

Supplier Code of Conduct

klöckner & co



SUPPLIER CODE OF CONDUCT

Klöckner & Co SE and its subsidiaries ("Klöckner") maintain worldwide relations with customers, suppliers, producers of steel, metal, building materials and technology equipment, logistics enterprises and other service providers. We consider our suppliers/vendors and providers ("Supplier" or "Suppliers") to be key partners. As such, we expect that they too will uphold the same commitments to laws, sustainability and ethical values by which we abide.

Our comprehensive sustainability concept integrates the entire value added supply chain: from the purchase, storage and the numerous processes/services up through the distribution of the product, including continuous improvement of the work processes. Our customers expect and rely upon these sustainability efforts, compliance with local laws and the ethical values expressed within the Klöckner & Co SE Code of Conduct.

In conjunction with this we ask that you, as a valued Klöckner supplier, review and embrace our specific expectations related to labor, the environment and business ethics, and indicate your understanding and compliance with them by signing at the end of this document.

Labor

- a) At Klöckner, we expect that our suppliers respect and comply with the fundamental rights granted to all employees under applicable national statutes. Furthermore, we expect our suppliers to fully recognize the labor standards issued by the International Labor Organization (ILO), taking into due account the applicable laws and regulations issued by different countries and local authorities.
- b) Suppliers must not utilize involuntary labor of any type. This shall include, but not be limited to, forced, indentured, and bonded or prison labor.
- c) Suppliers must not utilize child labor. For purposes of the Code, a "child" will be considered any person younger than (i) fifteen (15) years old; (ii) the minimum age for completing compulsory education in the country of manufacture; or (iii) the minimum age for employment in such country, whichever is the highest.
- d) Suppliers must treat each of their employees with respect and dignity. Accordingly, Suppliers shall not subject any employee to physical, sexual, verbal or other forms of harassment, coercion, abuse or unlawful discrimination.
- e) At Klöckner, we expect our suppliers to respect the right of their employees, to the full extent of applicable national statutes, to form a workers' council, collective bargaining unit (union) or other employee representations, and to enter into collective bargaining.
- f) Suppliers must fully comply with applicable national statutes on working time and must pay each of their employees at least the minimum wage, and supply the minimum benefits, required by applicable local laws. In the absence of applicable local laws, Suppliers shall provide minimum wages and

benefits consistent with industry practice in their location.

- g) Suppliers shall comply with all applicable health, safety and welfare laws, rules and regulations, and shall provide a safe working place for their employees. Suppliers must have and implement effective programs to promote the foregoing.

Conflict Minerals

Klöckner expects each Supplier to take reasonable efforts to avoid in its products the use of raw materials which directly or indirectly finance armed groups who violate human rights. No Supplier shall supply goods to Klöckner containing columbite-tantalite (coltan), cassiterite, wolframite, tin, tungsten, tantalum or gold (the "Conflict Minerals") obtained from sources that finance or benefit armed groups in any country defined in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (a "Covered Country").

All Suppliers shall inform Klöckner in writing (email: compliance@kloeckner.com) at the time any orders or contracts are entered for the sale of goods to Klöckner whether any such goods contain Conflict Minerals. Such notification shall identify the specific Conflict Mineral and its country of origin and the name of the respective smelter. If the Conflict Mineral originates from a Covered Country, the Supplier must confirm that the purchase of such Conflict Mineral did not directly or indirectly finance or benefit armed groups in the Covered Countries, and state the basis for such confirmation.

Klöckner, in its sole discretion, reserves the right to terminate and cancel any orders or

contracts for goods containing Conflict Minerals.

Environment

Suppliers should strive to minimize impact on the environment from their operations and, at a minimum, must operate in compliance with applicable environmental laws, rules, regulations and ordinances.

Business Ethics and Integrity

Klöckner expects each of its Suppliers to conduct its business subject to high ethical standards. At a minimum, each Supplier must conduct business in accordance with all applicable laws, rules and regulations regarding business ethics, including those dealing with bribery or other prohibited business transactions.

Suppliers must conduct business in an honest and ethical manner. We do not tolerate bribery or corrupt business practices. We expect our Suppliers to comply with fair competition practices, including compliance with all antitrust laws and regulations.

Suppliers must refrain from presenting any invitations or gifts to Klöckner employees so as to gain any form of influence. Any invitations or gifts extended to our employees or related parties must be reasonable and suitable in terms of scope, design and social acceptability, i.e., they must be of reasonable financial value and reflect ordinary local business custom. We also expect our suppliers to refrain from asking our employees or related parties for any inappropriate advantages.

Suppliers must avoid all conflicts of interest that may adversely influence the business relationships.

Compliance

Suppliers must maintain documentation reasonably necessary to demonstrate evidence of compliance with this Code. Such documentation must be made available to Klöckner upon reasonable advance written request. If any ethical or legal compliance issues arise that raise any questions or concerns, Suppliers have the responsibility to bring them forward.

To raise a concern, Suppliers can call the Klöckner & Co Corporate Compliance Office at **+49 203 3072119** or send an email to **compliance@kloeckner.com**. The function of the Corporate Compliance Office is to ensure that all compliance issues raised through any channels offered to Suppliers in this Code are resolved quickly, fairly and at the proper level in our organization.

In addition, our independent, confidential and anonymous reporting system "Let Us Know" is available seven days a week, anywhere around the world. Its website is offered in multiple languages and is available via: **<http://www.kloeckner.com/en/let-us-know.html>**.

Failure to comply with this Code may subject a Supplier to possible termination of its business relationship with Klöckner.

Supplier Declaration

We, the undersigned, hereby confirm on behalf of our company (the "Supplier") that by signing this document, we undertake to acknowledge and comply with all provisions and principles laid out in the Klöckner & Co SE Supplier Code of Conduct, above and beyond any other contractual obligations that we might have entered into with Klöckner or any Klöckner affiliates.

Place and Date:

Name of Supplier:

Name(s) of Authorized
Signatories (in print):

Signature(s):

Klöckner & Co SE

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