



CODE OF CONDUCT

SAT Anlagentechnik GmbH



Code of conduct and sustainability requirements



Preamble

All employees of SAT Anlagentechnik GmbH are bound by the regulations in this "Code of Conduct".

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

We require our suppliers to the same extent to ensure and actively pursue the implementation and realization of standards relating to sustainability and social responsibility throughout the entire supply chain. This includes compliance with environmental standards, human rights principles and occupational health and safety regulations.

We expect our suppliers to establish clear guidelines and processes to ensure that all suppliers and subcontractors comply with these standards. We also require them to carry out regular audits to ensure compliance with the standards and to take measures to improve where necessary.

In the event of non-compliance, the business relationship is not automatically terminated immediately, but is subjected to a critical review and work is carried out with the supplier to ensure unconditional compliance. If the standards required by us are repeatedly not met, SAT will terminate the business relationship. SAT reserves the right to terminate the business relationship immediately in the event of serious cases of non-compliance.

In the event of non-compliance with the specified standards, the suppliers must inform SAT - Anlagentechnik GmbH immediately.

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

Together, we strive to build a responsible and sustainable supply chain in which similar standards are pursued along the entire value chain.

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

Dr. Kai Stürken

Managing Director
SAT Anlagentechnik GmbH

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COMPLIANCE



1.1 Laws and regulations

"We and our suppliers comply with applicable law at 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 ensure our business success worldwide. Any violation of applicable laws or regulations can have serious consequences, such as criminal prosecution, compensation for damages or damage to reputation.

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

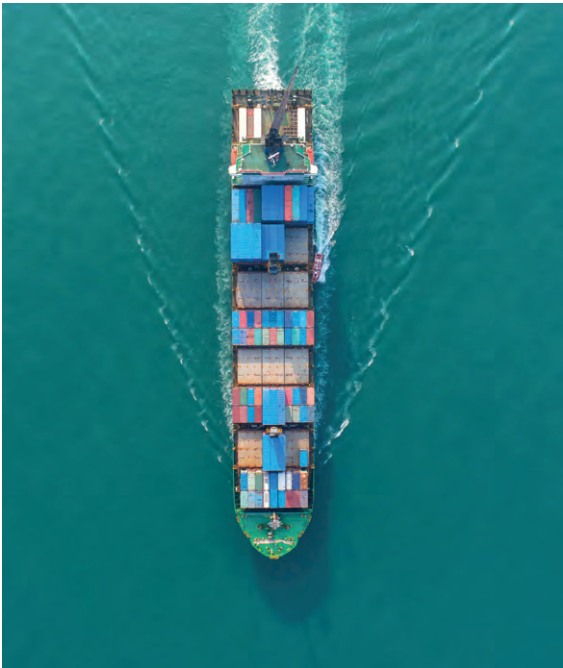
1.2 Health and safety

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

To prevent accidents and injuries, employees must be provided with a safe and healthy working environment and, if necessary, safe and healthy accommodation. The minimum requirements are set out in the applicable local laws.

Employees may withdraw from hazardous situations or refuse to work if there is a risk to life and limb without fear of consequences under labor law.





1.3 Export control

"We and our suppliers ensure compliance with all regulations for the import and export of goods, services and information."

Cross-border trade is subject to prohibitions, restrictions, authorization requirements or other monitoring measures within the scope of export controls.

In addition to goods, export control regulations also apply to technologies, technical drawings and software. Regardless of the scope of delivery, transactions with persons or companies on sanctions lists are also generally prohibited.

When importing or exporting products and services, every employee is requested to draw attention to possible problems independently of the official SAT export control.

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

1.4 Conflicts of interest

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

A potential conflict of interest exists if the private interests of employees collide or may collide with the interests of SAT. A conflict of interest can arise in particular from secondary activities or from the operational function if the personal interests of the employee are placed above the interests of SAT.

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

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

COMPLIANCE



1.5 Data protection and information security

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



To protect privacy, special legal regulations exist for the handling of 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 should contact their line manager or the data protection officer or the data protection coordinator.

