sto Group understands what these standards mean and acts with awareness of the company’s four brand values: Close, Experienced, Performing, and Advanced.

Ensuring compliance with this approach is one of the most important aspects of the work we do every day. We need to uphold and foster a culture of sincerity in which every employee has a sense of personal responsibility for conducting themselves in a legally compliant manner.

This Code of Conduct provides an authoritative guide to acting with integrity, and must be followed by every employee in the Sto Group worldwide. It contains a summary of key legislation and internal regulations that underpin the correct ways of working with third parties in a business environment, dealing with the public, and interacting with co-workers on a daily basis.

This Code of Conduct is designed to help its users make the right decisions about how to act. That said, it does not claim to be exhaustive and cannot cover every eventuality that Sto Group employees may encounter in business dealings. For that reason, we are also here to give you further information and support in fulfilling your duties, should you need it.

We would like to thank you sincerely for your dedication to Sto and for doing your part in helping us achieve our aims.

Best regards,

Rainer Hüttenberger  
Chief Executive  
Officer (CEO)

Jost Bendel  
Chief Technology Officer

Désirée Konrad  
Chief Financial Officer

# Code of Conduct

## Corporate responsibility

### 1. Interaction with customers

As a business that is focused on innovation, we develop, produce, and market innovative products and services that are designed to bring our customers real benefits. Our customers have a legitimate interest in staying informed about our products and services.

We aim to provide this information in a timely, transparent manner. As an example, we publish our Technical Data Sheets and Sustainability Data Sheets on our website.

### 2. Interaction with suppliers and service providers

We uphold high performance and sustainability standards in all our business activities. The same applies to the relationships we maintain with our suppliers and service providers, and what we expect of them. As they assist us in achieving our sustainable growth and our success, they represent vital players in our business.

Every relationship that we cultivate with our suppliers and service providers is based on high standards of quality in the products and services delivered, plus availability, competitive prices, maximum suitability, sustainability, and integrity.

The expectations that Sto has regarding its suppliers are documented in the supplier code of conduct and must be met.

### 3. Child labour, forced labour, and human rights

Children have the right to grow in an environment where they can play and learn, not one in which they will be exploited as cheap, enslaved sources of labour. Working on the basis of this belief, we emphatically object to child labour and exploitation, and uphold legislation in this area without exception.

We are strongly opposed to and dissociate ourselves from forced labour in all its forms. We dedicate ourselves to ensuring that every employee in our value chain is able to perform their work voluntarily, without the threat of violence or other negative circumstances.

Not only do we respect and support internationally accepted human rights, but we have also committed ourselves to observing and upholding the Ten Principles of the United Nations Global Compact.

We see protecting human rights as a key aspect of the responsibility we bear as a company, and our commitment to this principle is documented in our Policy Statement on Human Rights.

#### 4. Donations and sponsoring

We are aware of the responsibility that we have towards societal and environmental issues, and that fulfilling this is essential to achieving corporate success over the long term. With this in mind, we aim to establish dialogue with various groups and use a range of platforms and opportunities to do so. These include the donations we make and our consistent, transparent approach to sponsoring political causes.

When engaging with parties and interest groups within the political sphere, we feel it is our duty to maintain a neutral stance. In all of our donation and sponsoring activities – such as funding for parties, political organisations, elected officials, and candidates for political office – we make sure to comply with both legislation and internal regulations. As a company, we donate on a purely voluntary basis and do not expect any benefits in return. We are required to observe the conditions that apply to approvals for donations, submitting complete documentation, and tax deductibility.

#### Our products and services

#### 5. Environmental protection, climate protection, resource protection, sustainable management, and the circular economy

For more than 60 years now, we have been improving the lives of people in the built environment. The long-term outlook that our founders held and our stable ownership structure have allowed us to stay true to our vision. For this reason, we believe that sustainability is one of the pillars of our corporate philosophy – something embedded in our Guiding Principles. As one of the foundations on which our Group does business, sustainability is also a fundamental element of our model. Approaching financial, societal, and ecological challenges from a holistic perspective allows us to cultivate long-term values.

Caring for our environment and climate is one of our top priorities. As part of our commitment to sustainable development, we take a proactive approach to employing new, more sustainable, and more environmentally friendly technologies and methods, and we are dedicated to keeping our impact on the environment to a minimum.

We aim to take a responsible approach towards using and procuring natural resources (water, energy, materials, and plots of land) in the process of manufacturing and selling our products and services. Each of our employees is called to do their part to protect the environment in the areas for which they are responsible and are able to act. Our efforts go beyond adherence to legal standards, extending to our voluntary commitment to environmental and energy management standards such as ISO 14001 and 50001.

#### 6. Information and communication

We always provide truthful information about our products and services. Incorrect or misleading information has the potential to damage not only our reputation, but also that of our customers – something that we consider improper and entirely against our principles.

**Integrity at Sto****7. Competition and competition law**

Competition law is designed to protect the free market. It prohibits business practices that are intended to prevent, limit, or distort competition, or that have this effect. Examples of practices that might cause this are price-fixing agreements or dividing up market segments or customers.

We respect the rules of fair and open competition, and do not make any agreements that would affect competition or consumers in a way that stands against this.

