



+500

**PROGRESS
AND EXPERIENCE**

COMPLIANCE
AT ISABELLENHÜTTE



ISABELLENHÜTTE

Innovation by Tradition

COMPLIANCE AT ISABELLENHÜTTE

In this flyer, we would like to present our shared understanding of compliance in our corporate group.

Firstly, our management team explains why it is so important to tackle the issue of compliance. We then go on to present our **Code of Conduct (CoC)**. These are the guidelines that apply to all of us.

Responsible and sustainable action has always been part of our corporate culture. Due to the increasing size of our company and growing internationalisation, it is now very important to communicate this culture and convey it to each of our employees.

The fundamental rules and principles formulated in this brochure serve to ensure that all our employees conduct themselves in a lawful and responsible manner. These principles apply to all of us and reflect values that are universally binding.

The reputation of Isabellenhütte depends on every single person. Each of us is required to ensure our own behaviour complies with the applicable standards.

Sincerely,
Frank Nagel

Compliance is important for us	// 04
Code of Conduct	// 05
1. Basic understanding of socially responsible corporate governance	// 05
2. Scope	// 05
3. Key features of socially responsible corporate governance	// 06
4. Implementation and enforcement	// 09
Our leadership principles	// 10
Contacts	// 11

COMPLIANCE IS IMPORTANT FOR US

We understand "compliance" as *doing the right and honest thing*. This means that our actions are in accordance with the law, ethical principles, industry standards, customer and supplier expectations, and our own values and self-imposed rules. Consequently, we understand compliance management to be the quality management of all our corporate activity.

This basic philosophy has been in place throughout our extensive company history. For us, "innovation from tradition" means: our past, present and future role is as a reliable and competent partner. Reliability is our hallmark, and we keep our promises – as we have for over 500 years.

Today, due to the expectations of our customers, business partners, shareholders, the authorities and the public – as well as the consequences arising from these expectations – this reliability has taken on a significant meaning for the success of our business and for the reputation and ongoing existence of Isabellenhütte.

Failure to comply with the aforementioned rules has the potential to cause significant economic and legal risks as well as reputational damage to the company, its management, executives and employees.

As a result, we are determined to make the best possible use of compliance management to ensure full legal and regulatory compliance while also achieving optimal economic results.

Everyone's behaviour is crucial in this regard. The correct course of action in any instance always requires responsible consideration on your part. When in doubt, it is always your personal responsibility to seek advice from your immediate supervisors, or from compliance officers or company management, who will be happy to assist. This approach ensures well-founded decision-making and shared responsibility. It is the only way we will achieve our driving principle:

innovation from tradition.

Holger Spiegel

Thilo Gleisberg

Dr. Felix Heusler

Below you will find the current Code of Conduct (CoC) for Isabellenhütte.

1 BASIC UNDERSTANDING OF SOCIALLY RESPONSIBLE CORPORATE GOVERNANCE

This CoC is based on a shared basic understanding of socially responsible corporate governance. For Isabellenhütte, this means taking responsibility by considering the economic, technological, social and environmental consequences of corporate decisions and actions, and by achieving an appropriate balance of interests. Within this potential framework and scope for action, Isabellenhütte voluntarily contributes to the common good and to sustainable development of the global community at the locations where it operates. In doing so, the company is guided by universal ethical values and principles, in particular integrity, honesty and respect for human dignity.

2 SCOPE

2.1 This CoC applies to all Isabellenhütte subsidiaries and business units around the world.

2.2 Isabellenhütte also undertakes to promote compliance with the contents of this CoC among its suppliers and elsewhere in the value chain insofar as this can be achieved within its operating framework and areas of activity.

3 KEY FEATURES OF SOCIALLY RESPONSIBLE CORPORATE GOVERNANCE

Isabellenhütte actively seeks to ensure that the values and principles set out below are observed in a sustainable manner.

3.1 COMPLIANCE WITH THE LAW

Isabellenhütte complies with the applicable legislation and other statutory regulations in the countries where it operates. In countries with weak institutional frameworks, Isabellenhütte carefully considers what good corporate practice from its country of origin should be applied to promote responsible corporate governance.

3.2 INTEGRITY AND PRINCIPLES OF CORPORATE GOVERNANCE

3.2.1 Isabellenhütte bases its actions on universal ethical values and principles, in particular: integrity, honesty, respect for human dignity, openness and equal treatment regardless of religion, ideology, sex or ethnicity.

3.2.2 Isabellenhütte opposes corruption and bribery as set out in UN Convention Article 2. Suitable strategies are adopted to promote transparency, acting with integrity, and responsible management and governance within the company.

3.2.3 Isabellenhütte pursues lawful and accepted business practices and respects fair competition. Competition is focused on professional conduct and high-quality work. A cooperative and trusting relationship is maintained with supervisory authorities.

3.3 CONSUMER INTERESTS

Insofar as consumer interests are concerned, Isabellenhütte complies with consumer protection regulations and appropriate sales, marketing and information practices. Particularly vulnerable groups enjoy special attention (e.g. youth protection).

