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# CODE OF CONDUCT S&T MOLD SRL

## TABLE OF CONTENTS

FOREWORD	2
COMPLIANCE WITH THE LAW	2
ANTI-CORRUPTION AND ANTI-BRIBERY	2
FAIR COMPETITION	3
BUSINESS RELATIONSHIPS AND CONDUCT TOWARDS THIRD PARTIES	3
FINANCIAL AND OPERATIONAL RECORDS	3
ANTI-MONEY LAUNDERING	3
COMPLIANCE WITH IMPORT/EXPORT CONTROLS	3
ENVIROMENTAL RESPONSABILITY	4
OUR EMPLOYEES	4
MANAGEMENT, RESPONSIBILITY, AND SUPERVISION	4
HANDLING S&T PROPERTY	5
INFORMATION MANAGEMENT	5
DATA PROTECTION AND SECURITY	5
CONFLICTS OF INTEREST	6
GIFTS, INVITATIONS, AND EVENTS	6
INVITATIONS AND EVENTS	6
DONATIONS, SPONSORSHIP, AND ADVERTISING	7
IMPLEMENTATION AND SUPORT	7
VIOLATIONS AND MISCONDUCT	8
COMPLAINTS AND REPORTING	8

**PUBLIC**  
**FOREWORD**

The reputation of our company and the trust of our clients, investors, employees, and the public depend on the daily conduct of each individual working within **S&T MOLD SRL (S&T)**.

This **Code of Conduct** establishes the expected behavior of **S&T employees** toward their company, colleagues, clients, suppliers, and the public. It applies to all employees, including **associates and administrators of S&T**. This Code serves as a summary of mandatory guidelines.

While primarily an internal policy document, it also informs our business partners about the expected conduct from us and what we expect from them. This Code replaces any existing instructions on these matters.

### **COMPLIANCE WITH THE LAW**

All **S&T employees** must comply with the legal regulations of the jurisdictions in which we operate, as well as the internal policies of S&T. Every employee is obligated to **follow this Code** and act accordingly. Employees must uphold the law in their professional responsibilities and refrain from activities that could damage S&T's reputation.

### **ANTI-CORRUPTION AND ANTI-BRIBERY**

S&T competes globally for contracts awarded by public sector entities and state-owned enterprises. A key priority for S&T is strict compliance with all applicable laws and regulations regarding public procurement, including those prohibiting improper attempts to influence government officials.

Corruption harms both the company's operations and the reputation of its employees. At S&T, we compete fairly for contracts. Our competitive advantages are the **quality, pricing, and innovation** of our products and services. We do not compete by offering improper benefits to others. Under no circumstances is it permitted to make payments to gain an **unearned** advantage in a commercial transaction.

Corruption is not a minor offense—it is an illegal activity. Such actions expose both individuals and the company to the **risk of prosecution**. Employees are strictly required to **refrain from any form of corrupt behavior**, whether direct or indirect. This applies especially to attempts to influence decision-makers in **business partnerships or the public sector** by offering, promising, or granting prohibited benefits, or by authorizing, directing, approving, or tolerating such behavior by others. This restriction also includes limiting the offering of **payments, gifts, or any other benefits** to public officials.

This prohibition extends to providing **inappropriate advantages** when initiating business relationships with private or public entities. Promises, offers, invitations, and gifts must be avoided in cases where they could be perceived as an attempt to improperly influence a **public official or business partner**.

S&T employees are also **strictly prohibited** from requesting or accepting such advantages while conducting business with third parties. This also includes **receiving personal discounts** from S&T business partners or competitors that are granted individually and solely because the employee is affiliated with S&T—especially in cases where these discounts are **not available to all** or a **large group** of S&T employees.

Furthermore, our company holds **ISO 37001:2016 certification** for **anti-bribery management systems**, demonstrating our commitment to upholding the **highest international standards** in

**PUBLIC**

mitigating bribery and corruption risks. This certification highlights our dedication to maintaining a **transparent, ethical, and legally compliant** business environment. By implementing **global best practices**, we ensure that all our **processes and activities** are conducted with **integrity and accountability**.

### **FAIR COMPETITION**

S&T is committed to fair conduct towards competitors and to supporting free and undistorted competition. Achieving this objective requires every employee to comply with and uphold the principles of fair competition.

### **BUSINESS RELATIONSHIPS AND CONDUCT TOWARDS THIRD PARTIES**

S&T strives to maintain **partnership-based relationships** with its **clients, suppliers, and other business partners**. S&T treats all business partners **fairly and respectfully** and competes for clients based on the **quality and advantages** of its products and services.

