

## **Code of Conduct**

### **Preamble**

Our Code of Conduct shall be a guideline for the entire Steel Service Krefeld-group of Companies, hereinafter „SSK-Group of Companies“, (Steel Service Krefeld GmbH, Steel Service Krefeld (USA), Inc. and Steel Service Krefeld (Canada), Inc. and applies equally to all of us. It especially addresses the Top Management, Managers, all our employees and our suppliers. On one hand it represents what we expect from ourselves to meet the values and principles mentioned here and indicates responsible conduct towards our business partners, customers and our employees.

### **Obligation of the Top Management**

The SSK-Group of Companies consider itself to act economically, socially and environmentally friendly. Our aim is to carry out our business in all markets we are active in with competence, fair competition and based on ethic and moral foundations. To this we count compliance with applicable laws and the acceptance of ban of cartels respectively restriction of competition. We want to avoid taking illegal advantages from our customers, suppliers or competitors

### **Implementation and Enforcement**

SSK-Group of Companies commits itself to take all efforts necessary to comply with the principles of this Code of Conduct.

### **Team Spirit and Constructive Cooperation**

We are constantly questioning existing solutions and keep on creating new ideas to the benefit of our customers. In order to do this successfully we strongly support a constructive cooperation of our employees. Their interests and demands towards us are essential for our work and consistent refinement. We are successful in our business areas by the diversity of different people we employ.

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### **Standards of Cooperation**

We expect all our employees to act always according to highest professional standards and in accordance to the company guidelines. If our employees will not carry out their obligations against existing guidelines, rules or regulations they may have face strict disciplinary actions.

### **Open Communication with our Employees**

We do not hide any misconduct. If our employees report in good faith a true or suspected misconduct we will not tolerate any attempts to silence them or to take reprisals on these employees. We interpret „good faith“ in a way that our employees are convinced that their presentation describes the truth. This applies irrespective of whether a later investigation confirms the presentations of our employees as true or not.

### **Dialogue with our Cooperation Partners**

Any business information of our partners and their business secrets will always be handled sensitively and secretly. Necessary documents and files will be created appropriate, stored properly or destroyed after the end of cooperation.

### **Customer Orientation**

We behave fair and honest towards our customers and business partners. We understand the wishes, requirements and expectations of our customers and business partners in order to provide a target-oriented implementation on our products, services or other processes. It is our primary objective to establish a long-term and stable relationship with our customers and business partners.



## **Code of Conduct**

### **Acceptance of Gifts, Donations**

#### **a) Gifts to our employees**

Our employees do not solicit services, gifts or benefits from our customers or suppliers that influence or appear to influence the employee's conduct in representing our company.

If gifts are offered by third parties they shall only be accepted if they are general practice and if recognized as courtesy or politeness (for instance promotional gifts with logo of the donor like calendars or pens).

If the value of gifts will exceed the usual amount the Compliance Officer or the Management has to be informed. If that is not possible the acceptance of gifts has to be rejected in principle.

#### **b) Gifts offered by our employees**

Gifts offered by our employees shall only be offered within the ordinary range and to a reasonable extent. The individual offered a gift shall not associate it to a commitment which may influence commercial decisions to be taken.

#### **c) Donations**

The SSK-Group of Companies does not make donations to political parties, individuals or organisations whose objectives are contrary to the principles of our company or harmful to our reputation. The allocation of donations is transparent at all times.

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### **Bribery and Corruption**

We do not tolerate any kind of corruption or bribery, regardless if our company assets or third party assets might be harmed. By control mechanisms we take all actions necessary to prevent bribery, theft, embezzlement, fraud, tax evasion or money laundering.

Under no circumstances employees are allowed to solicit or to grant personal gifts, cash, cash equivalents, loans, travel etc. which are tied to an undue advantage (placing of orders, awarding of projects).

Even our business partners are urged to avoid any conflict of interest which contains risks of corruption.

### **Data Protection**

We treat all personal data of our customers, business partners as well as our employees with greatest care. This includes names, addresses, telephone no. as well as data of birth or information about current state of health. Our employees are obliged to take all actions necessary to protect data from internal or external data theft from our IT-systems. This especially includes misuse of assigned passwords or unauthorized downloading of data files, especially inappropriate materials from the internet.

We have published further information on the subject of data protection on our website [www.steelservicekrefeld.com](http://www.steelservicekrefeld.com).

### **Environmental Protection**

Protection of our environment and climate protection are very important to us. All our employees are encouraged to ensure all natural resources (for instance energy, water, area) used in our company are treated respectfully. A responsible approach to the production and distribution of our products and/or our services is expected from our employees.

We obey the laws and rules to protect our employees from health and safety risks at their workplace. Especially our Managers take actions to provide a workplace which ensures a healthy and risk-free work environment.



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### **Compliance with applicable laws**

Our Managers are committed to make themselves familiar with applicable laws, rules and regulations which apply to their area of responsibility and to fulfill all obligations without exception. Especially our Managers bear a high level of responsibility to comply with the Code of Conduct.

Business practices of our business partners and their suppliers have also to comply with applicable laws. This applies especially to imports, exports and domestic trade of goods, technologies or services but also to movements of capital and payments.

Violation against economic embargos as well as regulations of trade, import or export control, terrorist funding has also to be excluded by our business partners.

### **Fair Competition**

We are committed to fair competition and apply to its laws and regulations. We refrain from making price fixings, conditions or strategies with our competitors, suppliers, other companies or traders which may hinder fair competition. We do not participate in anti-competitive boycotts.

### **Ban on Discrimination**

Any kind of discrimination is strictly prohibited – no matter whether it is about nationality, ethnic affiliation, age or gender, sexual orientation, marital status, pregnancy, disability, religion or ideology. Promotions or engagement of new employees are free from discrimination.

### **Handling of Corporate Internals**

We place particular emphasis on careful dealing of our products, used equipment and intellectual properties of our company.



STEEL SERVICE KREFELD

Unternehmensgruppe - Group of Companies

Steel Service Krefeld GmbH - Steel Service Krefeld (USA), Inc. - Steel Service Krefeld (Canada) Ltd.

## **Code of Conduct**

### **Protection of Child Labour and Forced Labour**

Without exception we strictly decline child labor and forced labour and we also expect it from our business partners. School-aged children (younger than 15 years of age) shall not be employed even if permitted by the legal regulations of countries our suppliers are based in.

Krefeld, 04.08.2021

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Jürgen Beesen –

Managing Partner Steel Service Krefeld GmbH;  
President of Steel Service Krefeld (USA), Inc. and  
President of Steel Service Krefeld (Canada) Inc.