

SUPPLIER CODE OF CONDUCT

STEULER LININGS

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1 INTRODUCTION

1.1 INTRODUCTION

Economic success and responsibility toward society are inextricable. Responsible and ethical conduct toward employees, business partners, society and the environment is an integral part of the Steuler Group. We also see sustainability as an integral part of our business processes. As a technology company with a high level of material competence, we procure raw materials, goods and services from suppliers across the globe to ensure the long-term success of our customers with innovative product and service solutions.

The basis for this is company management system that is aligned toward responsible and long-term value creation. For this reason, we include our suppliers directly into our sustainability strategy. In addition to process-related, commercial and technical criteria, our procurement activities also take social and ecological aspects, human rights, work conditions, anti-corruption and environmental protection aspects into account.

The interaction between products, performance, the market, region and process, costs, quality, reliability, innovation and sustainability are also important factors for supplier selection and evaluation. The Steuler Group also feels bound by the following rules.

1.2 EXPECTATIONS AND VALIDITY OF THE SUPPLIER CODE OF CONDUCT

Steuler expects its suppliers to ensure that their activities comply with the valid national laws, the principles of the United Nations Global Compact and this Steuler Supplier Code of Conduct. They are also expected to implement suitable processes that help ensure compliance with valid laws in their company, and promote continuous improvement with respect to the principles and requirements of the Steuler Supplier Code of Conduct. Steuler also expects its suppliers to ensure that their affiliated companies also observe and recognize all principles and requirements described here. 'Affiliated companies' within the meaning of this declaration are companies that have, directly or indirectly, at least fifty percent (50 percent) of the voting capital in the economic property of the main company.

Business partners within the meaning of this Supplier Code of Conduct, which we expect to comply with the standards laid out here, are all third parties that work for, on behalf of, or with Steuler. This also includes suppliers, sales partners, consultants, agents, subcontractors, minority shareholders, commercial agents and freelance employees.

2 INTEGRITY

2.1 COMPLIANCE WITH VALID LAWS

Compliance with all valid laws and regulations is a matter of course for us. We also expect this from our business partners. This is the only way to secure a trusting and long-term business relationship.

There may be stricter regulations in some countries, business fields or markets than those that are described in the Supplier Code of Conduct. In these cases, the stricter regulations should be applied.

2.2 FOREIGN TRADE LAW

National and international laws govern the import, export or domestic trade in goods, technologies or services, handling of certain products as well as capital and payments. Appropriate action must be taken to

ensure that transactions with third parties do not breach valid economic embargos or trade, import or export control regulations or the fight against terrorist funding.

2.3 ANTI-BRIBERY AND CORRUPTION

Steuler expects its suppliers to never tolerate corruption and to ensure that the conventions of the United Nations (UN) and the Organization for Economic Cooperation and Development (OECD) for fighting corruption and the relevant anti-corruption laws are observed. In particular they must ensure that their employees, subcontractors or agents do not offer, promise or grant benefits to Steuler employees or closely-connected third parties with the objective of receiving an order or any other preferential treatment in their business dealings.

2.4 INVITATIONS AND GIFTS

Steuler expects its suppliers to not use invitations and gifts to influence others. Invitations and gifts to Steuler employees or persons close to these employees are only allowed in an appropriate form and scope, and if they are seen and tolerated as the allowed expression of conventional local business practice. At the same time, suppliers may not demand any inappropriate benefits from Steuler employees.

2.5 CONFLICTS OF INTEREST

Steuler expects its suppliers to only make decisions about their business dealings with Steuler based on factual criteria. Conflicts of interest with private issues or other economic or other activities, even of relatives or other close persons or organizations must be avoided from the outset.

Business partners who are affected by a possible or actual conflict of interest with respect to their work for Steuler have a duty to disclose and solve this immediately.

