

Third Party Code of Conduct

Privileged & Confidential

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Group Compliance Manager

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This policy has been
approved by the Executive
Board of C. Steinweg Group



C. Steinweg Group

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1 Introduction

C. Steinweg Group together with its subsidiaries and affiliates (Steinweg) is committed to conducting its business in accordance with the highest standards of integrity and in full compliance with all applicable laws and regulations in the countries and jurisdictions in which Steinweg operates or conducts business.

This Third Party Code of Conduct (“the Code”) expresses the minimum standards that Steinweg expects from all Third Parties when conducting business with or on behalf of the Steinweg (requirements), as well as establishing global guidelines that we consider responsible business practices, which we encourage third parties to adopt in practice (expectations)

By entering into a business relationship with Steinweg, the Third Party undertakes that all contractual and business relationships with Steinweg are subject to the provisions contained in this Code.

The objective of the Third-Party Code of Conduct is to create and encourage further transparency on the Third Parties and to recognize the interdependency between impacts on people and the environment, risks, and business opportunities between Steinweg and Third Parties.

2 Code of Conduct

Steinweg is committed to its values and inspiring principles to provide a safe and secure work environment for employees and business partners. We stand for quality and reliability. We always strive for lasting relationships with both customers and employees. Together, we are committed to identifying, understanding, manage, and report on environmental impacts, risks, and opportunities for the benefit of employees, partners and consequently communities in all ways. Our approach is based on honesty, integrity, openness, and respect for human rights and for the interests of our employees. We are committed to upholding the legitimate interests of anyone with whom we are doing business.

We expect our business partners to apply codes of conduct that are consistent with our own, which implies assuming responsibility for the impact of everyone’s action on the supply chain and associated activities in an ethical and compliant manner.



3 Human Rights

Third Parties must strictly commit to respecting the protection of internationally recognized human rights as set out in the United Nations (UN) Universal Declaration of Human Rights and in a manner consistent with the UN Guiding Principles on Business and Human Rights.

We expect our Third Parties in business to understand and address human rights risks that may arise from their business activities and supply chain. If there is a cause which contributes to an adverse impact on human rights in their business activities and supply chain, we expect that they provide for, or cooperate in, processes to enable an appropriate remedy.

4 Complying with the law

Third Parties must comply with all applicable laws, including but not limited to laws concerning labour rights, workplace health and safety, environmental protection, product safety, bribery and corruption, sanctions and trade controls, money laundering, competition, data protection and privacy.

This requires Third Parties providing evidence that due diligence has been undertaken to identify and mitigate regulatory risk across the supply chain.

5 Safe working conditions

Third Parties shall provide and maintain safe and healthy working conditions for all workers and implement precautionary measures against accidents and occupational diseases.

Third parties must obtain, keep current, and comply with all required health and safety permits and adhere to all relevant environmental laws and regulations, encompassing the proper management of perilous and unsafe substances.

Third Parties must assess the health and safety hazards and risks in their operations and implement appropriate health and safety controls to protect their workers, including:

- Provide a safe and healthy working environment, including appropriate personal protective equipment.
- Have appropriate policies and controls protecting the safety and health of their workforce, including providing regular health and safety training to their workforce.
- Invest in risk prevention strategies and to have a remedial plan of action in case of accidents or other contingencies which might arise when conducting business with or on behalf of the Steinweg.

6 ESG

The Third Party shall adhere to sustainability and good governance practices according to the international standards of the industry. Third Parties must also understand their impact on their entire supply chain, and do their best to ensure that they are doing the right thing for all parties engaged in.

Steinweg incorporates climate change and various environmental factors as an essential component of our operational approach. We anticipate our third-party associates to reflect a similar dedication by minimizing or eradicating waste. Third parties are required to conduct their operations responsibly regarding the environment, adhering to all relevant environmental legislation and regulations, in line with the goals of the Paris Agreement.

We expect Third Parties to maintain respectful relationships and communicating openly and honestly with local stakeholders and to identifying actual and potential impacts of their activities on their host communities, both positive and negative, to take action to avoid or mitigate negative impacts.





7 Competition

Third Parties and their employees will abide by the principles of fair competition and all national and international competition laws and regulations.

We expect Third Parties to refrain from engaging in actions that could potentially breach or create the impression of breaching antitrust regulations, for instance, participation in any formal or informal agreement aimed at unlawfully constraining competition, establishing pricing, remuneration, or advantages, or dividing clients, markets, personnel, or services related to Steinweg, or any other association with Steinweg.

8 Slavery, forced labour and child labour

Our Third Parties must have zero tolerance for any form of slavery, forced labour or child labour (as defined by the International Labour Organisation, or ILO) in their operations and supply chains. They must not provide employment to anyone under the national minimum legal age for employment, and must take steps to ensure that such persons are not employed in their supply chains.

Steinweg is fully opposed to any abuses of a person's freedoms and rights in our direct operations and our indirect operations. We expect Third Parties to incorporate the requirements of this section into all contracts with subcontractors and suppliers involved in the provision of materials, products or services.

9 Integrity

Third Parties shall be committed to operating lawfully, ethically and with integrity. We expect Third Parties to not unfairly or illegally discriminate based on race, nationality, religion, gender, age, sexual orientation, disability, ancestry, social origin or trade union membership.

We expect all Third Parties do not offer, provide, or authorize bribes of any kind, either directly or indirectly, to a public official or a private individual. They must never request or accept bribes of any kind, either directly or indirectly.

Third Parties must avoid conflict of interests with their obligations to Steinweg and take steps to declare and manage any conflicts, including in respect of their workers. In line with our commitment to beneficial ownership transparency, we expect our partners to consider publicly disclosing their beneficial owners.

10 Whistle blowing

We expect our Third Parties to provide their stakeholders, including their workforce and associated communities, access to speak-up mechanisms for the confidential raising of concerns without fear of retaliation. A speak-up mechanism is a way for stakeholders to raise a concern safely and anonymously about possible negative impacts on them involving a supplier and seek remedy.

11 Privacy and Security

Third Parties must be committed to handling personal information or data responsibly and in compliance with relevant data protection and privacy laws. Third parties are prohibited from misrepresenting facts, withholding essential information, or altering records or reports in a manner that could deceive or support others in such deceptive practices.

12 Business Continuity

Third Parties might face, when conducting business with or on behalf of the Steinweg, specific operational situations, incidents, events, processes, or contingencies which might triggers and require specific countermeasures to mitigate the risks that appear.





Third parties shall be prepared for any disruptions of its business (including but not limited to natural disasters, terrorism, or cyber-crime). They should have an all-encompassing business continuity program in place to address potential disruptions involving the loss of facilities, technology, or essential human resources required to support Steinweg.

13 Investigations and corrective measures

Where we find instances of non-compliance by Third Parties with the requirements of this Third-Party Code of Conduct, we shall investigate these incidents to understand the causes and contributing factors, and we will take appropriate action accordingly. Third parties are required to cooperate in the investigation and assessment of potential or actual adverse impacts and provide Steinweg with access to relevant information on reasonable requests.

14 Communication and audit

Third parties must communicate the principles set out in this Code of Conduct to all employees, subcontractors, or independent contractors engaged in work for the Group. Third Parties must have documented monitoring procedures in place to show they are complying with the Code as well as a training plan according to this Code.

Steinweg reserves the right to check compliance with this Code of Conduct and the related policies upon the giving of reasonable notice.

15 Steinweg Integrity & Compliance

Third Parties may contact Corporate Compliance at compliance@nl.steinweg.com for clarification on the provisions of this Third-Party Code of Conduct.