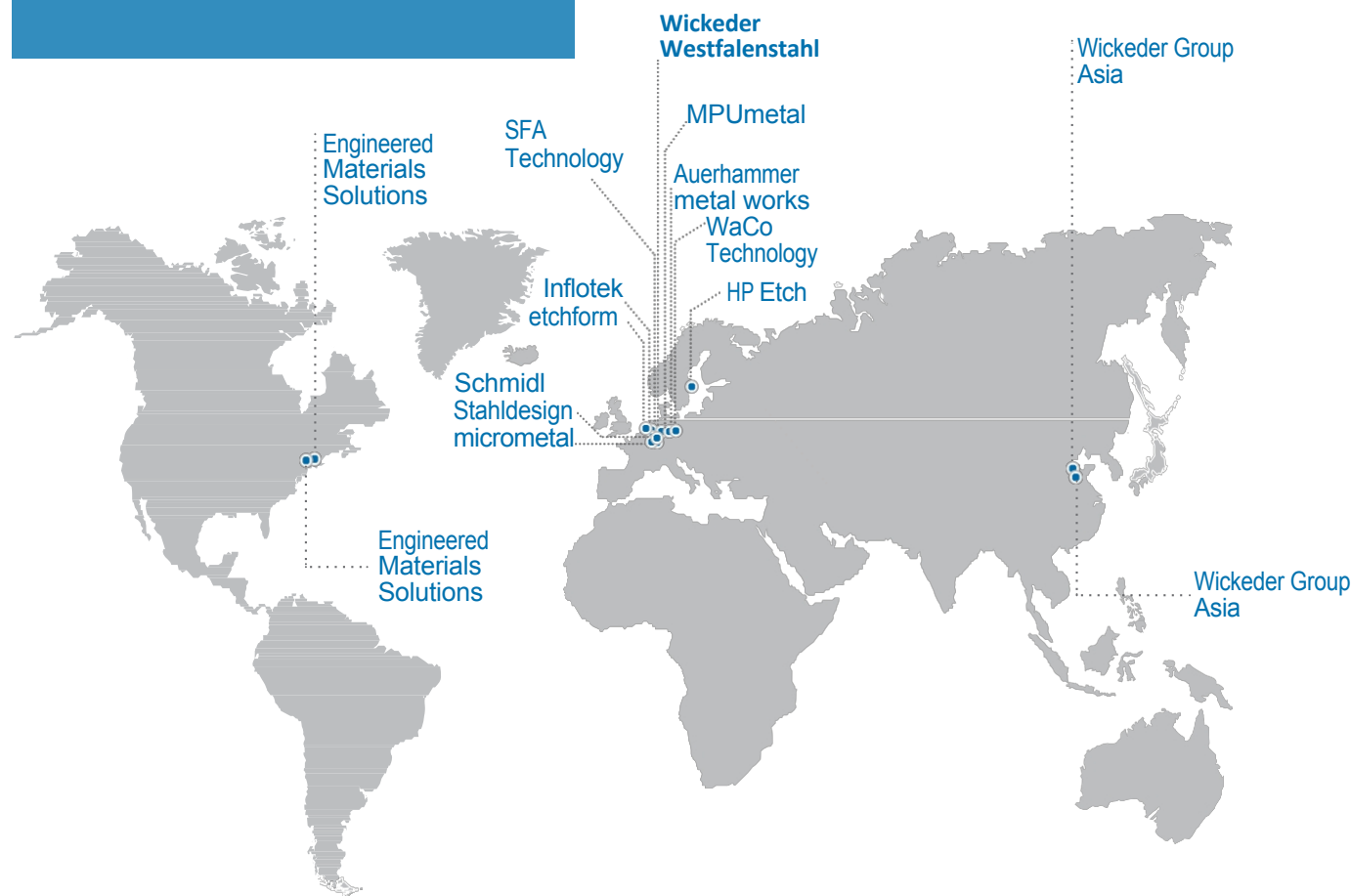


best of metal

Code of Conduct
Wickeder Group

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Employees
1051
(as of Feb 23)

Locations
15

Worldwide
Wickeder Group

FOREWORD

Dear colleagues,

The Wickeder Group is an internationally active group of companies that has to comply with a wide range of social, political and legal conditions in Germany and abroad. Even supposedly minor breaches of the law by employees can have a significant impact on the company's reputation and cause it considerable damage, including financial damage. In addition, legal violations can also have serious personal consequences for the employees involved. For this reason, compliance with all applicable laws and the relevant internal regulations issued by the Wickeder Group is a top priority at the Wickeder Group.

