



CODE OF CONDUCT

Breitenfeld
Edelstahl



Introduction

In our organization, compliance is a very important topic, and we have therefore decided to draft this Code of Conduct. Compliance means respecting many legal regulations, such as

- **complying with legal requirements and regulations**
- **prevention of corruption**
- **avoiding the violation of competition law**
- **preventing discrimination**
- **complying with environmental law requirements**

and much more.

Compliance in our company also includes respecting ethical codes of conduct and other non-legal regulations.

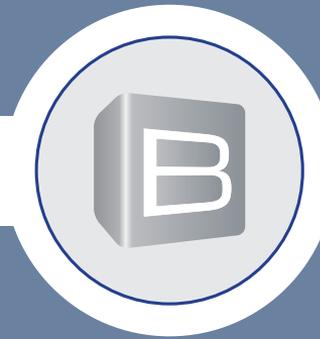
The goal of this Code of Conduct is that everyone within the company acts according to the rules.

We at Breitenfeld Edelstahl AG employ people of different backgrounds, social environments and biographies. These characteristics significantly change the general value structure of a company. With a collection of binding rules provided in this Code of Conduct, the behavior of our employees, partners and anyone else working for our company can be led in the right direction. The DOs and DON'Ts are defined in a comprehensible and tangible manner.

This document is a summary of the codes of conduct in our company. It contains the essential values and fundamental beliefs of the company. Breitenfeld Edelstahl AG has voluntarily committed itself to comply with the Code of Conduct. The Code of Conduct is based on the company's principles and visions, and it forms the basis for further specific guidelines and regulations. We regard the Code of Conduct as self-evident.

PREAMBLE

Our Code of Conduct is a guideline for the entire company Breitenfeld Edelstahl AG and therefore applies equally to each of us. Specifically, it is addressed to the management, the executives and all our employees. On the one hand, it represents the demands we place on ourselves to live up to the values and principles it contains, and at the same time, it shows the outside world that we act responsibly towards our business partners, customers and employees.



THE MANAGEMENT'S COMMITMENT

We at Breitenfeld Edelstahl AG consider ourselves obligated to act economically, socially and environmentally conscious. The company strives to run its business competently on an ethical and moral basis, and to engage in a fair competition in all markets in which it operates. This includes complying with current laws and respecting the ban of cartels and/or competitive constraints. At all costs, we want to avoid getting an improper advantage over our customers, suppliers or competitors.



TEAM SPIRIT, CONSTRUCTIVE COOPERATION

We constantly question existing solutions and develop new ideas for the benefit of our customers. For this purpose, we encourage our employees to work together constructively. Their interests and demands imposed upon us are crucial for our work and development. Only with consistent teamwork we are able to be successful in the different business areas.



STANDARDS OF COOPERATION

We trust our employees and assume that everyone acts in the company's best interest. If employees violate existing guidelines, rules or regulations in their work and/or by the way they are behaving, these employees must expect disciplinary actions.



OPEN COMMUNICATION

Faults that occur are communicated openly. We want to learn from our mistakes and thus further develop the company. A report about an actual or suspected misconduct will be handled carefully.



COMMUNICATION WITH COOPERATION PARTNERS

All of our partners' business information is always treated confidentially. Required documents are properly prepared, stored or, if necessary, returned or destroyed at the end of the cooperation.



CUSTOMER ORIENTATION

We always act fair and honestly towards our customers and business partners. The demands, needs and expectations of our customers and business partners are recorded in order to ensure the target-oriented implementation of products, services or other processes. Our primary goal is to build a long-term and stable relationship with our customers and business partners based on trust - this is also declared as one of the strategic goals in our mission statement.



GIFTS GIVEN TO OUR EMPLOYEES

Our employees do not demand or accept personal advantages from customers or suppliers that influence or could influence their own behavior towards the company. Gifts by third parties may only be accepted if they are common practice and can be seen as courtesy (promotional gifts bearing the company logo, such as calendars or pens). If the gift's value exceeds the usual amount, the Compliance Officer or management must be informed.



GIFTS

MADE BY OUR EMPLOYEES

Gifts on our part may also only be offered within the framework that is customary for the business relationship and in a materially reasonable scope. The recipient must not be able to associate any obligation with it that would influence his business decisions.



DONATIONS

In general, Breitenfeld Edelmetall AG does not make any donations to political parties, individuals or organizations whose objectives contradict our corporate philosophy or damage our reputation. Donations are always made transparently.



BRIBERY AND CORRUPTION

We do not tolerate any form of corruption or bribery, regardless of whether it damages our company assets or the assets of third parties. Control mechanisms are in place to prevent bribery, theft, embezzlement, fraud, tax evasion or money laundering. Our employees are prohibited from accepting or granting favors of any kind (cash, travel, gifts, etc.) that are linked to an undue advantage (order placement, awarding projects, etc.). Our business partners are also required to avoid conflicts of interests that may involve a risk of corruption.



DATA PROTECTION

We treat all personal data of customers, business partners and employees with the utmost care. This includes names, addresses, phone numbers, as well as date of birth or information on the current state of health. In order to secure the data, our employees are obligated to take all suitable measures to protect our IT system against internal and external data theft. This applies particularly to misused passwords within the company and to unauthorized downloads of files, especially inappropriate content from the Internet.



ENVIRONMENTAL PROTECTION

The protection of the environment and climate are very important to us. Our employees are required to treat all natural resources that are used in our company (e.g. energy, water, land) with care. We expect our employees to act responsibly during the production and distribution of our products/services. To protect our employees, we comply with all laws and regulations concerning health and safety at work. For that, our managers take measures to create a healthy and hazard-free working environment.



COMPLIANCE WITH APPLICABLE LAW

We require our managers to become familiar with the laws, regulations and rules relevant to their area of responsibility, and to comply with them invariably. Especially our managers bear a high level of responsibility when it comes to fulfilling the Code of Conduct. The business practices of our business partners and their suppliers must also comply with applicable laws. This covers import, export and domestic merchandise trade, technologies and services, but also payments and capital movement. Our business partners must not violate economic embargoes, nor regulations of trade, import and export control, nor be involved in terrorist financing.



FAIR COMPETITION

We are committed to fair competition and abide by the laws and rules. We refrain from making agreements on prices, conditions and strategies with competitors, suppliers, other companies and distributors that hinder fair competition. We do not take part in anti-competitive boycotts.



NON-DISCRIMINATION PRINCIPLE

Any form of discrimination is prohibited. This concerns nationality, ethnicity, age, gender, sexual orientation, marital status, pregnancy, disability, and religion or belief.



HANDLING COMPANY PROPERTY

It is of great importance to us that everyone handles the manufactured products, work equipment and the company's intellectual property responsibly.



PROTECTION AGAINST CHILD OR FORCED LABOR

We strictly reject any form of child or forced labor without any exceptions and expect the same from our business partners.

Contact

Compliance Officer: Thomas Cseve
compliance@breitenfeld.at

Implementation

Breitenfeld Edelstahl AG undertakes all necessary efforts to comply with the principles and values described in this Code of Conduct:

Board of Directors

St. Barbara, 31.10.2021