

Code of Conduct of astria GmbH

The astria GmbH specializes in the manufacturing and import of goods from Asia. Central elements of our corporate culture are compliance with applicable legal regulations, integrity, and sustainable actions. Our Code of Conduct reaffirms our ongoing commitment to lawful behavior, the promotion of fairness, respect for cultural diversity, the assumption of social responsibility, and the protection of the environment and the well-being of all individuals working in and along our supply chain.

Although the Supply Chain Due Diligence Act is not directly legally binding for us as a medium-sized company, we acknowledge the associated principles and obligations for ourselves as well.

We expect all business partners and suppliers to act with the same level of compliance, integrity, fairness, responsibility, honesty, and commitment to sustainability as we do.

The principles set out in this Code of Conduct for suppliers of astria GmbH (“Code”) are an essential component of supplier selection and evaluation. Our Code applies worldwide and is directed toward manufacturing suppliers, service providers, and other business partners (“Suppliers”). It is a binding component of all purchasing contracts of astria GmbH. We expect our suppliers to comply with all principles and requirements listed below and to pass them on to their subcontractors.

Compliance with laws, regulations, and standards

Suppliers of astria GmbH comply with all applicable national laws and regulations of the countries in which they operate and consider internationally recognized environmental, social, and governance standards (ESG standards) with the aim of continuously improving their sustainability performance.

Corruption, bribery, embezzlement, and fraud

We reject all forms of corruption, bribery of public officials or in business dealings, embezzlement of company funds, and theft of company or third-party property. Our suppliers must comply with all applicable anti-corruption laws, including those governing foreign bribery, such as the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act. We do not request, accept, promise, or grant bribes, kickbacks, or other unlawful advantages in connection with business opportunities or activities. Reasonable courtesies of low value are excluded; cash gifts are strictly prohibited.

Conflicts of interest

We make business decisions exclusively based on objective criteria and are not influenced by personal interests or relationships. Actual or potential conflicts of interest related to our work must be disclosed immediately.

Fair competition

We respect the principles of fair and free competition and comply with applicable competition and antitrust laws. We do not engage in anti-competitive agreements with competitors, suppliers, or customers, do not exchange competitively sensitive information, and reject any unlawful cartel-related contact. Abuse of a dominant market position does not occur.

Anti-money laundering and counter-terrorism financing / financial documentation

We ensure compliance with applicable regulations regarding the prevention of money laundering and terrorist financing. We maintain proper financial records, prepare reports in compliance with legal requirements, and have an established risk management system.

Export control and customs regulations

We ensure compliance with all import and export regulations for goods, services, and information. We meet the obligations from customs and foreign trade laws in all countries in which we operate and observe current sanctions and embargo lists.

Data protection

We comply with applicable data protection laws, particularly the requirements of the GDPR, to protect the personal data of employees, customers, business partners, and other affected individuals.

Business secrets and intellectual property

The protection of information, trade secrets, and intellectual property is a high priority. We protect our know-how, patents, intellectual property, and confidential information appropriately and safeguard trade and business secrets from unauthorized access by third parties.

We commit to treating all non-public technical and commercial information made available to us in the context of the business relationship confidentially, not to disclose it without authorization, and not to make it available to third parties.

Human rights / fair and safe working conditions

We respect internationally recognized human rights, particularly the Children's Rights Guidelines, the UN Guiding Principles on Business and Human Rights, and the labor standards of the International Labour Organization (ILO), which form the basis of all business relationships. We commit to respecting the rights of our employees and treating them in accordance with these guidelines.

Child labor

We reject prohibited child labor and observe legal minimum age requirements. If no national regulations exist, ILO Convention 138 applies. Accordingly, the employment of children under 15 is prohibited. Employees under 18 may only be employed in compliance with national labor laws and with consideration for education and training requirements. Their health and safety must not be endangered.

Slavery and forced labor

We do not tolerate slavery, servitude, or forced labor in any form within the supply chain. This also includes bonded labor, debt bondage, and involuntary prison labor. Work must always be voluntary. We do not withhold personal belongings, passports, wages, training certificates, work documents, or other records of employees without legal basis.

Freedom of association

We respect the right of employees to freely join or form trade unions or to refrain from doing so, in accordance with local laws, without discrimination, retaliation, or intimidation. We recognize the right to strike and collective bargaining within national legal frameworks.

