



STI Group Corporate Compliance

Guideline

for Business and Cooperation Partners

Responsible Action

- As of 2018_02_01 -

Responsible action

***Competence and responsibility
are the keys to success.***

Dear Business and Cooperation Partners,

As an independent family business we offer our customers tailor-made solutions for a successful presentation at the POS with the aim of promoting and expanding the sale of their products.

Transparency and credibility are essential components of our company culture: being seen to practise cultural openness, tolerance and respect, internally and externally, underlines our international profile.

As a responsibly acting family business, the STI Group observes applicable legislation and regulatory and ethical standards in all relevant spheres of influence. We expect the same from our business partners.

We take pride in living by our values, honouring our commitments and acting fairly and honestly: these principles are integrated in this Compliance Guideline. Our company is also committed to the United Nations Global Compact's ten principles. Our success in a dynamic and highly competitive market depends on the observance of all these obligations and beliefs.

This „STI Group Corporate Compliance for Business Partners“ is a guideline for all our business- and cooperation partners. Therefore, we kindly ask you to confirm the content of the compliance within your company by returning the duly signed Compliance.

The contents of the Compliance Guideline are checked annually and, in the event of legal amendments, immediately updated.

We look forward to a further good and responsible cooperation.



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STI - Gustav Stabernack GmbH



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Lauterbach, 2018_02_01

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1. Our Guidelines

The STI Group's success comes from many sources and is - just like our company image - shaped by the people who work for us. Against this backdrop the STI Group has summarised its values in five principles that provide staff with direction and perspective. They are an expression of our company ethos and the basis of our joint success.



■ **Respect and Fairness**

We treat everyone with fairness, work closely and openly with our customers, and trust in our colleagues and partners. We embrace and respect the diversity of our staff and cultural differences; we believe in open discussions and welcome different opinions.

■ **Creativity and Joy**

We enjoy our work! Motivation and inspiration drive us to creative and intelligent solutions. We are proud of our individual achievements and celebrate shared success with our colleagues. We are optimistic about our future and think positive!

■ **Responsibility**

We act sustainably, conscious of our responsibility towards both the environment and society. We behave responsibly towards customers, suppliers and colleagues, and are fully committed to our targets. Our sense of responsibility encourages loyalty.

■ **Passion**

We do what we love, and love what we do. Through our enthusiasm, we aim to ignite a similar passion in others. We always strive for outstanding solutions that keep us and our customers one step ahead.

■ **Success**

Our products and services have a direct impact on the success of our customers. We are responsible for our success and our success will be the customers satisfaction.

2. Applicable Law

The STI Group operates internationally. As a result laws, local conventions and social norms may differ in different locations. This Compliance Guideline therefore prescribes that national and local laws are to be complied with as long as they do not violate applicable EU law (if delivered to the EU).

As a business partner of the STI Group you are obliged to comply with applicable law - irrespective of whether it is supranational or local law. Applicable law overrides any contrary instruction of a manager.

The most important Competition Law prohibitions and taboos are: pricing agreements, agreements about market share, capacity agreements, allocation of regional markets, allocation of customers and price fixing. Concerted actions, informal talks or informal gentlemen's agreements that are aimed at or could result in a restriction of competition are prohibited.

Minimising risks

In the course of business activities, the STI Group is exposed to a range of inextricably linked with corporate action. The STI Group meets these risks with, among other things, a Risk Management System that is an integral component of the business processes and company decisions. Such a system is also required from all business partners.

2.1. Consideration of the basic rights of staff

- As a business partner of the STI Group you respect equality of opportunity and promote equal treatment of personnel inside and outside the company, irrespective of their skin colour, race, nationality, social origin, any disability, sexual orientation, political or religious conviction, gender or age.
- You respect the dignity, privacy and personal rights of every individual. You refrain from sexual harassment and other forms of harassment in the workplace and consistently pursue grievances.
- You do not employ people against their will or force them to work (forced labour).
- You provide appropriate remuneration, guarantee the legal minimum wage and observe the legal maximum working time in the respective country.
- You recognise the freedom of association of employees, and undertake neither to prefer nor disadvantage members of employee organisations or trade unions.
- You support the acquisition of qualifications and further training of staff, both with comprehensive training measures and specialist staff.

