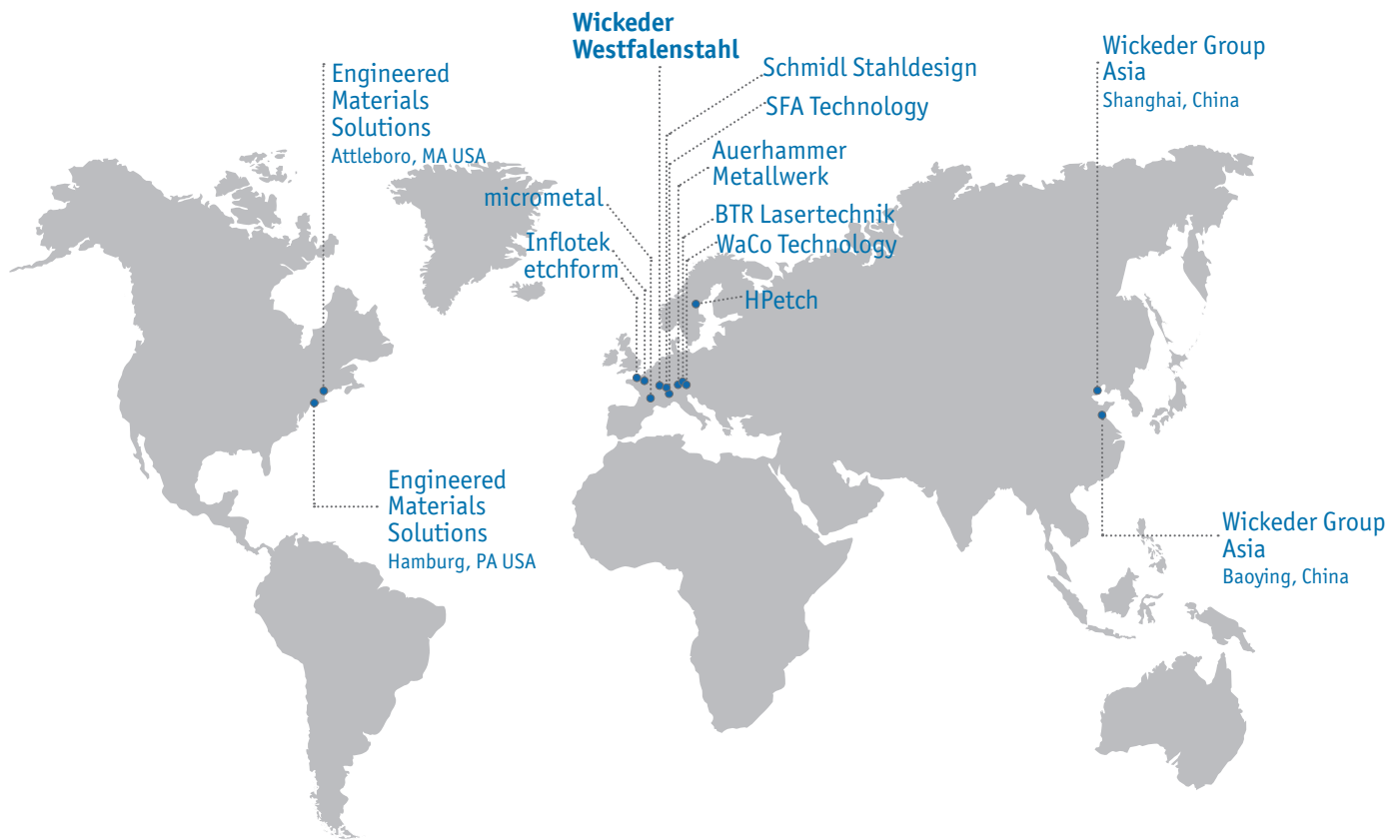


**best of metal**

**Code of Conduct**  
Wickeder Group



Employees  
**1100**

Locations  
**15**

**Worldwide**  
Wickeder Group

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# FOREWORD

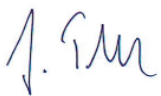
Dear colleagues,

The Wickeder Group is an internationally active group of companies that must 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 group'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 Wickeder Group<sup>1</sup> is a top priority at Wickeder Group.