S&T's **expectations for its suppliers** include **sharing the company's values** and complying with all **applicable laws and regulations**. Additionally, S&T expects its suppliers to **act in accordance with the principles** outlined in the **Supplier Code of Conduct**, comply with all **legal requirements**, and **encourage their own suppliers** to adhere to the same standards.

### **FINANCIAL AND OPERATIONAL RECORDS**

All employees are required to ensure the accuracy, truthfulness, and completeness of financial and operational records. All entries must describe each transaction or expense in an objective and truthful manner. Their recording and maintenance must be prompt. They must be kept up to date and comply with applicable accounting norms and standards. The records must include all data, certifications, and other written materials necessary for financial reporting and disclosure, as well as materials collected for other purposes.

### **ANTI-MONEY LAUNDERING**

"Money laundering" is the process of disguising the nature and source of funds derived from illicit activities such as terrorism, drug trafficking, or bribery—followed by introducing these "dirty money" funds into financial and business flows. Such laundering is carried out to give the money a legal appearance and to conceal its source or the identity of its owner.

S&T is committed to conducting business with "honorable" clients—a term that defines parties engaged in legal commercial activities, whose funds come exclusively from legal sources, and whose operations comply with anti-money laundering and counter-terrorism financing regulations.

All S&T employees are required to comply with all record-keeping and accounting requirements when carrying out cash-based and other types of transactions. They are also obligated to adhere to contractual provisions.

### **COMPLIANCE WITH IMPORT/EXPORT CONTROLS**

S&T complies with all applicable export controls and customs laws and regulations. All employees whose work is related to imports and exports are required to adhere to all applicable laws and provisions.

**PUBLIC**

**ENVIRONMENTAL RESPONSIBILITY**

S&T is committed to protecting the environment and promoting sustainable development by adopting eco-friendly principles in all aspects of its activities. We are dedicated to complying with all applicable legal regulations and promoting proactive measures to minimize our environmental impact. We believe that technological development should not come at the expense of the environment; on the contrary, it can support the transition to a greener and more responsible future.

In this regard, we are committed to implementing clear and effective measures to ensure a continuous reduction of our environmental impact. Our environmental policy reflects our dedication to protecting natural resources, preventing pollution, and fostering a sustainable work environment. Additionally, our company holds ISO 14001:2015 certification for environmental management systems, demonstrating our commitment to meeting the highest international environmental protection standards.

**OUR EMPLOYEES**

S&T is committed to ensuring a work environment that promotes equal opportunities and eliminates all forms of illegal discrimination based on race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age, or sexual orientation. This policy aims to eliminate unfair and discriminatory practices within the company and encourage the full contribution of a diverse community. The company is actively committed to combating any form of discrimination.

S&T also strives to provide fair and accessible services to all clients and partners without discrimination. All employees and collaborators must be treated with respect and dignity. Therefore, we adhere to a "zero tolerance" policy regarding discrimination and actively promote diversity in all its forms—not only gender diversity but also diversity in nationality, social background, education, professional experience, generational differences, and disabilities. These principles apply both internally and externally, extending to our relationships with partners.

S&T's policy is to recruit personnel with the highest level of motivation and skills. To maintain and enhance these qualities, S&T invests in the development of its employees' expertise.

**MANAGEMENT, RESPONSIBILITY, AND SUPERVISION**

S&T's culture of business integrity and adherence to rules is driven by top management. Each member of the top management team is required to fulfill their organizational and supervisory duties in an exemplary manner. All leaders are responsible for the behavior of the employees under their supervision. This means, among other things, that every manager must emphasize the importance of ethical conduct and compliance, maintain them as regular topics in daily operations, and encourage them through personal leadership and training. It is important to note that the fulfillment of these responsibilities by the manager does not exempt other employees from this requirement.

**PUBLIC**

## **HANDLING S&T PROPERTY**

Employees are required to treat S&T's property and resources with the utmost care. Unless special approval has been obtained, corporate machinery and equipment must be used exclusively for business purposes—not for personal use.

## **INFORMATION MANAGEMENT**

Employees are required to maintain the confidentiality of non-public information and ensure its availability is restricted from third parties. Additionally, the confidentiality of operational information and trade secrets must be protected in accordance with the provisions of ISO 9001:2015 implemented. This information includes non-public data from or about suppliers, clients, employees, agents, consumers, and other third parties. It also includes information regarding elements in which S&T's contractual partners hold confidential interests. "Third parties" are defined as family members, friends, and acquaintances. The obligation to maintain confidentiality remains in effect even after the termination of the business relationship. Within S&T, confidential information will only be shared with employees whose job responsibilities require access to such information.

