Starline Computer GmbH

Code of Conduct

For employees, partners, and suppliers.

Version 1.0 | Kirchheim unter Teck;LH
1.8.2026

The Starline Computer GmbH stands for reliable IT infrastructure — and for the values upon which this reliability is built. Our Code of Conduct summarizes what we stand for and what we expect from everyone who works with us.

Compliance & Integrity
We always act in accordance with applicable laws. Corruption, bribery, and conflicts of interest are not tolerated in any form. Business decisions are made objectively, transparently, and fairly.

Respect & Fair Working Conditions
Every person working for or with Starline is treated with dignity and respect. We unequivocally reject forced labor, child labor, and any form of discrimination — both within our own operations and throughout our entire supply chain.

Environment & Sustainability
We act in an environmentally responsible manner: through energy-efficient products, compliant disposal, reduction of packaging and waste, and preferential collaboration with environmentally conscious partners.

Data Protection & Information Security
We consistently protect personal data in compliance with the GDPR. Confidential information — from customers, partners, and internally — is handled with the utmost care. For us as an IT infrastructure provider, IT security is not an option but a requirement.

Fair Competition & Clean Supply Chain
We commit to fair competition without collusion. We procure responsibly, reject conflict minerals, and expect our suppliers to uphold the same ethical standards that we follow.

Quality & Product Integrity
We supply only original, certified products. Counterfeits and pirated copies are strictly prohibited. Quality defects are communicated openly and resolved promptly.

Whistleblower Protection & Open Error Culture
Those who report violations are protected. Starline provides secure reporting channels and fully supports the Whistleblower Protection Act (HinSchG).

This Code of Conduct is binding for all employees, suppliers, partners, and service providers of Starline Computer GmbH. The full version is an integral part of all business relationships.

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Introduction

Starline Computer GmbH, headquartered in Kirchheim unter Teck, is a leading provider of IT infrastructure solutions. Our portfolio includes servers, storage systems, networking solutions, and customized IT infrastructure for companies of all sizes. Quality, reliability, and technical excellence form the foundation of our business model — and the standards by which we measure ourselves daily.

These principles do not end at our company's borders. They extend to all partners, suppliers, and service providers who are part of our value chain. The quality of our products and the integrity of our company depend directly on with whom and under what conditions we collaborate.

With this Supplier Code of Conduct, we clearly define the standards we expect from our suppliers, manufacturers, logistics providers, and other business partners. It is based on internationally recognized principles — including the Universal Declaration of Human Rights by the United Nations, the ILO Core Labor Standards, the OECD Guidelines for Multinational Enterprises, and the UN Global Compact Principles.

This Code of Conduct is a binding part of every business relationship with Starline Computer GmbH.

We expect you, as a supplier, to communicate this Code within your organization, ensure compliance, and pass on comparable requirements to your own suppliers. We view this as a shared responsibility — and as the foundation for a long-term, trust-based partnership.

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1. Compliance and Ethical Conduct

1.1 Compliance with Legal Requirements

You are required to comply with all applicable national and international laws, regulations, and regulatory requirements relevant to your business activities. This includes, in particular, trade, tax, labor, social, environmental, and competition law, as well as all industry-specific regulations.

Where local legal requirements fall short of the standards defined in this Code, we expect you to adhere to the higher standards set forth in this Code. Where local laws are stricter than this Code, such laws take precedence.

1.2 Corruption and Bribery

You tolerate no form of corruption, bribery, or improper influence — neither towards Starline nor towards third parties. It is prohibited to directly or indirectly offer, grant, or promise advantages to employees of Starline Computer GmbH in order to influence business decisions.

Permitted are industry-standard, transparent, and low-value gifts such as occasional meals or promotional items of symbolic value, provided they do not imply a quid pro quo and stay within legal limits. In case of doubt: refrain from giving the gift.

You maintain internal policies and control mechanisms for corruption prevention and ensure that these are known and effective within your organization.

1.3 Conflicts of Interest

You avoid situations where the private or business interests of your employees could conflict with the interests of Starline. Existing or potential conflicts of interest are disclosed immediately.

1.4 Money Laundering and Terrorism Financing

You ensure that no transactions within your business relationship with Starline are used to conceal proceeds from illegal activities or to finance terrorism. Suspicious transactions are reported immediately to the competent authorities.

1.5 Competition Law

You comply with all applicable competition and antitrust laws. Price-fixing, market allocation, bid-rigging, or the exchange of competitively sensitive information with competitors is strictly prohibited—even in informal settings such as trade fairs or industry events.