This Code of Conduct summarizes the values, principles and practices that guide the corporate conduct of the Wickeder Group. It provides a binding framework for orientation and applies equally to all of us - management, executives and each individual employee. Together, we are responsible for the reputation of our company. The Code of Conduct and the associated other internal regulations and guidelines reflect the Group's goal of ensuring compliance with all applicable legal provisions throughout the company and thereby protecting the interests of the Wickeder Group and its employees. They also serve to create a working environment characterized by integrity, respect and fair and responsible conduct.

Managers at the Wickeder Group are expected to organize their area of responsibility in such a way that the rules are observed at all times. Managers are particularly expected to act as role models for compliant behavior and to set an example. All Wickeder Group employees are also expected to adhere to the rules and set a good example.

Wickede (Ruhr), April 2023



Dr. Jürgen



PlattAndreas
Braun
Management
Board



Dr. Christian Wittneven
Management Board

SCOPE AND PURPOSE

This Code of Conduct applies worldwide to all companies and employees of the Wickeder Group. The Wickeder Group includes Wickeder Westfalenstahl GmbH and all companies in which Wickeder Westfalenstahl has a direct or indirect holding of at least 50%. The Code of Conduct provides a guiding framework for all Wickeder employees.

Group and defines fundamental standards of conduct that apply worldwide. Further specific rules are formulated in the corresponding internal company guidelines. These guidelines are valid and binding for all companies and employees of the Wickeder Group without restriction.

GENERAL PRINCIPLES OF ACTION

Compliance with the law and internal regulations

Compliance with all applicable legal provisions and internal regulations at the Wickeder Group is the indispensable basis for all actions of the Wickeder Group and its employees. All employees of the company are required to inform themselves about the legal provisions and internal regulations applicable to their area of responsibility at the Wickeder Group and, in cases of doubt, to seek advice from their superiors and other competent bodies at the Wickeder Group.

Ultimately, deviant behavior therefore endangers the jobs of all Wickeder Group employees. New employees must undertake to comply with the Code of Conduct in their employment contract. Investigations by the authorities, internal investigations or negative press coverage due to breaches of applicable law or other regulations also have a lasting negative impact on business operations.

Violations of laws and other binding regulations as well as internal regulations can result in criminal, labor and civil law penalties for Wickeder Group employees.

If stricter regulations than those in this Code of Conduct or in other internal regulations result from the laws applicable in the individual case, the statutory regulations shall apply. If the applicable law is less strict, the stricter rules still apply. Regulations in this Code of Conduct or in the other internal regulations of the Wickeder Group.

consequences. For the Wickeder Group, such violations can lead to high fines, contract award bans, official sanctions, claims for damages from customers or competitors and serious reputational damage. Such risks and damage can have a lasting impact on the economic viability and survival of the affected Group companies as well as for the Wickeder Group. Wickeder Group as a whole.

RESPONSIBILITY AS A BUSINESS PARTNER



1. HONEST BEHAVIOR

The Wickeder Group's standards go beyond mere compliance with the law and other binding regulations. The Wickeder Group expects its employees to behave honestly, sincerely and loyally in their business activities and in all situations related to these activities.

Anyone who appears externally on behalf of the Wickeder Group bears responsibility as a representative of the Group. Proper conduct also includes complying with the recognizable meaning of internal guidelines and not trying to circumvent them with formalistic justifications. In addition, line managers must fulfill their role model function.