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

1.6 Disclosure of information

"We and our suppliers: Transparency strengthens sustainability. Together for comprehensive disclosure along the supply chain."

As part of our sustainability strategy, we require our suppliers to disclose comprehensive information about their business practices and sustainability performance. This includes the provision of data on environmental impacts, social aspects and ethical standards along the supply chain.

We expect transparent reporting on emissions, resource consumption, employee rights, human rights standards and anti-corruption measures.

Disclosure should take place regularly and comply with internationally recognized standards for sustainability reporting.

By disclosing information, we can work together to build a more sustainable supply chain and strengthen our efforts to promote environmental and social responsibility.





1.7 Financial responsibility

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



Our sustainability requirements for suppliers include financial responsibility and accurate recording of business practices. We expect our suppliers to maintain transparent and accurate financial records and to report their Conduct business activities in accordance with applicable laws and regulations. In doing so, they should take responsibility for their financial decisions and act reliably in relation to our information disclosure requirements. Furthermore, we expect them to promote the use best practices in financial management and to disclose potential conflicts of interest. Together, we strive to build a supply chain that is based on financial integrity and transparency and supports long-term sustainable relationships.

1.8 Plagiarism and intellectual property

"We and our suppliers protect intellectual property and do not tolerate plagiarism"

As part of our sustainability strategy, we attach great importance to protecting against counterfeiting and respecting intellectual property in our supply chain. Our requirement for suppliers is therefore: zero tolerance for plagiarism and infringements of intellectual property. We expect our suppliers not to manufacture products that are counterfeit or infringe the intellectual property of others. They should ensure that all materials and designs used are legally acquired or licensed and take measures to protect the confidentiality of information and intellectual property. Together, we strive to build a supply chain that respects the protection of intellectual property and supports fair trade - for a sustainable future.





1.9 Whistleblowing and protection from retaliation

"We and our suppliers protect whistleblowers from retaliation"

We are committed to responsible business practices that include transparency and the protection of whistleblowers.

Our principles for suppliers relate in particular to whistleblowing and protection from retaliation.

We expect our suppliers to establish effective mechanisms to enable whistleblowers to safely and confidentially report grievances or unlawful behavior.

We also require that suppliers do not retaliate against whistleblowers and keep their identity strictly confidential. Together, we are working towards a business culture that protects whistleblowers and recognizes their important role in exposing wrongdoing.

1.10 Fair competition and antitrust law

"We and our suppliers ensure that we operate fairly on the market and promote competition"

Our requirements for suppliers in the area of sustainability include compliance with fair competition practices and antitrust law.

We expect our suppliers to comply with all applicable antitrust laws and to avoid any form of behavior that violates antitrust law. They should operate fairly and transparently on the market, without collusion, price manipulation or other unfair competitive practices. Our suppliers should actively promote competition by offering customers choice and not engaging in unlawful market foreclosure.

Together, we strive to build a supply chain that is based on fair competition and offers equal opportunities to all parties involved.



COMPLIANCE

1.11 Land, forest and water rights

"We and our suppliers protect land, forest and water rights and prevent the misuse of resources"

Our sustainability requirements for suppliers include the responsible handling of land, forest and water rights as well as protection against forced evictions. We require our suppliers to ensure that their business practices do not lead to land grabbing, illegal deforestation or the misuse of water resources. We also expect them to seek dialog with local communities in order to take their interests and rights into account appropriately. Our suppliers should ensure compliance with internationally recognized standards such as the Guiding Principles on Business and Human Rights and relevant environmental regulations. Together, we strive for a supply chain that respects land, forest and water rights and contributes to the sustainable development of communities.



1.12 Women's rights

"We and our suppliers protect the rights of women"

Our policy on the protection of women's rights obliges suppliers and us to ensure that women are not discriminated against, harassed or exploited.

We require our suppliers to comply with national and international labor laws to protect women's rights and combat gender inequality.

