



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 applies 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 labour 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 through communication, establishing the rules described and aiming to ensure compliance with them.

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

The monitoring system for compliance with the Code of Conduct (governance system) consists of the analysis and treatment of any complaints made, and is the responsibility of the conduct ombudsman and Stricker's Legal Department.

The Code of Conduct comes into effect on the date of its disclosure. In the case of updates, the disclosure of the most recent version is ensured through communication 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 contents of the Code of Conduct;
- 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 behaviours comply with the required standards, you should seek support Stricker's Sustainability or Legal areas;
- 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, occupational health and safety, and be aware of human and labour 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:

- Ignore or not report situations where they believe there is or may be a violation of the Code of Conduct;
- Attempt to prevent a colleague from reporting a potential or current violation or ask 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;
- Make decisions regarding environmental, safety, or quality issues without the authority and/or sufficient knowledge to do so;
- Respond to customers about Stricker's quality, environment or safety without authorization to do so;
- Neglect good environmental and OHS practices, human and labour rights, and business ethics rules.



1.3. Stricker's values



Team

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



Creativity

Innovate, embrace the unexpected, ask questions and find answers.



Customer

A partner, always first, with a "can do" attitude.



Culture

We encourage a corporate culture promoting quality where each customer is unique, each day a new challenge and a new achievement.



Excellence

Quality service, rigour, and effectiveness.



Ethics

Based on Ethics, we build genuine and trustworthy relationships with our employees, customers, partners and communities.



Integrity

Respect in all situations, trust, 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 labour rights, the environment, and occupational health and safety.

Stricker's sustainability culture is cemented by an Integrated Management System, including in its policy, the principles and values in its strategy, processes, projects, and decisions.

BUILDING THE FUTURE IS IN OUR NATURE

Stricker is committed to quality and sustainability in its various aspects, seeking to ensure a policy based on the following pillars:



Integrated Management System



Occupational Health and Safety



Product sustainability



Human and Labour rights



Environment



Business ethics

3. Stricker's Quality Management System and Products' Sustainability

Stricker products undergo comprehensive quality control, conducted not only during the reception and production stages but also at supplier facilities.

Stricker maintains its focus on providing reliable and safe products to its customers. To ensure the proper functioning of this area, the company has specialized staff in the field of Product Compliance and specialized consultancy, focused on ensuring 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.

Policies and commitments:

- Continuously improve the integrated management system;
- Fully satisfy the needs of customers and stakeholders;
- Ensure trustworthy and rigorous business relationships with customers and suppliers with minimal risk to the business and the environment;
- Promote active participation of and in the external community (customers, business partners, institutions, among others) to achieve the objectives;
- Guarantee 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;
- Ensure product safety by complying with applicable legislation and regulations.

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 electricity consumption and maximizing the use of natural lighting in buildings;
- Maintenance of equipment using fluorinated gases and respective reporting to the authorities, contributing to climate change mitigation and environmental protection by reducing fluorinated greenhouse gas emissions;
- Practices to minimize water consumption and avoid waste;
- Inclusion of electric and plug-in hybrid vehicles in the company's fleet;
- Raising awareness for the adoption of good environmental practices during the onboarding of new employees.

Policies and commitments:

- Comply with legal and regulatory requirements regarding the environment, as well as applying good voluntary practices;
- Include environmental criteria in its processes, projects and decisions;
- Protect the environment and prevent pollution, through the sustainable use of resources, by controlling gas emissions and liquid effluents, reducing/reusing waste generated by 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 environmental risks, allowing their prevention and the provision of adequate measures to face environmental emergencies;
- Promote environmental awareness among employees, suppliers, customers, consumers, and other interested parties.



5. Safety and Health

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

To ensure the proper functioning of this area, the company has staff specialized in the field of Occupational Health and Safety, 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 to:

- 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 OHS risks, 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 health and safety concerns, in compliance with the company's best practices in this area.

Policies and commitments:

- Comply with legal and regulatory requirements in terms of Occupational Health and Safety, 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 OHS in its activities, aiming to control eventual emergency situations and prevent or reduce work accidents and occupational diseases;
- Include safety and health criteria in the processes, projects and decisions;
- Promote a culture of safety and health in its activities.