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2. Labor Rights and Decent Working Conditions

Starline is committed to the Core Labor Standards of the International Labour Organization (ILO) and expects its suppliers to uphold the same stance. The following principles are binding for all employees in your operation and – to the extent known – within your own supply chain.

2.1 Prohibition of Forced and Compulsory Labor

You do not employ any persons against their will. All forms of forced labor, debt bondage, human trafficking, or modern slavery are strictly prohibited. All employees are free to terminate their employment relationship at any time, subject to reasonable notice periods, without fear of financial or personal consequences. Passports, identity documents, or other personal records of employees shall neither be withheld nor confiscated.

2.2 Prohibition of Child Labor

You do not employ children or young persons below the minimum legal age. This is at least 15 years in accordance with ILO Convention No. 138. For hazardous or health-damaging activities, the minimum age is 18 years. Young employees of legal working age are afforded special protection: their work must not endanger their health or impair their school or vocational training.

2.3 Non-Discrimination and Equal Treatment

You treat all employees with dignity and respect. Discrimination based on gender, age, origin, nationality, ethnicity, religion, belief, sexual orientation, disability, or any other personal characteristic is not permitted at any stage of the employment relationship – from hiring and compensation to promotion and termination. Harassment, intimidation, and abuse of any kind are not tolerated.

2.4 Freedom of Association and Collective Bargaining

You respect your employees' right to organize into trade unions, join professional associations, and engage in collective bargaining. The exercise of these rights shall not be hindered, sanctioned, or otherwise restricted. Where legal restrictions on freedom of association exist, you shall enable your employees to form alternative forms of representation.

2.5 Compensation and Working Hours

You pay all employees wages that meet at least the legal minimum wage requirements of the respective country and adequately cover their basic needs. Wages are paid promptly, in full, and transparently. Unlawful deductions – such as for work materials, accommodation, or protective clothing – are prohibited.

Working hours must comply with applicable legal regulations. Overtime must be voluntary, adequately compensated, and must not exceed the maximum limits permitted by law. All employees receive their entitled rest periods, break regulations, and leave entitlements.

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3. Health and Safety

3.1 Safe Working Conditions

You ensure that all workplaces – including production sites, warehouses, offices, and other facilities – comply with applicable legal requirements for occupational safety and health. Potential hazards are systematically identified, assessed, and reduced to a minimum through appropriate technical, organizational, or personnel-related measures.

This encludes in particular:

- the provision and maintenance of suitable personal protective equipment,
- the regular instruction and training of all employees on safety topics,
- ensuring functional emergency, evacuation, and first-aid facilities,
- the regular inspection and maintenance of machines, plants, and facilities,
- the safe storage and handling of hazardous substances and materials.

3.2 Incident Reporting and Continuous Improvement

You systematically record work accidents, near-misses, and occupational diseases, analyze their causes, and derive appropriate corrective measures. An open safety culture, where employees can report hazards and incidents without negative consequences, is actively promoted.

3.3 Mental Health and Well-being

In addition to physical safety, you take the mental health of your employees seriously. Stressors such as excessive work pressure, bullying, or a hostile work environment are actively countered. Employees have access to suitable support services.

3.4 Accommodation

Where you provide accommodation for your employees, it must meet basic requirements regarding cleanliness, safety, and privacy. The use of this accommodation is voluntary and must not be used as a means of pressure.

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4. Environmental Protection and Sustainability

4.1 Principle

Starline is aware of its ecological responsibility and expects equivalent commitment from its suppliers. You operate your business in compliance with all applicable environmental laws, regulations, and permits, and beyond that, you strive for continuous improvement of your environmental performance.

4.2 Compliance with Environmental Regulations

You fully comply with all environmental laws and regulations relevant to your activities. In the context of the IT hardware supply chain, the following regulations are particularly relevant:

- **RoHS-Directive (2011/65/EU):** Restriction of Hazardous Substances in Electrical and Electronic Equipment. You confirm RoHS compliance for all products supplied to Starline and provide corresponding declarations of conformity.
- **REACH-Regulation (EC 1907/2006):** You proactively inform Starline about the presence of Substances of Very High Concern (SVHC) in supplied products, if their concentration exceeds the threshold of 0.1% by weight.
- **ElektroG / WEEE-Directive:** Electrical and electronic waste equipment is only taken back via authorized and certified disposal routes and directed to recycling.
- **Packaging Act (VerpackG):** Packaging is registered and licensed with authorized dual systems. Over-packaging is actively avoided.

4.3 Resource Efficiency and Emission Reduction

You implement measures that continuously reduce the consumption of natural resources – energy, water, raw materials – in your operational processes. Waste is avoided wherever possible, reused, or properly recycled. Air emissions, wastewater, and other environmental impacts of your operations are monitored, documented, and limited to the minimum legally permitted.

