

CODE OF CONDUCT

STEULER GROUP

Creation date 05.06.2018
Last update 01.12.2023

Created Head of Quality, Safety and Environmental Management	Reviewed Head of Corporate Development	Released Managing Director	Document no. Ticket no.
Christiane Arndt	Jörg Borkowsky	Michael Steuler	PD-ORG-ALL-2179-S

CONTENTS

1	Introduction	3
2	Scope of Application	3
3	Compliance with Laws, Recognised Standards and Guidelines	3
4	Bribery and Corruption	3
5	Bookkeeping	3
6	Law on Cartels, Competition Law	4
7	Maintenance of Secrecy, Data Protection	4
8	Protection of Copyrights and Personality Rights	4
9	Handling of the Company's Property	4
10	Health and Safety at Work	4
11	Handling of Alcohol and Drugs	4
12	Working Time	4
13	Remuneration	5
14	Participation	5
15	Child and Adolescent Labour, Forced Labour	5
16	Promotion of the Development of Employees, Training	5
17	Interaction with Each Other	5
18	Diversity and Equality of Opportunity	5
19	Environmental Protection	5
20	Information and Communication	5
21	Complaints Procedure	5
22	Final Remarks	6
23	Annex	7

1 INTRODUCTION

Founded in 1908, the medium-sized traditional company is now one of the leading specialists for industrial linings and is active in equipment engineering for environmental and pickling technology around the globe.

The Steuler Group comprises all companies of Steuler Holding GmbH. Our company strives to maintain values such as innovation, flexibility, safety and growth. As a result of our motivated and creative employees, we - in collaboration with our customers and partners - create solutions that greatly benefit our customers.

For Steuler, entrepreneurial responsibility means that we not only take into account economic factors in our business strategy, but that we also always bear in mind our employees, the good of the company and the environment.

The success of our company depends upon our employees being motivated, competent and acting responsibly. We promote the development of our employees by means of services and programmes and thus strengthen our Group's position as one of the most attractive employers in the field of linings, plant construction. This Code of Conduct constitutes a commitment on the part of all Steuler Group employees to act properly and responsibly in their everyday professional life. The principles described in this document, which have been developed continually throughout the company's history of more than 100 years, reflect the Steuler culture and the interaction at our company. Our employees remind themselves every day that they are representatives of the company in everything that they do and are perceived as such. By contributing to a positive perception of the Steuler Group through their work, they also support the economic success of our company.

These principles of conduct are intended to give all employees of the Steuler Group a secure feeling for what is right and wrong behavior, even if not every possible conflict of interests can be named individually. With this feeling of security, we all approach our market partners and encourage them to adopt the appropriate basic behavior.

For our trading partners, we are a reliable, transparent and responsible partner that acts in an ethically proper manner. The corresponding framework for this is prescribed to us by this Code of Conduct.

In the event of serious violations of our Code of Conduct, our own employees must expect reactions from the company, including disciplinary measures.

We are aware that stricter rules than those listed here may apply in certain regions, cultures and organizations. The rules published here therefore apply as a minimum standard.

What the Steuler Group expects from supplier companies in business cooperation is also formulated in the Supplier Code of Conduct, which is published on the Steuler Group intranet and website.

2 SCOPE OF APPLICATION

This Code of Conduct shall apply to all Steuler Group companies and all Steuler employees worldwide, regardless of their position, rank or influence.

Existing guidelines (e.g. works agreements or department-specific sup-

plements) shall apply alongside this Code of Conduct without limitation. Our managerial staff are ascribed particular responsibility. In addition to acting as a role model, they have the task of implementing this Code of Conduct at the company and ensuring compliance herewith.

3 COMPLIANCE WITH LAWS, RECOGNISED STANDARDS AND GUIDELINES

We undertake to comply with all laws valid for our Group (nationally as well as worldwide) and with the relevant standards and guidelines recognised internationally. In particular, this Code of Conduct covers the provisions of the United Nations and the International Labour Organisation (ILO**) (see annex).

We shall adhere to the Code of Conduct set out below and not circumvent it by means of contractual agreements or comparable measures.

4 BRIBERY AND CORRUPTION

We shall observe the respective statutory provisions for combating bribery and corruption. When dealing with customers, suppliers, service providers and state institutions, we, as employees, shall keep the Steuler Group's interests strictly separate from our private interests. We shall always act, and make (purchase) decisions, for the benefit of the company without regard to our personal interests. We shall not accept personal advantages in return for preferential treatment in business dealings.