6. Human and labour rights

Forced labour and labour abuse

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

Child labour

Stricker does not tolerate or cooperate with any form of child labour 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 its employees' right to join or not join a union, or to organize for collective bargaining, without fearing 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 behaviour in its recruitment processes, namely based on race, religion, gender, sexual orientation, ancestry, age, language, territory of origin, political or ideological beliefs, economic situation, social context or contractual agreement, fostering respect for human dignity. Stricker's recruitment processes are free of charge for the candidate and their confidential and personal information is safeguarded, complying with legal and regulatory requirements regarding data privacy.

Work-life balance

Stricker aims for the professional and personal satisfaction and fulfilment of its employees, continually seeking solutions to improve their working conditions and balance their professional and personal lives.

- Encourages employee participation in satisfaction surveys;
- Provides fruit to employees, to instil 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 behaviour, namely based on race, religion, gender, sexual orientation, ancestry, age, language, territory of origin, political or ideological convictions, economic situation, social context or contractual agreement, 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 current labour legislation regarding the minimum age for employment admission, therefore only accepts employees aged 16 years or older. It is Stricker's standard practice to hire employees who are of legal age (over 18).

However, in the event of hiring an employee aged between 16 and 18 years old, for internships or other contexts, 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 Occupational Health and Safety, and specifically with regard to activities prohibited or restricted to minors.

Policies and commitments:

- Ensure fair salary conditions and working hours aligned with the functions performed by employees;
- Promote a culture of respect among all employees;
- Value the talent and potential of its employees, seeking opportunities to stimulate their training and professional development, integrated into a policy of career management and performance evaluation;
- Promote equal opportunities for all employees during their journey in the company and for potential employees in the recruitment and selection stages;
- Promote the professional and personal satisfaction and fulfilment of its employees, continually seeking solutions to improve their working conditions and balance 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 conducts 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 updated records of matters related to its business and which demonstrate compliance with applicable legislation and regulations.

Conflicts of interest

Stricker employees must act in accordance with 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 measures 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 regulatory 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 it operates or in which it markets its products or services.

