Ladies and Gentleman!

Four of our fundamental values at starlim-sterner are growth, perfection, development and humaneness. To us they mean more than mere buzz words: they define the core of our company philosophy and have accompanied us, from the early beginnings as a small family enterprise to the rise to a global active group of specialized companies that produce, process and further develop high-quality products. Only those who undergo permanent development are capable to permanently offer clients the best solutions and survive on future markets. We build on long-term relationships with our customers, suppliers and employees. Therefore, mutual trust is essential.

Responsible and lawful conduct is a basic requirement of trust and the corporate success of starlim-sterner. As important as achieving our goals is the path we take to get us there. Following our corporate culture, we thereby set the highest standards. As a reliable partner, we have developed this Code of Conduct based on our fundamental values, which acts as the foundation of any and all business activities and decisions, the interaction with business partners and customers as well as the interaction with employees and colleagues. The aim of this Code of Conduct is to determine principles and guidelines, which help you to conduct yourself responsibly during the performance of work and business and in compliance with increasingly complex legal regulations and to serve as a benchmark for your behaviour. We all share the responsibility to create and preserve trust, which is so important to our success.

“AS IMPORTANT AS ACHIEVING OUR GOALS IS THE PATH WE TAKE TO GET US THERE.”

Thomas Bründl
In all business transactions and decisions, we observe any and all applicable national and international laws and regulations, but also internal policies or guidelines, whichever is stricter. Our respective managing directors and executives are aware of their special responsibility with regard to professional and competent management and therefore, they always act as a role model for our employees. Our good reputation, which we work so hard each day to uphold, might be damaged through isolated violations of legal provisions. The starlim-sterner Group does not tolerate any violations of laws, regulations and other directives at all. Any violations and especially violations of this Code of Conduct could lead to consequences under employment law, civil law and criminal law and the termination of business relationship.

One of our fundamental values is growth. Therefore, we support our business partners by our high quality products and services and always act in compliance with any and all national and international competition laws...

The starlim-sterner Group is unreservedly committed to the principle of free competition on fair terms, and in particular to strict adherence to antitrust law, and we expect the same from all our competitors and business partners. Violations of national or international competition rules can have serious implications for the starlim-sterner Group and the affected employees. In particular, such violations may result in high monetary fines, disgorgement of profits and claims for damages by customers or competitors. Therefore, any and all agreements and concerted practices, which have as their object or effect the prevention or restriction of competition, are prohibited.

With competitors, no arrangements of any kind shall be initiated, planned, discussed or concluded on any commercial matters. Especially agreements on pricing, offers, terms and conditions, production capacities, allocations of customers or sales territories and the exchange of sensitive commercial information, which allows conclusions to be drawn on pricing, quantities or turnovers of competitors – whether in written, orally or through conclusive behavior – are forbidden. Following, it does not make a difference if it is an agreement or only informal talks.

However, the above principles and guidelines for conduct and the provisions of antitrust laws are to be adhered to when participating in meetings, branch meetings or association work. Whenever an anti-competitive behavior of other participants of such committees or in the context of such association events is being observed, we are withdrawing from these events and report the incident to the respective superior.
Corruption, bribery, gifts and hospitality

Corruption is the misuse of entrusted power for private use or advantage. It undermines fair competition and causes damage to competition.

The starlim-sterner Group will not tolerate economic crime, corruption or bribery as well as related crimes in any guise or form. Orders should only be obtained and awarded upon fair competition and objective criteria (e.g. quality, pricing, reliability) – following the principle “The best provider gains the contract”.

Employees of the starlim-sterner Group are prohibited from accepting or offering benefits meant to influence business transactions in a forbidden manner or if even the mere appearance of such aim could arise. This applies also to benefits to related persons (e.g. family members, close friends). This rule is not applicable on gifts of nominal value and hospitality within the limits of ordinary business practice, if an influence of business transactions is excluded a priori (e.g. invitations to business meals, little Christmas- or birthday gifts). All other gifts shall be refused and the employee’s superior shall be informed. In individual cases, the acceptance of higher-value gifts can be approved from the respective manager. However, even several subsequent approvals do not legitimate claims for future. The offer or receipt of money or benefits with a monetary value is always forbidden.

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Acceptance of outside employment

Acceptance of political offices

Acceptance of functions in legal entities and other associations of individuals

Participation in an enterprise, except participations in stock corporations as a small shareholder or in mutual funds with broad investment diversification

Conflicts of interest

We respect the privacy of our employees. Since corruption is often a consequence of conflicts of interest, all our employees must avoid situations, in which personal or family interests conflict, or could conflict, with the interests of the starlim-sterner Group. Conflicts of interest mostly arise when professional activities are affected by private interests, like...

Most actual or potential conflicts of interest can be avoided in a way that is acceptable to both the employee and the group. However, any existing or potential conflicts of interest must be reported to the respective superior.
To act in compliance with all applicable data protection and privacy regulations, in particular the EU General Data Protection Regulation (GDPR), is particularly important to us.

