

klöckner & co

Your partner for a sustainable tomorrow

Compliance Management System

Corporate Compliance

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Agenda

Compliance Management System

Compliance Organization

Reporting Line

Compliance Management System

Compliance means

acting in accordance with all applicable laws and regulations, as well as the internal guidelines and procedures of the Klöckner & Co Group. It applies to the Group, its governing bodies, management and all employees.

Compliance Objectives

- Ensure lawful and responsible conduct across the Klöckner & Co Group based on a corporate culture of trust
- Identify and reduce compliance risks through preventive measures
- Ensure early detection of compliance violations
- Mitigate harm in the event of compliance violations and prevent their recurrence through appropriate measures
- Create sustainable competitive advantages through compliant corporate governance

Compliance Management System

Key elements

of Klöckner & Co's Compliance Program

- Competition Law
- Anti-Corruption
- Anti-Money Laundering
- Export Controls
- Sanctions Screening

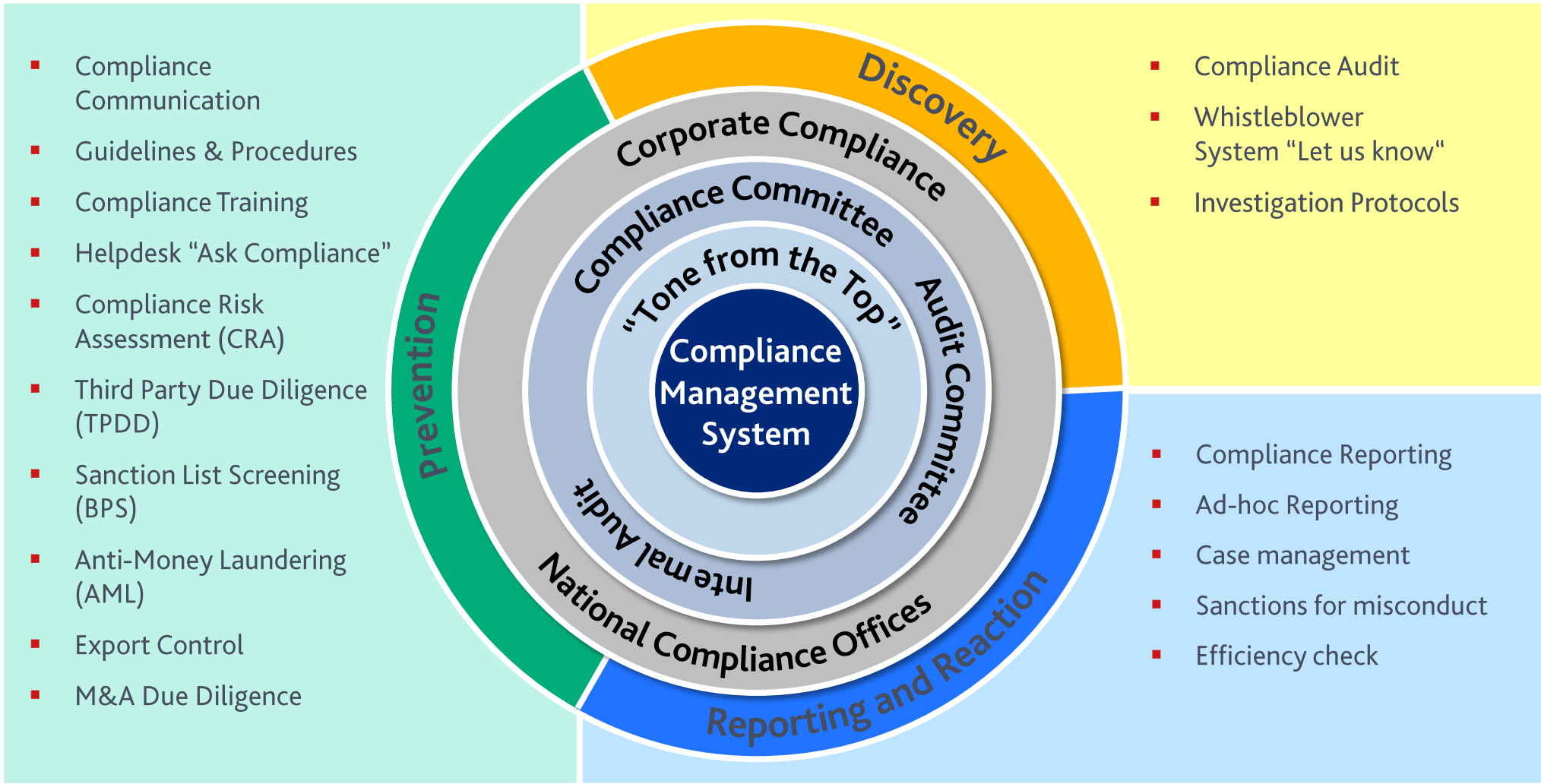
„Tone from the Top“

Klöckner's leadership stands for:

