



Building
Trust Together

Code of Conduct

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Note: As used in this Code of Conduct, "ST" or the "Company" refers to STMicroelectronics N.V. and its majority-owned affiliates.



Jean-Marc Chery

President and Chief Executive Officer

Ethics and integrity are core to our decision-making process, every day, everywhere, and protect our long-term success.



Message from our President & CEO

At ST, we are creators and makers of semiconductor technologies serving customers with innovations that make a positive impact on people's lives, paving the way to a more sustainable world.

This refreshed version of our Code of Conduct reflects our commitment to a strong ethical culture, which defines who we are as a Company, where integrity, respect and accountability are at the core of our decision-making process.

Our Code of Conduct is more than a set of rules and principles; it reflects our shared values that guide our behavior and actions every day. It reaffirms the values that define who we are and how we work together:

- **Integrity** – we conduct our business with the highest ethical standards, honor our commitments, deliver on our promises, are loyal and fair, and stand up for what is right.
- **People** – we behave with openness, trust and simplicity; we are ready to share our knowledge, encourage everyone's contribution, develop our people through empowerment, teamwork and training; each one of us is committed and personally involved in the continuous improvement process.
- **Excellence** – we strive for quality and customer satisfaction and create value for all our partners; we are flexible, encourage innovation, develop our competences, seek responsibility and are accountable for our actions; we act with discipline, base our decisions on facts and focus on the priorities.

Each and every one of us has a responsibility to live up to these commitments. Doing the right thing is not always the easiest path, but it is always the right one. By holding ourselves and each other accountable for the highest ethical standards, wherever we operate, we strengthen our Company, protect our culture and our people, and foster trust from all our stakeholders (including our customers, employees, suppliers, business partners, shareholders, and authorities).

Please read carefully this Code of Conduct, use it as a guide, seek advice when in doubt, and never be afraid to speak up if you see something that does not align with our values.

By placing integrity, respect, and accountability at the core of our decision-making process, we support our ambitions, build sustainable success, and create long-term value for all our stakeholders.

I count on each of you to contribute to ST's success, by promoting and upholding the principles described in our Code of Conduct. Thank you for your commitment.

Foreword from our Chief Ethics & Compliance Officer

Upholding a strong ethical culture is vital to any organization and essential to our Company's success. It builds trust with all our stakeholders, protects our reputation and our people, supports sustainable growth, and creates long-term value for everyone connected to our business.

Trust is the foundation of lasting success. It fosters teamwork, collaboration and innovation, empowering each of us to perform at our best while ensuring a safe and ethical workplace for all. This trust is earned only when we consistently act with integrity and uphold the values and principles set out in this Code of Conduct.

I encourage you to read our Code of Conduct carefully, talk about it openly with your colleagues, and refer to it regularly. Remember, *how* we achieve our goals is just as important as the results themselves. Our Code of Conduct provides a framework to guide us throughout our professional journey at ST, defining who we are as a Company and setting clear expectations for how we treat each other and do business ethically, no matter where we operate. Each of us share the responsibility to live by these principles and values, even when nobody is watching.

While this Code of Conduct (along with our policies and procedures) cannot address every possible situation you might encounter, it embeds the shared values and ethical principles to guide you in your day-to-day activities and secure an ethical decision-making process. And if you ever feel uncertain about the right course of action, please reach out and seek advice before acting.

As ST's Chief Ethics & Compliance Officer, I am committed to ensuring you have guidance and resources readily accessible and, if something does not seem right, a safe channel to raise concerns openly without fear of retaliation. Our leadership team stands firmly behind this commitment.

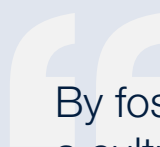
We all play a crucial role in fostering an environment where people feel respected, safe and empowered to do the right thing.

This Code of Conduct is mandatory for all ST's employees (whether part-time, contractors, temporary, interns, remote workers, or full-time) regardless of role, function or seniority as well as to the Executive Committee and Board members. We also expect our suppliers and other business partners to uphold similar high standards of integrity, respect, and accountability, in line with applicable laws and regulations.

Thank you for your commitment to building trust and advancing our ethical culture together.

**Philippe Dereeper**

Chief Ethics & Compliance Officer
and Executive Secretary of the
Supervisory Board

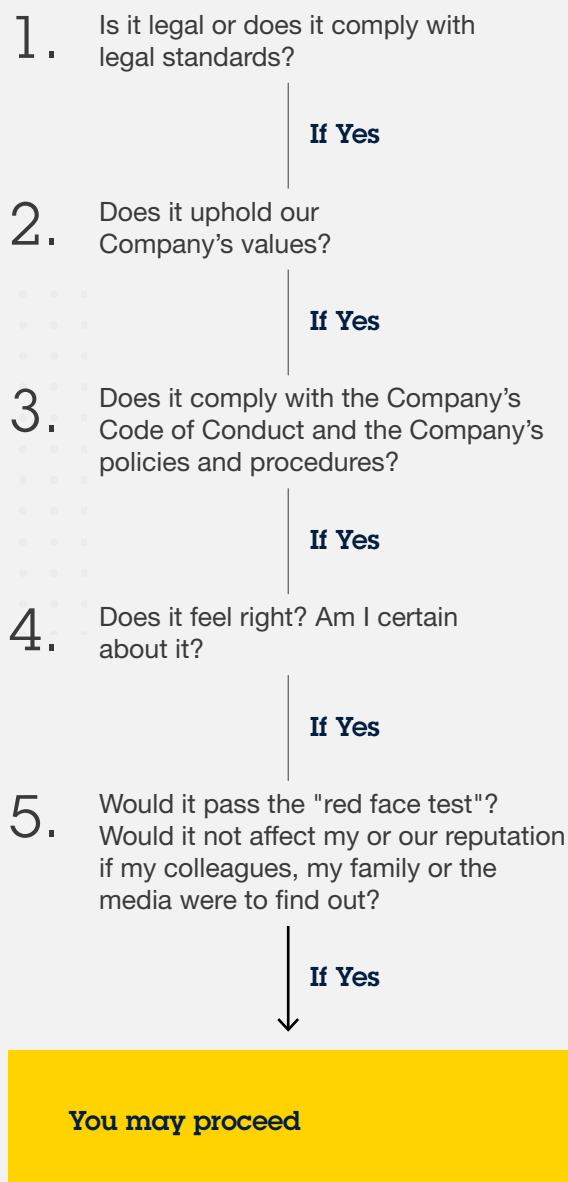


By fostering and upholding
a culture of Integrity, Respect
and Accountability, we are
building trust together and
creating long-term value
for all our stakeholders.

1. We help you do the right thing

How we conduct business and achieve our goals is as important as achieving them. We want to be recognized for making the right decisions. If you face a challenging decision or feel uncertain, seek advice and reach out before acting.

As a practical simplified guidance to help you do the right thing, always ask yourself the following 5 questions:



Do not proceed

If you are unsure or cannot answer positively to each of these 5 questions, please reach out and seek advice and guidance from the Ethics, Compliance & Privacy department before acting.



If no or unsure

This practical simplified guidance is designed to support you in making the right choices; however, it is not exhaustive. For detailed requirements and processes on how we conduct business with integrity at ST please refer to the policies and procedures that complement our Code of Conduct. Alternatively, reach out to the Ethics, Compliance & Privacy department.

2. We make it safe to speak up

We foster a culture of trust, integrity, respect and accountability. Our whistleblowing program is a key component of our culture, serving as a fundamental pillar for maintaining an ethical and responsible workplace.

We encourage everyone to express, in good faith, any concern(s) regarding possible violations of our Code of Conduct, policies, or the law, by using the Ethics Hotline provided by the Company, when they see or even suspect something may be wrong. The Ethics Hotline enables the reporting of all concerns while ensuring confidentiality and, when permitted by law, anonymity. It also ensures that the information reported is treated securely.

Every report is taken seriously as an opportunity to identify potential issues, and strengthen our commitment to business integrity, respect and accountability.

All ST employees and interested third parties (for example third party suppliers or other business partners) should feel comfortable speaking up. We encourage ST employees and interested parties to voice their concerns openly and honestly, without fear of retaliation. Every concern raised in good faith will be assessed

and, as appropriate, lead to the opening of an independent investigation. Proper and timely feedback will also be given to the reporter who expressed the concern.

We have zero tolerance for any form of retaliation. Any ST employee or interested third party who believes they have been retaliated against should promptly report such concern to the Ethics Hotline and/or to the Ethics, Compliance & Privacy department.

We encourage you to speak up if you feel something isn't right or witness wrongdoing or misconduct. Our Ethics Hotline is available 24/7 via phone or online. Let's maintain and promote a culture where ethics and integrity guide our business conduct wherever we operate, and continue to work together to uphold a culture of integrity, respect and accountability that protects ST's people, business and reputation.

Thank you for trusting us in the process.

We foster a culture of trust, integrity, respect and accountability.

See something?
Say something!



3. We conduct our business with integrity



3.1. Conflict of interest

A conflict of interest occurs when an employee's personal interest — such as financial, professional, family, romantic, associative, cultural, or charitable — may interfere with their judgment, actions, or inaction while working for ST. Whenever a conflict of interest situation arises (whether actual, potential, or even when the situation creates an appearance of a conflict of interest), it must be timely reported and disclosed to the Company so that it can be duly assessed and managed. We do not allow our personal or other interests to interfere with our business decisions or the interests of the Company.