Furthermore, we undertake not to offer, promise, demand, grant or accept in business dealings any gifts, payments, invitations or services that could influence a business relationship in an impermissible manner. We shall avoid situations where our personal, family or financial interests could conflict with the Steuler Group's interests. If such conflict of interests becomes apparent, we shall disclose it and obtain the consent of the managerial staff member responsible. In this connection, the guidelines on donation and sponsoring measures of the Steuler Group shall also apply. These are published on the Intranet and on our company website and can be viewed at any time.

We undertake to report any indications of deviations from these principles. The first point of contact is the respective managerial staff member responsible. Alternatively, an ombudsman (see "Complaints Procedure" on page 5) is available for this.

5 BOOKKEEPING

As employees, we shall use assets and funds of the Steuler Group, or carry out transactions for the company, only if the respective processes are properly entered in the books of account and reported. We undertake to carry out all entries in the company's books of account and documents truthfully, fully and accurately. Such entries shall be carried out completely and in accordance with the principles of proper accounting. We shall carry out payment requests and payments only in the company's interest and only for purposes permissible by law and shall ensure that they match the corresponding payment documents.

6 LAW ON CARTELS, COMPETITION LAW

We shall adhere to fair competition with companies in the market. As Steuler employees and persons acting on behalf of the Steuler Group, we shall comply with all domestic, EU and foreign laws on cartels and the laws against unfair competition. We shall not carry out collusion and shall refrain from pursuing activities of any kind that influence prices or terms, allot sales territories or customers or hinder free and open competition in an impermissible manner. We undertake not to carry out with customers or suppliers any kind of collusion intended to restrict the customers' freedom to independently set their prices and other terms (setting of prices and terms).

In the event of any indications of anti-competitive conduct, we shall immediately inform the managerial staff member responsible. Questions as to what is permissible under competition law and/or under the law on cartels, and what measures are possible or necessary, may also be put to this person. Alternatively, an ombudsman (see "Complaints Procedure" on page 6) is available for this.

7 MAINTENANCE OF SECRECY, DATA PROTECTION

We warrant to communicate transparently within the scope of the provisions of the law on data protection and the bounds of commercial confidentiality. At the same time, we undertake to protect industrial and trade secrets.

As employees of the Steuler Group, we shall make sure that we do not pass on confidential information or documents to third parties and do not store confidential information or documents on external data carriers (USB sticks etc.). The same shall apply to the passing-on of corresponding content and/or documents to private email accounts etc. and to publication in social networks or Internet portals for example, unless we have been expressly authorised to do so, or this is purely for official use, and data protection is observed.

We shall disclose confidential information externally only if this is demanded under statutory obligations or by order of a court or a public authority. This obligation to maintain confidentiality shall continue to apply even after the employment relationship with the Steuler Group has ended.

We shall collect, process and/or use personal data of employees or third parties only if the data subject has consented thereto, or a legal basis for this exists.

8 PROTECTION OF COPYRIGHTS AND PERSONALITY RIGHTS

When using images, photographs, texts and products in official Steuler media (website, presentations, publications etc.), we, as employees, shall respect the copyrights and personality rights concerned. Therefore, we shall ensure that these are used only if the rights of use have been transferred to us beforehand, and are used only within the scope of the agreement made. We shall use images of persons only with their consent or within the bounds legally permissible.

9 HANDLING OF THE COMPANY'S PROPERTY

We, as employees, shall handle carefully and properly the Steuler Group's property and use it only for activities that serve the company's purpose. Property of the company also includes communication equipment as well as intangibles such as know-how and industrial property rights.

We shall not use the company's equipment or property for private purposes, or remove such equipment or property from the company's grounds, unless the managerial staff member responsible has expressly consented thereto, or this is permitted under a company rule.

10 HEALTH AND SAFETY AT WORK

We are, together with the Steuler Group's occupational health and safety management, committed to health protection and promotion and shall ensure that our employees' work environment is safe, healthy and hygienic. In this respect, we shall take measures necessary for avoiding accidents and physical and mental health damage that could arise in connection with our work. We, on the part of the company, shall make available suitable resources (e.g. protective clothing, toilets, skin care products and handwash etc.). At the same time, we undertake to subject the work environment to a constant process of improvement.

