

Code of Conduct

1. Purpose and Scope

This Code of Conduct sets out the principles, standards, and expectations that guide how Steder conducts its business. It reflects our commitment to ethical conduct, legal compliance, and responsible business practices across all operations.

This Code applies to all persons working for or on behalf of Steder in any capacity, including but not limited to employees, directors, officers, agency workers, contractors, consultants, interns, volunteers, suppliers, and business partners.

Compliance with this Code is mandatory.

2. Ethical Business Conduct

Steder is committed to conducting all business activities with integrity, transparency, and professionalism.

All individuals covered by this Code must:

- Act honestly and in good faith at all times;
 - Avoid any conduct that could damage the reputation of Steder;
 - Comply with all applicable laws, regulations, and internal policies;
 - Refrain from fraudulent, deceptive, or misleading practices;
 - Avoid conflicts of interest or disclose them where they arise.
-

3. Respect for Human Rights

Steder respects internationally recognised human rights and is committed to ensuring that human rights abuses do not occur within its operations or supply chains.

This includes respect for:

- Human dignity and equality;
 - Freedom from discrimination, harassment, or abuse;
 - Safe, healthy, and fair working conditions.
-

4. Anti-Slavery and Human Trafficking

4.1 Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour, and human trafficking, all of which involve the deprivation of a person's liberty for personal or commercial gain.

Steder has a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and with integrity in all business relationships and to implementing effective systems and controls to ensure modern slavery does not occur in our own business or in any part of our supply chains, in line with international standards such as:

- The United Nations Guiding Principles on Business and Human Rights;

- OECD Due Diligence Guidance for Responsible Business Conduct;
- International Labour Organization (ILO) Labour Standards;
- The UK Modern Slavery Act 2015.

4.2 Responsibilities

All persons working for or on behalf of Steder are responsible for:

- Understanding and complying with our anti-slavery commitments;
- Remaining alert to risks of modern slavery in business activities and supply chains;
- Avoiding any activity that could contribute to or conceal modern slavery.

Management is responsible for implementing this policy, monitoring its effectiveness, and ensuring appropriate training is provided.

4.3 Suppliers and Business Partners

Steder expects all suppliers, contractors, and business partners to uphold the same high standards. As part of our contracting and due diligence processes:

- The use of forced, compulsory, or trafficked labour is strictly prohibited;
- Suppliers are expected to apply these standards to their own supply chains;
- Non-compliance may result in termination of business relationships.

4.4 Reporting and Protection

Anyone who suspects or becomes aware of modern slavery or human trafficking must report concerns as soon as possible to management or via established reporting or whistleblowing procedures.

Steder encourages openness and supports anyone who raises concerns in good faith. No individual will suffer retaliation, discrimination, or adverse treatment for reporting concerns honestly, even if they later prove to be unfounded.

5. Fair Employment Practices

Steder is committed to fair and lawful employment practices, including:

- Compliance with labour, wage, and working-time laws;
- Prohibition of child labour;
- Equal opportunities and non-discrimination;
- Respectful and professional workplace behaviour.

Harassment, bullying, or discrimination of any kind will not be tolerated.

6. Health, Safety, and Well-Being

The safety and well-being of employees and others affected by our operations is a priority.

All individuals must:

- Follow health and safety rules and procedures;
 - Take reasonable care of their own safety and that of others;
 - Report unsafe conditions, incidents, or risks promptly.
-

7. Confidentiality and Data Protection

Confidential information, including personal data, business information, and commercially sensitive material, must be protected and used responsibly.

All data must be handled in accordance with applicable data protection laws and internal policies.

8. Reporting Concerns and Compliance

Any breach or suspected breach of this Code must be reported promptly. Reports may be made through line management or via designated reporting mechanisms.

Breaches of this Code may result in disciplinary action, up to and including dismissal or termination of contractual relationships.

9. Governance and Review

This Code of Conduct:

- Does not form part of any individual's contract of employment;
 - May be amended by Steder at any time;
 - Is reviewed periodically to ensure continued relevance and effectiveness.
-

Approval and Commitment

Steder is committed to upholding the principles set out in this Code of Conduct and expects the same commitment from all those who act on its behalf.