Code of Conduct for Suppliers

Our understanding of sustainability in supplier management

At Starlab International GmbH we consider sustainability to be an essential component of our business processes. As a technology group with high materials competency in the Life Science sector, we purchase raw materials, commodities and services from suppliers worldwide, so as to secure the sustainable success of our customers by providing innovative solutions for products and services.

This requires responsible management that strives for a long-term, value-added business model. For this reason, our suppliers are an integrated part of our sustainability strategy. In all our procurement activities, we carefully take into consideration a set of economic, process-driven and technical criteria as well as essential social and ecological factors such as human rights, labor conditions, anti-corruption concerns and environmental protection.

At Starlab International GmbH, we expect that our suppliers comply with applicable national statute, with the principles of the United Nations Global Compact, and with the Starlab International GmbH Code of Conduct for Supplier.

Furthermore, we expect our suppliers to introduce suitable processes within their organizations that support compliance with applicable statute and that drive continuous improvements with regard to the requirements laid out in the Starlab International GmbH Code of Conduct for Suppliers.

Moreover, we expect from our suppliers to ensure compliance with these principles and requirements by all their affiliates. For the purposes of this Code of Conduct for Supplier, an affiliated company shall mean an enterprise in which one of the parties holds a direct or indirect participating interest of more than 50% of the voting registered capital.

Conduct towards employees

At Starlab International GmbH, we expect that our suppliers respect and comply with the fundamental rights granted to all employees under applicable national statute. Furthermore, we expect our suppliers to fully recognize the labor standards issued by the International Labor Organization (ILO), taking into due account the applicable laws and regulations in different countries and at different sites.

Child labor

At Starlab International GmbH, we expect our suppliers to prohibit and refrain from any kind of child labor within their organization.

Discrimination

At Starlab International GmbH, we expect that our suppliers promote equal opportunities and equal treatment. Furthermore, we expect our suppliers to prohibit any form of discrimination in recruiting, promoting or selecting employees for basic or advanced training programs. Within the organization of our suppliers, no employee may be discriminated against based on his or her gender, age, color, race, nationality, sexual orientation, disabilities or religious conviction.

Forced labor

At Starlab International GmbH, we expect our suppliers to prohibit any kind of forcedlabor in their organization.

Freedom of association

At Starlab International GmbH, we expect our suppliers to respect the right of their employees, to the full extent of applicable national statute, to form a worker council, collective bargaining unit or other employee representations, and to enter into collective bargaining.

Remuneration and working time

At Starlab International GmbH, we expect our suppliers to fully comply with applicable national statute on working time. Furthermore, we expect that the employees of our suppliers receive a remuneration which is in line with applicable national statute.

Occupational health and safety

At Starlab International GmbH, we expect our suppliers to fully comply with applicable national statute governing health and safety at work. Furthermore, our suppliers are ex-

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pected to establish and maintain an appropriate occupational health and safety management system (e.g., in accordance with OHSAS 18001, or national equivalent). This includes containing actual as well as potential health and safety risks at work. Moreover, our suppliers are expected to train their employees for the purpose of preventing accidents and occupational diseases as best as possible.

Environmental protection

At Starlab International GmbH, we expect our suppliers to comply with all applicable national laws, regulations and standards to protect the environment. Our suppliers are expected to establish and maintain a suitable environmental management system (e.g., in accordance with ISO 14001, or national equivalent) to minimize environmental impact and hazards, and to improve environmental protection in their everyday operations.

Dodd-Frank Act / Conflict Minerals

At Starlab International GmbH, we expect our suppliers to be able to declare that to the best of their knowledge they have no reason to assume that the products delivered to us contain conflict minerals from the DR Kongo or other countries mentioned in the Dodd-Frank Act. In case a supplier would not be able to do so, he is obliged to inform STARLAB International GmbH about this in writing without delay. Upon request of STARLAB International GmbH in such case, supplier will provide STARLAB International GmbH with a completed questionnaire from the following link:

https://www.responsiblemineralsinitiative.org/reporting-tem-plates/cmrt/

Conduct in business environment

Prohibition of corruption and bribery

At Starlab International GmbH, we expect our suppliers to have zero-tolerance for corruption and to ensure compliance with all United Nations (UN) and Organisation for Economic Co-operation and Development (OECD) conventions against corruption, and with all governing anti-corruption laws. In particular, our suppliers are expected to ensure that their employees, subcontractors and agents do not offer, promise or grant any advantages to any STARLAB International GmbH employees or related parties with the goal of securing an order award or any other form of preferential treatment in their business transactions.

Invitations and gifts

At Starlab International GmbH, we expect that our suppliers refrain from presenting any invitations or gifts to our employees so as to gain any form of influence. Any invitations or gifts extended to Starlab International GmbH employees or related parties, if any, must be reasonable and suitable with a view of scope and design, i. e. they must be of low financial value and reflect ordinary local business custom. We also expect our suppliers to refrain from asking Starlab International GmbH employees or related parties for any inappropriate advantages.

Preventing conflicts of interest

In our suppliers' dealing with us, we expect our suppliers to take decisions based on objective criteria only. Any factors that might influence or suppliers' decisions due to private, business or other conflicts of interest must be prevented from the start. The same applies to relatives and other related parties.

Unrestricted competition

At Starlab International GmbH, we expect our suppliers to always compete in a fair manner and to comply with applicable antitrust laws and regulations. Our suppliers are expected not to enter with competitors into agreements that might constitute a breach of antitrust law, nor take advantage of any dominant market position they might hold.

Money laundering

At Starlab International GmbH, we expect our suppliers to comply with all applicable statute governing the prevention of money laundering, and not to participate in any money laundering activities.

Supplier relations

At Starlab International GmbH, we expect our suppliers to communicate the principles laid out herein to their subcontractors and subsuppliers and to take these principles into account when selecting subcontractors and supsuppliers. Our suppliers are expected to encourage their subcontractors and subsuppliers to comply with the minimum standards of this Code of Conduct regarding the protection of human rights, working conditions, anti-corruption and environmental protection when fulfilling their contractual obligations.

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Compliance with the Starlab International GmbH Code of Conduct for Supplier

We will review our suppliers' compliance with the principles and requirements laid out in the Starlab International GmbH Code of Conduct for Suppliers regularly, asking our suppliers to complete a self-assessment no asking our suppliers to complete a self-assessment not more than once a year.

Any violation of the principles and requirements set out in this Starlab International GmbH Code of Conduct for Supplier will be regarded as a serious violation of the supplier regarding his contractual obligations towards Starlab International GmbH. In the event that supplier is suspected of violating and of the principles laid out in the Starlab International GmbH Code of Conduct for Supplier (e.g. based on negative media reports), Starlab International GmbH reserves the right to request from the supplier that all relevant information be disclosed.

Furthermore, Starlab International GmbH reserves the right to stop any business with all suppliers who are in clear, verifiable violation of the Starlab International GmbH Code of Conduct for Supplier and/or who are neither seeking nor implementing measures for improving their sustainability performance. In the event that a supplier evidently fails to fulfill and of the principles and requirements set out in this Starlab International GmbH Code of Conduct for Supplier, or refuses to implement measures for improving his sustainability performance, Starlab International GmbH reserves the right to immediately terminate any or all contracts with the supplier for cause.

References

United Nations Global Compact www.unglobalcompact.org

Universal Declaration of Human Rights www.un.org/en

International Labour Standards (ILO) http://www.ilo.org/global/standards/lang--en/index.htm

OHSAS 18001 Occupational Health and Safety Assessment Series www.ohsas-18001-occupational-health-and-safety.com

International Organization for Standardization (ISO) www.iso.org

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