

Supplier Code of Conduct



SUPPLIER CODE OF CONDUCT

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

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

In view of this, we ask that you, as a valued Klöckner Supplier, review and adopt our specific expectations in relation to human rights – as laid down in United Nations Resolution 217 A (III) – the environment and business ethics, and indicate your understanding and compliance with them by signing at the end of this document.

Human and Labor Rights

Klöckner encourages its Suppliers to identify the risk of potential human rights violations and risks in its own operations as well as in their value chains and to implement appropriate actions/measures to eliminate or mitigate any such risks identified. The relevant improvement plans must be implemented, reviewed and updated whenever necessary, but at least every 12 months. This is mandatory for all Suppliers that are required by a law of their country of domicile or country of operation, or by a regulation or directive of the European Union to review, assess and eliminate human rights violations or to mitigate human rights violation risks in their business operations and/or in their value chain or parts thereof.

At Klöckner, we expect our Suppliers to respect and comply with the fundamental rights, particularly human rights. 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.

- a) Suppliers must not use involuntary labor of any type. This shall include, but not be limited to, forced, indentured, and bonded or prison labor and any other kind of "modern slavery."
- b) Suppliers must not use any kind of child labor. For the purposes of this Code, a "child" is considered to be 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.
- c) Suppliers must respect diverse cultural, ethical and religious backgrounds, and comply with the principle of equality, regardless of race, gender, age, origin, skin color, disability, nationality, sexual orientation, gender identity, religion or any other protected characteristics or activities.

- d) Suppliers must treat all 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 representative bodies, and to enter into collective bargaining.
- f) Suppliers must fully comply with all 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 must comply with all applicable health, safety and welfare laws, rules and regulations, and shall provide a safe workplace 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 the use in its products of raw materials which directly or indirectly finance armed groups that violate human rights. No Supplier shall supply goods to Klöckner containing columbite-tantalite (coltan), cassiterite, wolframite, tin, tungsten, tantalum or gold ("Conflict Minerals") obtained or originating from countries that are defined as conflicted countries in Regulation (EU) 2017/821 of the European Parliament and of the Council, as amended from time to time, as well as in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protections Act, as amended from time to time ("Covered Country/Countries").

When any orders or contracts for the sale of goods to Klöckner are entered into, all Suppliers shall inform Klöckner in writing (email: compliance@kloeckner.com) 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 relevant 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 on which such confirmation is given.

Klöckner reserves the right to terminate and cancel any orders or contracts for goods containing Conflict Minerals at its sole discretion.

Environment

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

1. Sustainable resources management

Klöckner encourages its Suppliers to identify potential negative environmental impacts and risks in its own operations as well as their value chain and to implement appropriate actions/measures to eliminate or mitigate any such impacts/risks identified. The relevant improvement plans must be implemented, reviewed, and updated whenever necessary, but at least every 12 months. This is mandatory for all Suppliers who are legally obliged by a law of their country of domicile or country of operation, or by a regulation or directive of the European Union to review, assess and eliminate negative environmental impacts or to mitigate the risks of such impacts in their business operations and/or in their value chain or parts thereof.

2. Energy efficiency, renewable energy, greenhouse gas emissions and air quality

Our Suppliers are aware of their current energy sources and identify opportunities to reduce their absolute emissions of air pollutants and greenhouse gases.

Our Suppliers make sustained efforts to reduce their absolute emissions of air pollutants and greenhouse gases in their value chain and support the goals of the Paris Agreement.

3. Responsible chemical management

Chemicals used by our Suppliers are purchased, stored, transported, handled and used in line with all applicable legal requirements and in a way that protects the health and safety of workers and the environment.

4. Consumption of water and discharge of wastewater

When our Suppliers use water in their operations, opportunities to reduce water consumption and discharge wastewater in an environmentally friendly manner are identified and implemented.

5. Waste

Our suppliers store, handle, transport and dispose of waste in accordance with all applicable legal requirements and in a manner that protects worker health and safety and the environment. No waste is landfilled on site. Hazardous and non-hazardous waste are stored separately.

Business Ethics and Integrity

Klöckner expects all of its Suppliers to conduct their business in accordance with 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 which address bribery or other prohibited conduct.

Suppliers must conduct business in an honest and ethical manner. We do not tolerate bribery or corrupt business practices, including money laundering. We expect our Suppliers to comply with fair competition practices, including compliance with all antitrust laws and regulations as well as export control regulations and applicable sanctions, especially those imposed by the EU, United Kingdom, Switzerland and the United States of America.

Suppliers must refrain from offering any invitations or gifts to Klöckner employees in order 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, which means they must be of a reasonable financial value and reflect customary local business practices. 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 could adversely influence the business relationship.

Compliance

Klöckner expects its Suppliers to ensure that their subcontractors and suppliers agree to all of the principles and requirements described in this Code in a similarly binding manner and to take this into account in the selection of their subcontractors and suppliers.

Suppliers must maintain the documentation reasonably required 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 questions or concerns, it is the Suppliers' responsibility to notify such issues to Klöckner.

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 ethical and/or compliance issues raised through any channels offered to Suppliers under this Code are resolved quickly, fairly and at the proper level within our organization.

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

In the event that a Supplier evidently fails to fulfill any of the principles or requirements set out in this Code or refuses to implement appropriate measures to eliminate or mitigate a failure to comply with the

principles and requirements set out in this Code, having been given a reasonable grace period, Klöckner reserves the right to immediately terminate any or all contracts with the Supplier for cause.

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, as amended from time to time (the current version is available on the website of Klöckner & Co SE [Compliance | Klöckner & Co SE \(kloeckner.com\)](https://www.kloeckner.com)), 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) and functions
of Authorized
Signatories (in print): _____

Signature of Authorized
Signatories: _____