



 STRICKER

# CODE OF **CONDUCT**

Policies, Values and Principles

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# 1. The code and rules of conduct

## 1.1. Purpose and application

This Code of Conduct is applicable to Stricker and aims to:

- Demonstrate the company's commitment to perform with ethics and integrity, in the various aspects of sustainability and with respect for the rights of stakeholders;
- Establish the principles defined for Stricker's activities, through its sustainability commitments, which are part of its ethics, human and labor rights, environment, safety and health, and quality policies;
- Guide how the company should deal and work with its Employees, Customers, Suppliers, and other partners, serve its Shareholders and interact with Society.

Stricker reserves the right to modify any section of this Code whenever necessary. All significant changes made to the Code of Conduct will be duly disclosed and communicated to all Employees.

## 1.2. Validation, review and monitoring

The Code of Conduct is disclosed to all employees by means of a statement, establishing the rules described and aiming to comply with them.

The Code of Conduct is validated / approved by Top Management and is revised whenever relevant changes arise in any of the topics included in it, by decision of Top Management.

The system for monitoring compliance with the Code of Conduct (governance system) consists of the analysis and treatment of any reports made and is the responsibility of the conduct ombudsman and Stricker's legal department.

The Code of Conduct enters into force on the date of its disclosure. In the case of an update, the disclosure of the most recent version is ensured by means of a notice to all employees.

The versions control of the Code of Conduct is carried out in accordance with what is stipulated in Stricker's Integrated Management System.

### **Stricker employees must:**

- Ensure that they know and understand the Code of Conduct contents;
- Attend the training(s), as required in this matter;
- Follow the Code of Conduct: if you are not sure how to interpret it or if you have doubts about whether specific behaviors meet the required standards, you should seek support from the Sustainability area or Stricker's Legal area;

- Immediately report current or potential violations of the Code of Conduct, whether accidental or deliberate, related to oneself, colleagues or other employees acting on behalf of Stricker;
- Know the contribution of their role to good performance in terms of quality, environment, safety and health at work, and be aware of human and work rights and the company's ethical principles;
- Collaborate and follow the company's procedures, contributing to the continuous improvement of the organization.

### **Stricker employees must not:**

- Ignoring or not reporting situations in which you believe there is or may be a violation of the Code of Conduct;
- Attempting to prevent a colleague from reporting a potential or current violation or asking them to ignore an issue;
- Retaliate against anyone who reports a potential or current violation;
- Discuss any potential or current violation under investigation with others, unless authorized by the investigation team;
- Making decisions on environmental, safety or quality issues without sufficient authority and/or knowledge to do so;
- Respond to customers about Stricker's quality, environment or safety without authorization to do so;
- Neglect good environmental practices, OSH, human and labor rights, and business ethics rules.



### 1.3. Values for stricker



#### **Team**

Being in permanent mutual aid, contribute to business and people growth.



#### **Creativity**

Innovate, solve unexpected problems, ask questions and find answers.



#### **Client**

To be a long term partner, always in the foreground, with a Can Do attitude.



#### **Culture**

We encourage a corporate culture of quality promotion in which each customer is unique, each day a new challenge and a new achievement.



#### **Excellence**

Serve the customer with quality, accuracy and efficiency.



#### **Ethics**

Going by Ethics, we build genuine and trusting relationships with our employees, customers, partners and communities.



#### **INTEGRITY**

Respect others in all circumstances, have confidence, openness and pragmatism.



#### **Sustainability**

We include sustainability in our strategy, processes, projects and decisions.

## 2. Stricker management system policies and commitments

Certified by ISO9001 since 2000, Stricker assumes Quality as a key factor for the success of its strategy, encouraging a culture of continuous improvement at all levels of the organization and believes in a positive and inspiring work environment, based on ethical principles, with respect for human and labor rights, for the environment, safety, and health at work.

Stricker's culture of sustainability is grounded by an Integrated Management System, including in its policy, principles, and values in force in its strategy, processes, projects, and decisions. Stricker is committed to quality and sustainability in its various aspects, seeking to ensure a policy based on the following pillars:



**Quality management system**



**Safety and health at work**



**Sustainability of Stricker products**



**Human and labor rights**



**Environment**



**Business ethics**

### **3. Quality and sustainability management system of Stricker products**

Stricker's products undergo extensive quality control, which is carried out not only at the reception and production stages, but also at the suppliers' facilities. Tests are also carried out to guarantee the conformity of the products, regarding applicable legal and regulatory requirements, with the aim of also ensuring the safety and health of consumers.