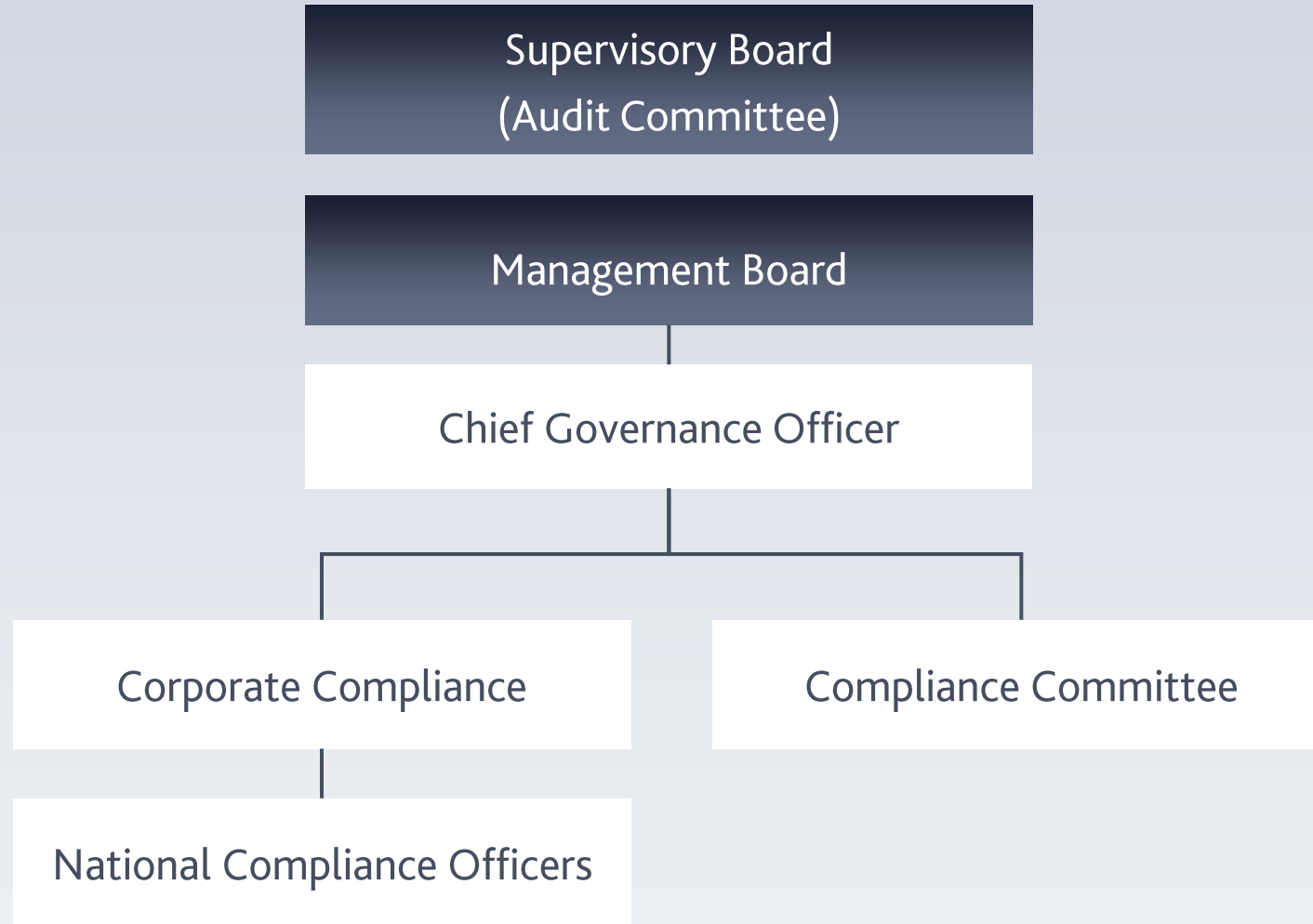
- Innovation, customer focus, and motivated employees acting responsibly
- Violations of competition law and anti-corruption rules will not be tolerated
- Misconduct will result in appropriate sanctions
- Violations may result in civil and criminal prosecution

Compliance Management System

based on the frame concept of the OECD concerning the principles of good corporate governance, latest edition 2015 [\(link\)](#)



Compliance Organization



Compliance Organization

Corporate Compliance

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Reporting Line