All information related to stock quotes is strictly confidential. The misuse of insider information is prohibited. Such misuse is a criminal offense. All legal requirements and compliance regulations must be observed when handling privileged information. The obligation to maintain confidentiality continues without limitation after the termination of the employment relationship.

## **DATA PROTECTION AND SECURITY**

Personal data provided to S&T by clients, employees, buyers, and suppliers is strictly confidential. Employees are prohibited, without prior approval from their superior, from making records, files, video or audio recordings, or reproductions of these in cases where such actions are not directly related to S&T's activities. Personal data may only be collected, processed, or used in cases where this is necessary for explicit and legal purposes.

Additionally, personal data must be kept secure, and appropriate precautions must be taken when transmitting it. Compliance with measures to ensure the security of information is considered especially important. Any use of personal data must be transparent to the individual concerned, guaranteeing their right to information, as well as their right to correct and, where applicable, to challenge, block, or delete this information. Personal data must be protected securely and transmitted only where the necessary precautionary measures have been applied. These data must be protected by all appropriate technical and organizational means available to the company to prevent unauthorized access, misuse, or unlawful or improper loss.

Each use of personal data must be carried out transparently for the individual involved. The individual's right to be properly informed about their data, to correct it, to object to its processing, or to limit, block, or delete it, must be guaranteed. Their right to data portability must also be ensured. S&T collects and processes personal data only after obtaining the consent of the individual involved. This allows for compliance with legal and/or contractual obligations. Such processes are followed in cases of legitimate interest, as far as permitted by laws and regulations. S&T collects, processes, and uses personal data only to the extent necessary. Each such case arises from the specific purpose. S&T respects the full rights of each individual whose data is collected, processed, or otherwise used.

PUBLIC

## CONFLICTS OF INTEREST

All employees are required to behave in a way that contributes to avoiding conflicts of interest that may affect S&T. Therefore, all employees must maintain a clear distinction between the interests of S&T and their own personal interests. An employee is not allowed to work for a company competing with S&T without prior notification.

It is prohibited to apply for any additional job that conflicts with the interests of S&T, especially for reasons of competition. Any remunerated additional job must be declared (in the KEY form) and may be prohibited if it interferes with the employee's duties within S&T.

## GIFTS, INVITATIONS, AND EVENTS

Gift-giving between business partners—provided it is done in an appropriate context—is an integral part of business practices. "Gifts" should be interpreted as physical items, as well as a variety of benefits or advantages. These include the promise of a discount, invitations, offers of paid presentations, and similar items. It does not matter whether these gifts are offered directly or indirectly to a business partner—through and to their family members or acquaintances. A gift is considered excessive if, when evaluated objectively, it could compromise the recipient's ability to make an objective decision. All forms of gratuities that could compromise the recipient's ability to make an objective decision or could affect the company's reputation are prohibited. Occasional acceptance of low-value gifts by employees is permitted, provided they comply with the above provisions.

The value of gifts cannot exceed 100 EUR per business partner (= company/individual). A gift exceeding this value must be politely declined, citing this Code. Offering financial gifts and other items to public officials is prohibited.

Each employee must clarify any uncertainties regarding gift evaluations, maximum limits, and their appropriateness with their superior. The decision, made jointly, should be documented. Each gift received will be reported and documented in the **Gift Registry**, according to the anti-bribery management system implemented within the company (ISO 37001:2016).

## INVITATIONS AND EVENTS

Business meal invitations are permitted, provided that their value does not exceed 100 EUR per business partner (= company / individual). Please consult your supervisor and the Compliance Officer in case of uncertainty regarding meal evaluation, maximum limits, and their appropriateness. The jointly adopted decision must be documented.

Participation in events or accepting invitations to such events is allowed, provided they have a well-defined business purpose (such as professional training or corporate/product presentations). This includes an appropriate level of hospitality. S&T generally covers travel and accommodation costs, provided they are clearly of a commercial nature.

Accepting business partners' invitations to events that lack a clear business purpose or have no business focus requires approval from the employee's supervisor and must be documented.

**PUBLIC**

## **DONATIONS, SPONSORSHIP, AND ADVERTISING**

All donations, sponsorships, and advertising activities carried out by S&T must be transparent, legal, and in line with the organization's ethical values. These activities must not create conflicts of interest or influence the company's business decisions.