Stricker remains focused on providing its customers with reliable and safe products. To ensure the proper functioning of this area, the company has specialized staff in the field of Product Compliance and specialized consultancy, whose focus is to ensure compliance with legal and regulatory requirements.

Stricker also carries out tests to guarantee the conformity of products, concerning applicable legal and regulatory requirements, in order to ensure the safety and health of consumers.

Stricker seeks to promote the incorporation of materials with less environmental impact in its products, from the design stage, namely using materials with a greater potential for life, recycled and recyclable.

## **Policies and commitments:**

- Continuously improve the integrated management system;
- Fully satisfy the needs of customers and interested parties;
- Ensuring business relationships of trust and rigor with customers and suppliers with the least possible risk to the business and the environment;
- Promote the active participation of and in the external community (customers, business partners, institutions, among others) in order to achieve the objectives;
- Ensuring product quality in accordance with customer requirements and expectations;
- Promote, in the design of its products, an investment in items with less environmental impact, namely through the use of materials with a greater potential for a useful life, recycled and recyclable;
- Ensuring the safety of products by complying with the legislation and regulations applicable to them.

## **4. Environment**

Stricker is committed to contributing in its activities to a more sustainable future, significantly reducing its environmental impact along the entire supply chain and considering the environmental implications in its business strategy. Thus, Stricker adopts a set of procedures:

- Waste management, with contracts signed with authorized waste management companies;
- Separation of waste in all areas of the company's facilities;
- Focus on reducing the production of waste by reusing it;
- Eco-energy policy, with a solar energy production unit (photovoltaic panels), managing the use of equipment to reduce electrical consumption and maximizing the use of natural lighting in buildings;
- Maintenance of equipment using fluorinated gases and respective reporting to the authorities, contributing to the mitigation of climate change and environmental protection by reducing emissions of fluorinated greenhouse gases;
- Practices to minimize water consumption and avoid waste;
- Inclusion of electric and plug-in hybrid vehicles in the company's fleet;
- Raising awareness towards the adoption of good environmental practices in the onboarding of new employees.



## Policies and commitments:

- Comply with legal and regulatory requirements on the environment, such as applying good voluntary practices;
- Include environmental criteria in your processes, projects and decisions;
- Protect the environment and prevent pollution, through the sustainable use of resources, by controlling gaseous emissions and liquid effluents, by reducing/reusing waste generated in the company, reducing the environmental impact of the activity;
- Evaluate environmental aspects and impacts throughout the supply chain, from the supplier to the final destination of its products, in order to establish adequate global measures for the sustainable growth of the activity;
- Identify potential risks to the environment, allowing their prevention and the provision of adequate measures to deal with emergencies of an environmental nature;
- Promote environmental awareness among employees, suppliers, customers, consumers, and other interested parties.
- Promote a culture of respect for the environment in its activity.



## 5. Safety and health

Stricker considers the health and safety of all employees as a priority, providing its employees with safe and healthy workplaces, in appropriate facilities, identifying hazards and preventing risks associated with its activities.

To ensure the proper functioning of this area, the company has staff specialized in the field of Hygiene and Safety at Work, as well as in consultancy, whose focus, in addition to legal compliance, is the continuous improvement of working conditions in its various aspects: physical, chemical, mechanical, biological, ergonomic, and emergency. The company has established good practices for:

- Provide a safe and healthy environment for its employees;
- Identify hazards and assess risks associated with workplaces, in order to adopt preventive and improvement actions;
- Prevent/reduce the risks of OSH, resulting from the activity, aiming to control eventual emergency situations and prevent/reduce work accidents and occupational diseases;
- Comply with legal and regulatory requirements.

Stricker expects its employees to actively share occupational safety and health concerns, in compliance with best practices established in the company in this area.

### **Policies and commitments:**

- Comply with legal and regulatory requirements in terms of safety and health at work, as well as applying good voluntary practices;
- Provide a safe and healthy environment for its employees;
- Identify hazards and assess risks within the scope of OSH in its activities, aiming to control eventual emergency situations and prevent or reduce work accidents and occupational diseases;
- Include safety and health criteria in your processes, projects and decisions;
- Promote a culture of safety and health in its activities.