We must always ensure the employee's personal interests are transparently disclosed and do not conflict with the interests of ST. Examples of conflict of interest may include:

- Personal relationships: situations where personal relationships, such as family or romantic relationships, could influence business decisions.
- Financial interests: holding financial interests in competitors, suppliers, or customers that could affect business decisions.
- Outside employment: engaging in outside employment or business activities that could conflict with the employee's responsibilities and duty of loyalty to the Company.

Each of us must disclose any actual, potential or perceived situation of conflict of interest to the Company in a timely manner to enable appropriate assessment and management when required. Transparently disclosing and managing conflict of interest build trust and confidence among employees, customers, and business partners, fostering strong and positive relationships. While conflict of interest may arise in certain situations, the key is to address them with transparency and accountability.

Examples of how we translate integrity into practice

WHAT WE DO



- We promptly and proactively disclose any conflict of interest, whether actual, potential or perceived.
- We regularly provide training and/or awareness sessions for employees to help identify and appropriately address conflict of interest.
- We seek guidance from the Ethics, Compliance & Privacy department when in doubt to identify and manage conflict of interest.

For more information, please refer to our Conflict of Interest policy.

We do not allow our personal interests to interfere with our business decisions or the best interests of STMicroelectronics.



IN PRACTICE



Question:

A friend is offering you, as a second job the opportunity to take on some consulting work with a new start-up company whose business isn't in direct competition with ST. You are considering accepting the offer without informing ST. Would that be appropriate?

Answer:

Engaging in outside business activities, such as consulting work, can create a situation where your loyalty, is, may be, or appears to be, divided. Not all outside engagements create a conflict of interest, but a conflict could arise. For that reason, before accepting the offer, you must disclose any outside engagement to ST for prior assessment.

Question:

A buyer is in the process of negotiation with a third party company recognized for its expertise in the field. The buyer's sister is a sales manager in that same company. What should the buyer do?

Answer:

Even if no favors are involved, this situation represents a conflict of interest and a risk of divided loyalty, which may impact the Company's interest and the employee's reputation. The buyer should report and disclose the situation to ST and recuse themselves from the discussion with this potential supplier. It is essential to ensure that all procurement decisions are made based on merit and in the best interests of the Company, free from personal bias or gain.

3.2. Anti-bribery and corruption

We have zero tolerance for any form of bribery or corruption. We do not receive, offer, accept, or give money, services, favors, or gifts to gain an improper business advantage from anyone in governments, another company or any other party.

Corruption in any form, including but not limited to bribes, facilitation payments, influence peddling, etc., whether by employees of ST or business partners who work for or on behalf of ST, whether directly or indirectly, is not acceptable in our business practices. ST strictly prohibits all facilitation payments, regardless of local customs or practices. Examples of facilitating payments are payments to expedite certain government services (such as permits, licenses, customs clearance) and grease payments to speed up administrative processes.

Corruption may be active or passive, direct or indirect, but in all cases, it is illegal and a criminal offence:

- **Active corruption** is the act of offering, promising, or paying a bribe to someone.
- **Passive corruption** occurs when a person solicits, agrees to receive or accepts a bribe from someone.
- **Direct corruption** occurs when the person involved personally engages in offering, giving, requesting or accepting a bribe.
- **Indirect corruption** occurs when corruption is carried out through intermediaries, agents, or business partners to conceal involvement or facilitate the corrupt act.

Although corruption can occur in all countries, sectors, and professions, certain countries, individuals and activities are more exposed to this risk and require increased vigilance.

In addition, we must be especially careful when dealing with public officials or government officials, who are subject to specific rules and restrictions. The term “public officials” or “government officials” broadly includes:

- Officers, employees of governments, governmental agencies, or international organizations;
- Persons acting on behalf of any governmental agency or public international organization;

- Officers or employees of state-owned or state-controlled companies;
- Members or employees of political parties, or candidates for public office;
- Members of royal or ruling families.

Any form of bribery or corruption is strictly prohibited, regardless of the recipient’s status.

If exposed to any request or offer that could be considered bribery or corruption – whether direct or indirect, active or passive – employees must immediately report it to the Company, e.g., through the Ethics, Compliance & Privacy department or the Ethics Hotline.

Upholding anti-bribery and corruption standards, in compliance with applicable anti-corruption laws and regulations in the countries where we operate, aligns with our values and enhances our reputation as a trustworthy business player. As a result, business decisions are made transparently and based on merit, helping to safeguard our assets and reputation while supporting the Company’s long-term success.

We choose our business partners with care.

When entering into business relationships, we ensure that all our partners respect and support our values and have adopted similar standards of business conduct. This includes conducting thorough due diligence on third parties before engaging in any business relationship to assess whether they uphold similar ethical principles.

Business partners, including direct and indirect suppliers, customers, and other stakeholders, play a crucial role in our operations, and we aim to ensure they align with our standards of integrity, quality, and ethical business practices. We also expect our business partners to report any concerns they may have.

For more information, please refer to our Anti-Bribery and Corruption policy.

Examples of how we translate integrity into practice

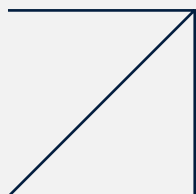
WHAT WE DO



- We implement and enforce a zero-tolerance policy towards corruption and bribery.
- We adhere to applicable anti-bribery and corruption laws and regulations.
- We assess bribery and corruption related risks and mitigate them through various activities, such as monitoring, accounting and non-accounting controls, auditing activities.
- We regularly provide training and/or awareness to exposed employees on recognizing and preventing bribery and corruption.
- We conduct thorough due diligence on third parties to confirm that we do business with and through reputable third parties, asking them to commit to anti-bribery and corruption standards.
- We request our third parties to undertake anti-bribery and anti-corruption measures.
- We regularly review the effectiveness of our anti-bribery and anti-corruption program and adapt it to ensure that it remains effective.

Zero

tolerance for bribery and corruption



IN PRACTICE



Question:

An employee insists on urgently selecting a specific service provider, without following the usual bidding process and established procedures. Another employee observed the situation and suspects that the requestor might be receiving a benefit in exchange for awarding the work to that specific supplier. What should the other employee do?

Answer:

We must recognize and avoid all situations that could be perceived as offering, promising, giving, or receiving any form of advantage – whether financial or otherwise – in exchange for an undue benefit. The other employee should report the situation using the existing reporting channels.

Question:

Is it acceptable for an employee to ask a government official, with whom they have a personal relationship, to expedite a permit approval, even if no money changes hands?

Answer:

No, this is considered influence peddling and violates ST's Code of Conduct. Using personal relationships to gain preferential treatment undermines fairness and transparency. All interactions with public officials must be conducted transparently and impartially, in accordance with applicable laws and Company policies.

3.3. Gifts, meals and entertainment

Gifts, meals, and entertainment can be customary to further good business relationships and are generally acceptable so long as they are reasonable, appropriate and are given without any improper intention to influence decisions, create obligations or result in a conflict of interest. Gifts, meals, and entertainment should never be given or offered with the expectation of receiving something in return, as this could be perceived as creating a situation of conflict of interest or an attempt at bribery or corruption. Therefore, ST employees must always report such gestures transparently to the Company.

Gifts, meals, and entertainment refer to any items of reasonable value or hospitality provided to or received from business partners, suppliers, customers, or other third parties, for which no reasonable fee is paid in return by the recipient.

We may offer or receive gifts, meals, and entertainment that fall within applicable laws and regulations, provided they are in line with our policy, as well as with the recipient's policy.

Gifts, meals, and entertainment offered or received must always be:

- **Reasonable:** in amount and frequency, taking into account the position of the recipient, and proportionate to the occasion (considering the location, sector and seniority of the recipient).
- **Appropriate:** given with a legitimate business purpose, considering the nature of the gift (its type, value, and suitability to professional and ethical standards), and the timing for its offering (e.g., not during a bidding process), complying with legal and customary practices.

Examples of how we translate integrity into practice

WHAT WE DO



- We are transparent and we disclose to the Company, any gifts, meals and entertainment offered, received or refused.
- We ask ourselves whether the gift, meal and entertainment could be perceived as an attempt to influence a business decision, and as such, would be inappropriate.
- We only accept or give gifts, meals and entertainment which are appropriate and reasonable in value.
- We do not give or accept anything that we would not feel comfortable discussing with our colleagues or friends.
- We always consider: does it have a legitimate business purpose? Is it modest or could it obligate the receiver to reciprocate? Is it offered around a sensitive period (e.g., bidding process)?
- We never expect anything in exchange of any gifts, meals and entertainment received or offered.
- When in doubt about the appropriateness of any gifts, meals, or entertainment, we seek guidance.

For more guidance, please refer to our Gifts, Meals and Entertainment procedure.

Gifts, meals, and entertainment should never be given or offered with the expectation of receiving something in return.



- **Transparent:** given openly, with proper disclosure according to Company policies, ensuring full visibility and documentation of the gesture.
- **Without improper intent:** given without expecting anything in return and free from any intention to unfairly influence decisions or gain undue advantage.

We do not engage in gifts, meals, and entertainment that compromise fair and independent business decisions and that may be – or be perceived as – conflict of interest, improper advantage or bribes.

Additionally, certain items are never appropriate and hence, always prohibited, due to their nature:

- Cash or cash equivalents (e.g., vouchers, gift certificates, or gift cards).
- Illegal items (e.g., weapons, drugs, etc.).
- Inappropriate items (e.g., any item of sexual nature).
- Lavish or extravagant items (e.g., all-expenses-paid trip to an exotic destination, memberships to exclusive country clubs, etc).