2. COMBATING CORRUPTION

The Wickeder Group rejects any form of corruption and avoids even the mere appearance of it ("zero tolerance"). It is prohibited to influence decisions by granting personal benefits of any kind. This applies both to public officials and to employees of other companies and other institutions in Germany and abroad.

3. FAIR COMPETITION

Fair and free competition is subject to the protection of national and international competition and antitrust laws. We are committed to fair competition and reject unlawful agreements or practices that restrict competition.

4. COMPLIANCE AND SUSTAINABILITY IN THE SUPPLY CHAIN

The Wickeder Group maintains a wide range of business relationships with suppliers and subcontractors. These relationships enable the Wickeder Group to offer its own services at a competitive price. The Wickeder Group therefore carefully selects its suppliers and subcontractors solely on the basis of their performance and reliability and requires their cooperation with regard to sustainability-related criteria.

The Wickeder Group promotes the principles and practices of sustainable action along the entire value chain and gives procurement ethics an important role. The Wickeder Group also demands integrity and law-abiding behavior from its business partners. In its business relationships with business partners, in particular suppliers, service providers, subcontractors and sales consultants, the Wickeder Group works towards compliance with the applicable standards. We expressly expect suppliers to follow the behavior of the Wickeder Group in terms of a sustainable social, environmental and corporate policy.

The Wickeder Group also monitors the supply and procurement of conflict materials such as tin, tantalum, tungsten and gold.

Further information can be found in the [Declaration on conflict materials](#)².



² The [declaration on conflict minerals](#) can be found online at www.wickeder.de/download

5. AVOIDANCE OF CONFLICTS OF INTEREST

At the Wickeder Group, business decisions are made exclusively in the best interests of the company. Conflicts of interest with private interests or other economic or other activities, including those of relatives or other related persons or organizations, must be avoided from the outset. The avoidance of conflicts of interest also requires that employees of the Wickeder Group avoid even the appearance of preferential treatment due to personal proximity in business dealings with competitors, consultants, customers, suppliers, service providers, subcontractors and other business partners of the Wickeder Group. Possible conflicts of interest must be disclosed by the persons concerned to their superiors and checked.

Any secondary employment may conflict with the interests of the Wickeder Group or lead to a conflict of interest. Therefore, secondary employment with competitors or business partners, in particular customers or suppliers, is not permitted. In any other case, they require the prior written approval of superiors and notification of the responsible HR department.



6. TRANSPARENT REPORTING

For the Wickeder Group, honest, transparent and reliable reporting and communication on relevant company business transactions to companies, advisory boards, employees, customers and business partners is essential. This also includes appropriate documentation of our actions both within the company and towards third parties.

All Wickeder Group employees are therefore obliged, as part of their contractual duties and tasks, to keep conscientious, complete, correct and timely records of relevant business transactions and reporting at the Wickeder Group. This is the basis for the credibility of the Wickeder Group in business terms. The respective superiors ensure that the documentation in their area of responsibility is carried out to an appropriate extent.

7. COMBATING MONEY LAUNDERING AND TERRORIST FINANCING

Money laundering is the smuggling of illegally generated money or illegally acquired assets into the legal financial and economic cycle. Terrorist financing occurs when funds or other resources are made available for terrorist offenses or to support terrorist groups.

The Wickeder Group combats all forms of money laundering and terrorist financing and takes precautions to avoid becoming involved in money laundering or terrorist financing.

8. INTERNATIONAL TRADE, TRADE RESTRICTIONS

International trade is a central part of the strategic orientation and operational activities of all Wickeder Group companies. It is therefore essential for all companies and employees to act in accordance with and in compliance with the applicable trade control and sanction regulations. Employees take the necessary precautions to ensure that violations of the applicable import, export and customs regulations are excluded. Wickeder Group employees must take care to ensure that the use of raw materials does not lead to the direct or indirect financing of armed groups that violate human rights.