## 6. Human and labor rights

### Forced Labor and Workmanship abuse

Stricker does not tolerate or cooperate with situations of forced labor or other forms of illegal work or that involve any type of abuse or any form of punishment. Therefore, Stricker does not participate in any type of illegal work, providing fair employment contracts to all its employees.

### Child labor

Stricker does not tolerate or cooperate with any form of child labor and is committed to complying with all minimum age provisions and relevant laws and regulations in this regard. Stricker complies with applicable legislation and regulations regarding the minimum age for admission to employment.

### Freedom of Union Association and Collective Bargaining

Stricker respects the right of its employees to join or not join a union or to organize themselves for collective bargaining, without fear of retaliation, intimidation or harassment.

### Salaries and working Hours

Stricker provides its employees with conditions that allow an adequate balance between work and private life, also complying with legal and regulatory requirements regarding salary, working hours, benefits, overtime and hiring procedures.



## **Ethical recruitment**

Stricker promotes transparent recruitment processes aligned with the culture of respect among its partners. In order to promote diversity and equality, Stricker does not tolerate harassing or discriminatory behavior in its recruitment processes, namely based on race, religion, gender, sexual orientation, ancestry, age, language, territory of origin, political beliefs or ideological, economic situation, social context or contractual relationship, fostering respect for human dignity. Stricker's recruitment processes have no cost to the candidate and their confidential and personal information is safeguarded, complying with legal and regulatory requirements regarding data privacy.

## **Work-life balance**

Stricker aims at the satisfaction and professional and personal fulfillment of its employees, continually looking for solutions to improve their working conditions and to provide conciliation between their professional and personal lives. In this sense, the company promotes several initiatives:

- Promotes the participation of employees in satisfaction surveys;
- Provides fruit to employees, to instill healthy eating habits;
- Establishes protocols with various entities with benefits for employees;
- Promotes interactive activities to improve organizational culture, team spirit and the working environment.

## **Discrimination and harassment**

Stricker promotes a culture of respect among its partners, valuing diversity and equality, prohibiting harassment practices and not authorizing discriminatory behavior, namely based on race, religion, gender, sexual orientation, ancestry, age, language, territory origin, political or ideological convictions, economic situation, social context or contractual relationship, fostering respect for human dignity.

Therefore, Stricker does not condone, under any circumstances, the discrimination or harassment of any individual or group within its entire supply chain.

## **Conditions for underage workers**

Stricker complies with the labor legislation in force, regarding the minimum age for admission to employment, so it only admits the work performed by employees aged 16 or over. Stricker's current practice is to hire employees of legal age (over 18 years of age).

However, in the event of hiring an employee aged between 16 and 18 years of age, in an internship or other context, Stricker ensures:

- The admission of a minor employee who has completed the minimum age for admission, has completed compulsory education or is enrolled and attending secondary education and has adequate physical and mental abilities for the job. In this context, evidence on these topics is collected through the verification of documentation and the admission medical examination.
- Compliance with the legislation on Safety and Health at Work and specifically with regard to activities prohibited or conditioned to minors.

## **Policies and commitments:**

- Ensuring fair salary conditions and working hours in line with the role performed by employees;
- Promote a culture of respect among all employees;
- Value the talent and potential of its employees, looking for opportunities to stimulate their training and professional development, integrated into a policy of career management and performance evaluation;
- Promoting equal opportunities for all employees during their journey in the company and for potential employees in the recruitment and selection stages;
- Promoting the satisfaction and professional and personal fulfilment of its employees as well, continually seeking solutions to improve their working conditions and combine with their professional and personal lives.

## **7. Business ethics**

### **Corruption and Fraud**

Stricker condemns corruption, bribery and fraud in all its forms. Therefore, Stricker employees must comply with all relevant laws in order to prevent bribery, fraud and all forms of corruption. Stricker carries out all its business transactions transparently and these transactions are clearly and accurately reflected in its records.

### **Confidentiality and business records**

Stricker ensures appropriate technical and organizational security measures to safeguard the confidential information of its stakeholders, complying with legal and regulatory requirements regarding privacy, to ensure that confidential information is not disclosed to third parties without prior authorization. Stricker maintains up-to-date records of matters related to its business and which demonstrate compliance with applicable legislation and regulations.

