

HEINE + BEISSWENGER

Gruppe



Code of Conduct of the Heine + Beisswenger Group

Growth

Innovation

Sustainability



Foreword

Dear colleagues,
dear business partners,

Appreciation, integrity, sustainability, excellence, passion and performance are core values on which everything we do is based. They form the basis of our corporate culture and are the key to top performance, sustainable profitable growth and success.

With this corporate code of conduct of the HEINE + BEISSWENGER Group (H+B), we inform all employees at every location and all business partners about the set standards that we live by. The corporate code of conduct builds on our principles, beliefs and values, which have been developed over many decades, and illustrates how we live them in everyday business. Our values stem from our long tradition as a family company. It is important to us that we actually live these values. They not only serve as a point of reference for the day-to-day activities of our employees, but also as a reliable compass for our stable business relationships.

We have developed our good reputation towards customers, suppliers and other business partners as well as our employees for more than one hundred and twenty years and can only maintain and develop this further if both we and our business partners follow the ethical standards that are anchored in our company principles as well as the law.

Accordingly, integrity is an essential element in our day-to-day business and is an important prerequisite for the economic success of our family business.

This corporate code of conduct was approved by the Executive Board of the Heine + Beisswenger Stiftung + Co. KG and underlines the importance that H+B attaches to responsible business relationships. H+B therefore demands that business partners also feel responsible for complying with this code of conduct and encourage each of their employees and their business partners to also comply with it.

The Executive Board of the

HEINE + BEISSWENGER Group



Dr. Rainer Lindner
CEO



Matthias Heine
Member of the Board



Robert Heine
Member of the Board

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Corporate values

Our values stem from our long tradition as a family company. It is important to us that we actually live these values. They not only serve as a point of reference for the day-to-day activities of our employees, but also as a reliable compass for our stable business relationships.

Values that stand for **reliability**



Preamble

This code of conduct applies to all employees and the executive bodies of the entire Heine + Beisswenger Group (hereinafter also "H+B"), including all locations and subsidiaries, and all business partners.

All employees of the Heine + Beisswenger Group companies are obliged to organize their business activities in accordance with these principles. The managers of the group must actively exercise their function as role models.

The code of conduct sets minimum standards that take precedence over more lenient legal requirements; Conversely, stricter legal requirements take precedence over the code of conduct.



I. Fundamental Principles and Rules of Conduct

a) Compliance with applicable laws

H+B was, is and will continue to aspire to be a reliable partner to customers, suppliers and other business partners as well as a responsible employer.

H+B and its employees comply with all applicable local, national and international laws and regulations relevant to business operations.

Compliance with these laws is essential for sustainable corporate success and future development.

In addition to reputational damage, violations of these laws can have serious consequences, including criminal law, and endanger the company's success.

H+B does not tolerate any violations of the law and expects all business partners and employees to comply with them.

b) Human dignity and working conditions

All people are unique, valuable and have individual abilities. H+B is an employer where equality, diversity and fair and respectful interaction play an important role. Therefore, H+B expects its employees to behave accordingly when carrying out their business activities. All employees have the rights of others to consider national and cultural differences in business life. H+B requires its business partners to adhere to the same principles.

Of particular importance are:

- The right to equal opportunities and the right to non-discrimination
- A fair and performance-related payment
- Compliance with applicable regulations on working hours
- Rejection of forced and child labor
- Work-life balance

c) Conflicts of interest

H+B demands integrity from all business partners.

All employees act exclusively in the interests of H+B when carrying out their work. Own private or economic interests must not collide in any way with the interests of the H+B Group or give the impression of colliding with them.

d) Transparency and four-eyes principle

There are decisions that can have a significant legal and economic impact. Especially with such decisions, it is important that wrong decisions are avoided and possibilities of abuse are ruled out. This requires transparency and traceability. For this reason, H+B's approval and signature guidelines ensure, among other things, that at least two responsible employees must be involved in decisions ("four-eyes principle").

e) Handling of company assets and other company resources

Business assets and other tangible and intangible company resources are always treated with the utmost care at H+B and protected against theft and misuse.

Corporate resources also include intellectual property such as patents, data in the IT systems, confidential business-related information about customers, suppliers, internal processes, etc. H+B observes and respects the statutory data protection conditions and other laws protecting intellectual property.

H+B does not provide any information to the outside that has not been expressly approved for this purpose. This includes contracts, employee, customer and supplier data. This ensures that confidential information is not passed on to unauthorized third parties.

If confidential information must be passed on to third parties for good reason, the executive board must be informed in advance and a non-disclosure agreement signed.

The private use of equipment and office equipment is generally not permitted. Exceptions are regulated by the corresponding guidelines (e.g. private use of company cars, compliance with the existing guidelines for internet use, mobile phone use, etc.).

The regulations also apply accordingly to protection against loss, damage or misuse of the assets and resources of business partners and other third parties.

If you, as a business partner, are provided with H+B property, e.g. systems, operating resources or information technology, software, data or intellectual property, you are obliged to handle it carefully and responsibly and to protect it from unauthorized access.



**WE ALSO CREATE ADDED
VALUE FOR EVERYONE
WHO WORKS FOR US**

II. Behavior towards business partners, employees and other third parties

H+B employees behave respectfully, appreciatively, reliably and trustingly towards business partners, other employees and third parties.

Colleagues, customers and partners are always treated politely and fairly. Communication is open, honest and transparent. Cooperation is based on helpfulness, mutual support and constructiveness.

It is important for H+B employees to keep promises and only promise what can be kept.