Lastly, gifts, meals and entertainment to Public or Government Officials are particularly sensitive and therefore, not allowed (exceptions, if any, require prior assessment and written authorization by the Ethics, Compliance & Privacy department).

IN PRACTICE



Question:

During a bidding process, a potential supplier suggested that they could offer you and your partner an all-inclusive weekend getaway. What should you do?

Answer:

Decline the gift/offer and immediately disclose the incident to both your line Manager and the Ethics, Compliance & Privacy department.

Question:

A supplier invites the project team who worked on a long-term project to a dinner, to acknowledge the successful collaboration. Is it acceptable?

Answer:

Yes, organizing a project dinner after the successful completion of a project is generally acceptable. However, such invitations from suppliers must never be expected, requested or implied as necessary to maintain the relationship. The invitation should be reasonable, infrequent, and clearly unrelated to any ongoing or future business decisions. If you are unsure or if there are other considerations to take into account, (e.g., ongoing negotiations, active tenders, or the value of the invitation), seek advice before proceeding.

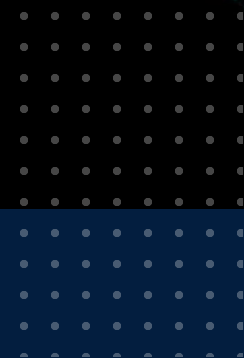
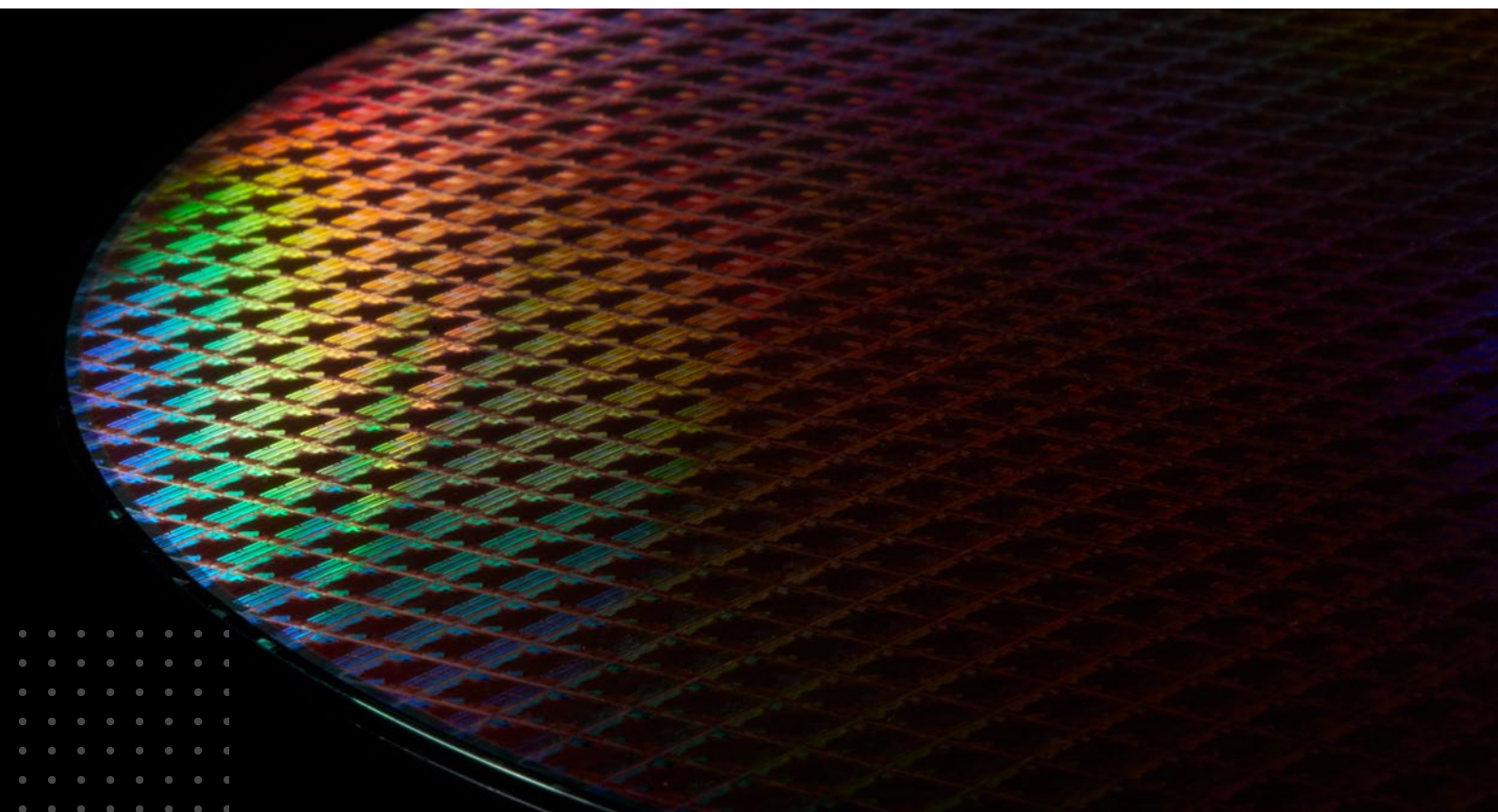
3.4. Political and charitable contributions

ST remains neutral in the political process by not providing Company funds, resources or time for political purposes. While ST employees are free to express their own views, it is important to remember that these views should be personal and not represent ST or its management. If employees are engaging in political activities, such as sending emails, letters, or contributing time, money, or resources to political causes and candidates, the Company should remain separate.

ST does not make political contributions or donations and, as such, respects the laws that regulate and limit the interactions that corporation can have in any political process.

We support charities, humanitarian efforts and philanthropic activities. However, we carry out business integrity due diligence in advance, prior to making any charitable contribution in the Company's name. Sometimes, what we think is a legitimate charity may be related to political causes or used as a conduit for bribery.

For more guidance, please refer to our Donation, Fundraising and Sponsorship procedure.



Examples of how we translate integrity into practice

WHAT WE DO



- We do not use Company funds, time, or resources for political purposes.
- We respect employees' personal political views but keep them separate from the Company.
- We support charitable activities with proper due diligence to ensure they are legitimate and ethical.

In compliance with the laws and regulations, ST remains neutral by not providing funds, resources or time for political purposes.



IN PRACTICE



Question:

You are asked to donate to a political candidate on behalf of ST. What should you do?

Answer:

Politely decline, explaining that ST does not engage in political contributions and that making such a donation on behalf of ST is against the Company's policy. Immediately report the request received to the Ethics, Compliance & Privacy department.

Question:

In order to obtain a favorable decision from a Public Official, an employee is considering making a donation to a non-profit organization that the Public Official is known to be associated with. What should be done?

Answer:

Selecting a non-profit organization associated with a Public Official, in order to obtain a favorable decision, would constitute a conflict of interest and a form of bribery. This would be a violation of ST's Code of Conduct. Anyone who becomes aware of or suspects such behavior should immediately report the incident to the Ethics Hotline or to the Ethics, Compliance & Privacy department. It is essential to ensure that all decisions are made transparently and ethically, free from any undue influence or personal gain.

3.5. Accounting practices

Maintaining accurate and comprehensive financial and non-financial records in the countries in which we operate is fundamental to comply with laws and meeting legal and other regulatory requirements. Recordkeeping and other accounting duties are undertaken in line with national accounting frameworks and tax regulations applicable in each jurisdiction, following standardized corporate policies and procedures.

Timely financial and non-financial reporting must be conducted in compliance with the applicable reporting frameworks and in line with regulatory requirements, to build trust with our shareholders, investors and other stakeholders. We must provide the users of our financial information with a set of high-quality financial statements, which fairly reflect our financial position at reporting date and objectively describe our economic performance on a given reporting period in compliance with the applicable financial reporting frameworks.

As a public company, we recognize our responsibility to provide clear and timely information about our financial and economic performance, and strategic direction. We aim to build strong and lasting relationships with our shareholders based on integrity, accountability, and sound corporate governance.

We rely on internal control over financial reporting, defining effective disclosure controls and procedures, ensuring that all economic, contractual and financial transactions are promptly communicated, properly authorized, and timely reported. This includes preparing financial statements and releasing financial information that provides a true and fair view of the Company's financial position and economic performance.

Our external reporting also integrates non-financial information with the aim of reaching the same level of quality as the financial information provided to our shareholders and other stakeholders. We provide transparent disclosures on ESG (Environmental, Social, and Governance) metrics (in line with European Sustainability Reporting Standards and per the Corporate Sustainability Reporting Directive).

We adhere to applicable accounting standards and policies, enacted laws and regulations, ensuring that all financial and non-financial information is disclosed in a clear and consistent manner.



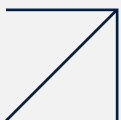
Examples of how we translate integrity into practice

WHAT WE DO



- We adhere to applicable accounting standards, laws, and regulations.
- We ensure that all financial and non-financial reports are accurate, complete, and faithfully represent our financial position, economic performance and non-financial performance and objectives.
- We implement internal controls to ensure the accuracy and reliability of financial and non-financial reporting.
- We engage with shareholders in a responsible and ethical manner, providing information that aligns with legal, regulatory and corporate disclosure requirements.
- We conduct regular audits and reviews, including the effectiveness of our internal control over financial reporting, to uphold strong corporate governance and accountability.