We welcome and prefer suppliers who actively pursue climate protection goals, track and reduce greenhouse gas emissions, and report transparently on their environmental performance – for example, as part of ISO 14001 certifications or recognized sustainability frameworks.

4.4 Chemical Management

Handling of hazardous substances, chemicals, and other environmentally relevant substances is carried out in accordance with applicable legal requirements. Corresponding safety data sheets are available, up-to-date, and accessible to all relevant employees for all relevant substances.

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5. Data Protection and Information Security

5.1 Protection of Personal Data

Where you process personal data in the context of your business relationship with Starline – whether from Starline Computer GmbH employees, customers, or other third parties – this shall be done exclusively on the basis of applicable data protection laws, in particular the General Data Protection Regulation (GDPR) and supplementary national data protection regulations.

You ensure that personal data:

- is processed only for the agreed and legally permissible purpose,
- is not passed on to third parties without explicit consent,
- is protected against unauthorized access, loss, or misuse through appropriate technical and organizational measures,
- is completely and demonstrably deleted or returned upon termination of the business relationship or upon request from Starline.

Data protection breaches affecting data from Starline or Starline customers must be reported to Starline immediately – at the latest within 24 hours of becoming aware of them.

5.2 Confidentiality of Business Information

All information that comes to your knowledge in the context of your business relationship with Starline and that is not publicly accessible shall be treated strictly confidentially. This applies in particular to:

- technical specifications, product configurations, and project documentation,
- pricing and terms information,
- customer data and project references,
- strategic information and planning documents.

This obligation of confidentiality extends beyond the duration of the business relationship. Confidential information must not be used for your own purposes or disclosed to third parties unless Starline has explicitly consented in writing.

5.3 Information Security

You maintain appropriate information security measures that reflect the current state of the art and ensure that Starline data and shared systems are protected against unauthorized access, manipulation, loss, or destruction. For systems or services operated on behalf of Starline or with access to Starline infrastructure, the agreed security requirements shall constitute the binding minimum standard.

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6. Fair Business Practices

6.1 Prohibition of Unfair Business Practices

You conduct your business activities with integrity and in accordance with the principles of fair, transparent competition. Unfair business practices of any kind – towards Starline, towards joint customers, or towards third parties – are prohibited.

6.2 Transparent Accounting and Billing

All business transactions within the framework of your relationship with Starline are documented completely, correctly, and traceably. Invoices must be content-accurate, complete, and include all legally required details. Fictitious invoices, contentally incorrect documents, or concealed payments are not permitted.

You maintain an internal control system that ensures the accuracy of your accounting and financial reporting.

6.3 Anti-Money Laundering and Sanctions

You ensure that all payment flows within your business relationship with Starline are legal, traceable, and free from connections to criminal activities. You screen your own business partners and sub-suppliers for entries in international sanctions lists and ensure that no transactions take place with sanctioned persons, organizations, or countries.

6.4 Protection of Intellectual Property

You respect the intellectual property of Starline Computer GmbH as well as that of third parties. Trademarks, patents, copyrights, designs, and other protected assets are not used, reproduced, or disclosed without explicit permission. This applies in particular to

product names, technical documentation, configuration and design documents that become accessible to you in the context of your collaboration with Starline.

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7. Supply Chain, Human Rights, and Conflict Minerals

7.1 Due Diligence in the Supply Chain

Starline expects you not only to adhere to the standards defined in this Code in your own operations but also to actively ensure that your direct suppliers and significant sub-suppliers apply comparable principles. This reflects shared responsibility in a global supply chain.

You maintain suitable processes for the identification, assessment, and management of human rights and environmental risks in your own supply chain – in accordance with the requirements of the German Supply Chain Due Diligence Act (LkSG) and the EU Supply Chain Directive (CSDDD).

Upon Starline's request, you must disclose:

- which significant production sites and sub-suppliers are involved in the manufacture of products intended for Starline,
- what measures you take to ensure compliance with human rights and environmental standards in your supply chain,
- whether and which violations in your supply chain are known and how they are addressed.

7.2 Conflict Minerals

Certain minerals used in IT hardware – in particular Tantalum, Tin, Tungsten, and Gold (3TG) – may originate from conflict zones and contribute to the financing of armed groups as well as human rights violations. Starline refuses to knowingly procure products that contain such minerals from uncontrolled conflict areas.

You are obligated to:

- now and document the origin of 3TG minerals in products supplied to Starline,
- participate in recognized industry initiatives for traceability (e.g., Responsible Minerals Initiative / RMAP) or demonstrate comparable due diligence processes,
- provide standardized declarations on the origin of conflict minerals upon request, in particular the Conflict Minerals Reporting Template (CMRT).

