



# Code of Conduct

## Principles of behaviour for International Metal Service GmbH

Economic success and corporate responsibility are inseparable. Our understanding of corporate behavior is characterized by respectful, fair and responsible dealings with our staff, our business partners, our society and the environment.

We understand the principles of behavior laid down in our Code of Conduct as a common guideline for our decisions and our actions. We are convinced that the sustainable and successful continuing development of our company depends, among other things, on the consistent implementation of this Code of Conduct. For that reason, the principles set out in the Code of Conduct apply equally to the executive board, our management team and all staff members of the International Metal Service GmbH.

Düsseldorf, September 2020

**Executive Board**

### **Preamble**

The International Metal Service GmbH is a global integrated steel provider of high-quality steel products. Our customers are at the heart of everything we do. We maintain trusting and reliable partnerships with our customers for the benefit of both parties; we view their lasting satisfaction as a prerequisite for our success. To this end, our staff make use of their many years of experience and their extensive expertise every day. In the process, they ensure that their behavior is in line with our Code of Conduct. We expect all of our management team to live up to their particular responsibility and their exemplary role towards each other, towards the company and our staff and towards our business partners. This can be seen, in particular, from the fact that they actively align themselves with our principles of behavior and support their staff in its implementation, in particular in preventing unlawful behavior.

In defining our principles of behavior, we were guided by our corporate values. Respect for human dignity, health and safety at work, responsibility and integrity in business dealings and the responsible, careful use of company property and limited resources are key-elements. These principles apply across national borders and represent a central point of guidance for all members of staff in their day-to-day work, including in their relations with each other. We are therefore working on getting our business partners, in particular our suppliers and distribution partners, to abide by our principles of behavior also.

The no-nonsense implementation of our principles ensures transparency and trust for our customers and business partners. In this way we ensure and bolster our own success, prevent harm to staff members and the company and at the same time make an important contribution to social and corporate development.

## **General principles of behavior**

### **Compliance with applicable law**

We operate our business in line with applicable local and international laws and with internal regulations and guidelines. We expect our staff – and in particular our management team – to be familiar and comply with the laws, regulations and internal rules relevant to their area of responsibility.

We will assist them to do so through appropriate training. In order to support our staff in their everyday work, the International Metal Service GmbH has laid down various guidelines. Every staff member is obliged to abide by these rules.

### **Equal opportunities and prohibition of discrimination**

We oppose all forms of discrimination. We respect human dignity. Our staff is the most important factor in our success. More than anything, our strength lies in the diversity of our workers, who all form part of our forward-looking company culture, which is characterized by different ways of thinking, respect and openness. We therefore expect every individual to behave with dignity and respect towards each other, and we will counter discrimination on the basis of ethnic origin, gender, ideology, religion, age, disability or sexual orientation with all means at our disposal.

## **Dealing with business partners and third parties**

### **Competition and anti-trust law**

We are committed to free and fair competition. In our business dealings we act with integrity and responsibility. We are convinced that, thanks to our high-quality steel products and the extensive expertise of our staff, we will be successful in competition. We decidedly reject interference in free competition by means of concerted practices and we are resolutely opposed to any form of abuse of these rules.

### **Conflicts of interest**

We undertake to always take commercial decisions in the interests of the International Metal Service GmbH. We are aware of the possibility of conflicts of interests and we will refrain from acting to the detriment of our company. A conflict of interest may arise, for instance, out of involvement in a competitor company. Another example of a source of conflicts of interest could be other authorized or unauthorized sideline activities.

The acceptance of discounts granted by suppliers, retailers or customers for private purposes could also engender a conflict of interest and have a significant influence on free commercial decision-making. Conflicts of interest can also arise through business relations with related parties, for which reason we are always careful to apply the “at arm’s length” principle in such cases.

### **Corruption and gratuities**

We explicitly oppose all forms of corruption. Business decisions must under no circumstances be influenced by the acceptance of a benefit or the granting of an advantage. We achieve our competitive advantages solely through business acumen and the quality of our products and services. Gratuities and hospitality may only be accepted and granted within the framework of our special internal rules. Donations and sponsorship will be judged on a case-by-case basis and may be subject to review before approval is granted. Acting within these stipulations requires transparency and trust both within the International Metal Service GmbH and towards our business partners.

## **Handling of company property, data and know-how**

### **Company property**

We protect the property and assets of our company. We show our respect by treating the property and assets responsibly and as carefully as if they were our own. In this way we ensure value retention, promote its appreciation and protect our company’s capital and that of our investors.

### **Data protection and data security**

We aim, within the framework of relevant statutory provisions, to ensure the highest levels of protection and the best possible security of the data of our staff, our customers and our business partners. This is a key building block with which to increase trust in our operations.

In particular, we will only collect, process or use personal data to the extent necessary for a particular, defined and permitted purpose. The transfer of data, prevention of data access and the use of data are also subject to special protection. All members of staff are obliged to act within the terms of relevant legislation and in so doing to always observe the personal rights of others.

### **Know-how and insider knowledge**

We rely on the valuable expert knowledge of our staff to foster our success. This knowledge must thus, in principle, only be used for the purposes of our company, must not be made available to third parties and is subject to corporate secrecy during and after employment. Furthermore, this knowledge must not be used for insider dealing within the meaning of the applicable regulations.

### **Man and the environment**

#### **Rejection of child labour**

We strictly reject child labour. Children are in particular need of protection, for which reason this is a particular concern for us. It is strictly forbidden for anyone under the age of 15 or under the legal minimum working age to be employed.

#### **Rejection of forced labour**

We want nothing to do with any form of forced labour or the exploitation of workers, in particular in relation to children and young people. We strictly reject this. Our staff perform their working duties as a result of a voluntary decision of their own free will, not because of the threat of direct or indirect violence or intimidation.

#### **Right to organise and right of collective bargaining**

We support our staff members in observing their rights as workers. Our staff have the right, as they so wish, to found, join or leave associations or organisations for the purposes of promoting the protection of workers' interests. No discrimination against staff members who are actively involved in representing the workers will be tolerated.

#### **Fair working conditions, health and safety**

We observe the appropriate rules to ensure fair working conditions and to protect the health of staff members. The health and safety of our staff is a particular concern of ours. We therefore ensure a healthy and hazard-free working environment through compliance with laws and regulations and observance of relevant design principles.

Our management team, in particular, must ensure that reasonable protective measures have been designed and implemented to ensure health and safety in the workplace.

#### **Protecting the environment**

We regard protecting the environment and the climate as an important element of our business practice. Careful interaction with the environment and the limited resources available, form permanent pillars of our corporate responsibility.

We therefore use our influence to ensure optimal, responsible conditions in connection with the procurement, manufacture, distribution and use of our products. Our staff share our convictions and act accordingly.