We keep accurate and comprehensive financial and non-financial records to faithfully reflect our performance at any given time.



IN PRACTICE



Question:

You are an employee in sales and had a great month far exceeding your sales' objectives. Another big contract has just been signed and you thought that it would be a good idea not to process it until next week so it would count towards next month's sales quota. You think this is okay because the Company is still doing business, and you shouldn't be penalized for getting new business early. Is this okay?

Answer:

No. All our transactions must be properly recorded in a timely manner. You are required to process the contract following the standard procedure without delaying it until next week. Our success is based on the accuracy and timeliness of information, and everyone must contribute to maintaining proper accounting practices.

Question:

You receive a request to alter financial data to meet your department quarterly targets. What should you do?

Answer:

Refuse the request and immediately report the incident to the Ethics Hotline. Altering financial data is unethical, illegal and against Company policy.

3.6. Insider trading

We keep non-public material information confidential, and we comply with applicable insider trading laws and regulations contributing to protecting the integrity of the financial markets. We aim at preventing the unlawful use of non-public material information and we oppose the misuse of inside information in the trading of securities.

Inside information shall be kept strictly confidential. Employees in possession of such information are prohibited from trading or attempting to trade securities while in possession of non-public material information. Employees are prohibited from recommending or inducing another person to trade in securities on the basis of non-public material information (tipping).

Insider trading involves buying or selling securities based on the sharing of material, precise non-public information about a company whether it concerns ST or other business partners, such as suppliers, customers, or competitors. It includes recommending or inducing another person to trade in securities based on non-public material information.

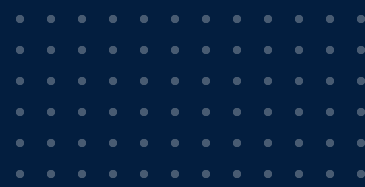
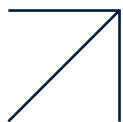
Non-public material information includes information of a «precise nature» that has not been made public or has not become public, and, as such, should remain confidential. If disclosed, this information would likely be used to make investment decisions (e.g., selling or buying stock).

In the course of work duties, we can be exposed to inside information which is not yet publicly disclosed and that could have an impact on the price of ST's stock or the stock of another company.

The penalties for engaging in insider trading can be severe, including fines and imprisonment.

For more guidance, please refer to our Insider Trading policy.

We keep all non-public information strictly confidential and prohibit their use in trading.



Examples of how we translate integrity into practice

WHAT WE DO



- We keep confidential non-public material information and are careful about what we say or share.
- We refrain from using inside information about ST or other companies in any transaction.
- In case of doubt, we seek advice and consult with the office of the Legal Counsel or the office of the Chief Ethics & Compliance Officer.

IN PRACTICE

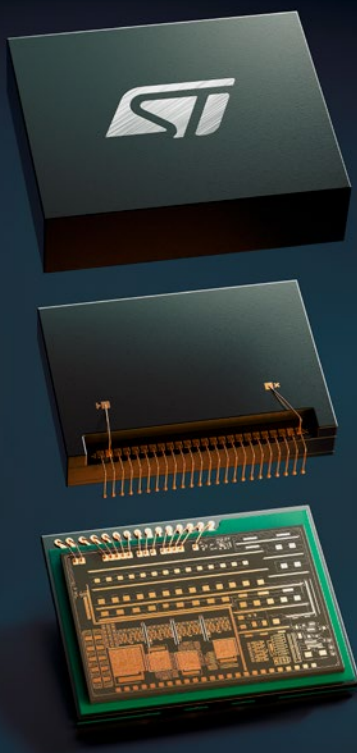


Question: A big order just came in, and you are told, “it turns out that company XYZ is about to launch a new product that is going to be a big game changer. I bet they are going to make a ton of money when these hit the market next quarter.” You watched the stock market and were thinking about buying some stock in company XYZ anyhow. Since you won’t be trading in ST’s stock, is it acceptable for you to buy some company XYZ stock?

Answer: No, because the information is not public, and a typical shareholder could be influenced in their decision to sell or not, which would be considered insider trading. As a part of our jobs, we may be exposed to confidential information about other companies and/or business partners. We must never use any confidential information obtained from third parties as a basis to initiate any transaction, either directly or indirectly.

Question: You are part of negotiations regarding an important business transaction. This transaction will represent a critical opportunity which the market will likely welcome. During the weekend, you shared the information with your cousin, who you know might be trading in the marketplace. Is this considered insider trading?

Answer: Yes, this would be insider trading. Joint ventures like mergers or acquisitions may be considered non-public material information. Such information is sensitive because it could significantly affect the company’s stock price once disclosed. Sharing this information with your relative, even if there is no direct personal advantage to you, is strictly forbidden. By informing your relative, you would be enabling them to trade based on confidential knowledge that is not available to the public, which is a violation of insider trading laws and Company policies.



3.7. Trade compliance

We adhere to applicable international trade laws and regulations. Under no circumstances will ST knowingly engage in or support any activity that violates these laws.

Trade compliance refers to the application of sets of laws and regulations governing the import, export and transfer of goods, services and technology. This means complying with export control laws (including regulations on dual use goods, technologies and services), sanctions and customs regulations and other trade-related requirements designed to prevent unauthorized

transactions and ensure lawful international trade. Violations of the laws and regulations can lead to criminal prosecution for companies and individuals. We don't conduct business with third parties or countries that are subject to sanctions or embargoes or are otherwise prohibited from conducting international transactions. We ensure that ST employees involved in such activities are knowledgeable and trained on relevant rules and regulations.

For more guidance, please refer to our Trade Compliance policy.



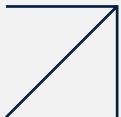
Examples of how we translate integrity into practice

WHAT WE DO



- We set and proactively manage trade compliance policies and procedures.
- We provide import and export oversight, strategic guidance and training.
- We conduct due diligence on business partners.
- We ensure the accuracy of product classifications for import and export purposes to meet regulatory requirements.
- We conduct regular risk assessments at both supply chain and global operations levels.

We comply with applicable trade laws and regulations.



IN PRACTICE



Question:

You receive an inquiry from a third party in a sanctioned country. What should you do?

Answer:

Do not engage in any trade or commercial activities with the third party located in a sanctioned country or listed on the sanction lists. Engaging in trade with sanctioned countries may result in severe legal penalties. You should immediately report to your management and the Global Trade Compliance department.

Question:

You are unsure whether a product is restricted or prohibited to ship. What should you do?

Answer:

Verify whether the product has an export control classification number assigned to it. That will help determine if an export license may be required to a destination country. If in doubt, seek guidance from our Global Trade Compliance department.

3.8. Antitrust and fair competition law

We compete fairly and honestly, striving to maintain undistorted and free competition, in accordance with applicable laws.

Businesses compete on prices, quality and/or services, in order to win new customers and new markets. When businesses collude and do not compete, customers do not get the best products at the best prices. Collusion may take the form of exchanging sensitive information with competitors, price alignment, market sharing, harmonizing commercial conditions, or bid rigging. We do not engage in these actions to win or retain business.

Anti-competitive agreements damage the long-term success and the markets that we operate

in and are punished heavily by the authorities. No short-term gain will ever be worth damaging our reputation or the trust our customers place with us. We define our business strategy autonomously and engage in practices that promote fair competition.

We carefully monitor the information we exchange to ensure it does not involve alignment on any matters or the sharing of sensitive information. It is essential to avoid even the appearance of engaging in anti-competitive behaviors.

For more guidance, please refer to our Antitrust policy.

