

# Code of Conduct for Business Partners of the Stern Energy Group

Economic success and social responsibility are inseparably linked. Responsible and ethical behaviour towards employees, business partners and society is an integral part of Stern Energy's value system. In addition, sustainability and responsible action are firmly anchored in our corporate culture. We attach just as much importance to compliance with essential standards focusing on the environment, social matters and corporate integrity as to the economic success and further development of our Group.

Given this background and being part of the Encavis Group, Stern Energy Group and each of its Country subsidiaries, regards the recognition of general international agreements and standards as the basis for business relationships, and thus respects human rights, labour standards, the environment as well as business ethics.

Accordingly, Stern Energy expects its business partners to acknowledge the United Nations Guiding Principles on Business and Human Rights and to comply with fundamental conventions of the International Labour Organisation (ILO). All business partners shall acknowledge the fundamental laws, regulations and policies relevant to their respective activities carried out jointly with or on behalf of Stern Energy.

The rules of conduct set out in this Code of Conduct (hereinafter also referred to as the "Business Partner Code of Conduct" or "BPCC") are generated from this commitment.

## I. Environment and climate

### > Environmental regulations

Our business partners shall comply with applicable environmental, health and safety laws.

### > Environmental impact

Our business partners shall conduct their business responsibly with regards to environmental risks and impacts. Stern Energy expects business partners to use their management systems to develop and apply processes and procedures to minimize environmental impacts and risks and to continuously improve their environmental performance. They shall use resources efficiently, employ energy-efficient and environmentally friendly technologies and reduce waste and emissions to air, water and soil.

### > Greenhouse gas emissions and energy

Our business partners shall continuously work to minimize greenhouse gas emissions in line with the Paris Agreement (limitation of global warming to 1,5 degrees by achieving a climate-neutral world by 2050), use renewable energy and improve energy efficiency.

## II. Society

### > Human rights

Our business partners shall respect the protection of internationally proclaimed human rights and fight against forced labour (including modern slavery and human trafficking) and child labour.

### > Labour standards

Our business partners shall treat their employees with respect and create a workplace that is free from harassment or abuse of any kind, without harsh and inhumane treatment and free from unlawful practices or discrimination. Business partners shall create an inclusive work environment that respects the diversity of their employees and the local community. They shall enable their employees or other stakeholders to report concerns or potentially unlawful practices in the workplace (including whistleblower tool).

### > Freedom of association and collective bargaining

Our business partners shall respect the rights of employees to freedom of association and collective bargaining in accordance with applicable legislation.

### > Working hours and remuneration

Our business partners shall adhere to minimum wages and working hours in compliance with the “National Collective Agreement” applicable to the Country in which they operate.

### > Respect for diversity

Our business partners shall act responsibly in their dealings with local communities. This also applies to indigenous peoples and landowners, whose rights, livelihoods, resources, and cultural heritage must be respected and treated with esteem and fairness.

## III. Business ethics

### > Anti-corruption

Our business partners shall prevent corruption in any form.

### > Fair competition

Our business partners shall comply with competition and antitrust laws.

### > Conflicts of interest

Our business partners shall take adequate precautions to prevent relationships, activities, or transactions where private interests or relationships have influenced or may potentially influence a business decision.

### > Money laundering prevention

Our business partners shall comply with applicable laws on the prevention of money laundering.

> **Protection of confidential information**

Our business partners shall protect confidential and other proprietary information and trade secrets they receive from us in the course of the business relationship.

> **Data protection and IT security**

Our business partners shall comply with applicable data protection and information security requirements in their handling of information.

> **Insider knowledge**

Our business partners shall comply with insider trading laws. Where our business partners become aware of such information, they shall handle it in accordance with insider trading regulations.

## **Sense of responsibility**

We expect our business partners to know their business areas or markets, where stricter rules than those described in this BPCC may apply. In such cases, our business partners shall guarantee that such rules are applied. Our business partners shall ensure that their own business partners who are used for or on behalf of Stern Energy are also aware of and comply with the minimum requirements of this BPCC (*supply chain compliance*).

## **Dealing with suspicions**

In the event of violations of this BPCC, Stern Energy reserves the right to respond appropriately depending on the severity of the violation. This includes, but is not limited to, the demand to remedy the violation without delay, the assertion of claims for damages or the termination of the contract. In the event of serious violations of this BPCC, Stern Energy reserves the right to immediately terminate the contract upon simple notice.

## **Implementation and control**

Our business partners shall implement appropriate processes to ensure compliance with this BPCC. Upon Stern Energy request, the business partner shall provide the necessary information. In case of reasonable doubt, Stern Energy is entitled to verify compliance with the applicable principles by means of an audit based on the OECD Due Diligence Guidance. If, in the opinion of Stern Energy, the principles are not complied with, the business partner shall, together with Stern Energy, take necessary steps to ensure implementation.

## **Contact**

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