This Code of Conduct summarizes the values, principles and practices that guide the corporate conduct of Wickeder Group. It represents a binding guideline that applies equally to the 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 objective of ensuring compliance with all applicable legal provisions throughout the company and thereby protecting the interests of Wickeder Group and its employees. They also serve to create a working environment characterized by integrity, respect and fair and responsible conduct.

Managers at 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 Platt  
Management Board  
(Chairman)



Andreas Braun  
Management Board



Dr. Christian Wittneven  
Management Board

## SCOPE AND PURPOSE

This Code of Conduct applies worldwide to all companies and employees<sup>2</sup> of Wicked Group. The Wicked Group includes Wicked Westfalenstahl GmbH and all companies in which Wicked Westfalenstahl holds a direct or indirect stake of at least 50%. The Code of Conduct provides a guiding framework for all Wicked Group

employees and defines basic 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 Wicked Group without restriction.

## GENERAL PRINCIPLES OF ACTION

### Compliance with the law and internal regulations

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

Violations of laws and other binding regulations as well as internal regulations can have consequences under criminal, labor and civil law for Wicked Group employees involved. For Wicked Group, such violations can lead to high fines, bans on awarding contracts, 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 and the Group as a whole.

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

If the laws applicable in an individual case result in stricter regulations than the regulations in this Code of Conduct or in other internal regulations, the statutory regulations shall apply. If the applicable law is less strict, the stricter regulations in this Code of Conduct or in the other internal regulations of the Wicked Group shall nevertheless apply.

<sup>2</sup> Where the term „employees“ is used, this refers to all managers and employees regardless of gender.

# RESPONSIBILITY AS A BUSINESS PARTNER



## 1. HONEST BEHAVIOR

The Wickeder Group's standards go beyond mere compliance with the law and other binding regulations. 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 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, managers must fulfill their role model function.

## 2. COMBATING CORRUPTION

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 anti-trust laws. We are committed to fair competition and reject unlawful agreements or practices that restrict competition.

## 4. COMPLIANCE AND SUSTAINABILITY IN THE SUPPLY CHAIN

Wickeder Group maintains a wide range of business relationships with suppliers and subcontractors. These relationships enable Wickeder Group to offer its own services at a competitive price. Suppliers and subcontractors are therefore selected carefully and exclusively on the basis of their performance and reliability. In addition, cooperation is required with regard to sustainability-related criteria.

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

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

Further information can be found in the [\*\*Declaration on conflict minerals\*\*](#)<sup>3</sup>.



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Code of Conduct

<sup>3</sup> The [declaration on conflict minerals](http://www.wickeder.de/download) can be found online at [www.wickeder.de/download](http://www.wickeder.de/download)

## 5. AVOIDANCE OF CONFLICTS OF INTEREST

At Wickedder Group, business decisions are made exclusively in the best interests of the company. Conflicts of interest with private interests or other economic interests, including those of relatives or other related persons or organizations, must be avoided from the outset. The avoidance of conflicts of interest requires that Wickedder Group employees prevent 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. 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 Wickedder 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 Wickedder Group, honest, transparent and reliable reporting and communication on relevant company business transactions to shareholders, 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 Wickedder Group employees are therefore obliged, as part of their contractual duties and responsibilities, to keep conscientious, complete, accurate and timely records of relevant business transactions and reporting at the Wickedder Group. This is the basis for credibility 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.

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 ruled out. Care must be taken 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

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

## 10. HEALTH PROTECTION AND PRODUCT SAFETY

Wickeder Group is committed to offering safe products and services. Information for use and further handling serves this purpose. The aim is 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

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 CO<sub>2</sub> neutrality.

## 12. SOCIAL RESPONSIBILITY

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, 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.

