

Code of Conduct of Wuppermann AG

1. Preamble

Wuppermann AG and its affiliated companies are committed to ecologically 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 conduct and to integrate them into our corporate culture. Furthermore, we strive to continuously optimise our business activities and our products in terms of sustainability and ask our suppliers to contribute to this in the sense of a holistic approach. We ensure that these resolutions are adhered to 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 achieve the position of the largest producer of hot-dip galvanised hot strip in Europe - as the problem solver for the highest corrosion protection requirements on a strip steel basis with the lowest CO2 emissions - and to strengthen the niche position as a steel pipe producer.

The basic prerequisite for the long-term success of our company are relationships based on trust and respect. That is why we are committed to transparency, fairness, responsibility and appreciation towards our employees as well as our customers and business partners.

We pursue the goal of setting standards in customer satisfaction with excellent customer service, product quality, reliability and flexibility.

In 150 years of entrepreneurship, responsible action towards the environment as well as towards our employees, shareholders, customers and business partners has become anchored in our corporate culture.

Wuppermann AG has signed the Diversity Charter. By signing, Wuppermann is making a voluntary commitment to diversity management, which is to be lived out in everyday corporate life. The aim of the Diversity Charter Association is to create a working environment for employees in which everyone is valued and promoted equally, regardless of nationality, ethnic origin, gender identity, religion or world view, 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 future cooperation, Wuppermann AG confirms the validity of the following regulations for a common code of conduct. This agreement shall apply as the basis for all future deliveries. Wuppermann AG undertakes to comply with the principles and requirements of the Code of Conduct. We contractually require our subcontractors to comply with the standards and regulations set out in this document. This agreement comes into force upon signature. In the event of a breach of this Code of Conduct, the company is at liberty to take this as a reason to terminate the business relationship, including all associated supply contracts.

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

on Children's Rights and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the International Labour Standards of the International Labour Organization and the United Nations Global Compact. We expect our suppliers to comply with all relevant laws, regulations and standards requirements.

2. Voluntary commitment

2.1. Employees

Exclusion of forced labour

No forced labour, slave labour or work comparable to forced labour may be used. All work must be voluntary and workers must be able to leave work or employment at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment.

Prohibition of child labour

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

Fair remuneration - wages and social benefits

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

Fair working hours

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

Freedom of association

Wuppermann AG respects the right of workers to freedom of association, to join trade unions, to appeal to workers' representatives or to join works councils in accordance with local laws. Workers shall be able to communicate openly with management without fear of reprisal or harassment.

Prohibition of discrimination

Discrimination against employees in any form is prohibited. 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

Wuppermann AG is responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures

are taken against accidents and damage to health that may arise in connection with the activity. In addition, employees are regularly informed and trained on applicable health and safety standards and measures. Employees are provided with access to drinking water in sufficient quantities as well as access to clean sanitary facilities.

Reporting violations - whistleblower protection / whistleblowing

Wuppermann AG provides internal reporting offices and reporting channels for itself and its affiliated companies in accordance with the applicable laws for the protection of whistleblowers. Wuppermann encourages individuals who become aware of conduct that violates the rules of proper corporate governance contained in the Code of Conduct, the Compliance Policy or other laws and regulations and/or constitutes a criminal offence (e.g. bribery offences, prohibited insider trading, environmental offences) ("Violation") to inform the Compliance Officer.

The Compliance Officer can be contacted as follows:

By phone: +49 2171 5000 809

E-mail: compliance@wuppermann.com

Postal: Wuppermann AG, Compliance Officer, Ottostr. 5, D-51381 Leverkusen

Information can be submitted in person or anonymously.

Dealing with conflict minerals

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

2.2 Ecological responsibility

Wuppermann AG complies with the applicable national environmental laws.

Treatment and discharge of industrial waste water

Wastewater from operations, manufacturing processes and sanitary facilities should be typed, monitored, inspected and treated as necessary before discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

Dealing with air emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be typed, routinely monitored, verified and treated as necessary prior to their release. The supplier is also responsible for monitoring its exhaust gas cleaning systems and is required to find economic solutions to minimise any emissions.

Chemical management and handling of waste / hazardous substances

The supplier shall follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a hazard when released into the environment shall be identified and managed in a manner that ensures safety when handling, transporting, storing, using, recycling or reusing and disposing of them.

Reduce consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, shall be reduced or avoided. This can be done directly at

the point of production or through procedures and measures, such as changing production and maintenance processes or company procedures, using alternative materials, saving, recycling or reusing materials.

Dealing with energy consumption/efficiency

Energy consumption shall be monitored and documented. Economic solutions shall 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 shall be observed. In addition, the applicable antitrust laws shall be applied, which specifically prohibit collusion and other activities that influence prices or conditions when dealing with competitors. Furthermore, these regulations prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to autonomously determine their prices and other conditions when reselling.

Confidentiality / data protection

Wuppermann AG is committed to meeting the reasonable expectations of its clients, suppliers, customers, consumers and employees regarding the protection of private information. Wuppermann AG complies with data protection and information security laws and official regulations when collecting, storing, processing, transmitting and disclosing personal information.

Intellectual property and plagiarism

Intellectual property rights must be respected; technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information are protected. For this reason, the use of plagiarised or counterfeit materials is prohibited.

Integrity / bribery, taking advantage

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

Financial responsibility

Wuppermann AG acts with integrity in its accounting practices, uses accurate data and has a system of checks and balances in place to reduce the risk of fraud. All business-related financial information is correctly created, recorded and stored in full compliance with the applicable regulatory requirements.

Export controls and economic sanctions

Wuppermann complies with the export control and economic sanctions provisions of the EU and, where applicable, the US.

3. Implementation of the requirements

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

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

In particular, Wuppermann AG does not tolerate any form of bribery and/or corruption within its supply chain and only maintains business relationships with partners who comply with applicable laws and regulations regarding working hours, overtime, remuneration and social 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.

A signed copy of this Code of Conduct will be provided to business partners upon request.