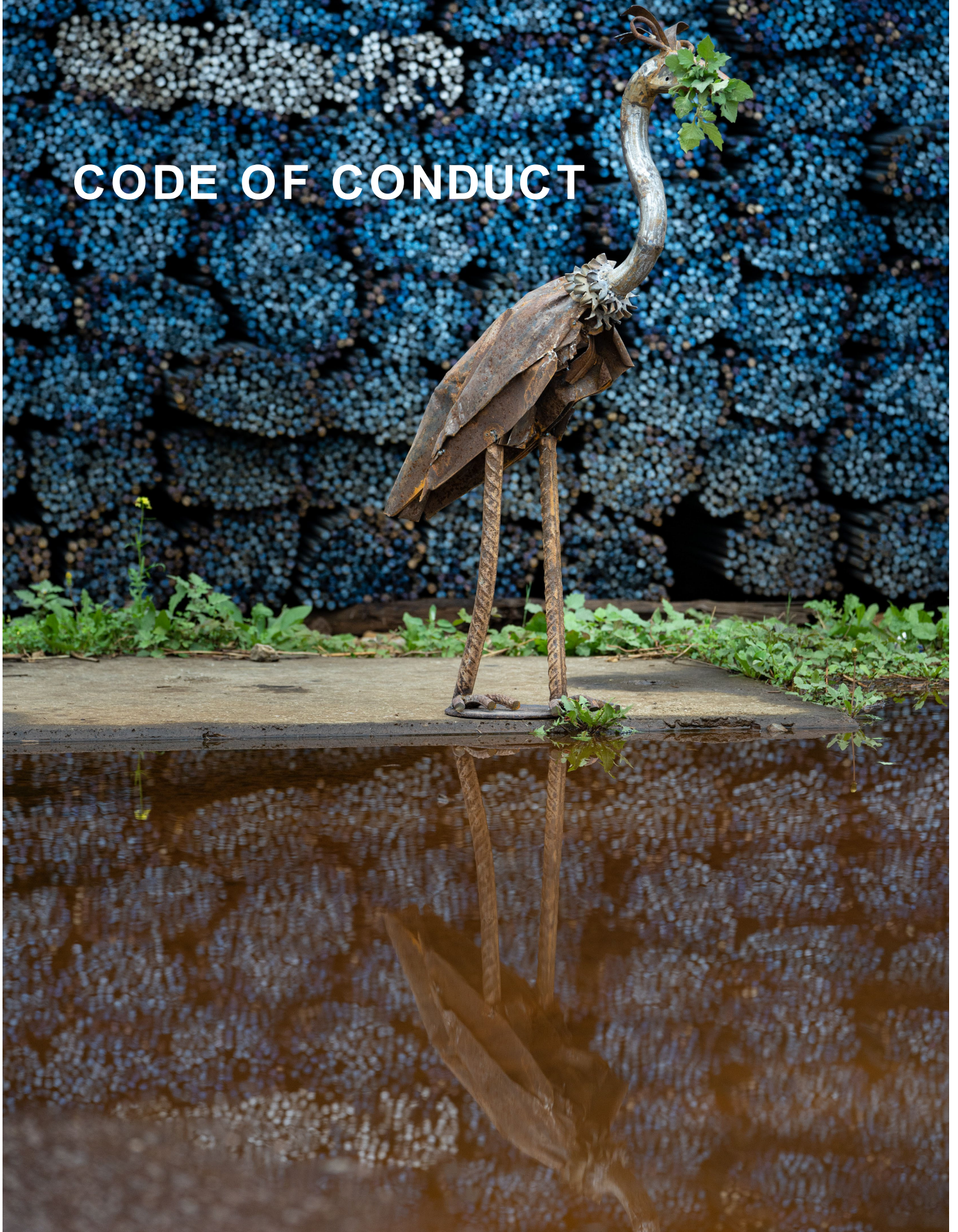




MARIENHÜTTE

CODE OF CONDUCT



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1 FOREWORD

We have been active in the field of upcycling for decades: We transform unsightly scrap iron into high-quality steel products and thus create the backbone of modern buildings.

This activity imposes a high degree of responsibility on us - responsibility towards the environment, responsibility towards our location and, above all, responsibility towards all those with whom we come into contact in the course of our activities.

Compliance with the applicable laws and standards is a matter of course for us. In addition, there are certain fundamental values that form the ethical and moral basis of our actions. We measure not only our behavior against these values, but also that of our business partners. So that we can master the challenges of the 21st century together.

The management



Dr. Markus Ritter



DI Herbert Fohringer

2 FUNDAMENTALS

This Code of Conduct is aimed at our partners in all business matters. The guidelines it contains summarize our values and form the basis for successful long-term collaboration and good cooperation.

We live the contents of this Code of Conduct in our company. We expect the same attitude from our partners. Every partner is therefore obliged to comply with the provisions of this Code of Conduct. This responsibility also includes the duty to bring its contents to the attention of its employees and its own partners and to regularly check compliance with it.

We assume that our partners comply with all legal provisions applicable to the provision of their goods/services as a matter of course and keep up to date with legal developments in their field of activity.

Although we always treat our partners with great trust, we are also subject to statutory verification and monitoring obligations. We therefore ask our partners in advance for their understanding that we reserve the right to check the implementation of this Code of Conduct.

If, in the course of their cooperation, partners discover or seriously suspect violations of the provisions of this Code of Conduct or of legal regulations, they are obliged to report these immediately to our management or using our whistleblower protection system. More information on our whistleblower protection system: <https://marienhuetten.hintbox.at/>

GENDER NOTE

As a progressive company, we attach great importance to equal rights for all gender identities. However, we also always strive to simplify complex areas for greater transparency and



efficiency. For this reason, we have refrained from using genders in order to improve readability. This in no way implies discrimination and always includes all gender identities equally.