We expect our employees to take responsibility for looking after their health. With the aid of various programmes offered, we shall support our employees in maintaining or developing a healthy lifestyle. We regularly provide our employees with training and instruction - tailored to their position - on applicable health protection and safety standards as well as safety measures and call upon them to comply with the protective measures envisaged.

11 HANDLING OF ALCOHOL AND DRUGS

Health and safety are great personal assets that are also important for our company's success. Additionally, full decision-making capacity is absolutely essential for safeguarding our competitive position. For these reasons, we must eliminate every impairment of our body and our judgement during work, and prohibit the consumption of alcohol, drugs and other intoxicants during working time and on the company's grounds. There is a strict ban on the bringing of alcoholic beverages and intoxicants onto the company's grounds, on the consumption thereof and on entering the company's grounds under the influence of alcohol or intoxicants. Exceptions for special events are provided in the corresponding works agreement.

12 WORKING TIME

We undertake to comply with the respective statutory provisions, company standards relating to working time and statutory public holidays, as well as the relevant ILO conventions** (see annex). In this respect, we shall strive for a good work/life balance for our employees. For this, we shall offer our employees - if possible - flexible working-time models, among other things. Further flexitime possibilities beyond those may be used within the scope of the company's needs.

13 REMUNERATION

The remuneration for our employees shall be based on the applicable statutory and company standards. We shall also apply accordingly the respective relevant national laws on the minimum wage. We shall regularly provide our employees with clear and detailed information on the composition of their remuneration.

14 PARTICIPATION

Our employees' opinions are important to us. Therefore, we shall involve our employees in business decisions. The management and employee representatives shall constructively work together accordingly and maintain an intensive exchange.

We shall encourage every employee to take a critical look at their work environment, and we shall reward good ideas by means of an in-house suggestion scheme.

We shall respect our employees' freedom of organisation and assembly as well as their right to collective bargaining through their respective representatives and shall ensure that this right is not impaired. Employees who become involved therein shall, of course, not face any negative consequences. This we promise.

15 CHILD AND ADOLESCENT LABOUR, FORCED LABOUR

We warrant to respect the rights of children and adolescents. All types of exploitation of children and adolescents are rejected by us. We shall ensure that the conventions of the ILO** (see annex) and the United Nations, as well as national standards and ordinances for the protection of children and adolescent workers are complied with. The age limit for admission to employment shall not be below the compulsory school age and shall in no event be below the age of 15. We warrant not to expose children or adolescent workers to any situations that are dangerous, unsafe or harmful to their health. For example, we shall not assign adolescents to the night shift during their training. Their working time and school time shall conform to the laws currently valid and not exceed eight hours per day.

16 PROMOTION OF THE DEVELOPMENT OF EMPLOYEES, TRAINING

Commensurate with our management philosophy, we shall uphold the values of commitment to development, performance orientation and respect and shall promote the personal development of our employees. To this end, we shall use appropriate personnel development and training schemes, offer our employees challenging tasks and enable them to identify with our company. At the same time, we expect our employees to be open and prepared to learn and further develop under their own responsibility.

We regard the training of young people as being one of society's most important tasks. Therefore, training has a very high status at our company. We shall promote the entry of young persons into the profession, as well as their individual further development, thus also strengthening the future viability of our company.

17 INTERACTION WITH EACH OTHER

Appreciation is an indispensable part of our management principles and thus a pillar of the Steuler culture. We shall be appreciative and respectful in our daily interaction with each other. We shall not tolerate any form of derogatory conduct, verbal and/or physical coercion, use of violence and/or harassment.

18 DIVERSITY AND EQUALITY OF OPPORTUNITY

Great potential lies in the diversity of our employees. Any form of discrimination in the course of recruitment and employment has no place at our company. The respective statutory provisions shall apply. We, as Steuler employees, undertake not to differentiate, give preference to, or exclude, people e.g. on the basis of:

- ethnic, national or social origin
- hair colour
- gender
- age
- nationality
- creed
- political opinion
- membership of a workers' organisation
- any physical or mental handicap
- sexual orientation

19 ENVIRONMENTAL PROTECTION

We shall arrange our processes in an environmentally conscious manner. In this respect, we shall observe applicable laws and minimum regulations relating to climate protection and environmental protection. Furthermore, we shall use resources (e.g. electricity, heating and water as well as raw, auxiliary and operating materials) sparingly in our everyday working life, so that we can avoid or reduce waste.