Examples of how we translate integrity into practice

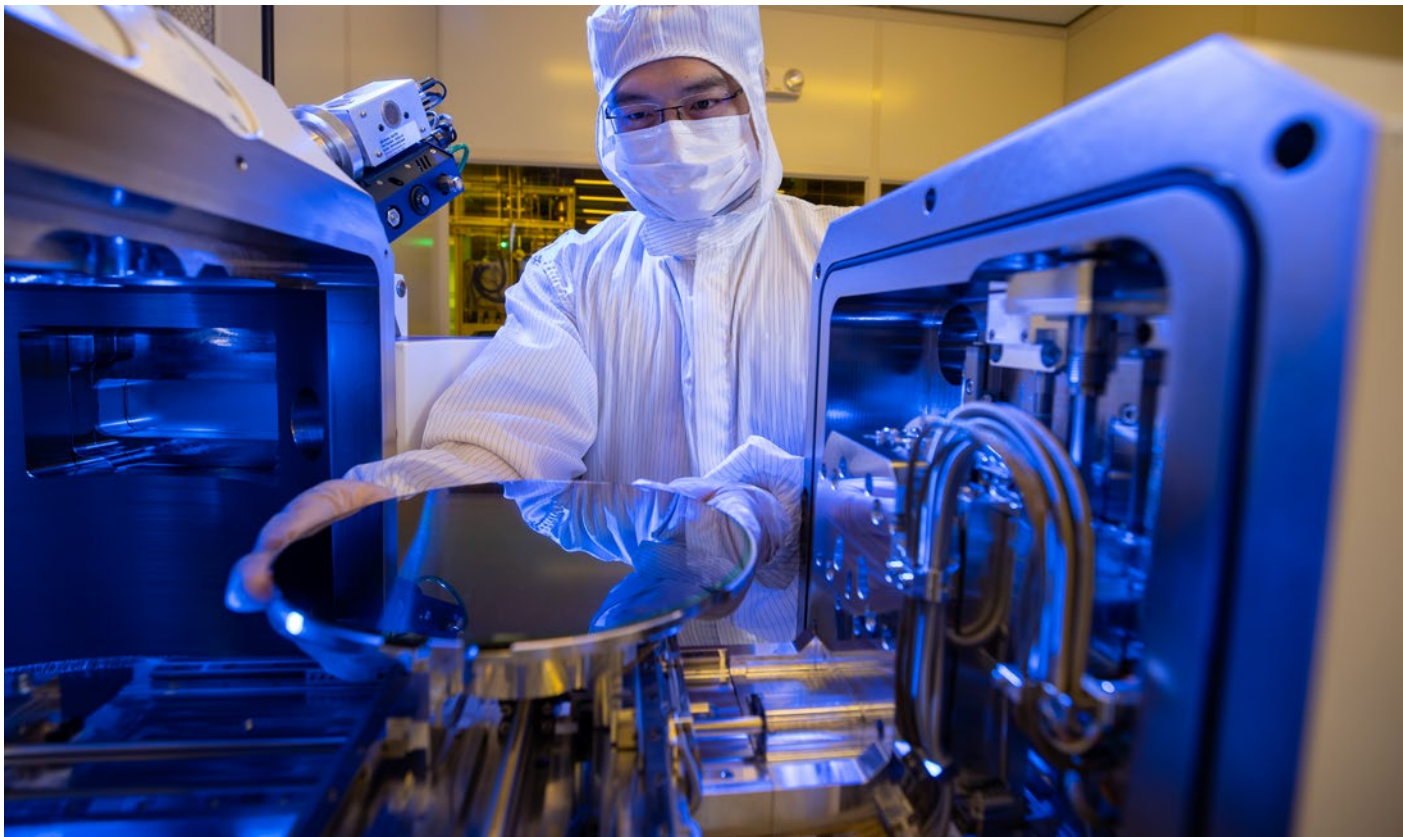
WHAT WE DO



- We promote fair and free competition.
- We compete in the right way.
- We regularly provide training and/or awareness to exposed employees to help them identify and prevent anti-competitive practices.

**We compete fairly and honestly
to maintain undistorted and
free competition.**





IN PRACTICE



Question:

You are participating in a trade conference gathering professionals in the field. During the meeting, one participant offers to share information about price or production volume. What should you do?

Answer:

Stop the discussion, make it clear that we do not engage in the exchange of sensitive information, and leave the meeting. Ensure that this is documented. If you are not sure, propose to interrupt the conversation while you seek advice with the Legal department or the Ethics, Compliance & Privacy department.

Question:

A competitor proposes that you could focus all your commercial efforts in the Americas, while they focus all of theirs in Asia. What should you do?

Answer:

This is market partitioning. Engaging in market allocation is illegal, anti-competitive, and against ST policy. Refuse the request and report the incident to the Ethics Hotline.

4. We respect people and care for the environment

4.1. We respect all individuals

We strive to foster a respectful and inclusive work environment where everyone feels safe and valued, enabling them to contribute fully. Every individual deserves to be treated with dignity and respect. We conduct ourselves with openness, respect, and simplicity, building trusted relationships.

We oppose any form of discrimination or harassment (whether verbal, moral or sexual), intimidation, threats, humiliation and violence. We treat everyone with consideration and equally regardless of religion, race, color, ethnicity, gender, age, nationality, political opinion, union affiliation, family situation, sexual orientation, disability, physical challenges, or other characteristics. We value each person's unique qualities. We collaborate, encourage contributions, and develop our people through teamwork, exposure and training. We aim at continuous learning and improvement.

- **Respect** is the recognition and consideration of others. It involves treating people with consideration, politeness, listening and fairness.
- **Fair and equal treatment** refers to ensuring that all interactions are equitable and grounded in the principles of justice, free from bias and prejudice. It involves treating everyone with impartiality.
- **Discrimination** means treating someone unfairly because of who they are. It can be intentional or unintentional and includes actions or decisions that disadvantage people based on protected characteristics. Discrimination is not allowed under the law or our policies. Discrimination can manifest in various forms, including preconceived opinions, exclusion, denial of opportunities, harm and biased decision-making. We do not tolerate such behavior at ST.

- **Harassment** refers to a range of behaviors that are unwelcome, offensive and intended to create an intimidating, hostile or offensive environment. Harassment can take many forms, including verbal, physical and psychological abuse (e.g., bullying, "jokes", intimidation, humiliation). Such behavior is not tolerated at ST.
- **Sexual harassment** refers to unwanted sexual advance, requests for sexual favors and other conduct (verbal or physical) of a sexual nature. Such behavior is not tolerated at ST.

We strive to foster a respectful and inclusive work environment where everyone feels safe and valued, enabling them to contribute fully.



Examples of how we translate integrity into practice

WHAT WE DO



- We treat everyone with respect, dignity and fairness.
- We foster a safe work environment.
- We encourage open communication, continuous feedback and the sharing of ideas.
- We support diversity and inclusion in all aspects of our work.
- We empower our employees by providing them necessary training and/or awareness, and resources.
- We do not tolerate any form of retaliation.
- We listen attentively.

IN PRACTICE



Question:

You notice that several colleagues often leave a teammate out of conversations, dismiss their ideas, and exclude them from all group activities. As a result, the atmosphere is becoming tense and unpleasant. What should you do?

Answer:

Do not ignore this behavior. When colleagues exclude or undermine someone, it can create a toxic work environment that can amount to harassment or discrimination. Such actions harm both the targeted individual and the entire team. Report the behavior to the Ethics Hotline so the situation can be properly assessed. Everyone deserves respect and support at work, and fostering an inclusive, positive atmosphere is a shared responsibility.

Question:

A new employee in your team tells offensive jokes about gender, race, politics, or religion at the coffee machine. What should you do?

Answer:

The new employee is creating an uncomfortable work environment and is not respecting co-workers or following our Code of Conduct. Discuss this situation with your manager or HR. Alternatively, report the behavior to the Ethics Hotline.



4.2. We prioritize health and safety

We put health and safety first and recognize the duty to provide a safe and secure environment to everyone working at/for STI. We take all reasonable steps to maintain the safety of employees and eliminate potential causes of workplace accidents or injuries, in accordance with applicable laws and regulations in countries where we operate.

We don't compromise on safety. We endeavor to provide a safe and healthy workplace for our

workforce in all our sites worldwide, to prevent work-related occupational injuries and illnesses. We believe it is essential to invest in healthcare and the well-being of our workforce for a positive and productive working environment.

For more guidance, please refer to our Occupational Health & Safety policy.

Examples of how we translate integrity into practice

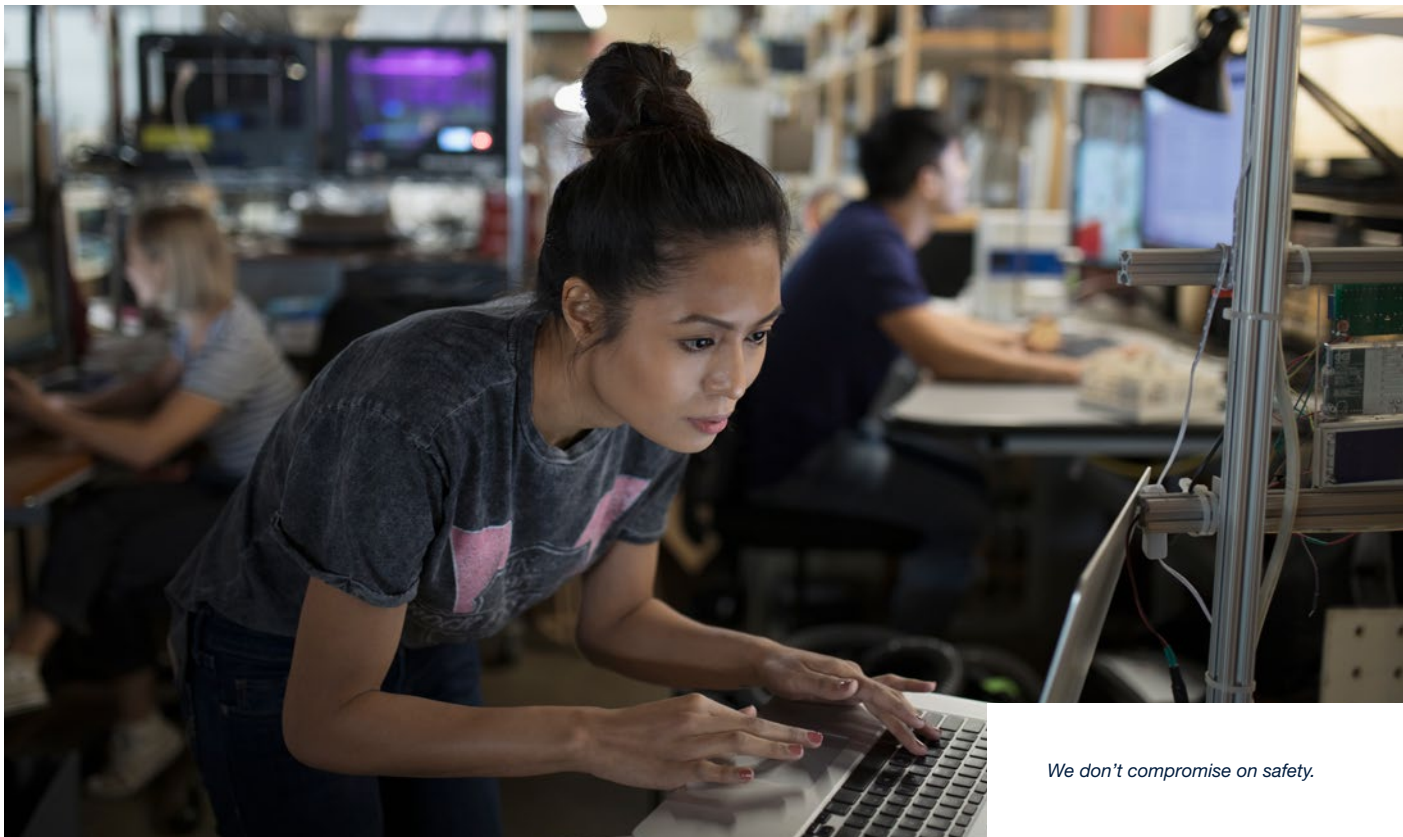
WHAT WE DO



- We deploy safety, health and well-being programs.
- We ensure high standards of work environment.
- We promote continuous improvement and shared vigilance.
- We encourage open communication about health and safety concerns.
- We remediate any identified safety issue.