Conflicts, problems and undesirable developments are addressed objectively and as quickly as possible in order to find common solutions.

Communication with offices and authorities is based on partnership and with foresight. It is carried out exclusively by the executive board or by employees authorized by the executive board.

a) Integrity

H+B expects loyalty and integrity from its employees. In addition, integrity is also maintained when dealing with other business partners. H+B will only maintain relationships with business partners who will do business with integrity and will not expose H+B to criminal or other liability or in any way damage H+B's reputation. This includes prevention of money laundering and terrorist financing, export control and sanctions law, tax laws and customs regulations, national and international laws and regulations that regulate import, export, commercial, brokerage or financing transactions, the provision of services and the transfer of goods (goods, software and technology).

b) Fair competition

H+B is committed to fair competition in compliance with all relevant antitrust and competition law provisions. Agreements or the creation of anti-competitive agreements as well as the exchange of competition-relevant information are strictly prohibited. Meetings with competitors are only permitted if there is a non-competitive, valid business reason.

Agreements with other business partners such as customers, suppliers and other trading companies are also prohibited.

c) Corruption

Corruption encompasses all direct or indirect actions which, in connection with a business activity or a public office, are aimed at inadmissibly influencing the business partner's decision-making process by demanding, accepting, offering or granting personal benefits. Corresponding benefits can consist of a gift, an invitation or another favor and benefit the person himself or a third party, for example a family member. As corruption generally distorts competition and, if an official is involved, jeopardizes the integrity of state action, it is prohibited by law in almost all countries.

H+B expects that all suppliers do not misuse invitations and gifts to influence. Invitations and gifts to employees of the H+B Group or persons close to them are only granted if the cause and scope are appropriate, i.e. they are of low enough value and do not give any indication of an intention to influence and are granted or accepted in a transparent manner.

Donations (without consideration, donation receipt required) or sponsorship activities (with consideration, sponsorship contract required) must be approved by the executive board of the H+B Group, as such donations can also be interpreted as hidden bribery.

d) IT-security

With the use of modern information technologies for networking with employees and business partners, the sustainable and value-oriented use of digital solutions is becoming increasingly important. Information and cyber security, the protection of personal data, insider information and the security of IT systems have a high priority.

e) Proper conduct in public

H+B requires business partners and employees not to make any H+B-related statements or statements in public or via social media and not to use H+B logos for their own purposes without the approval of H+B Corporate Communications.

A DYNAMIC FAMILY BUSINESS



III. Sustainability, Environment, Health and Safety

Protecting the environment and complying with all environmental regulations and standards applicable to the H+B Group is an important part of our business activities, both in trade and in production. H+B combines tradition and modernity and has provided the more than 120-year history with strategies for the future. We rely on sustainable action in all dimensions.

For the H+B Group, sustainability is not just a word. As a traditional family company, we assume responsibility along the three dimensions of sustainability: economy, ecology and social issues and are an important partner for both the manufacturing plants and customers from the automotive, mechanical engineering, renewable energy, agriculture, food industry etc. It is our duty to help the German steel industry achieve its sustainability goals.

**SUSTAINABILITY IS
ONE OF THE SIX
CORPORATE VALUES
AT H+B**



We are guided by the principles of the Greenhouse Gas Protocol and base our calculations on this standard.

H+B focuses on quality in all areas of the company. This is guaranteed, among other things, by our quality management system. It is part of our

integrated management system, which, in addition to quality assurance, also takes into account energy efficiency and environmental protection.

As an employer, H+B provides safe and hygienic working conditions. The corresponding legal requirements, regulations or company guidelines regarding occupational safety and active health protection are observed and fulfilled.

Resources and energy are used sensitively and sustainably and attention is paid to compliance with waste separation regulations.

SUPPORT ALONG THE ENTIRE VALUE CHAIN



IV. Reporting and Contacts

Violations of one or more points of this code of conduct lead to internal disciplinary measures. Depending on the severity of the occasion, these can range from warnings to warnings and termination without notice.

In addition, H+B reserves the right to claim damages and to take steps under civil law.

In the event of violations by business partners, H+B reserves the right to take legal action or to terminate the business relationship.

Violations of the corporate code of conduct or other undesirable developments must be reported to the manager (managing director or branch manager) or the human resources department personally or anonymously and without culpable hesitation. In the case of anonymous tips, stricter verification measures must be taken with regard to the truthfulness in order to avoid defamation and other disadvantages that accused employees could suffer.

If you as an employee are unsure or have questions - ask your supervisor.

All reports are treated confidentially and carefully checked.

A report will in no way result in negative consequences, unless the allegations are knowingly false.

In accordance with the Whistleblower Protection Act, we have set up and communicated internally a reporting platform for the submission of information on white-collar crime and abuses in the company. This whistleblower system enables our employees to report violations of the law, including competition and antitrust law, anti-corruption law, data protection, know-how protection, protection of confidential information and other white-collar crimes, either anonymously or by naming their names.

Our business partners have the option of reporting violations to info@heine-beisswenger.de.

Approval of the H+B Code of Conduct

As a business partner of H+B, we act according to the ethical and legal principles laid down in this code of conduct. We also pass these requirements on to our supply chain. We hereby acknowledge the code of conduct and confirm that we comply with the above principles and requirements by applying our own, equivalent corporate code of conduct in our company.

Date/signature and stamp of business partner or digital signature



**REPRESENTED ACROSS
GERMANY: OUR LOCATIONS
AT A GLANCE**

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