2.6 FAIR COMPETITION

Steuler expects its suppliers to practice fair competition and to observe the valid competition and cartel laws. Suppliers may not participate in agreements that are in violation of antitrust laws with competitors, nor may they abuse their market position. They refrain from anti-competitive agreements with competitors, suppliers, sales companies, dealers and customers, as well as any other anti-competitive practices. These include, for instance, fixing prices with competitors, dividing up customers or sales areas among competitors, anti-competitive boycotts and unlawful exchange of sensitive competition-related data with competitors.

2.7 PROTECTION OF ASSETS AND PROPERTY

Any form of fraud or economically-damaging offences (e.g. fraud, breach of trust, theft, embezzlement, tax evasion or money laundering) is prohibited, irrespective of whether Steuler company assets or the assets of third parties are damaged. Steuler expects its suppliers to observe the relevant, statutory obligations relating to the prevention of money laundering, and to refrain from participating in money laundering activities.

2.8 PROTECTION OF INTELLECTUAL PROPERTY

Regardless of its commercial value, intellectual property includes all rights to immaterial works (products of intellectual work). This also

includes software, graphic designs. Intellectual property is protected by laws (e.g. copyright laws, brand, design or patent laws) as a business secret or know-how.

Breaches of protected intellectual property include e.g. the use, transfer and unauthorized duplication or editing of intellectual property (patents, drawings, samples, etc.) be it physically or digitally.

For Steuler as a company, the protection of intellectual property is of huge corporate importance and is therefore also expected from our business partners.

2.9 DATA PROTECTION

When collecting, storing, processing or transferring personal data (e.g. name, address, telephone number, date of birth, information about health) of employees, customers or other third parties, our business partners must exercise great care and treat this information in strict confidence, and also observe all valid laws and regulations.

2.10 FINANCIAL INTEGRITY

Business transactions, assets and liabilities are recorded and documented in compliance with the statutory requirements. Documents relevant for financial accounting may not be deliberately falsified with incorrect or misleading entries. Any kind of balance sheet manipulation is strictly prohibited. Business incidents must always be documented or booked.

2.11 CONFIDENTIALITY AND BUSINESS INFORMATION

Our business partners ensure that confidential information and data is stored carefully, is not forwarded or made accessible to authorized persons, and is only used for the agreed business purposes.

The discussion of confidential information in public and social media or the unauthorized transfer of information about the company or its customers to third parties, e.g. the media or competitors, is a breach of trust and may also be a violation of competition law and lead to considerable claims for damages.

2.12 INFORMATION SECURITY

Every day information that needs to be protected is used by the company and processed with IT systems. Here, suitable safety precautions (processes, approved technologies and licensed software) are required to guarantee the protection of intellectual property and personal data. Non-observance of safety measures can have serious consequences, for instance data loss, theft of personal data or breaches of copyright laws.

Our business partners undertake to only use the information provided by Steuler to fulfil the agreements concluded with Steuler and not for impermissible own or personal purposes or for unethical or illegal activities.

It is the responsibility of our business partners to ensure that all necessary measures are taken to protect sensitive information against internal or external misuse and threats.

3 HUMAN AND EMPLOYEE RIGHTS

3.1 COMPLIANCE WITH VALID NORMS AND LAWS

Steuler expects its suppliers to comply with basic labor regulations of the valid national and international laws and to recognize the core labor standards of the International Labour Organisation (ILO) and the

International Human Rights Charter of the United Nations taking into account the laws and legal forms that apply in the various countries and sites. Steuler expects its suppliers to respect third-party rights and to keep any consequences to a minimum in observation of international standards.

3.2 CHILD LABOR

Steuler expects its suppliers to prohibit and refrain from any type of child labor in their companies within the meaning of the Conventions 138 and 182 of the ILO and the national laws. The minimum age of a child or youth employed to work may not lie below the age at which mandatory school attendance in the country ends in which the business partner operates.

3.3 FORCED LABOR

Steuler expects its suppliers to prevent any kind of forced labor or human trafficking in their company and to refrain from these practices. Also, forced labor i.e. any work conducted by a person against their will under the threat of punishment, and modern forms of slavery and human trafficking will not be tolerated by our business partners.

