



Streff Data Protection Services (PSF) S.à r.l. | 5, rue Pierre Flammang, L-8399 Windhof
IBAN: LU21 0026 1530 2150 0000 | R.C. B11477 | TVA: LU10342305
Tel: +352 26 30 59 29 | Fax: +352 26 30 59 19 | E-Mail: data.protection@streff.lu | Web: www.streff.lu

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1. Streff Code of conduct

With the present Code of Conduct, Streff commits itself to fulfilling all legal requirements and to complying with the ethical standards listed here within the scope of all its activities. To enable us to fulfil this obligation, the Streff Code of Conduct defines what Streff expects from its business partners, employees and suppliers- regardless of their geographical location or personal background.

STREFF hereby declares:

1.1 Basic Conduct

legal compliance

- Comply with the laws of the applicable jurisdiction(s).

Competition and Antitrust Law

- To support honest and fair competition;
- Not tolerate any form of unethical or illegal business practice;
- Not to gain unfair advantage through manipulation, secrecy, misuse of confidential information;
- Not to enter into agreements between competitors aimed at restricting or avoiding competition;
- Act in accordance with applicable antitrust laws.

Prohibition of corruption and bribery

- Not to tolerate or engage in any form of corruption or bribery, including any unlawful payment offer or similar inducement to government officials, to influence decision making.

Combating money laundering and terrorist financing

- Not to tolerate unlawful actions in the receipt of funds;
- To fulfil the duties of due diligence in combating money laundering and terrorist financing

Prohibition of child labour

- To recognise and respect the rights of children;
- Not to hire workers who do not have a minimum age of 15 years;
- The rights of young workers must be protected;
- Comply with International Labour Organisation (ILO) Conventions 138 and 182 prohibiting child labour.



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1.2 Behaviour towards employees

Respect for the fundamental rights of employees

- To promote equal opportunities and equal treatment of its employees regardless of skin color, race, nationality, social origin, disability, sexual orientation, political or religious beliefs, gender or age;
- Respect the personal dignity, privacy and personal rights of each individual;
- Not to employ or force anyone to work against their will;
- Not to tolerate unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment or discrimination;
- Not to tolerate conduct (including gestures, language and physical contact) that is sexual, coercive, threatening, abusive or exploitative;
- Provide adequate remuneration and ensure the national minimum wage set by law;
- Comply with the maximum working hours established by law in each country;
- To the extent permitted by law, recognise workers³ freedom of association and neither favour nor discriminate against members of workers³ organisations or trade unions.

Employee health and safety

- To assume responsibility for health and safety towards its employees;
- To contain risks and ensure the best possible precautionary measures against accidents and occupational diseases;
- Provide training and ensure that all employees are knowledgeable about occupational safety;
- Establish and implement an appropriate occupational safety management system.

1.3 Conduct towards customers

- When dealing with business partners (customers, suppliers, cooperation partners) and government institutions, the interests of the company and the private interests of employees on both sides are strictly separated.
- Actions and (purchase) decisions must be made free of considerations unrelated to the subject matter and personal interests.
- The behaviour towards customers is always ethically correct, respectful and professional.

1.4 Environmental protection

- To observe environmental protection with regard to legal norms and international standards;
- Minimize environmental pollution and continuously improve environmental protection;
- Establish and implement an appropriate environmental management system.



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1.5 Control of compliance

Compliance in the supply chain / supply chain

- To appropriately promote compliance with the contents of the Code of Conduct by its suppliers;
- Comply with the principles of non-discrimination in supplier selection and dealings with suppliers.

Compliance by employees

- Every Streff employee undertakes to comply with this Code of Conduct without exception.

1.6 Violations and sanctions

- to punish violations of the Code of Conduct and internal directives, for which the respective superiors are responsible
- In particular, to implement the following sanctions in the event of infringement:
 - Reference
 - notice
 - indemnity
 - criminal charge

AGREEMENT:

If you become a supplier to Streff, you automatically agree to the requirements set forth in the Anti-Bribery & Anti-Corruption and Data Protection policy. If, for any reason, you do not agree to these requirements, please complete this document below and return it to us by post.

Address : 138, route d'Arlon, L-8008 Strassen, or via email service@streff.lu