**8. Corruption, bribery, gifts, and invitations**

Sto employees and business partners are prohibited from granting or promising unfair benefits – such as placing new orders or maintaining existing ones – to individual persons or organisations, either directly or indirectly. Additionally, they are not permitted to request or accept benefits of this nature. Unfair benefits include impermissible discounts, bribes, kickbacks, and underhand payments. Unfair benefits may relate to any assets, including payments, meals, gifts, offers of entertainment, travel expenses, and sham agreements.

These principles apply to every public and private business transaction that Sto is involved in worldwide. Numerous countries have strict laws and regulations regarding bribery and unfair benefits, which may lead to criminal and private actions against Sto and the individuals involved.

**9. Export controls**

All employees who deal with foreign trade activities must refrain from participating in transactions that are classified by national or international export control regulations as impermissible.

Before employees enter into a business relationship with a new business partner, they must ensure that there is no respective entry on any national or international sanctioned party lists. Before processing an export of commercial or non-commercial commodities, software, or technology, physically or electronically, employees must ensure that the item in question is not controlled and does not require an export licence from the authorities. Some destinations are subject to comprehensive foreign trade controls, i.e. embargoes or sanctions, and require additional checks prior to proceeding.

**10. Taxes**

Sto operates all over the world. We want to maintain our reputation as a fair and respected taxpayer in the countries in which we operate. We are obliged to comply with the fiscal provisions of all countries in which we operate. This includes fiscal regulations of all kinds – in our case, particularly those relating to profit and value added taxes.

Sto is respected as a fair taxpayer. Sto's structures are geared towards its commercial purposes and were not established with the aim of avoiding taxes. Sto does not use any artificial arrangements in connection with tax havens or countries with special secrecy legislation.

## 11. Data protection

We use a range of electronic systems for processing, exchanging, and transferring data between Sto Group companies and third parties. As interaction between people at our various sites has increased, so too has the extent to which personal data is exchanged. This trend is being exacerbated by the increasingly widespread use of modern telecommunications methods as well as electronic tools and platforms.

We have committed ourselves to upholding data protection standards, and we put appropriate measures in place to ensure that personal data is protected against unauthorised access by third parties and misuse.

Whenever we collect and process personal data (such as information about employees, business partners, customers, and suppliers), we are required to do so in compliance with the data protection legislation that applies in that situation.

### Personnel policy

## 12. Recruitment conditions, employment conditions, and working conditions

We give all of our employees across the globe a working environment that is innovative, challenging, and focused on growth. Our personnel policy sets out our guidelines in areas such as recruitment, promotion, career development, and remuneration.

We foster an equal-opportunities workplace among our employees, who are recruited and promoted solely on the basis of their expertise, skills, and performance. We abide by national laws and labour standards with regard to appropriate remuneration and maximum working hours, and ensure that fair working conditions are in place across the board.

We aim to foster an environment of ongoing, open dialogue with all our employees, and regularly conduct a global employee survey in which we request honest, anonymous feedback on needs and expectations with the aim of identifying areas that hold potential for improvement.

## 13. Ban on discrimination; interacting respectfully

As we conduct business activities across numerous countries with many different cultures, open-mindedness and tolerance have always been core values of our organisation. A diverse working environment offers many advantages, but the interactions that take place within it need to be judiciously handled. Indeed, exerting this kind of care is what allows the strengths in diversity to come to the fore.

We strongly believe that a diverse workplace strengthens our innovative abilities: by drawing from the many backgrounds, cultures, languages, and ideas that our employees bring to the table, we can harness a genuine competitive advantage. That is why we are committed to treating all of our current and future employees fairly and equally, and to applying the principles of equal rights. We do not condone discrimination or harassment of any kind in the workplace.

## 14. Health and safety at the workplace

Upholding health and safety standards is one of the bedrocks of our activities. We are conscious of the responsibility that we hold in this area and approach it methodically, conducting numerous campaigns with the aim of ensuring that our working environment remains safe and healthy. Our strategy in this area has a systematic format and is based on technical, organisational, and personnel-related measures.

We aim to make continuous improvements wherever it makes sense and is financially possible to do so. We regularly monitor the outcomes of our efforts to make sure that we reach our goals.

All of us are called to identify areas in which improvements can be made and keep doing what we can to cultivate a better working environment.

### Compliance management

## 15. Compliance officers

The Chief Compliance Officer helps to ensure that the Sto Group Code of Conduct is upheld across the Group. The Chief Compliance Officer coordinates the local compliance contacts and facilitates an exchange of experiences and best practices within this network.

A local compliance contact person has been appointed in every Sto company. They are responsible for the following tasks in particular:

- Serving as a point of contact for employees who need help and advice.
- Coordinating local compliance activities.
- Supporting and carrying out compliance monitoring.

## 16. Reporting infringements and the whistleblower system

It is vital that we recognise severe infringements of this Code of Conduct so that we are able to deal with them swiftly and permanently. Sto Group employees should play an active part in upholding the Code of Conduct and are required to report any infringements. In most cases, employees should seek out a one-to-one discussion with their supervisor, a colleague in a position of trust, or the relevant compliance contact person.

To deal with severe Code of Conduct infringements, however, we have also put a whistleblower system in place as an additional option for reporting serious matters such as sexual harassment by a supervisor, concealment of a bribe, or environmental violations. The whistleblower system is at our employees' disposal around the clock, seven days a week. It can be accessed via a secure website in any country where Sto is represented.