3.4 COMMUNICATION

When discussing the requirements of this CoC and its implementation with employees, customers, suppliers and other stakeholder groups, Isabellenhütte engages in open dialogue. All documents and records are prepared conscientiously, not illicitly altered or destroyed, and are stored appropriately. Any trade secrets or business information from partners are treated sensitively and confidentially.

3.5 HUMAN RIGHTS

Isabellenhütte is committed to promoting human rights. The company respects human rights in accordance with the UN Human Rights Charter, in particular:

- 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

Protecting health and safety at work, in particular ensuring a safe and healthy working environment to prevent accidents and injuries.

3.5.3 HARASSMENT

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

3.5.4 FREEDOM OF EXPRESSION

Protecting and granting the right to freedom of opinion and expression.

3.6 WORKING CONDITIONS

Isabellenhütte complies with the following International Labour Organization (ILO) core standards.

3.6.1 CHILD LABOUR

The prohibition of child labour (i.e. the employment of individuals younger than 15 years of age, unless local legislation sets higher age limits and unless exceptions are permitted).

3.6.2 FORCED LABOUR

The prohibition of forced labour of any kind.

3.6.3 REMUNERATION

The labour standards regarding remuneration, in particular the level of remuneration in accordance with applicable laws and regulations.

3.6.4 WORKERS' RIGHTS

Respecting the rights of workers to freedom of association and freedom of assembly and collective bargaining, insofar as this is legally permissible and possible in the relevant country.

3.6.5 PROHIBITION OF DISCRIMINATION

Equal treatment of all employees.

3.7 WORKING HOURS

Isabellenhütte complies with labour standards regarding maximum permissible working hours.

3.8 ENVIRONMENTAL PROTECTION

Isabellenhütte complies with the regulations and standards on environmental protection covering its operations and activities in an environmentally conscious manner at all locations. The company also uses natural resources responsibly in accordance with the principles of the Rio Declaration (27 principles of the 1992 Rio Declaration on Environment and Development).

3.9 CIVIC ENGAGEMENT

Isabellenhütte contributes to the social and economic development of the country and region in which it operates and promotes appropriate voluntary activity by its employees.

4 IMPLEMENTATION AND ENFORCEMENT

Insofar as is reasonable, Isabellenhütte makes every appropriate effort to implement and apply the principles and values described in this CoC on an ongoing basis. On request and as part of a reciprocal framework, contractual partners should be informed about the key measures so that it is clear how compliance will always be ensured. There is no entitlement to the disclosure of trade and business secrets, information relating to competition or other information worthy of protection.

OUR LEADERSHIP PRINCIPLES

In addition to the Code of Conduct, which should govern our daily actions, our leadership principles offer further guidance for our conduct towards our employees and each other.

TRUST IN THE SUCCESS OF YOUR TEAM.

We encourage our employees to work independently and cultivate an environment that offers room for experimentation and growth.

BE A ROLE MODEL AND SHOW COMMITMENT.

Our speech and actions are in harmony, which allows us to build sustainable relationships and trust.

ENABLE YOURSELF AND YOUR TEAM TO LEARN FROM MISTAKES.

We treat each other with respect and see mistakes as opportunities for improvement.

DEVELOP YOUR EMPLOYEES AND YOURSELF.

We strengthen our potential, so we can meet current and future challenges.

COMMUNICATE AS EQUALS AND ENCOURAGE MUTUAL FEEDBACK.

Throughout the company, our communication philosophy is open, clear and appreciative.

ENABLE SERVICES THAT INSPIRE OUR CUSTOMERS.

We develop new ideas and strategies with our teams across departmental boundaries to achieve optimal results for internal and external customers.

ADOPT AN ENTREPRENEURIAL SPIRIT AND SEIZE OPPORTUNITIES.

We consistently act in a solution-oriented manner and make responsible decisions that ensure success by taking calculated risks.

SET **CLEAR GOALS** WITH YOUR TEAM.

We motivate people by setting meaningful goals and we celebrate our successes.

If you have any further questions or suggestions on the subject of compliance, you can always contact the following people in confidence:

Compliance Officer

Frank Nagel
Tel: +49 (0) 2771 934-120
frank.nagel@isabellenhuetten.de

Human Resources Management

Elmar Ensmann
Tel: +49 (0) 2771 934-450
elmar.ensmann@isabellenhuetten.de

Works Council

Udo Koch
Tel: +49 (0) 2771 934-400
betriebsrat@isabellenhuetten.de

Communication

Jutta Waldschmidt
Tel: +49 (0) 2771 934-121
jutta.waldschmidt@isabellenhuetten.de

Data Protection Officer

LAN Security (Business Secrets Protection Act Officer)

We expressly ask you to report possible compliance-related issues to us. In addition to the above contacts, whistleblowers can contact our confidential email address *Compliance@isabellenhuetten.de* or use one of the two mailboxes in the administration and works council buildings.

We have also set up an external whistleblowing system for Isabellenhütte, which can be contacted in the following ways:

Tel: +49 271-38682468

Email: dsb@lan-security.de

Web form: <https://www.lan-security.de/Hinweisgebersystem/>

Your data will of course be received in absolute confidence and will not be passed on to third parties.



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