We support and promote gender equality in all aspects of the supply chain and are committed to an inclusive and respectful working environment. We require suppliers to establish effective mechanisms to report and investigate cases of abuse and to ensure that women have access to appropriate grievance mechanisms.

SOCIAL RESPONSIBILITY



2.1 Communication

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



Our communication guidelines stipulate that managers both at suppliers and in our own company have a responsibility to establish clear and appropriate communication standards. This includes the obligation to know relevant

laws, regulations and internal company rules and ensure that these are adhered to in communications. Managers are also responsible for observing compliance guidelines and ensuring that all communication activities are in line with legal requirements.

2.2 Child labor

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

We condemn all forms of child labor and are committed to its complete elimination in our supply chain. Our principles for suppliers include the clear prohibition of child labor and compliance with national and international labor standards, in particular the ILO conventions. We expect our suppliers to introduce appropriate mechanisms and controls to ensure that no child labor is used in their operations or by their suppliers.



2.3 Forced labor

"We and our suppliers do not tolerate forced labor"



We condemn all forms of forced labor and are committed to its complete elimination in our supply chain. Our principles for suppliers include the clear prohibition of forced labor and respect for human rights in accordance with

international standards. Employees must not be required to provide a deposit or personal documents when they are hired by the supplier. We expect our suppliers to implement appropriate mechanisms and controls to ensure that no form of forced labor is used in their operations or by their suppliers.

2.4 Discrimination

"All decisions are based on objective criteria"

We are committed to a supply chain that is free from discrimination and promotes equal opportunities. Our principles for suppliers include the clear prohibition of any form of discrimination, including discrimination based on gender, race, religion, nationality or sexual orientation.



In all personnel decisions, in particular with regard to recruitment, promotion, payment, special benefits, training, dismissals and terminations, all employees must be treated exclusively on the basis of their skills, qualifications and behavior.



2.5 Harassment

"We and our suppliers do not tolerate harassment or aggression"

Suppliers and employees are obliged to ensure that no physical, sexual, psychological or verbal harassment, aggression or abuse towards employees takes place.

Neither personal insults nor sexual harassment in the workplace will be tolerated.

Sexual harassment includes unwanted verbal, non-verbal or physical sexually motivated behavior. Any form of derogatory comments about a person's appearance, questions about a person's sex life, sexual coercion or unwanted sexual activity is prohibited. Suppliers and employees are encouraged to report any incidents or suspicions of harassment immediately. Reports will be treated confidentially and it will be ensured that no negative consequences follow for the reporter.

This policy is intended to ensure that our work environment is free from any form of harassment and to ensure a respectful and professional working environment for all involved.

2.6 Freedom of association and collective bargaining

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

We support the right of workers to freedom of association and trade union organization in our supply chain.

Our principles for suppliers include the recognition and respect of these rights in accordance with international labor standards.

We expect our suppliers to allow workers to freely choose whether they wish to organize and to facilitate collective bargaining.

We also require them to prevent discrimination or retaliation against unionized workers and to maintain open and constructive communication with trade unions.

Together, we strive to build a supply chain that respects the right to freedom of association and collective bargaining and strengthens the voice of workers.



2.7 Bribery and corruption

"We and our suppliers condemn all forms of corruption corruption and bribery"

All forms of bribery and corruptibility are prohibited, whether by public officials or in business dealings. Inducements, for example in the context of invitations or in connection with advertising measures that serve the purpose of promoting business relationships or presenting products or services, are permitted - provided 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 must not have an unreasonably high value and must not disproportionately exceed the limits of normal business practice or the recipient's normal standard of living. As a 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 checks must be carried out to ensure that this is not a covert attempt at bribery.

In relation 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.



SOCIAL RESPONSIBILITY



2.8 Diversity, equality and inclusion

"We and our suppliers are committed to diversity, equality and inclusion in our supply chain."