We endeavor to provide a safe and healthy workplace for our workforce in all our sites worldwide.





We don't compromise on safety.

IN PRACTICE



Question:

Your team is pushing hard to meet a deadline for a client's order. While everyone is working hard to install all machines and tools, you notice that an equipment you have to use (and checked before usage) is at risk. Stopping to fix the issue would mean temporarily halting installation and possibly missing the client's deadline. You decide to stop your activity to fix the issue. Did you do the right thing?

Answer:

Yes, you did the right thing. Safety must always be your top priority. Meeting an order or deadline is never worth sacrificing health or risking an accident. We are all responsible for ensuring a safe work environment.

Question:

A team member has been consistently working long hours without taking breaks, and you are concerned about their health. What should you do?

Answer:

Encourage your colleague to take regular breaks and share your concern with your manager or HR. Promoting a healthy work-life balance is important for the well-being and productivity.

4.3. We promote Human Rights

We respect and promote fundamental Human Rights¹ wherever we operate, for all individuals, ensuring ethical and responsible business conduct throughout our activities. We respect the dignity of every individual. We expect our business partners, such as suppliers, subcontractors, and distributors, to comply with the same standards in their business practices and individual behavior. We partner and work with organizations that share our standards in observing and respecting Human Rights.

- **Prohibition of child labor** – we prohibit child labor, in accordance with applicable laws and fundamental Human Rights.
- **Prohibition of forced labor** – we ensure that all work is voluntary and free from coercion, prohibiting practices such as debt bondage, human trafficking, and slavery.
- **Adequate wages and benefits** – we ensure that employees receive equitable compensation for their work, which is regularly reviewed and adjusted to reflect changes in the cost of living and economic conditions.
- **Responsible organization of working hours** – we maintain reasonable working hours and sufficient rest, in compliance with applicable laws and industry standards.
- **Working conditions** – we provide a safe and healthy work environment conducive to employee well-being by implementing measures to prevent workplace accidents and injuries.

- **Freedom of association** – employees are free to join or form groups, such as unions, to advocate for their interests, protecting their rights to collective bargaining and peaceful assembly without fear of retaliation.

ST is dedicated to remedying any adverse Human Rights impacts resulting from its operations, ensuring accountability and fostering trust with stakeholders, including local communities. ST's approach includes thorough verifications, transparent communication, and collaboration with relevant parties to implement corrective actions and prevent future occurrences. We continuously develop and implement measures to prevent, mitigate or address any actual or potential negative impacts on our workforce that we may have caused or contributed to.

For more guidance, please refer to our Human Rights procedure.

¹ Applying the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the fundamental conventions of the International Labor Organization and their Declaration on Fundamental Principles and Rights at Work, the OECD's Guidelines for Multinational Enterprises, and the UN Global Compact.



Examples of how we translate integrity into practice

WHAT WE DO



- We respect and promote internationally recognized Human Rights¹ in all aspects of our operations and business relationships and take appropriate steps to address any adverse impacts we have caused or contributed to, including providing remedy as needed.
- We partner with organizations that uphold the same Human Rights standards we adhere to.
- We regularly audit our third parties to ensure they uphold our Human Rights standards.

IN PRACTICE



Question:

You are part of the procurement team and, during the onboarding process, discover that a potential supplier has been convicted for using child labor. What should you do?

Answer:

Stop any negotiations with the supplier, deny the supplier in our due diligence tool, and reject the supplier creation request for ethics reason. We must ensure that all our business partners adhere to our Human Rights standards, and we prefer not to do business with them than to compromise on these standards.

Question:

You are working with a third party contractor and notice that their employees are not provided with adequate safety equipment. What should you do?

Answer:

You should formally raise this concern with the contractor and report the issue through the Ethics Hotline. The contractor should be held responsible for ensuring safe working conditions at their site, as it is essential that our business partners uphold the same Human Rights standards we adhere to.

We respect and promote fundamental Human Rights wherever we operate, for all individuals, ensuring ethical and responsible business conduct throughout our activities.



4.4. We care for the environment

We provide semiconductor solutions that contribute to addressing environmental challenges. We believe that the semiconductor industry plays a key role as a strategic enabler of a low-carbon society. As part of our value proposition, we aim to design and manufacture products that are power efficient and support our customers in developing technologies with a low carbon footprint.

We are dedicated to managing our business operations in an environmentally responsible way. At the same time, our manufacturing operations require water, energy and chemical substances, and can have a negative impact on the environment. Minimizing our overall environmental footprint is a priority for ST.

We are dedicated to the decarbonization of our own operations and our supply chain.

We strive to implement solutions to reduce water extraction and consumption, in close relationships with various stakeholders in the local communities where we operate. Our water management approach includes water stress assessments, conservation programs, water efficiency, and wastewater treatment.

We strive to reduce waste by minimizing resource consumption, recycling, and implementing circular economy programs. Our priority is to reduce, prepare for reuse, and recycle our waste and we consider landfill or incineration to be a last resort.

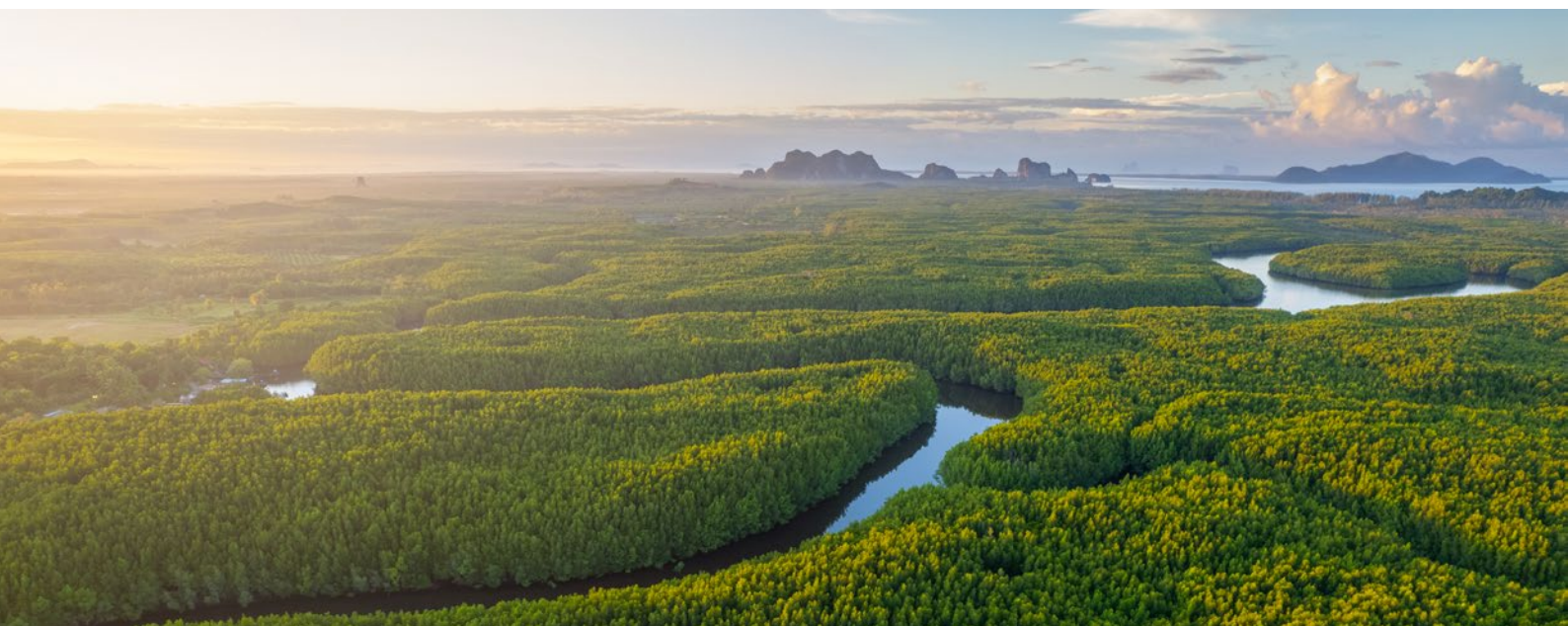
We carefully manage the chemical substances and materials we use throughout our operations. This allows us to monitor and address our impacts on people and the environment, and to comply with legal and customer requirements.