RESPONSIBILITY AS A MEMBER OF SOCIETY



9. MARKETING AND CONTRACTUAL PRACTICES

The Wickeder Group is committed to fair contractual practices and to providing information in a comprehensible and factually correct manner. Methods or messages that are false, misleading or deceptive are prohibited.

10. HEALTH PROTECTION AND PRODUCT SAFETY

The Wickeder Group is committed to offering safe products and services. Information for safe use and further handling is provided for this purpose. The Wickeder Group strives to eliminate the negative effects of production processes, products or services on health and to respond to the macroeconomic trends of a growing world population, urbanization and scarcity of resources with efficient process engineering.

11. ENVIRONMENT AND SUSTAINABILITY

The Wickeder Group aims to design value creation processes responsibly and to contribute to sustainable management and the protection of natural resources with ever more efficient systems and process solutions for its customers and in its own production.

Efficiency refers in particular to the lowest possible use of energy, careful use of water and other raw materials and high recyclability in relation to optimized performance. The highest possible proportion of renewable energy underlines our responsible approach to the environment with the aim of achieving CO2 neutrality.

12. SOCIAL RESPONSIBILITY

The Wickeder Group is an important employer and taxpayer in the regions in which the respective company operates. In compliance with local, regional and international laws and regulations, the Wickeder Group contributes to the creation and development of prosperity and income.

As a globally active company, the Wickeder Group participates in a large number of international, regional and local initiatives and exchanges information on specialist and market topics in relevant trade and industry associations.

The Wickeder Group is socially committed in the form of donations or sponsoring activities, primarily for projects in the direct sphere of activity of the locations.



RESPONSIBILITY AS AN EMPLOYER



13. HUMAN RIGHTS AND WORKERS' RIGHTS

The Wickeder Group respects general human rights and ensures compliance with them within the scope of its regional influence and vis-à-vis its business partners. The Wickeder Group rejects all forms of forced labor and child labor. The Wickeder Group combats all forms of violence and discrimination. This also includes gender-specific violence and harassment in the workplace.

The Wickeder Group recognizes the right to a fair, living wage for all employees. Pay and other benefits (social benefits, vacation, etc.) take into account the principle of fairness and comply with national legal standards and any applicable collective bargaining agreements.

14. DIVERSITY AND INCLUSION

The Wickeder Group creates a working environment in which diversity, equality and inclusion are promoted. This means that equal opportunities are guaranteed for employees - regardless of demographic and other personal characteristics, in particular, but not limited to, age, disability, gender, sexual orientation, gender identity, race, skin color, nationality, ethnic or national origin, religion or ideology. In addition, the Wickeder Group offers a corporate culture in which everyone feels valued and included in order to work successfully within the Wickeder Group and has equal access to opportunities and resources.

15. ACTION AGAINST DISCRIMINATION, HARASSMENT AND HARASSMENT

The Wickeder Group prohibits all forms of discrimination and all forms of sexual and non-sexual harassment. The Wickeder Group pursues a zero tolerance policy and actively and consistently takes action against such behavior. The Wickeder Group promotes a culture of respect and tolerance as well as reporting concerns when discrimination or harassment of any kind is noticed. Even signs of ethical violations or harassment will not be tolerated.

16. DATA PROTECTION AND DATA SECURITY

Special legal regulations exist for the protection of personal data. The Wickeder Group is fully committed to complying with these regulations. Personal data of all kinds must therefore be carefully protected against unauthorized access and misuse.

Information technology (IT) and electronic data processing (EDP) are an integral part of everyday working life at the Wickeder Group. However, they harbor a variety of risks. The Wickeder Group takes these risks very seriously, both in its own interests and in the interests of its business partners, and combats any vulnerabilities preventively and as soon as they become known.

Wickeder Group employees are obliged to familiarize themselves with the applicable IT/EDP guidelines and to comply with the requirements contained therein.

17. OCCUPATIONAL SAFETY AND HEALTH PROTECTION

Occupational health and safety is a top priority at the Wickeder Group. The Wickeder Group is jointly responsible for creating a working environment in which workplace-related illnesses and accidents are excluded as far as possible. With this in mind, the Wickeder Group promotes the guarantee, expansion and further development of safe working conditions. The Wickeder Group expressly encourages all those involved to exercise their special right to make suggestions regarding occupational health and safety.