As an integral part of our sustainability strategy, we are committed to diversity, equality and inclusion in our supply chain. We expect our suppliers to take active measures to promote a diverse and inclusive working environment based on equality and non-discrimination. This includes providing equal opportunities for all employees regardless of gender, ethnicity, religion, sexual orientation or physical disability. Our suppliers should implement transparent recruitment and promotion processes to promote diversity within their workforce. We also expect them to foster a culture of recognition and appreciation in which all employees have equal opportunities and their individual skills and experience are valued. Together, we strive to build a supply chain where diversity is valued and all employees are on an equal footing.



2.9 Rights of minorities and indigenous peoples

"We and our suppliers are committed to the rights of minorities."

As part of our sustainability strategy, we are committed to protecting and recognizing the rights of minorities and indigenous peoples along our supply chain. We expect our suppliers to respect and protect the fundamental human rights of these groups, including the right to self-determination, cultural identity and land ownership. Our suppliers should ensure that their business practices do not cause discrimination, land grabbing or forced displacement. We also require them to promote dialog and cooperation with minorities and indigenous communities to ensure that their perspectives and interests are adequately taken into account. Together, we strive to build a supply chain that respects and supports the rights and protection of minorities and indigenous peoples.



SOCIAL RESPONSIBILITY



2.10 Remuneration

"Our employees and those of our suppliers receive fair wages / salaries for the work they do"

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

Employees 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 the workers in detail. Supplier shall also ensure that wages and benefits are paid in full compliance with all applicable laws and that compensation is paid either in cash or by check in a manner convenient to the workers.

The Supplier shall ensure that there is no subcontracting of labor and no fictitious apprenticeship arrangements designed to avoid its obligations to personnel under applicable labor and social security laws and regulations.



2.11 Political activities

"We and our suppliers do not engage in political opinion-forming"

The conduct of party political activities on company premises, with company funds or in the name of the company is prohibited.

This does not affect the necessary exchange with official representatives of the federal, state and local governments.

SOCIAL RESPONSIBILITY



2.12 Working hours

"We and our suppliers comply with the legal regulations on working hours"

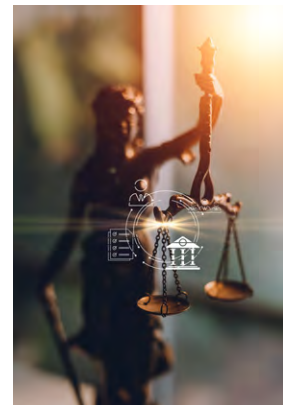
As a company, we attach great importance to appropriate working hours and work-life balance, both for our own employees and for the employees of our suppliers. Our principles for suppliers include compliance with the legal regulations on working hours and rest periods. We expect our suppliers to ensure that their employees have fair and reasonable working hours that do not entail any health risks or overwork. We also require them to limit overtime to a reasonable level and ensure adequate rest periods. Together, we strive to build a supply chain that promotes the health, safety and well-being of all employees, including those in our own company and our suppliers, and enables balanced working hours.



2.13 Human rights

"We and our suppliers bear our social responsibility"

We are committed to respecting and promoting human rights in our supply chain. Our principles include the clear prohibition of human rights violations and respect for fundamental human rights as set out in international human rights standards. We expect our suppliers to respect and protect human rights by providing non-discriminatory working conditions, preventing forced labor and child labor and ensuring fair wages and working hours. Together, we strive to build a responsible supply chain that respects human rights and contributes to the well-being of employees and communities.



2.14 Ethical recruitment

"We and our suppliers act according to ethical criteria when recruiting employees without exception"

As part of our sustainability strategy, we attach great importance to ethical recruitment practices along our supply chain. We expect our suppliers to ensure that all employees are hired fairly and transparently, without discrimination, forced labor or child labor. Ethical recruitment encompasses the values of transparency, honesty, fairness and objectivity. Our suppliers should take active measures to ensure that their recruitment practices are communicated transparently, provide honest information and are fair and objective in the selection of employees. In this way, we contribute to the creation of a fair and sustainable supply chain that respects the dignity and human rights of all employees.





3.1 Environmental protection

"We and our suppliers respect, protect and preserve our environment"

All applicable environmental laws and regulations of the country in which activities are carried out 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 limited wherever possible. They may only be used if they are used correctly and the environment is not harmed by their use.

