

## Code of Conduct of Wuppermann AG

### 1. Preamble

Wuppermann AG and its affiliated companies are committed to ecological and socially responsible corporate governance. We expect the same behaviour from all our suppliers and customers. We also expect our employees to observe the principles of ecological, social and ethical behaviour and to integrate them into our corporate culture. Furthermore, we are constantly striving to optimise our business activities and our products in terms of sustainability and encourage our suppliers to contribute to this in the sense of a holistic approach. We ensure that these resolutions are observed in the supply chain.

As a medium-sized family business with tradition, quality is our top priority. This applies in particular to the cooperation with our customers and suppliers, as well as to our products. We strive for long-term growth and financial stability.

Our goal is to become the largest manufacturer of hot-dip galvanised hot-rolled strip in Europe - as the problem solver for the highest corrosion protection requirements based on steel strip with the lowest CO2 emissions - and to strengthen our niche position as a steel tube producer.

Relationships based on trust and respect are prerequisite for the long-term success of our company. For this reason, we are committed to transparency, fairness, accountability and appreciation towards our employees, customers and business partners. We aim for setting standards in customer satisfaction with excellent customer service, product quality, reliability and flexibility.

In almost 150 years of entrepreneurship, responsible behaviour towards the environment as well as towards our employees, shareholders, customers and business partners has become an integral part of our corporate culture.

Wuppermann AG signs the Charter of Diversity. By signing the charter, Wuppermann commits itself to the management of diversity, which is to be lived in everyday business life. The aim of the Diversity Charter Association is to create a working environment for employees in which everyone is equally valued and encouraged, regardless of nationality, ethnic origin, gender identity, religion or belief, disability, age or sexual orientation. The initiative is supported by Minister of State Annette Widmann-Mauz, Federal Government Commissioner for Migration, Refugees and Integration.

For the future cooperation, Wuppermann AG confirms the validity of the following regulations for a joint code of conduct. This agreement is the basis for all future deliveries. Wuppermann AG confirms to comply with the principles and requirements of the Code of Conduct. We commit our subcontractors to comply with the standards and regulations listed in this document. This agreement comes into force upon signature. Any violation of this Code of Conduct may be reason and occasion for the company to terminate the business relationship, including all related supply contracts.

The Code of Conduct is based on national laws and regulations and international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Corporate Behaviour, the United Nations Guidelines on

Business and Human Rights, the International Labour Standards of the International Labour Organisation and the United Nations Global Compact. We expect our suppliers to comply with all relevant laws and regulations and the requirements of standards.

## **2. Self-Commitment**

### **2.1. Employees**

#### **Exclusion of forced labour**

No forced labour, slave labour or similar work may be used. All work must be voluntary and employees must be able to stop working or terminate their employment at any time. Furthermore, no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment, may take place.

#### **Prohibition of child labour**

Child labour must not be used in any phase of production. We comply with the recommendations of the ILO conventions on the minimum age for the employment of children. According to this recommendation, the age should not be lower than the age at which compulsory education ends and in any case not lower than 15 years.

#### **Fair payment**

The remuneration paid to the workers shall comply with all applicable laws on remuneration, including, for example, laws on minimum wages or overtime. If the statutory minimum wage is not sufficient to cover the cost of living, the business partner is obliged to pay a remuneration that covers the basic needs. Wage deductions as punitive measures are not permitted. The basis according to which workers are paid will be made known to the employees on an ongoing basis by means of a pay slip.

#### **Fair working hours**

Working hours must comply with applicable laws or industry standards. Overtime is only permitted if it is voluntary and does not exceed 12 hours per week, while employees must be given at least one day off after six consecutive working days. The weekly working time must not regularly exceed 48 hours.

#### **Freedom of Association**

We respect the right of workers to freedom of association, to join trade unions, to appeal to workers' representatives or to be members of works councils in accordance with local laws. Workers must be able to communicate with management openly and without fear of reprisal or harassment.