We assess any environmental risks or negative impacts within our operations and supply chain and take action to mitigate or eliminate them.

We consult and engage stakeholders on environmental challenges and opportunities, including customers, employees, partners or communities in which we operate.

We report transparently on our environmental risks and negative impacts in our annual report.

For more guidance, please refer to our Global Environmental policy.



Examples of how we translate integrity into practice

WHAT WE DO



- We engage regularly with our stakeholders on environmental topics through a respectful and trustworthy approach.
- We conduct regular environmental audits and assessments to ensure compliance with local environmental regulations and standards.
- We run life cycle assessments as relevant to understanding the impact of our products.
- We are working towards implementing a climate transition plan in line with European standards.
- We recycle water, implement water saving initiatives and monitor treatment effectiveness.
- We promote resource efficiency, recycling, and the reuse of materials to support a circular economy.
- We substitute and minimize the use of hazardous materials and heavy metals where feasible.

We believe that the semiconductor industry plays a key role as a strategic enabler of a low carbon society.



IN PRACTICE



Question:

During supplier engagement, you find that a supplier is at an early stage of developing their greenhouse gas reduction initiatives. How should you proceed?

Answer:

Collaborate with the supplier to share ST's carbon neutrality goals and encourage progress on emissions reduction. ST values building long-term partnerships with suppliers committed to continuous environmental improvement. Supporting suppliers in their journey helps us collectively advance our sustainability objectives.

Question:

You observe that water usage seems higher than usual or suspect a possible water leakage. What should you do?

Answer:

Immediately report the observation or any suspected water leakage to the site manager. ST's Global Water Policy promotes regular monitoring and evaluation of water flows and balance to optimize water use and minimize environmental impact. Prompt notification helps the site take timely corrective actions and supports our commitment to responsible water stewardship.

5. We protect our data, information and assets

5.1. Assets and confidential information

Safeguarding our assets and confidential information is fundamental to our success and reputation. This responsibility belongs to every single employee, as together we protect not just business interest, but the trust placed in us by customers, partners, and stakeholders worldwide.

Our most valuable assets encompass data and information that are ST's proprietary, which may be confidential or secret; physical assets such as servers, computers and Company phones; and business-critical systems and infrastructure upon which business-critical system operate. Each of these plays a crucial role in our continued success and must be protected accordingly.

Unauthorized disclosure, access, or theft of assets might pose severe risks to our success. Beyond immediate financial losses, such incidents might compromise competitive position, damage our business relationships, erode stakeholder confidence, and threaten long-term growth opportunities. Every breach might undermine the trust that our stakeholders have invested in us, creating lasting damage that extends beyond financial impact.

In the course of their employment, employees will unavoidably receive, be exposed to, access, and/or otherwise handle confidential, personal, and proprietary information of ST, its clients, business partners, and other employees. Employees have a duty of loyalty and confidentiality toward the Company and must always protect such information.

Every employee has a duty to protect and maintain confidentiality. We all contribute to our cybersecurity defense by following defined processes such as choosing strong passwords and protecting them, enabling two-factor authentication, using only authorized tools, locking screens when leaving workstations unattended, and shredding confidential documents when they are no longer needed. We must always store ST documents on Company solutions or storage devices, not on personal devices or on-line solutions used personally. Laptops or phones must never be left unattended, whether in restaurants, airports and planes, stations and trains, or any other public space or means of transportation.

We maintain clean desks free of sensitive documents, avoid sharing confidential information unless necessary, and operate strictly on a need-to-know basis. We remain vigilant against cyber threats that could compromise Company and personal data, including phishing attacks, malware, ransomware, data breaches, and social engineering attempts.

We protect confidential information at every step of our processes.

Examples of how we translate integrity into practice

WHAT WE DO



- We use ST's assets and information responsibly and only for legitimate business purposes.
- We report any suspicious activities or potential security breaches, including the loss, misuse, or theft of any equipment.
- We define and implement measures to protect digital assets and information from cyber threats, which must be followed by all employees.
- We provide employees with training and awareness sessions about best practices, processes, and cyber threat detection.

IN PRACTICE



Question:

You need to make a quick 5-minute stop to pick up some essentials and have your ST PC laptop with you (or other any devices provided by ST). You are considering leaving it in your car during this brief stop. Is this a safe decision?

Answer:

No, you should not leave your ST PC (or any other devices provided by ST) in the car, even for a brief 5-minute stop. Leaving it unattended, even for a short duration, poses a significant risk of theft or unauthorized access. Instead, take your ST device with you to ensure it remains secure and always protected. Always prioritize the security of Company assets and confidential information.

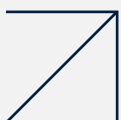
Question:

You are working on an important file which includes confidential information. You are considering copying them on your personal GoogleDrive or any other solution over the Internet using your personal account.

Answer:

You must not copy any Company information on any online solution you use personally. There is no need to backup data on your personal account, as they are stored in shared Company repositories (such as O365 Teams).

Safeguarding our assets and confidential information is fundamental to our success and reputation.



5.2. Data privacy

Protecting the personal data of our employees, business partners, customers and users is a shared responsibility.

Personal data protection involves the proper collection, usage, storage, and safeguarding of personal data to ensure its security and appropriate use.

Personal data refers to data in electronic or physical format that can directly or indirectly identify an individual such as general identification and contact details (e.g., name, email, phone number, address), government-issued identification numbers (e.g., national ID, passport), financial information (e.g., credit card, bank account numbers), technical identifiers (e.g., national ID, device ID, geolocation), and biometric identifiers (e.g., facial geometry, fingerprint).

Protecting personal data is fundamental to maintaining the trust and confidence of our stakeholders. Any misuse or breach of this information may not only jeopardize our reputation but can also result in significant financial losses, regulatory penalties, and legal consequences.

We recognize that strong personal data protection practices are essential, not only as a matter of responsibility, but also as a critical component of our business integrity and long-term success. Therefore, we handle all personal data with the utmost care, transparency, and compliance with applicable laws and industry standards.

For more information, please refer to our Privacy policy.



Strong personal data protection practices are essential, not only as a matter of responsibility, but also as a critical component of our business integrity and long-term success.

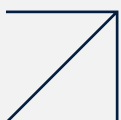
Examples of how we translate integrity into practice

WHAT WE DO



- We limit data collection and use – we collect and use personal data only to the extent necessary and provide clear, transparent information about our data practices.
- We minimize data retention – we retain personal data within the Company and with third parties only for as long as necessary to fulfill legitimate business purposes or comply with legal obligations.
- We ensure security and accountability – we implement robust security measures to protect personal data and maintain accountability throughout its lifecycle.

Protecting the personal data of our employees, business partners, customers and users is a shared responsibility.



IN PRACTICE



Question:

You want to organize an event with customers and a few employees, and you would like to have a photographer present. What should you be mindful of?

Answer:

Among other obligations, data protection provisions require obtaining consent from individuals before collecting, using, or disclosing their personal data.

Question:

You work in a department with access to employee data and receive a request from an external party asking for access to an employee's personal data. What should you do?

Answer:

Protecting personal data and restricting access on a need-to-know basis is essential for maintaining privacy and complying with personal data protection laws. Any external requests must be carefully evaluated and handled according to company policies and applicable regulations.

5.3. Social media usage

We maintain professionalism in all social media interactions and protect ST's reputation and confidential information. We represent ourselves authentically while respecting professional boundaries.

We are mindful of our digital footprint – everything we post online can be shared and searched indefinitely. When discussing Company matters, we clearly indicate that our views are personal unless specifically authorized to speak on behalf of ST.

We never share confidential or proprietary information on social media platforms or anywhere else on the internet. We always verify information before sharing to prevent spreading misinformation. We respect intellectual property rights and obtain permission from individuals featured in photos before publishing them online. We remember that even private accounts reflect

on our Company, so we maintain professional standards consistently.

We respect colleagues, competitors, and partners in all online interactions. When identifying as ST employees, we avoid sharing personal opinions on controversial topics, political matters, or sensitive industry issues. When engaging in discussions, we focus on constructive dialogue rather than criticism.

We take responsibility for our online activities and consider their potential impact on ST and its stakeholders. If we are unsure about posting content, we seek advice and authorization from the Integrated Marketing & Communication department before proceeding.

For more guidance, please refer to our Social Media procedure.

Examples of how we translate integrity into practice

WHAT WE DO



- We protect ST's confidential and proprietary information by not sharing it on social media or internet.
- We use social media platforms to communicate in a respectful and professional manner.
- We seek authorization before making statements on behalf of ST.

We maintain professionalism in all social media interactions and protect ST's reputation and confidential information.





We use social media platforms to communicate in a respectful and professional manner.

IN PRACTICE



Question:

You notice a colleague has posted a comment on their personal social media profile that appears to represent ST's official position on a recent product launch, but you know they are not authorized to speak on behalf of the Company. What should you do?

Answer:

Only authorized individuals may communicate externally on behalf of ST. You should remind your colleague that personal opinions must be clearly distinguished from official Company statements by including a disclaimer such as "These are my personal views and do not represent ST's positions." If the post could cause confusion or misrepresent ST, encourage them to remove or correct it and report the situation to the Integrated Marketing & Communication if necessary. This helps protect ST's reputation.