The environmentally sound disposal of waste and containers must be guaranteed and proven upon request. All waste generated during production must be disposed of correctly.

3.2 Responsible procurement of raw materials

"We and our suppliers ensure responsible raw material procurement"

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

We are committed to the responsible sourcing of raw materials in our supply chain. Our principles for suppliers include the avoidance of conflict minerals and compliance with internationally recognized environmental and social standards in the procurement of raw materials.

We expect our suppliers to establish transparent supply chains and ensure that their raw materials come from legal and sustainable sources.

Together, we strive to build a supply chain that is environmentally sound and socially responsible in order to minimize negative impacts on people and the environment.



ECOLOGICAL RESPONSIBILITY



3.3 Resource-saving 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. To this end, it undertakes to comply with all applicable laws and regulations. In addition, it is desirable that the supplier continuously improves its environmental performance and 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 must be introduced and their effectiveness monitored. 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.

Water quality and use

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

Chemicals management

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





3.4 Land, forest and water rights

"We and our suppliers respect and protect land, forest and water rights"

Our sustainability requirements for suppliers include the responsible handling of land, forest and water rights as well as protection against forced evictions. We require our suppliers to ensure that their business practices do not lead to land grabbing, illegal deforestation or the misuse of water resources.

We also expect them to seek dialog with local communities in order to take their interests and rights into account appropriately. Our suppliers should ensure compliance with internationally recognized standards such as the Guiding Principles on Business and Human Rights and the relevant environmental protection regulations. Together, we strive for a supply chain that respects land, forest and water rights and contributes to the sustainable development of communities.



3.5 Reuse and recycling

"We and our suppliers reduce waste and environmental impact through recycling"

We are committed to a circular economy and attach great importance to reuse and recycling in our supply chain. Our principles for suppliers include the promotion of products and packaging that are reusable, repairable and recyclable.

We expect our suppliers to use sustainable materials and actively work to maximize resource efficiency and reduce waste.

We also require them to implement recycling programs and work with local recycling infrastructures.

Together, we strive to build a supply chain that promotes reuse and recycling and contributes to reducing waste and environmental impact.

ECOLOGICAL RESPONSIBILITY



3.6 Noise emissions

"We and our suppliers reduce noise emissions to protect the environment and our employees"

We attach great importance to protecting the environment and minimizing noise emissions in our supply chain. Our principles for suppliers include a commitment to reduce the noise level of their production processes and transportation activities. We expect our suppliers to take effective measures to minimize noise pollution and ensure compliance with applicable noise protection regulations. We also require them to prioritize the use of low-noise machines and equipment and to continuously look for ways to reduce noise. Together, we strive to build a supply chain that promotes protection against noise pollution and contributes to improving environmental quality.



3.7 Soil quality

"We and our suppliers protect soil quality"

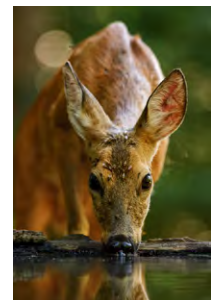


We are committed to protecting and maintaining soil quality in our supply chain. Our principles for suppliers include a commitment to take measures to minimize soil erosion and maintain soil health. We expect our suppliers to use environmentally friendly processes and materials to minimize the negative impact on the soil. We also require them to reduce the use of harmful chemicals and switch to sustainable alternatives. Together, we strive to build a supply chain that protects soil quality and contributes to the sustainable use of resources.

3.8 Animal welfare, biodiversity, land use and deforestation

"We and our suppliers protect animal habitats and preserve biodiversity"

We are committed to the protection of animals, the preservation of biodiversity, sustainable land use and the fight against deforestation in our supply chain. Our principles for suppliers include a commitment not to tolerate animal cruelty or abuse and to take measures to ensure animal welfare. We expect our suppliers to support the conservation of biodiversity by promoting the protection of endangered species and their habitats. We also require them to practice sustainable land use and take measures to prevent or minimize deforestation. Together, we strive to build a supply chain that prioritizes animal welfare, biodiversity, sustainable land use and protection from deforestation, contributing to a healthier and more sustainable environment.



