



+500

**PROGRESS
AND EXPERIENCE**

COMPLIANCE AT ISABELLENHÜTTE



ISABELLENHÜTTE

Innovation by Tradition

COMPLIANCE AT ISABELLENHÜTTE

In this flyer, we want to show you our joint understanding of compliance in our company.

You will first learn about the importance of dealing with the topic of compliance from the explanations of our business management. Afterwards, we will present to you our **Code of Conduct (CoC)**. These are all of the guidelines that apply to us.

We have decided to adopt the industry standard code of conduct of the German Electrical and Electronic Manufacturers' Association. You will find our management guidelines at the end of the brochure. Together with the behavioral rules of the CoC, they determine our daily actions as well as how we treat our employees.

Responsible and sustainable action has always been part of our corporate culture. Due to the increasing size of our company and the growing internationalization, it is very important to us today to communicate this culture and thus to convey it to all of our employees.

The main rules and principles formulated in this brochure are intended to ensure the legally correct and responsible behavior of all of our employees. They apply to all of us and reflect the ideal that is binding for all of us.

The reputation of Isabellenhütte depends on each individual. Each of us is called on and obligated to align our behavior with the set standards.

Sincerely,
Frank Nagel

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COMPLIANCE IS IMPORTANT TO US

We understand "compliance" as *Doing the right and honest thing*. This means that our actions are consistent with the laws, ethical principles, industry standards and expectations of our customers and suppliers as well as with our own values and self-imposed rules. We therefore see compliance management as the quality management of all of our business activities.

This basic orientation has always been a part of our extensive company history. For us, Innovation by Tradition means: We were, we are and we will be a reliable and competent partner. We are characterized by our level of reliability and we keep our promises – for over 500 years.

Today, this reliability is very important for the successful business activity, reputation and enduring existence of Isabellenhütte due to the expectations of our customers, business partners, shareholders, authorities and the public as well as the associated consequences.

Failure to comply with these rules may cause considerable economic and legal risks as well as a damaged reputation for the company, its management and all the employees.

We are therefore focused on fully utilizing compliance management to achieve legally and regulatory compliant results with simultaneously optimal economic results without exception.

The behavior of each individual is crucial here. It is always up to your own sense of responsibility to determine what is the correct action to take. It is your personal responsibility in the process to seek the advice of managers, compliance officers or the company management, who will be happy to help you. This approach allows for verified decisions to be made and responsibility to be shared. This is the only way to develop what has always been driving us:

Innovation by Tradition.

Jürgen Brust

Dr. Felix Heusler

You will find the current Code of Conduct (CoC) below. We have decided not to forge our own path here, but rather to adopt the industry standard. For this reason, with its signature Isabellenhütte has undertaken to adopt the CoC of the German Electrical and Electronic Manufacturers' Association (ZVEI) and implement it to the best of their knowledge and belief. This CoC is periodically expanded by the ZVEI and can always be viewed on their homepage.

(<https://www.zvei.org/en/subjects/society-environment/zvei-code-of-conduct-companies-stand-by-their-social-responsibility/>).

The version valid for Isabellenhütte can be found here:

1. BASIC UNDERSTANDING OF SOCIALLY RESPONSIBLE BUSINESS MANAGEMENT

This CoC is based on a common understanding of socially responsible business management. For Isabellenhütte, this means that they take responsibility by considering the consequences of their entrepreneurial decisions and actions in an economic, technological as well as social and environmental respect and contribute to a fair balance of interests. As part of their respective opportunities and spheres of action, Isabellenhütte voluntarily contributes to the well-being and sustainable development of global society at locations where they are active. They are oriented to universal ethical values and principles, in particular integrity and honesty as well as respect for human dignity.

2. SCOPE OF APPLICATION

2.1 This CoC applies to all branches and business units of Isabellenhütte world-wide.

2.2 Isabellenhütte undertakes to promote compliance with the content of this CoC among its suppliers and in the further value added chain as part of its respective opportunities and spheres of action.

3. CORNERSTONES OF SOCIALLY RESPONSIBLE BUSINESS MANAGEMENT

Isabellenhütte actively works to ensure that the values and principles set out below are sustainably adhered to and observed.

3.1 COMPLIANCE WITH LAWS

Isabellenhütte complies with the applicable laws and other legal regulations in the countries in which they operate. For countries with weak institutional frameworks, they carefully examine which good corporate practice from their own country should be applied to support responsible corporate management.

3.2 INTEGRITY AND ORGANIZATIONAL GOVERNANCE

3.2.1 Isabellenhütte bases its actions on universal ethical values and principles, in particular integrity, honesty, respect for human dignity, openness and non-discrimination of religion, world view, gender and ethnicity.

3.2.2 Isabellenhütte rejects corruption and bribery within the sense of the relevant UN Convention². It promotes transparency, integrity and responsible management and control in the company in a suitable way.