Wickeder Group's social commitment in the form of donations or sponsoring activities focuses on projects in the direct sphere of activity of the locations.



# RESPONSIBILITY AS AN EMPLOYER



## 13. HUMAN RIGHTS AND WORKERS' RIGHTS

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. It also rejects all forms of forced labor and child labor and combats all forms of violence and discrimination. This also includes gender-specific violence and harassment in the workplace.

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

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 such as age, disability, gender, sexual orientation, gender identity, race, skin color, nationality, ethnic or national origin, religion or ideology. In addition, Wickeder Group lives a corporate culture in which everyone feels valued and included in order to work successfully and have equal access to opportunities and resources.

## 15. ACTION AGAINST DISCRIMINATION AND HARASSMENT

Wickeder Group prohibits all forms of discrimination and all forms of sexual and non-sexual harassment. The Group pursues a zero tolerance policy and takes active and consistent action against such behavior. It 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 are not tolerated.

## 16. DATA PROTECTION AND DATA SECURITY

Special legal regulations exist for the protection of personal data. 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 Wickeder Group. However, they harbor a variety of risks. 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 Wickededer Group. It is the joint responsibility of all those involved to create a working environment in which workplace-related illnesses and accidents are excluded as far as possible. With this in mind, Wickededer Group promotes the guarantee, expansion and further development of safe working conditions. The 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 Wickededer Group plays a particularly important role in individual personnel development. Wickededer 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 Wickededer Group serves the good of the company. It must be protected from misuse. Wickededer 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, Wickededer Group recognizes the right of employees to freely associate, to form and join an employee organization of their choice, to be represented and to conduct collective bargaining. Wickededer Group strives for a fair relationship between the economic interests of the company and the interests of the employees. The 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 Wickededer 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. Wickededer 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. Wickededer 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 THE MANAGERS

Managers at Wickededer 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 guidelines. This requires personal discussions as well as organizational measures.

## 23. QUESTIONS IN DOUBT

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 Wickededer Group's legal department.

## 24. REPORT OF VIOLATIONS

Due to the far-reaching importance of correct behavior 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, Wickededer Group expects all employees to report this to their line manager or the relevant specialist department (e.g. legal, HR or finance department). Wickededer Group managers ensure that serious misconduct, particularly in the areas of corruption, competition law and data protection, is reported to Wickededer Group legal department or the local compliance officers.

In addition, Wickededer 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 Wickededer 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 Wickededer 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.





# WHISTLEBLOWING HOTLINE

## INTERNAL REPORTING POINTS

### **Legal department of Wickeder Westfalenstahl GmbH**

Wickeder Westfalenstahl GmbH  
Marc Arnold (General Counsel)

Hauptstraße 6  
58739 Wickede (Ruhr)  
Germany

+49 2377 917 418  
whistleblowing@wickeder.de

## EXTERNAL REPORTING POINTS

### **Germany**

Lawyer  
Dr. W. Nolting-Hauff  
Orrick Herrington & Sutcliffe Rechtsanwälte  
Heinrich-Heine-Allee 12, 40213 Düsseldorf  
+49 211 36787 0

### **Netherlands**

Lawyer  
G. Hempel  
H-ILF B.V.  
Kerklaan 12, 2351 NS Leiderdorp  
+31 6 52661380

### **Sweden**

Lawyer  
B. Kurz  
TERRA Advokat AB  
Artillerigatan 42,  
SE-114 45 Stockholm  
+46 (0)70 758 26 01

### **USA**

Lawyer  
Dr. W. Nolting-Hauff  
Orrick Herrington & Sutcliffe Rechtsanwälte  
Heinrich-Heine-Allee 12, 40213 Düsseldorf  
+49 211 36787 0

### **China**

Lawyer  
Harry He  
AllBright LawOffices  
9, 11, 12/F, Shanghai Tower No.501,  
Yincheng Middle Road,  
Pudong New Area Shanghai 200120  
+86 21 2051 1000

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## Code of Conduct