Personal data shall only be processed if an appropriate legal basis exists and all principles of processing of personal data are complied with. In particular, we provide the required, at least state-of-the-art technical and organizational measures in order to protect personal data.

In order to define the data protection and privacy standards in the starlim-sterner Group, we have developed a privacy policy, to which we strictly adhere to.

"DATA PROTECTION AND PRIVACY IS TOP PRIORITY FOR OUR GROUP."
07 Protection of intellectual property

Our inventions and know-how form the basis for the development and production of innovative products and thereby secure the long-term success of the starlim-sterner Group.

The promotion of the creative and innovative skills of our employees is therefore strategically important; also our intellectual property shall be protected by preventing third parties from gaining knowledge or obtaining unauthorized access to it. This applies to confidential information provided by third parties as well. Each employee is obliged to observe appropriate and required security standards in both, personal and electronic communications with third parties.

In the adjacent overview you will find important rules that always have to be observed.

Without the explicit approval of the respective managing director, employees are not allowed to place company-relevant information in public (e.g. internet) or to take part at public discussions acting in their capacity as employees of starlim-sterner (e.g. presentation events, talks, internet forums etc.).

Do not distribute information about new products before patents or other intellectual property rights have been registered or a decision to waive such rights has been made.

Do not discuss proprietary information during cooperation with customers, suppliers or other business partners.

In the case of forwarding information inside and outside the company, the need-to-know-principle must always be observed and it must be checked in advance if the recipient is entitled to receive the data and information.

Ensure that prior to initiating negotiations with potential business partners, confidentiality agreements have been signed.

08 Humanity, respect and fair treatment

We are proud of the diversity and uniqueness that the worldwide business of starlim-sterner entails and respect and observe human rights as fundamental values.

We prohibit any form of child or forced labour and we expect the same from our business partners. We are fair in the interaction with customers, suppliers and employees. Our collegial, open-minded and appreciative attitude and way of dealing is one of our distinguishing features and as a family enterprise, this is particularly important to us.

The starlim-sterner Group does not tolerate any discrimination, preferential treatment or harassment as a result of gender, age, nationality, race, skin color, ethnicity, religion or beliefs, social status, origin, family status, sexual orientation or disability or any other characteristics that are protected by law. Each employee shall be obliged to respect the personal sphere of other employees. Sexual harassment, mental or physical coercion or verbal abuse are prohibited and not tolerated at all.

„WE JUDGE PEOPLE BY THEIR SKILLS, NOT BY GENDER, ORIGIN OR RELIGION.“
As a global enterprise, the starlim-sterner Group is committed to fully comply with any health and safety regulations regarding all business activities, and to even surpass the requirements where possible.

We offer appropriate and sufficient equipment in order to safeguard a secure and healthy way of working. The starlim-sterner group strives to create a safe and zero-risk work environment for their employees and safe and zero-risk services for our customers. We make every effort to avoid hazards and situations which could contain a risk for accidents, infringements, health- or material damages. It is part of our company philosophy, to produce our quality products in an economical and environmentally friendly manner and to avoid negative environmental impacts to achieve long-term success. Beyond adhering to all environmental laws and provisions as a matter of course, we are committed to a responsible and sustainable treatment of resources, energy and waste. A balanced relationship with nature is essential for the planning and controlling of any products, activities and services, including their environmental influence.

All employees responsible for environmental protection are aware of their special responsibility for compliance with environmental law. Moreover, each employee is obliged to contribute to a continuous improvement of the environmental management system through sustained attention, responsible conduct and thinking. We expect the same from our suppliers.

Towards public, any and all verbal, written and/or digital announcements and press releases relevant to starlim-sterner shall be issued exclusively by the respective managing director or communication officer.
It is the responsibility of each employee to act in compliance with all applicable laws, regulations and internal guidelines and this Code of Conduct.

To the right you will find some questions which are intended to help you to verify the conformity of your conduct with this Code of Conduct.

Inquiries & reporting
If, despite careful consideration of the above guidance, you are unsure whether a specific conduct is in compliance with this Code of Conduct or the law, you can contact your direct superior, the responsible division manager, Legal Services or the Compliance Contact under compliance@starlim.com.

In the event that you become aware of or suspect a violation of this Code of Conduct or other applicable laws, standards or guidelines, please contact Legal Services or the Compliance Contact under compliance@starlim.com and, if applicable, follow our internal procedural guidelines. All information and reports will be reviewed with due care and will be treated with confidentiality.

Handling of this Code of Conduct

If you are not sure in certain situations, whether a specific conduct or a specific decision is in compliance with the law or this Code of Conduct, you should ask yourself the following questions:

- Would I act in the same manner if my superior, managing director or my colleagues were present?
- Is the intended activity legal? Is it in compliance with internal guidelines and values of the starlim-sterner Group?
- How would I react if the media reported on my activities? Would I be ill at ease?
- Does my activity protect the reputation of the starlim-sterner Group?

“EACH OF US IS OBLIGED TO PROTECT AND MAINTAIN OUR GOOD REPUTATION.”