20 INFORMATION AND COMMUNICATION

The Code of Conduct is available to all employees and is also available in the various language versions on our company website at www.steuler.de at any time.

21 COMPLAINTS PROCEDURE

We expect all our employees to act responsibly in accordance with this Code of Conduct. In the event of any justified suspicion of a breach of Section 3 (Bribery and Corruption), Section 4 (Book-keeping), Section 5 (Law on Cartels, Competition Law), Section 6 (Maintenance of Secrecy, Data Protection), Section 14 (Child and Adolescent Labour, Forced Labour) and Section 18 (Environmental Protection), our employees must inform the managerial staff member responsible. If employees do not wish to contact such manage-

rial staff member, they may report the matter to an independent point of contact (ombudsman). Such reports shall be treated confidentially in respect of identity. If employees report in good faith a suspicion of misconduct, they need not expect any negative consequences of any kind.

Employees must not use the complaints procedure to deliberately give false leads or false information. We point out that, in specific cases, we are legally obliged to pass on to third parties (e.g. for the opening of investigation proceedings) information that is, in principle, to be treated confidentially. Depending upon the respective case, employees may also be summoned as a witness.

THE STEULER GROUP'S OMBUDSMEN FOR THE COMPLAINTS PROCEDURE IN GERMANY ARE:

Thomas Koch
Legal department, Höhr-Grenzhausen
Phone: +49 2624 13-277

Harry Brunner
Works council, Höhr-Grenzhausen
Phone: +49 2624 13-421

EXTERNAL CONTACT POINT ACC. WHISTLEBLOWER STRUCTURE OF THE STEULER GROUP:

Lawyer Markus Schmuck
Caspers Mock Anwälte mbB, Koblenz
Mail: schmuck@caspers-mock.de
Phone: +49 261 4049754

22 FINAL REMARKS

All company rules and guidelines must be consistent with this Code of Conduct. We are not able to foresee every single case and every situation. Therefore, these principles are broad in scope and are, by their very nature, formulated in a general manner. This Code of Conduct is not intended to replace any existing provisions or procedural instructions. On the contrary, it is intended to address the key points of autonomous and entrepreneurial responsibility and thus give all employees a clear understanding of the principles and ethical values valid at Steuler. All employees and workers of the Steuler Group are responsible for the correct implementation of this Code of Conduct.

The principles are regularly discussed and explained internally with the various departments and compliance with them is checked. This usually takes place as part of the internal audits. As part of these audits, all departments are also invited to make suggestions for changes or additions to these principles of conduct, which are then taken into account in the regular revision rounds.

The Management shall regularly check the content of this Code of Conduct and compliance herewith too and, if necessary, take corrective measures.

This Code of Conduct shall remain valid even if one of the principles proves to be invalid or (in general or in the country concerned) unlawful. A formulation that reflects as closely as possible the content of the original formulation, but takes account of the respective legal provisions shall then be promptly found.

23 ANNEX

OVERVIEW OF RELEVANT ILO CONVENTIONS AND RECOMMENDATIONS

The following overview serves to aid understanding of the relevant ILO conventions. Some German laws go beyond the regulatory content of a few of these conventions. For this reason, Germany has not signed some of the conventions mentioned below.

1	Hours of Work (Industry)
14	Weekly Rest Day (Industry)
26	Minimum Wage-fixing Machinery
29	Forced Labour
79	Night Work of Young Persons (Non-industrial Occupations)
87	Freedom of Association and Protection of the Right to Organise
98	Right to Organise and Collective Bargaining
100	Equal Remuneration
105	Abolition of Forced Labour
111	Discrimination (Employment and Occupation)
131	Minimum Wage Fixing
135	Workers' Representatives
138	Minimum Age
142	Human Resources Development
143	Migrant Workers (Supplementary Provisions)
154	Collective Bargaining
158	Termination of Employment
159	Vocational Rehabilitation and Employment of Disabled Persons
182	Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour
E 143	Recommendation Concerning Protection and Facilities to be Afforded to Workers' Representatives in the Company
E 146	Recommendation Concerning Minimum Age for Admission to Employment

You can find the texts of the ILO conventions and recommendations at www.ilo.org.