Question:

You notice a colleague has posted sensitive project details on their LinkedIn profile. What should you do?

Answer:

You should take a screenshot and immediately report the incident to the Ethics Hotline. Protecting confidential information is crucial to maintaining the Company's competitive advantage and trust.

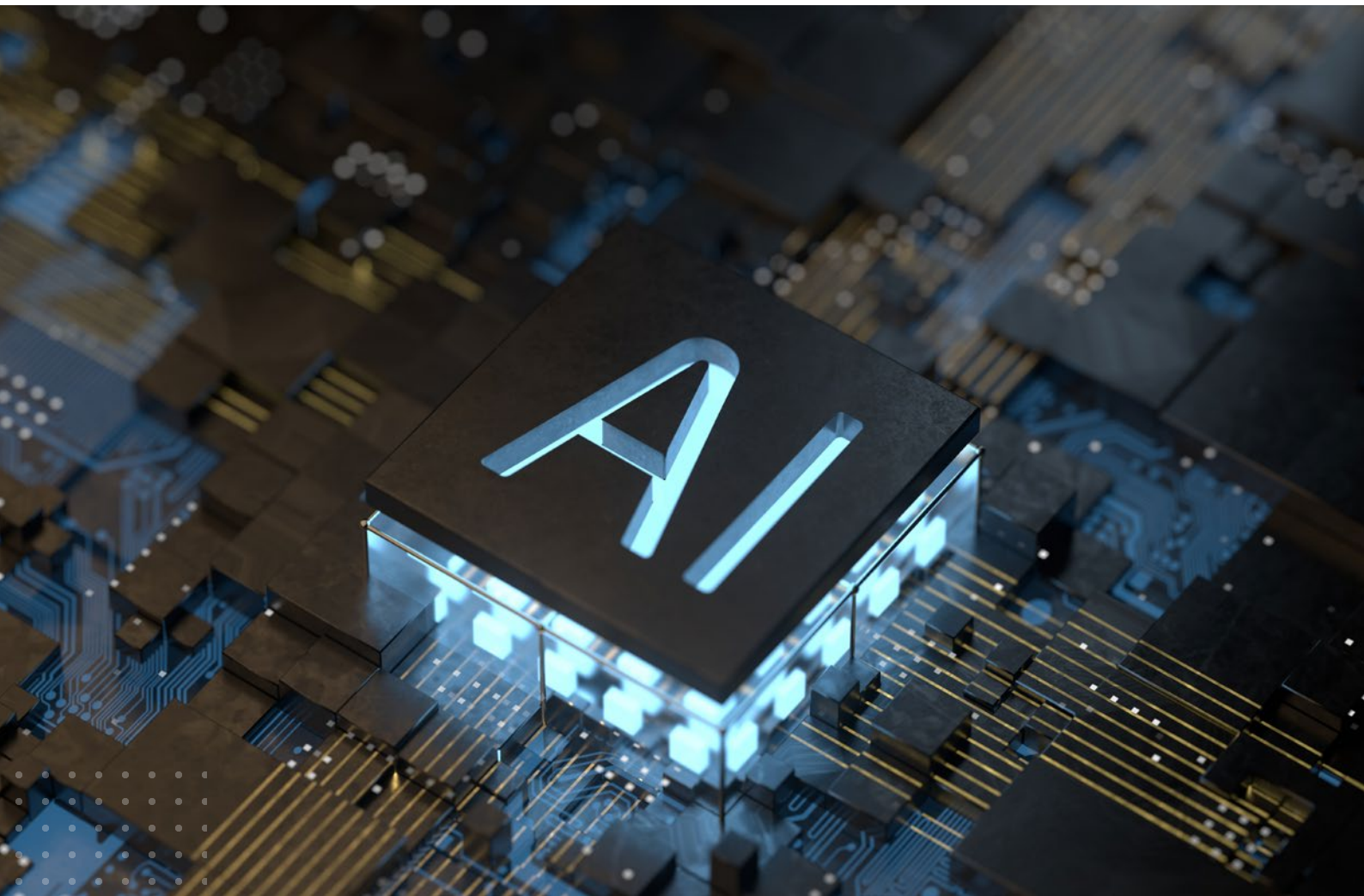
5.4. Artificial intelligence

We strive for the ethical and responsible use of Artificial Intelligence (AI) in all our operations, ensuring that we proceed in a manner that respects human rights, privacy, confidentiality and fairness.

The ethical use of AI involves developing, using, and/or implementing AI technologies in a way that is transparent, accountable, aligned with our ethical principles and applicable regulatory requirements.

We only use AI tools that are internally validated to ensure we meet our internal guidelines concerning reliability, security, and ethical considerations.

We are dedicated to harnessing the power of AI to augment our operations, keeping and ensuring that its application aligns with our core values and ethical standards. We aim to foster trust and integrity in all our AI-driven initiatives, ensuring they contribute positively to our mission and the communities we serve.



We are dedicated to harnessing the power of AI to augment our operations, keeping and ensuring that its application aligns with our core values and ethical standards.

Examples of how we translate integrity into practice

WHAT WE DO



- We ensure transparency and explainability by making AI systems and their decision-making processes understandable and accessible to users.
- We promote AI systems that recognize equality and are unbiased across all areas of their application.
- We hold developers and users of AI systems accountable for their actions and decisions.
- We protect confidentiality by using AI responsibly, ensuring that all data processed is handled with the highest confidentiality to protect the privacy and security of our business operations, customers, and stakeholders.
- We respect privacy, protecting the personal data and privacy of individuals in all AI applications.
- We ensure that human judgment and oversight are integral to any AI-based decision-making processes we use internally. As AI systems become increasingly capable of performing actions autonomously across various domains, ST collaborates to defining use cases with clients during the design phase, guaranteeing that humans retain the ability to take control of the systems when necessary.
- We foster collaboration and engagement by actively engaging with stakeholders, including customers, partners, and regulatory bodies, to ensure our AI practices are aligned with societal expectations and legal requirements.

IN PRACTICE



Question:

You need to better understand the demographic of our customer base and would like to insert some customer data into a public GenAI tool and ask it to pull out some patterns for you. Is this ok?

Answer:

Inserting Personally Identifiable Information (PII) into a public GenAI tool could lead to a data breach, as the information would become accessible to individuals outside our Company. PII must never be input into a public GenAI tool. Non-public or confidential information you may hold about a third party Company / customer should never be input into a public GenAI tool as it may lead to the breach of confidentiality undertakings.

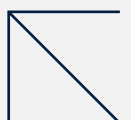
Question:

An AI system makes an autonomous decision that has significant implications for a project. What should you do?

Answer:

Review the AI's decision with a human expert to ensure its accuracy and appropriateness. Maintain the ability for humans to override AI decisions when necessary to ensure responsible and ethical outcomes.

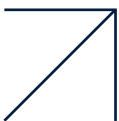
We strive for the ethical and responsible use of Artificial Intelligence (AI) in all our operations.



6. We strive for excellence in everything we do

We strive for excellence in everything we do. Our success is built on establishing honest and trusted relations with our stakeholders: we encourage innovation, we listen to anticipate future needs, we are flexible, we develop our competences, seek responsibility and are accountable for our actions; we communicate transparently, and we act with discipline basing our decisions on facts and focus on the priorities.

We strive for excellence in everything we do.



- **Customers:** We are dedicated to making our solutions the best, safest and most reliable in the market. Our goal is to become our customers' most valued and trusted partner through excellent quality, reliability and responsiveness. When making decisions related to product quality, our first consideration will be the protection of our customers and the safety of consumers through open, timely and factual disclosure to appropriate parties.
- **Business partners:** In all our commercial relationships with customers, suppliers, and other business partners, we strive to build trusted, mutually beneficial collaborations. When establishing business relationships, we must ensure that our partners not only respect and support our values and principles but also adhere to comparable standards of ethical business conduct.
- **Shareholders:** As a corporation, our primary objective is to generate sustainable economic value for all our stakeholders, including shareholders. Profitability is essential to ensure security and create future opportunities for all. We aim to achieve this by fostering sustainable growth in our business, managing resources responsibly, maintaining control over expenses, and striving for excellence in project execution.
- **Governments and communities:** In order to establish trust and protect our reputation, while supporting balanced decision-making, we develop healthy relationships with local governments and communities; our Company has an important role in promoting responsible business practices based on integrity, trust and openness.

7. Accountability and resources

7.1. Disciplinary measures

The provisions and principles included in this Code of Conduct are mandatory for all ST employees. Any violation of this Code of Conduct will be addressed promptly and appropriately and may result in appropriate disciplinary measure(s), in accordance with applicable laws and internal policies, up to and including termination of contractual relationship.

7.2. Resources

Each section of this Document contains guidance on which complementary document to consult or who to seek advice from. If ever in doubt or if you need any additional information, please seek guidance from the Ethics, Compliance & Privacy department.

- Ethics, Compliance & Privacy department intranet.
- For the list and access to the policies and procedures relating to our Code of Conduct, please visit the online version of this Code of Conduct.
- Download the ST Integrity App!

The application includes quick access to useful information and resources, fun quizzes to test your knowledge, as well as the latest news and developments about ethics and compliance principles and initiatives in ST.

More information available [here](#).

**Ethics, Compliance
& Privacy department**



Ethics Hotline



Download the ST Integrity App!





Code of Conduct

Building Trust Together

For more information on ST products and solutions, visit www.st.com

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