ECOLOGICAL RESPONSIBILITY



3.9 Renewable energies and decarbonization

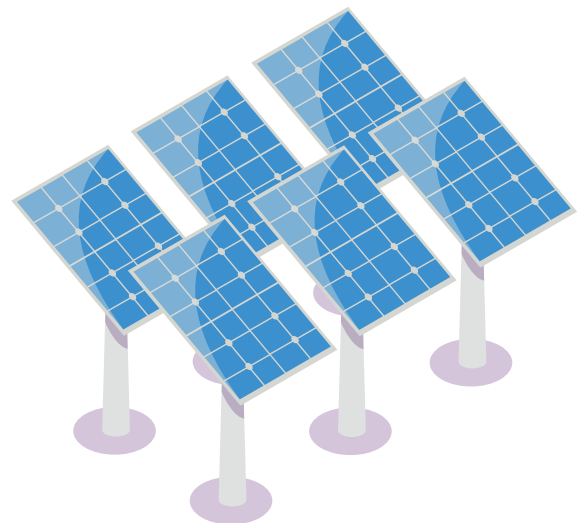
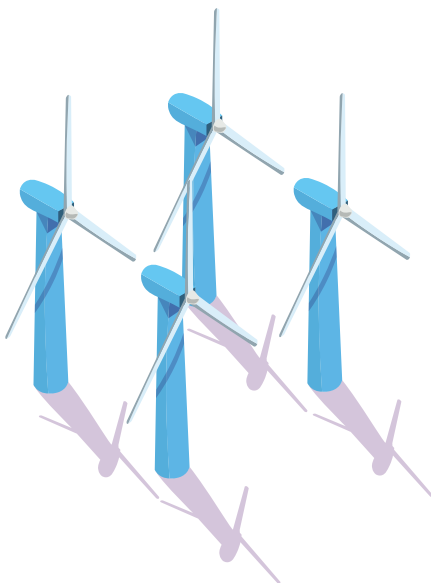
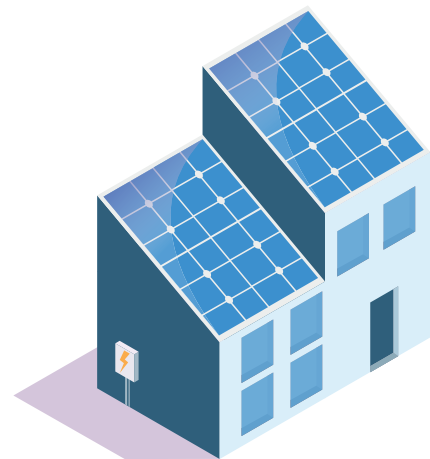
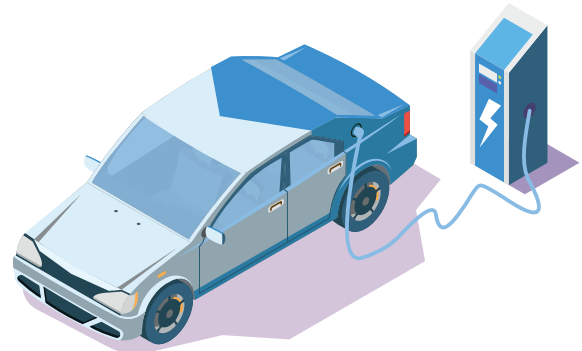
"We and our suppliers actively support the path to decarbonization through the use of renewable energies"

We attach great importance to a sustainable supply chain and are committed to the use of renewable energy and decarbonization.

Our principles for suppliers include a commitment to using renewable energy to reduce greenhouse gas emissions. We expect our suppliers to take active measures to make their energy consumption more environmentally friendly and to support the transition to renewable energy sources.

We also require them to disclose their CO₂ emissions and implement decarbonization strategies.

Together, we strive to build a supply chain that relies on renewable energy and contributes to reducing our environmental footprint.





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