#### **No Discrimination**

Discrimination against employees in any form is not permitted. This applies, for example, to discrimination based on gender, race, caste, skin colour, disability, political conviction, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

#### **Health protection; Safety at work**

We are responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary preventive measures are taken against accidents and damage to health that may occur in connection with the activity. In addition,

the employees are regularly informed and trained about applicable health and safety standards and measures. Employees are given access to sufficient quantities of drinking water and access to clean sanitary facilities.

### **Complaint mechanisms**

We are responsible for establishing an effective complaints mechanism at company level for individuals and communities who may be affected by adverse impacts. Even where legal systems are effective and well-equipped, complaints mechanisms can offer particular advantages, such as rapid access and redress, reduced costs and transnational reach.

### **Dealing with conflict minerals**

So-called conflict minerals are currently not used at Wuppermann.

## **2.2. Ecological responsibility**

Wuppermann AG complies with the applicable national environmental laws.

### **Treatment and discharge of industrial waste water**

Waste water from operating procedures, manufacturing processes and sanitary facilities shall be typified, monitored, checked and, if necessary, treated before discharge or disposal. In addition, measures should be introduced to reduce the production of waste water.

### **Dealing with air emissions**

General emissions from operations (air and noise emissions) and greenhouse gas emissions must be typified, routinely monitored, verified and treated as necessary before release. The supplier is also responsible for monitoring his waste gas purification systems and is required to find economic solutions to minimise any emissions.

### **Chemicals management and handling of waste / hazardous substances**

The supplier follows a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a risk when released into the environment must be identified and handled in such a way as to ensure safety during their handling, transport, storage, use, recycling or reuse and their disposal.

### **Reduce consumption of raw materials and natural resources**

The use and consumption of resources during production and the generation of waste of all kinds, including water and energy, must be reduced or eliminated. This can be done either directly at the place of origin or through procedures and measures, e.g. by changing production and maintenance processes or company procedures, by using alternative materials, by savings, by recycling or by reusing materials.

### **Dealing with energy consumption/efficiency**

Energy consumption must be monitored and documented. Economic solutions must be found to improve energy efficiency and minimise energy consumption.

## **2.3 Ethical business conduct**

### **Fair competition**

The standards of fair business, fair advertising and fair competition must be respected. In addition, the applicable antitrust laws must be applied, which, when dealing with competitors,

prohibit in particular agreements and other activities that influence prices or conditions. Furthermore, these rules prohibit agreements between customers and suppliers which aim to restrict customers' freedom to determine their own prices and other conditions of resale.

#### **Confidentiality / Data protection**

Wuppermann AG undertakes to meet the reasonable expectations of its principal, suppliers, customers, consumers and employees with regard to the protection of private information. When collecting, storing, processing, transmitting and passing on personal information, Wuppermann AG must observe the laws on data protection and information security and the official regulations.

#### **Intellectual property**

Intellectual property rights must be respected; transfers of technology and know-how must be carried out in a way that protects intellectual property rights and customer information.

#### **Integrity / Bribery, taking advantage**

The highest standards of integrity must be applied to all business activities. Wuppermann AG pursues a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing the standards must be in place to ensure compliance with anti-corruption laws.

### **3. Implementation of the requirements**

By signing this document, Wuppermann AG undertakes to act responsibly and to comply with the principles/requirements set out. We confirm that we effectively communicate the contents of this Code to employees, agents, subcontractors and suppliers and assure that all necessary precautions are duly implemented.

We expect our suppliers to identify risks within their supply chains and to take appropriate measures. In the event of suspected violations and to secure supply chains with increased risks, Wuppermann AG requires disclosure of the supply chains.

In particular, Wuppermann AG will not tolerate any form of bribery and/or corruption within their supply chain and will only do business with partners who comply with applicable laws and regulations regarding working hours, overtime, compensation and benefits.

Wuppermann AG reserves the right to review business relationships with suppliers and customers and to terminate contracts in the event of a serious breach or persistent failure to meet the standards described herein.

Date

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Wuppermann AG

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