### **Conflicts of interest**

Stricker employees must act in the Company's best interests and therefore must not have any relationship, financial or otherwise, with any supplier that may conflict, or appear to conflict with Stricker's interests. Employees must report any potential conflicts of interest as soon as they are identified so that they can be properly considered and appropriate action can be taken.

## **Bribery**

Stricker employees may not accept inappropriate gifts or offers from suppliers, and may only occasionally offer or accept non-monetary gifts of modest value. These eventual offers must never create a feeling of obligation or the impression of an obligation, as they can be understood as a bribe.

## **Free competition**

Stricker complies with competition laws in all countries where it does business and does not tolerate any violation of competition laws. Whenever doubts arise on this topic, Stricker's legal department should be contacted.

## **Personal data protection**

Stricker is concerned with the collection and processing of the personal data of its employees, customers, suppliers and partners, so it carefully respects the Data Protection Legislation and the guidelines of the control authorities. In this sense, Stricker employees must also act in compliance with internal regulations and procedures on the processing of personal data.

## **Legislation and regulations**

Stricker is committed to complying with the law, regulations and rules applicable to all its activities, enforcing the competition laws in the countries where they operate or in which they market their products or services.

## **Policies and commitments**

- Prohibit any practice of fraud, corruption, and bribery, as well as the adoption of behaviors that may create expectations of favoring in relations with the company.
- Act in compliance with competition laws, in accordance with market rules and criteria and promoting fair competition.
- Adopt measures that ensure exemption from acting in decision-making processes, in cases of potential conflict of interest involving the company.
- Maintain a policy to prevent illegal practices in financial and accounting matters, such as tax fraud and money laundering.
- Act with respect for the privacy of data, including personal data of employees, customers, and suppliers, in compliance with applicable privacy laws and internal regulations and procedures implemented on Protection of Personal Data.

## 8. Support/ contacts/ report system

### 8.1. Complaints and reports

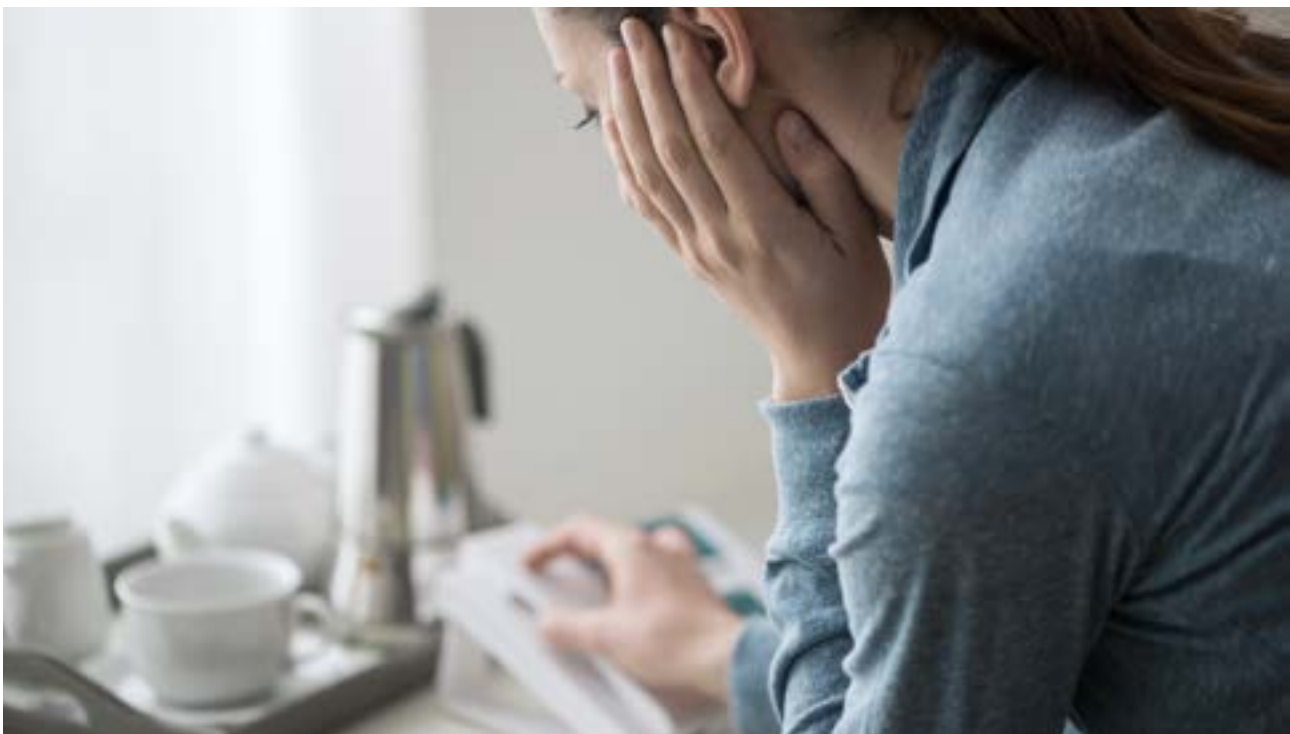
Any violation of this Code of Conduct must be reported directly on the Reporting platform available through the Stricker website, to ensure the protection and confidentiality of the whistleblower's data.