18. PERSONAL DEVELOPMENT AND TRAINING

Training and further education at the Wickeder Group plays a particularly important role in individual personnel development. The Wickeder Group is convinced that sound training and further education as well as the opportunity for lifelong learning are part of a fulfilling working life.

19. RESPONSIBLE HANDLING OF ASSETS AND CONFIDENTIAL INFORMATION

The material and intellectual property of the Wickeder Group serves the good of the company. It must be protected from misuse. The Wickeder Group expects its employees to handle the company's assets responsibly.

Care and responsibility are also required when handling confidential information that employees receive in the course of their work. It must not be misused for personal gain or passed on to third parties without authorization.

20. EMPLOYEE REPRESENTATION AND TRADE UNION RIGHTS

Within the locally applicable legal framework, the Wickeder Group recognizes the right of employees to freely associate, to form and join an employee organization of their choice, to be represented and to engage in collective bargaining. The Wickeder Group strives for a fair relationship between the economic interests of the company and the interests of the employees. The Wickeder Group promotes social dialog, for example in the form of negotiations, consultations or an exchange of information between employers, employee representatives (trade unions) and employees on economic and social issues that are in the common interest. All Wickeder Group employees and managers, as well as all employee and trade union representatives, should adhere to basic democratic principles to ensure that employees can decide freely and fairly whether they wish to form or join a representative body and that, in such a case, they can freely choose a representative of their own choice. The Wickeder Group and its managers must remain neutral and may not influence the free choice of employees by exerting pressure or intervening in any other inadmissible way.



21. WORKING HOURS

Working hours, including overtime, must not exceed the statutory and collectively agreed requirements in the respective countries or international standards. The Wickeder Group generally rejects overtime as a substitute for insufficient regular pay. Should overtime be paid, the remuneration shall follow the respective statutory, contractual or collectively agreed regulations.

22. RESPONSIBILITY OF SUPERIORS

Managers at the Wickeder Group are expected to set a good example. Our managers are the first point of contact for questions about understanding the regulations and ensure that the employees in their area of responsibility are aware of and comply with the Code of Conduct and the associated Group ^{guidelines}³. This requires both personal discussions and organizational measures.

23. DOUBLE QUESTIONS

If employees have any questions about the Code of Conduct and the internal guidelines, they can contact the managers, the relevant specialist departments and, in particular, the Wickeder Group's legal department.



24. NOTIFICATIONS OF VIOLATIONS

Due to the far-reaching importance of correct conduct on the part of all employees, compliance with the Code of Conduct and the associated guidelines is a joint responsibility. If there are indications of a violation, the Wickeder Group expects all employees to report this to their line manager or the relevant specialist department (e.g. legal, HR or finance department). Wickeder Group managers ensure that serious misconduct, particularly in the areas of corruption, competition law and data protection, is reported to the Wickeder Group legal department or the local compliance officers.

In addition, the Wickeder Group Whistleblowing Hotline is available for the (anonymous, if desired) reporting of violations of this Code of Conduct, such as compliance incidents, discrimination, harassment or environmental violations. This offers Wickeder Group employees and external parties the opportunity to make a report. Independent law firms have been commissioned for this purpose. Further information can be found in the attachment "Reporting offices" to this directive.

No employee who reports (suspected) violations of laws, the Code of Conduct or the associated guidelines in good faith and is not guilty of any wrongdoing must fear any disadvantages as a result of a report. If an employee was personally involved in violations of laws, the Code of Conduct or the associated guidelines and damage to the Wickeder Group can be averted through voluntary reporting, this will be taken into account in his or her favor. Anyone who recklessly or knowingly raises false suspicions or accusations must expect consequences themselves.

³ The group guidelines can be found in the employee handbooks



REGISTRATION POINTS

INTERNAL REPORTING POINTS

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