Equal opportunities and prohibition of discrimination

We do not tolerate discrimination based on national or social origin, ethnicity, culture, religion, belief, political opinion, sexual orientation, union membership, age, gender, or disability.

Occupational health and safety

We ensure occupational safety and health protection at least in accordance with applicable laws. We are committed to taking appropriate measures to prevent workplace accidents, health risks, and occupational illnesses.

Workplace violence and harassment

We do not tolerate violence or harassment at the workplace, including threats, intimidation, physical assaults, and any form of harassment.

Fair compensation and working hours

We ensure adequate compensation that meets at least the statutory minimum wage requirements. Where no legal requirements exist, we follow industry and regional standards. Working hours do not exceed the legal limits and comply with industry norms. We record and monitor working hours to avoid unlawful excesses.

Environmental responsibility and environmental protection

We take responsibility for designing our business activities to be as environmentally friendly as possible. We comply with national and international environmental laws and regulations and apply sustainability principles to conserve resources and minimize environmental impacts. This includes proper waste disposal and handling of hazardous substances.

Product compliance and safety

We manufacture and import goods from Asia that must meet the highest quality standards. Therefore, we commit to complying with all applicable regulatory and internal standards related to product integrity, compliance, and safety. Our suppliers must develop and deliver products that represent the latest recognized state of the art.

Conflict minerals

For conflict minerals such as tin, tungsten, tantalum, gold, and other resources like cobalt, we establish processes according to OECD guidelines for minerals from conflict and high-risk areas. Smelters and refiners without audited due diligence processes should be avoided.

Supply chain due diligence

We operate effective risk management to identify and minimize human rights and environmental risks in our supply chains and to prevent, end, or mitigate violations. This includes grievance mechanisms and compliant reporting. We expect the same from our suppliers.

Supplier Obligations

The suppliers of astria GmbH confirm that they have, or will establish, appropriate processes and structures to comply with the requirements of this Code. They ensure that their employees are aware of and adhere to the principles, and they support them in acting lawfully and with integrity.

Compliance with this Code shall also be a decisive factor in the selection of subcontractors, particularly with regard to human rights and environmental expectations.

Control Mechanisms

Suppliers support astria GmbH in implementing statutory and voluntary due diligence obligations through active cooperation, such as responding to self-assessment questionnaires. This also includes conducting training on relevant laws and standards.

astria GmbH reserves the right to review compliance with legal and Code-related requirements at suppliers' sites, following prior notice and in accordance with applicable laws—if necessary, with the involvement of external experts and in the presence of supplier representatives.

Measures in the Event of Violations

Compliance with the principles of this Code is essential for us and for any contractual relationship. In the event of violations by our suppliers, we are entitled to request disclosure of all relevant information. In addition, we may—without prejudice to other contractual rights—terminate the business relationship in whole or in part with immediate effect, unless a concept for remedying and preventing future violations is promptly developed and implemented. During the implementation phase, we may temporarily suspend the business relationship. In cases of violations by upstream suppliers, we expect our suppliers to work towards alignment with this Code.

Reporting Channels and Whistleblower Protection

We encourage all individuals to report violations of this Code to the management of astria GmbH, in particular via e-mail to: office@astria-sourcing.com.

Whistleblowers may also report human rights or environmental risks or violations within the meaning of the Supply Chain Due Diligence Act that are caused or potentially caused by our own business operations or those of a (indirect) supplier.

We maintain a reporting system for employees and external parties that allows reports to be submitted digitally, anonymously or non-anonymously. No retaliatory measures are taken against individuals who submit reports. The identity of whistleblowers is treated with the highest possible confidentiality. Employees of astria GmbH are not subject to disciplinary measures for reporting violations, unless they were themselves involved in the misconduct. We comply with all requirements of the Whistleblower Protection Act.

Mutual Recognition

Both astria GmbH and its contracting partners have implemented their own Codes of Conduct as self-commitments. The parties mutually recognize these Codes as equivalent and waive any contractual subordination to the other party's Code. Any significant changes to the Codes will be communicated without delay.

Authoritative Language Version

The German version of this Code of Conduct constitutes the authentic and legally binding version. Translations are provided for convenience only. In the event of any discrepancies, differences in interpretation, or inconsistencies between the German version and any translation, the German original shall prevail.