Reports must be submitted through the WhistleB/Navex platform, available on the Stricker website, under the address WhistleB, Whistleblowing Centre. If there are complaints by other means (e.g., social networks), whoever receives the report should encourage the whistleblower to submit it on the platform, so that it can be considered.

Before communicating the report, the whistleblower must ensure that he only sends the personal data necessary for Stricker to be able to follow up on him, any non-relevant personal data will be deleted.

In the event of a report, Stricker ensures:

- The reservation of confidentiality in relation to the report made;
- Compliance with Law 93/2021 of December 20, which establishes the general regime for the protection of whistleblowers;
- The analysis of the report and the initiation of disciplinary proceedings whenever justified and there is proven knowledge of alleged situations of non-compliance;
- The protection of the whistleblower and witnesses against possible retaliation or reprisals following the reporting. Compliance with the duty of information to the holders involved in the report in the following terms:





## Privacy Information

(provided under the terms of the article 13 of the GDPR (General Regulation on Data Protection))

Responsible for Treatment	Stricker
Data Protection Officer	Departamento jurídico da Paul Stricker, SA.
Data collected	Personal data relating to the holders identified below. Identification, contact and other data related to the reports content.
Types of Holders	Whistleblowers, denounced, third parties who can be identified in the reports.
Purpose	Management and processing of the report of infractions submitted through the Infraction Reporting Channel.
Basis	Compliance with legal obligations and legitimate interest.
Data Retention Term	Reports will be kept for a minimum period of five years and, regardless of this period, during the pendency of judicial or administrative proceedings relating to the report. The abovementioned is without prejudice to the archival conservation rules of the judicial courts and administrative and tax courts.
Data Transmission	Authorities competent to investigate infringements, namely: Public Ministry, criminal police bodies, Portuguese Central Bank, independent administrative authorities, public institutes, general inspection and similar entities and other central services of the direct administration of the State endowed with administrative autonomy, local authorities, and public associations.  Institutions, bodies, or organizations of the European Union.
Rights of Personal Data Subjects	Under the Personal Data Protection Law, the right of access, updating, rectification, elimination, portability, limitation and erasure of personal data is guaranteed. As well as the right to file complaints before the National Data Protection Commission (CNPD). These rights performing must be carried out through the following email; dpo@stricker.pt or by mail to "Núcleo Industrial de Murte de", Lot 5, 3060-372 Murte de,

The Reporting Channel Regulation can be consulted on Stricker's website and on the internal document management platform.



## 8.2. Disciplinary actions

- Violation of the Code of Conduct has the disciplinary consequences provided for in the Labor Code, without prejudice to any civil and/or criminal liability.
- Any legal or regulatory breach, within the scope of this Code of Conduct, constitutes a prohibited behavior which will be, in addition to the legally admissible punishment in criminal proceedings, the object of disciplinary action under the terms provided for in labor legislation.
- Stricker, whenever it becomes aware of alleged non-compliance with the rules established in this Code of Conduct, investigates the alleged non-compliance, and may initiate disciplinary proceedings, according to the severity of the same. The author(s) will be civilly and criminally liable, as well as to pay a compensation for the consequences of their actions.