- You do not employ any workers who have not reached the age of 16. In industrialised countries, the complete physical and mental development of young people is considered achieved by this age. In countries with inadequate socioeconomic conditions that in ILO Convention 138 fall under the exception for developing countries, the minimum age may be reduced to 14 with the consent of the national employee and employer associations. Country-specific exceptions in professional training are correspondingly observed.

2.2. Health and safety of staff

- In the working environment you assume responsibility for the health and safety of your staff.
- You insulate against risks in the working environment, ensuring the best possible preventive measures for the avoidance of accidents and occupational diseases.
- You offer training courses for the successful commitment of the staff in their working environment and ensure that all staff are familiar with the topic of safety at work.

3. Responsibility toward the company/the company values

The STI Group expects all business partners to protect corporate information.

3.1. Data protection

The confidentiality of the data of our customers and staff and the observance of legal data protection provisions should be important to you. The collection, processing and use of personal data within the company and also within the operational framework of the internet site takes place in accordance with relevant national and international data protection standard.

3.2. E-Mail and internet / telecommunications

All emails, SMS, MMS and internet records or messages that go out from the STI Group's electronic communications systems represent company records that are stored and archived. As a business partner of the STI Group, you are required not to post or tolerate any abusive, obscene, or offensive E-mails.

4. Responsibility and Benefits

Relationships with any contracting partners and suppliers must be conducted in compliance with applicable case law and good business practice.

The STI Group encourages fair competition between possible suppliers, contractual partners, and other sellers, and treats every company or individual with fairness, integrity and without discrimination. The choice of subcontractors, suppliers, and sellers is made according to objective criteria such as quality, technical experience, prices, deliveries and observance of deadlines, sustainability of products or services and the purchasing guidelines of the STI Group. The STI Group expects the same from its business partners.

4.1. Confidential information and intellectual property

The success of the STI Group and their business partners depends on the protection of confidential information and intellectual property. Therefore information must always be treated in strictest confidence. This particularly applies to inventions, research results and technical data, formulas, discoveries, drafts, improvements, ideas, production guidelines, computer programs, trademarks, patents, copyrights, unpublished financial or price information, other confidential information and all the documentation referring to them.

Confidential information includes customer data, information about sales and marketing as well as the corresponding databases, marketing plans, staff data and business proposals and strategies. All business partners of the STI Group treat all information acquired through the work with the company as confidential information of the STI Group.

Because of the high significance of confidentiality for the company, suppliers and contracting partner of the STI Group are obliged to sign agreements with respect to the use of confidential information and intellectual property of the STI Group or their customers (non-disclosure agreements).

4.2. Presents, payments, non-cash benefits

In general any acceptance of presents, money payments and/or other non-cash benefits is inadmissible unless the Managing Director responsible agrees to the acceptance in advance. The acceptance of money or cash gifts is excluded from this and is strictly forbidden.

Low-value, one-off ordinary advertising acknowledgements (e.g. mass advertising articles such as ball-point pens, calendars, writing pads, etc.) up to the relevant deductibility limit applicable for taxation are to be taken as approved. In order to exclude any accusation of personal gain, accepting repeated benefits within one year from persons with whom there is regular business contact is not allowed.

For the arrangement of departmental and private functions for whatever reason support by third parties with whom business connections exist or are being initiated must not be requested, agreed or accepted.

4.3. Acceptance of services and invitations

As staff of the STI Group we may not accept gratuitous or advantageously priced services from suppliers that are in a business relationship with the STI Group or wish to initiate one. We kindly ask our business partners to refrain from that. Generally applicable discount regulations are excepted (e.g. special sales promotions).

The following exceptions also apply:

- Staff can accept invitations to conferences, receptions or social events (culture, sport, politics) - including appropriate entertainment - if the business attendance at the event is also in the interest of the corporate group. Invitations to events and trips beyond that, where costs are assumed by business partners or third parties wishing to initiate a business relationship, are considered to exceed what is customary in the trade.
- The supply of services or travel costs for accompanying close relatives or private individuals, by business partners or third parties who wish to initiate a business relationship, are always to be considered inappropriate and must be refused.

4.4. Responsibility towards society

The STI Group perceives Corporate Social Responsibility (CSR) as an investment in society and therefore in its own future.

The three dimensions of sustainable development – economy, ecological and social – determine our actions. We expect the same from our business partners with the provision that they best support the STI Group in achieving the goals.

Hereby I confirm that we act according to the STI Group Compliance. Please return within 14 days after you have received this document to the person you received it from.

Company: _____

Signature: _____

Name and Job Title: _____

Place and Date _____