The requirements of the EU Conflict Minerals Regulation (EU 2017/821) and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas must be complied with.

7.3 Deforestation and Land Use

Where your products or production processes involve agricultural raw materials or wood products, you must ensure that these are not linked to illegal deforestation, land grabbing, or the violation of land use rights of local communities – in accordance with the requirements of the EU Deforestation Regulation (EUDR).

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8. Product Quality, Product Integrity, and Export Control

8.1 Quality and Specification Compliance

You supply exclusively products and services that meet the agreed specifications, applicable standards, and the legitimate quality expectations of Starline Computer GmbH. Quality assurance processes are established in your operations and are continuously reviewed for their effectiveness.

Deviations from agreed specifications, known or suspected defects, and safety-related product issues are communicated to Starline immediately and proactively – even if the affected goods have already been delivered. Recalls and corrective measures are initiated without delay.

8.2 Prohibition of Counterfeits and Non-Original Products

You supply exclusively original products and components authorized by the respective manufacturers. Placing counterfeit products, imitations, replicas, refurbished components without appropriate labeling, or other non-original goods on the market is strictly prohibited.

You guarantee the authenticity and originality of every component supplied. Upon request, you provide manufacturer certificates, test reports, delivery notes from original manufacturers, or other suitable proof of origin. If it is subsequently determined that supplied goods are not original, you bear all resulting damages, costs, and follow-up expenses in full.

This applies particularly to safety-critical components such as server CPUs, ECC memory modules, network cards, power supplies, and storage media, where non-original parts can lead to system failures, data loss, or security risks for the end customer.

8.3 Export Control and Trade Restrictions

IT hardware, particularly servers, network components, and encryption technologies, may be subject to export restrictions. You classify your products correctly according to applicable export control regulations and provide Starline with all required export control information in a complete, truthful, and timely manner. This includes in particular:

- the correct designation of export control classification numbers (ECCN, EU Dual-Use List numbers,

- country of origin information for preference and origin purposes,
- indications of applicable embargoes, sanctions, or licensing requirements.

You ensure that your products are not delivered to countries or recipients subject to international sanctions without the necessary approvals. Violations of export control regulations must be reported to Starline immediately.

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9. Implementation, Monitoring, and Consequences

9.1 Embedding in Your Organization

You ensure that this Code of Conduct is known and actively practiced within your organization. This includes in particular:

- Demonstrable communication of the requirements of this Code to all relevant employees, especially in procurement, production, logistics, and sales,
- Transferring comparable requirements to your own direct suppliers and key subcontractors,
- Establishing internal processes that ensure and document long-term compliance with the requirements of this Code,
- Designating a responsible person or function in your organization tasked with implementing and monitoring this Code.

9.2 Self-Disclosure and Obligation to Provide Proof

Upon request by Starline Computer GmbH, you are required to confirm in writing within a reasonable timeframe that you comply with the requirements of this Code, and to substantiate this statement with appropriate evidence. Such evidence may include:

- Completed self-assessment questionnaires,
- Certificates and audit reports from third parties (e.g., ISO 9001, ISO 14001, SA8000, IATF 16949),
- Sustainability or CSR reports,
- Internal policies and standard operating procedures,
- Other relevant documentation.

9.3 Improvement Plans and Consequences

If Starline determines during a review or through other means that you do not fully comply with the requirements of this Code, Starline will first seek a dialogue with you. For minor violations, you will be given the opportunity to submit and implement a concrete improvement plan within an agreed timeframe.

In cases of serious, repeated, or intentional violations—particularly breaches of the prohibition on child labor, forced labor, corruption, fraud, or significant data privacy violations - Starline reserves the right to:

- Suspend the business relationship with immediate effect,
- Terminate existing contracts for cause,
- Pursue claims for damages,
- Notify the competent authorities or file criminal charges.

9.4 Ongoing Partnership

This Code is not a tool for one-sided control, but rather the foundation of a fair and sustainable partnership. Starline supports its suppliers in implementing the requirements of this Code – through information, dialogue, and, where appropriate, joint measures for improvement.

We are convinced: suppliers who share the values of this Code are the partners with whom we want to collaborate long-term and successfully.

Closing Remarks

Trust is the foundation of every successful business relationship. Starline Computer GmbH builds this trust on reliability, quality, and integrity – and expects the same from every partner and supplier that is part of our value chain.

We thank you for your commitment to the principles of this Code of Conduct and look forward to a collaborative, trustworthy, and sustainable partnership.

Starline Computer GmbH
Kirchheim unter Teck