Policies and commitments

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

8. Support/contacts/report system

8.1. Complaints and reports

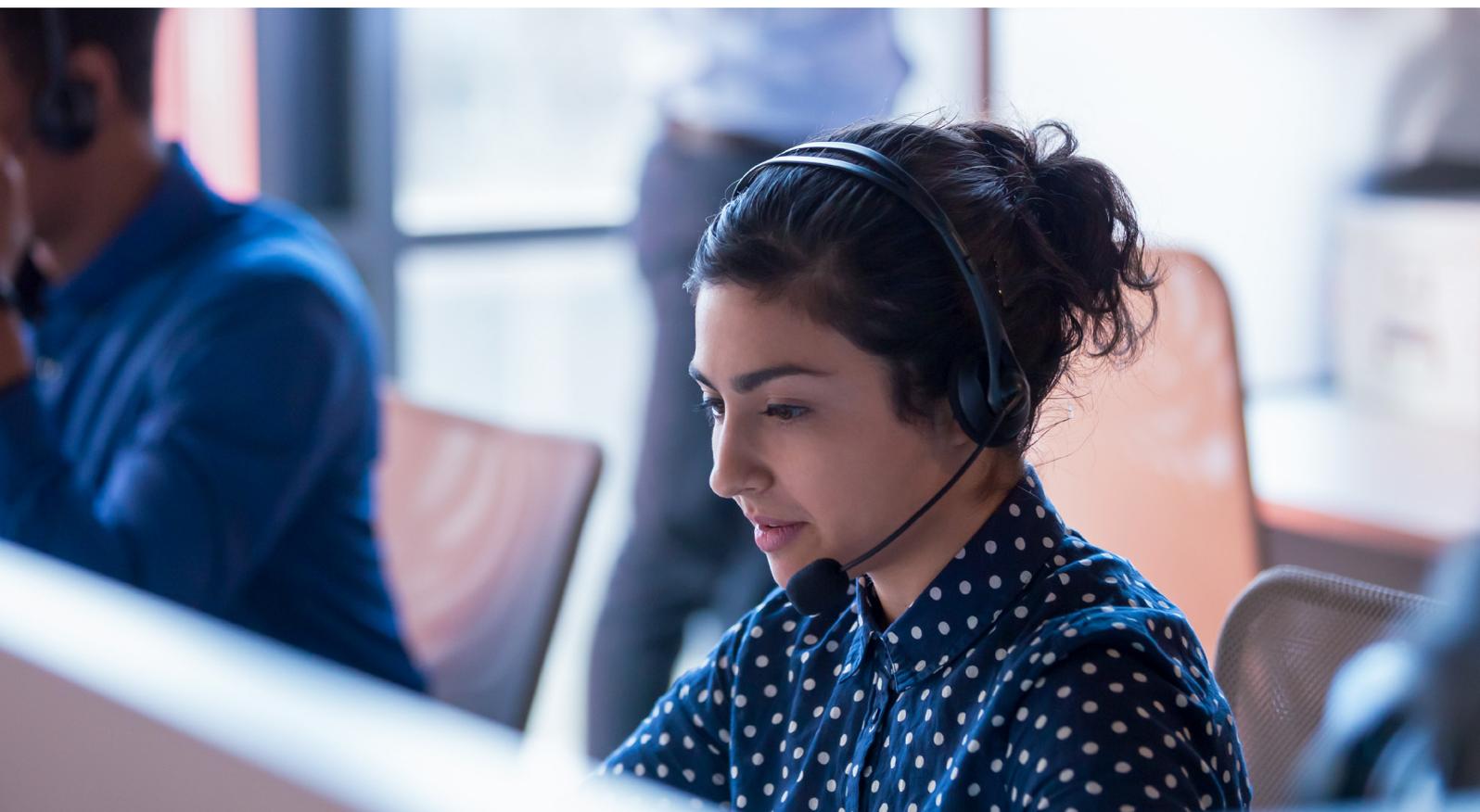
Any violation of this Code of Conduct must be reported directly on the Reporting platform available on the Stricker website, to ensure the protection and confidentiality of the whistleblower's data.

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 reporting a complaint, the whistleblower must ensure that only necessary personal data is provided for Stricker to follow up on the report, 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 to inform the individuals involved in the report as follows:



Privacy Information

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

Responsible for Treatment	Data Protection Officer (DPO)
Data Protection Officer	Legal Department of Paul Stricker, SA.
Data collected	Personal data relating to the subjects identified below. Identification, contact and other data related to the report's content.
Types of Subjects	Whistleblowers, denounced, third parties who can be identified in the reports.
Purpose	Management and processing of reports of infringements submitted through the Infringement Reporting Channel.
Basis	Compliance with legal obligations and legitimate interest.
Data Retention Period	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 mentioned above does not prejudice the archival conservation rules of the judicial and administrative and fiscal courts.
Data Transmission	Competent authorities for investigating infringements, namely: <ul style="list-style-type: none"> • Public Prosecutor's Office, criminal police bodies, Bank of Portugal, independent administrative authorities, public institutes, general inspectorates, and equivalent entities, and other central services of the State administration 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 to access, update, rectify, delete, portability, limitation and erasure of personal data is guaranteed. As well as the right to lodge complaints with the National Commission for Data Protection (NCDP). The exercise of these rights must be carried out via the following email: dpo@sticker.pt or by mail to be sent to Núcleo Industrial de Murte de, Lote 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

- Violations of the Code of Conduct will result in disciplinary consequences as provided for in the Labour Code, without prejudice to any civil and/or criminal liability.
- Any legal or regulatory non-compliance within the scope of this Code of Conduct constitutes prohibited behaviour, which, in addition to any legally permissible punishment under criminal law, will be subject to disciplinary action as provided for in labour legislation.
- Stricker, whenever it becomes aware of alleged non-compliance with the rules established in this Code of Conduct, will investigate the alleged non-compliance, and may initiate disciplinary proceedings, according to the severity of the non-compliance. The perpetrator(s) will be civilly, criminally, and financially liable for the consequences of their actions.



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