S&T donates funds and provides other forms of support to projects in the fields of education, science, art, culture, athletics, and social affairs. Donations that could be perceived as attempts to influence the behavior or decisions of public authorities, clients, or other stakeholders are strictly prohibited.

Sponsorships will only be granted for events or initiatives that promote positive values and align with the company's mission and objectives. All sponsorships must be properly documented and transparent regarding the benefits to the company.

Advertising campaigns will be conducted responsibly, without misleading the public or creating false impressions about the company's products and services. Advertising must comply with all legal regulations and be assessed to ensure that there are no conflicts of interest or undue advantages.

Monetary or in-kind donations to individuals, private bank accounts, political parties, or organizations closely affiliated with them are not permitted if they could harm S&T's reputation. All donations, sponsorships, and advertising activities must be monitored and periodically reported to ensure compliance with this code. Any suspicious or non-compliant activity will be investigated and addressed in accordance with the company's internal policies.

## **IMPLEMENTATION AND SUPPORT**

The implementation of this Code of Conduct is a fundamental responsibility of S&T's managers. They are responsible for ensuring that all directives, principles, and behaviors outlined in the code are correctly implemented and consistently applied in the organization's daily activities.

The implementation process involves several detailed steps, engaging both leadership and their teams to ensure that the entire workforce adheres to the company's ethical standards.

### **1. Managerial Responsibility:**

- ✓ Each manager is responsible for fully understanding the Code of Conduct and ensuring that it is communicated and followed by all team members.
- ✓ Managers must organize training sessions to explain the code's objectives and requirements, ensuring employees clearly understand expected behaviors.
- ✓ Within their teams, managers should promote a culture of responsibility and transparency, encouraging ethical behavior aligned with established standards.
- ✓ They will monitor the code's implementation and provide continuous support to employees, addressing questions and clarifying any concerns regarding its application.

### **2. Collaboration with Team Members:**

**PUBLIC**

- ✓ Managerii trebuie să colaboreze îndeaproape cu fiecare membru al echipelor lor pentru a evalua nivelul de înțelegere și aplicare a principiilor stabilite în Codul de Conduită.
- ✓ Această colaborare include sesiuni de feedback, discuții periodice și instruire suplimentare, dacă este necesar, pentru a clarifica orice aspecte ce ar putea genera confuzie sau interpretări greșite.
- ✓ Managerii trebuie să încurajeze un mediu în care angajații se simt confortabil să adreseze problemele etice și să raporteze orice comportamente care contravin codului, garantând confidențialitatea și protecția acestora.

**3. Ongoing Support and Evaluation:**

- ✓ Throughout the implementation process, managers must provide continuous support through additional resources and ongoing training to maintain proper application of ethical principles.
- ✓ Periodic performance evaluations related to Code of Conduct compliance will be conducted to identify any gaps and adjust implementation measures as necessary.
- ✓ Regular feedback sessions will be organized at both individual and team levels to assess the effectiveness of the application code and identify improvement opportunities.

**4. Corrective Measures and Continuous Improvement:**

- ✓ If irregularities or violations of the Code of Conduct are identified, managers will take corrective actions, which may include additional training, adjustments to internal processes, or disciplinary measures, as appropriate.
- ✓ Additionally, managers will contribute to the continuous improvement process by providing recommendations for updating the code and adapting it to organizational or legislative changes.

**VIOLATIONS AND MISCONDUCT**

Violations of professional conduct standards and other forms of professional misconduct have serious consequences for both the employee and S&T. Improper conduct is not tolerated. S&T managers will serve as role models in this regard.

S&T consistently penalizes every case of intentional and unlawful misconduct, as well as violations of internal guidelines. These penalties are applied uniformly, regardless of the employee's rank or position within the corporation.

**COMPLAINTS AND REPORTING**

All employees have the right to report compliance violations, whether confirmed or suspected. Reports can be made through the following channels:

- S&T Compliance Officer
- A senior manager or the employee's direct supervisor
- A member of the Legal Department
- A member of the Human Resources Department
- A member of the S&T Audit Department



**PUBLIC**

- Another option is to submit reports via email at [compliance@snt.md](mailto:compliance@snt.md).

All complaints can be filed confidentially and anonymously at any time. S&T places great importance on ensuring that employees feel safe reporting compliance violations or suspicions without fear of legal, professional, or personal repercussions. All reports will be reviewed, and corrective actions will be taken when necessary.

All documents will be kept confidential to the extent permitted by law. No retaliation against whistleblowers will be tolerated.