3 SOCIALLY AND ECOLOGICALLY SUSTAINABLE CORPORATE GOVERNANCE

We are aware of our responsibility towards people and the environment and demand the same awareness from our partners. For this reason, business processes must be aligned in such a way that they are not only aimed at growth and short-term profit, but also at achieving maximum social benefit while conserving the necessary resources as much as possible. A socially and ecologically sustainable corporate culture on the part of our partners is a basic prerequisite for cooperation.

Human rights

Human dignity and the human rights acquired at birth are of paramount importance and therefore indispensable. Our partners must recognize this principle, comply with all related legislation and ensure that their partners do the same.

Through our procurement management, we monitor human rights risks in our value chain and take appropriate measures. We strictly reject any form of exploitation - such as wage and social dumping, child labor, etc. - as well as other human rights violations. - We strictly reject any form of exploitation - such as wage and social dumping, child labor, etc. - as well as other human rights violations and any actions that promote or facilitate them. We are committed to the principles of internationally recognized human rights frameworks and standards. We also structure our business relationships accordingly.

Equal treatment and anti-discrimination

Our partners must ensure that persons working in their sphere are effectively protected against unequal treatment and/or discrimination on the basis of ethnic origin, gender, disability, religion, political views, ideology, etc.

Fair employer

Every employee makes a decisive contribution to the economic success of the company and therefore deserves to be treated with respect without exception. We expect our partners to live this respectful treatment by complying with labor law regulations, paying fair wages, making transparent and unbiased personnel decisions and respecting the compatibility of family and career.

Occupational health and safety

The health and safety of employees is a top priority. As employers, our partners must not only ensure a safe and healthy working environment and avoid any impairment of such an environment, but also actively promote the health of their employees. Compliance with statutory monitoring and evaluation obligations, the provision of the right PPE and regular employee training form the basis of all precautions in this context.

Environment and climate protection

We are aware that the production of steel is always accompanied by the consumption of natural resources and energy. Through innovative measures and continuous development of our production processes, we aim to keep the consumption and emissions required for steel production as low as possible. The value chain also plays a key role in achieving this goal. All our partners are therefore required to use resources and energy sparingly.

In addition to reducing our ecological footprint, we are also actively committed to our environment. We also want our partners to have a proactive environmental policy and to set and achieve internal environmental targets.

We reject any form of environmental offense, violation of environmental regulations or targeted greenwashing without exception. Our partners must share this attitude and ensure that they organize their value chain in accordance with these guidelines.



4 FAIR BUSINESS RELATIONSHIPS

Cooperation with our partners and our attitude towards our competitors is based on fair conduct, entrepreneurial diligence and respect. As a basis for cooperation, we also expect our partners to adopt this attitude not only towards us, but also towards their own partners and competitors.

Fair competition

The applicable competition rules must be strictly adhered to in all business activities. This also includes the rejection of any direct or indirect involvement in business practices that violate competition law. Above all, this means not entering into any price agreements or other agreements with competitors that divide up sales markets, customers or suppliers or otherwise unlawfully impair free and open competition. We strictly reject any behavior that uses unfair means or measures to mislead customers or disparage a competitor.

Behavior towards suppliers

We treat our suppliers honestly and fairly. We also apply this principle to the actions of our partners. All purchasing decisions are made exclusively on the basis of the quality, punctuality and price of the products or services.

Conflicts of interest

In the course of business activities, employees may find themselves in situations in which their personal or economic interests conflict with those of their employer. Our partners must train their employees to deal transparently with such situations and ensure that the best possible solution is found.

5 AN ATTITUDE OF INTEGRITY IN BUSINESS LIFE

All business decisions are made exclusively on the basis of transparent and objective criteria. This attitude is unshakeable and is also expected by our partners.

Avoidance of corruption

Our partners must ensure that corruption has no chance in their company. They must prohibit their employees from accepting or promising benefits, either directly or indirectly, if this is intended to influence business transactions or could create such an impression. The only exceptions to this are gifts of low value and hospitality within a reasonable framework that is customary in business.

Prevention of money laundering and tax evasion

As part of the cooperation, our partners undertake to comply with all applicable provisions against money laundering, tax evasion and the like. Money laundering refers in particular to the smuggling of funds or other assets originating from unlawful transactions. We reject any form of tax evasion or fraud without exception. Compliance with tax regulations and full cooperation with the relevant tax and financial authorities are a matter of course for us. Any infringement will result in the immediate termination of our cooperation.

6 PROTECTION OF INTELLECTUAL PROPERTY, DATA AND INFORMATION

The protection of personal data, confidential information and our company's own know-how is important to us. We expect the same attitude from our partners.

Intellectual property

We respect the intellectual property of our competitors and business partners. The unauthorized use of third-party intellectual property is not permitted. Similarly, our partners are obliged to respect our intellectual property as part of the collaboration, to refrain from any actions that violate or could violate our intellectual property rights and to prevent unauthorized third parties from gaining access to this knowledge.

Data protection

Personal data must be collected and processed exclusively in compliance with the statutory provisions. Our partners must handle personal data carefully and conscientiously and establish effective measures to protect it. If a data protection incident nevertheless occurs in the partner's area of activity, we must be informed immediately.

Protection of confidential information

Confidential information of a technical and commercial nature must be protected in full. Our business and trade secrets may not be made accessible to third parties or used to pursue private interests without our express permission. Business and trade secrets of our partners, to which we have access due to business relationships, enjoy the same protection.