3.2.3 Isabellenhütte pursues clean and recognized business practices and fair competition. In competition, it is aimed at professional behavior and quality-oriented work. They maintain a partnership with the supervisory authorities that is based on trust. We also comply with the guidelines published by the ZVEI: 'Guidelines for Our Association Work - Information for Antitrust-Compliant Work at the ZVEI.'

3.3 CONSUMER INTERESTS

As far as consumer interests are concerned, Isabellenhütte adheres to consumer protection regulations as well as appropriate sales, marketing and information practices. Particularly vulnerable groups (e.g. protecting minors) enjoy special attention.

3.4 COMMUNICATION

Isabellenhütte communicates openly and in a dialog-oriented manner with employees, customers, suppliers and other groups of interested parties and stakeholders about the requirements of this CoC and its implementation. All documents are produced prudently, are not unfairly changed or destroyed and are stored properly. Trade secrets and business information of the partners are handled sensitively and confidentially.

3.5 HUMAN RIGHTS

Isabellenhütte is committed to promoting human rights. They observe human rights according to the UN Charter of Human rights, in particular the following:

_ United Nations Convention against Corruption from 2003, in force since 2005

_ Universal Declaration of Human Rights, UN Resolution 217 A (III) from 1948

3.5.1 PRIVACY

Protection of privacy.

3.5.2 HEALTH AND SAFETY

Safeguarding health and occupational safety, in particular ensuring a safe and health-promoting work environment, in order to avoid accidents and injuries.

3.5.3 HARASSMENT

Protecting employees from physical punishment and physical, sexual, mental or verbal harassment or abuse.

3.5.4 FREEDOM OF OPINION

Protecting and granting the right to have and express opinions.

3.6 WORKING CONDITIONS

Isabellenhütte complies with the following core work standards of the ILO:

ILO = International Labor Organization

3.6.1 CHILD LABOR

The prohibition of child labor, i.e. the employment of people younger than 15 years of age, provided the local statutory provisions do not specify higher age limits and provided no exceptions are permitted.

3.6.2 FORCED LABOR

The prohibition of forced labor of any kind.

3.6.3 REMUNERATION

The working standards regarding remuneration, in particular with respect to the level of remuneration according to the applicable laws and regulations.

3.6.4 EMPLOYMENT RIGHTS

Respecting employees' rights to freedom of association, freedom of assembly as well as collective bargaining and negotiations, provided this is legally permitted and possible in the respective country.

3.6.5 NON-DISCRIMINATION RULE

Discrimination-free treatment of all employees.

3.7 WORKING HOURS

Isabellenhütte maintains working hours with respect to the maximum permissible working hours.

3.8 ENVIRONMENTAL PROTECTION

Isabellenhütte complies with regulations and standards for environmental protection that concern their respective businesses and acts in an environmentally responsible manner at all locations. Furthermore, they use natural resources responsibly in compliance with the principles of the Rio Declaration (the 27 principles of the "Rio Declaration on Environment and Development" from 1992).

3.9 CIVIC INVOLVEMENT

Isabellenhütte contributes to the social and economic development of the country and region in which they are active and promotes appropriate voluntary activities of its employees.

4. IMPLEMENTATION AND ENFORCEMENT

Isabellenhütte undertakes all appropriate and reasonable efforts to continuously implement and apply the principles and values described in this code CoC. Contract partners should be informed of essential measures by request and in the course of reciprocity so that it is evident how their compliance is generally ensured. There is no entitlement to the dissemination of trade and business secrets, to competition-related information or otherwise valuable information.

With its signature, Isabellenhütte Heusler GmbH und Co. KG has recognized this Code of Conduct with the ZVEI.

OUR GUIDING PRINCIPLES

In addition to the CoC, which is intended to determine our everyday actions, our guidelines of course still apply for our behavior towards our employees and each other:

- We act entrepreneurially, consistently and sustainably.
- We recognize opportunities of new ideas and advance them.
- We create prerequisites for successful work.
- We recognize and develop the strengths and potential of our employees.
- We enable our employees to take responsibility.
- We recognize good performance and openly discuss potential for improvement.
- We take time for our employees, treat them with appreciation and encourage constructive feedback and trust.
- We are sincere and binding towards employees, colleagues and supervisors.
- We communicate clearly and appropriately.
- We agree on ambitious and achievable goals.
- We make decisions in a comprehensible and well-informed manner.
- We analyze and optimize continuous processes and cooperation with our employees. To this end, we develop our process organization together.

If you have more questions or suggestions about compliance, you can always rely on the following people:

Compliance Officer

Frank Nagel
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compliance@isabellenhuetten.de

Data Protection Officer

External Service Provider

Environmental Officer

Martin Lang

Human Resources Management

Nicole Grill

Works Council

Udo Koch

Communication

Jutta Waldschmidt



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