3.4 DISCRIMINATION

Steuler expects its suppliers to promote equal opportunity and treatment when recruiting employees, and to prevent any form of discrimination with respect to promotions or training opportunities. No employee may be disadvantaged on the basis of their gender, age, marital status, color of their skin, nationality, ethnic, political or social origin, sexual orientation, disability, religion or ideology or political opinion.

3.5 FREEDOM OF ASSOCIATION

Steuler expects its suppliers to observe its employees' right to organize and conduct collective negotiations in line with national laws.

3.6 WORKING HOURS AND PAYMENT

Steuler expects its suppliers to observe all valid national laws pertaining to working hours. It also expects the supplier's employees to receive payment that is in compliance with the respective national laws.

3.7 CONFLICT MINERALS

Steuler expects its suppliers to observe all applicable regulations pertaining to conflict materials. In the event that a product contains one or several so-called conflict materials (tin, tantalum, tungsten or corresponding ores), Steuler expects its suppliers, on request, to demonstrate transparency along its entire supply chain through to the smelting works.

4 WORK SAFETY

HEALTH & SAFETY

Steuler expects its suppliers to observe all valid national laws pertaining to health and safety. It also expects its suppliers to develop and apply an appropriate health and safety management system (e.g. acc. to SCC** or ISO 45001). This includes minimizing actual and potential health and safety risk and also training employees to prevent accidents and occupational disease as best as possible.

5 ENVIRONMENTAL PROTECTION

RESPONSIBLE USE OF NATURAL RESOURCES

Steuler expects its suppliers to observe the respective national environmental laws, regulations and standards. Steuler also expects its suppliers to establish and apply an appropriate environment management system (e.g. acc. to ISO 14001) to minimize pollution and risks to the environment and to guarantee and improve environment protection every day in the company.

6 SUPPLIER RELATIONSHIPS

SUBCONTRACTORS AND SUB-SUPPLIERS

Steuler expects its suppliers to communicate all principles and requirements described here to their subcontractors and sub-suppliers, and to also take these into account during their selection. The suppliers encourage their own suppliers and subcontractors to comply with the stated standards relating to integrity, human and labor rights, health and safety as part of their contractual duties. Steuler also expects its suppliers to only use materials from legal sources and to provide evidence of this on request.

7 COMPLIANCE WITH THE STEULER SUPPLIER CODE OF CONDUCT

7.1 COMPLIANCE

The supplier self-disclosure form is used to check the supplier's compliance with the principles and requirements of the Steuler Supplier Code of Conduct. Also, as agreed with the suppliers, Steuler or a third party contracted by Steuler may carry out audits on site.

7.2 BREACHES

Every breach of the principles and requirements in the Steuler Supplier Code of Conduct is seen as a major violation of the contractual relationship by the supplier. If there is any doubt about compliance with the described principles and requirements of the Steuler Supplier Code of Conduct, Steuler reserves the right to demand information about the situation. Steuler is also entitled to terminate, without notice, individual or all contractual relationships with suppliers where there is evidence that they do not fulfil the Steuler Supplier Code of Conduct or do not strive toward implementing improvement action even after a reasonable deadline was set by Steuler.

8 STEULER SUPPLIER CODE OF CONDUCT

SUPPLIER DECLARATION

- 1. The supplier has received the 'Steuler Supplier Code of Conduct'.
- 2. The supplier undertakes to also observe and recognize the obligations connected to skeleton and delivery contracts with Steuler, as well as all principles and regulations of the Steuler Supplier Code of Conduct.
- 3. The substantive law applicable in the Federal Republic of Germany applies for the declaration.

Name of the supplier

Place

Date

Place

Date

Name, first name

Name, first name

Function

Function

E-Mail

E-Mail

Signature

Signature

This declaration must be signed by the proper number of correctly authorized representatives of the supplier.