



Code of Conduct

1. Preamble

Our Code of Conduct is intended as a guideline for the entire Steel Service Krefeld group of companies (Steel Service Krefeld GmbH, Steel Service Krefeld (USA), Inc., Steel Service Krefeld (Canada) Inc.) - hereinafter referred to as the "SSK group of companies" - and therefore applies equally to all of us. Specifically, it is addressed to the top management, the executives and all our employees. On the one hand, it represents our ambition to live up to the values and principles listed therein, and at the same time it signals to third parties responsible behaviour towards our business partners, our customers and our employees.

2. Obligation of the top management

The SSK Group of Companies believes it has a duty to act in an economically, socially responsible and environmentally conscious manner and we expect the same behaviour from our supplier companies. The company strives to conduct its business competently and on an ethical and moral basis and to compete fairly in all markets in which it operates. This includes compliance with applicable laws and acceptance of anti-trust bans or restrictions on competition. We want to avoid gaining undue advantages over our customers, suppliers or competing companies.

3. Implementation and enforcement

The SSK Group of Companies is committed to making the necessary efforts to live up to the principles and values described in this Code of Conduct. Furthermore, we strive to continuously optimise our entrepreneurial actions and our products or services in terms of sustainability.

4. Team spirit and constructive cooperation

We constantly question existing solutions and develop new ideas for the benefit of our clientele. To this end, we promote constructive teamwork among our employees. Their interests and demands on us are decisive for our work and further development. We are successful in our cooperation because of the diversity of our employees and their commitment to the business areas.

5. Standards of cooperation

We expect all our employees to act in accordance with the highest professional standards and our company's guidelines at all times. If employees violate existing guidelines, rules or regulations in the course of their work or through their conduct, they will be subject to disciplinary action.

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6. Open communication with our employees

We do not cover up misconduct. If our employees report actual or suspected misconduct in good faith, we will not tolerate any attempts to intimidate or retaliate against them. We understand "in good faith" to mean that our employees are convinced that their account is true. This applies whether or not a subsequent investigation confirms the employee's version of events.

7. Dialogue with Cooperation Partnerships

All business information of our business partners and their trade secrets are treated sensitively and confidentially as a matter of principle. Necessary documents are properly prepared, stored or, if necessary, destroyed after the end of the cooperation.

8. Customer orientation

We behave fairly and honestly towards our customers and our business partners. We record the wishes, needs and expectations of our customers and business partners in order to ensure a targeted implementation in products, services or other processes. Our primary goal is to build a long-term and stable relationship with our clients and business partners based on trust.

9. Acceptance of gifts, donations

a) Gifts to our employees

Our employees do not solicit or accept personal benefits from our clientele or supplying companies that influence or could influence their own behaviour with regard to their own work for the company.

If gifts are offered by third parties, they may only be accepted if they are common practice and can be recognised as a courtesy or favour (promotional gifts with the logo of the supplying company, such as calendars or pens).

In the case of gifts whose value exceeds the customary amount, the compliance officer or management must be informed. If this is not possible, these gifts must always be refused.

b) Gifts from our employees

Gifts on our part may also only be offered within the scope of what is customary for the business relationship and in a materially appropriate amount. The person receiving the gift must not be able to associate it with any obligation that would influence his or her business decisions.

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c) Donations

As a matter of principle, the SSK group of companies does not make donations to political parties, to individuals or to organisations whose objectives contradict our corporate philosophy or damage our reputation. Donations are always made in a transparent manner.

10. Bribery and corruption

We do not tolerate any form of corruption and bribery, regardless of whether this damages our company assets or the assets of third parties. We ensure through control mechanisms that bribery, theft, embezzlement, fraud, tax evasion or money laundering are prevented.

Under no circumstances our 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 conflicts of interest which contains risks of corruption.

11. Data Protection

We treat all personal data of our clients, business partners and employees with the utmost care. This includes names, addresses, telephone numbers as well as dates of birth or information about the current health status. Our employees are obliged to take all suitable measures to protect our IT system against internal as well as external data theft. This applies in particular to passwords misused in the company and unauthorised downloading of files, especially of inappropriate material from the Internet.

We have published further information on the subject of data protection on our website www.steelservicekrefeld.com.

12. Safety at work, health protection

Protecting the health of our employees is our highest priority. We comply with all laws and regulations concerning health and safety in the workplace to protect our employees. To this end, our managers in particular take measures to create a healthy and hazard-free working environment for our employees. We have introduced appropriate occupational safety standards in order to minimise possible damage to health or accidents that could arise in connection with working in our company and to permanently check for optimisation possibilities.

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13. Environmental protection

The protection of the environment and climate protection are important to us. Our employees are required to treat all natural resources (e.g. energy, water, land) used in our company with care. Responsible handling in the production and distribution of our products and/or our services is expected from our employees as well as from our suppliers.

14. Renewable energies

Our company is committed to constantly reviewing the energies necessary for its economic activities to see how their energy efficiency can be improved and how energy consumption can be minimised. We want to promote and continuously expand the use of renewable energies.

15. Soil quality

We undertake not to cause lasting damage to the soil on which our business activities take place and to limit the amount of soil used.

16. European Green Deal, reduction of Co² emissions

We expressly support the "European Green Deal", which aims to create a climate-neutral Europe by 2050 at the latest. The Co² emissions caused by our economic activities are regularly checked for optimisation possibilities. A certification of our company according to DIN EN ISO 14001:2015 planned until May 2024 will support us in this. This also applies to our membership in the Krefeld Climate Pact, with which we want to contribute to making the city in which our main economic activities take place climate neutral by 2035.

17. Compliance with applicable law

We require our managers to familiarise themselves with the laws, rules and regulations relevant to their area of responsibility and to comply with them without exception. Our managers in particular bear a high responsibility in complying with the Code of Conduct.

The business practices of our business partners and their suppliers must also take into account the applicable laws. This applies in particular to import, export and domestic trade in goods, technologies or services, but also to payment and capital transactions.

Violations of economic embargoes as well as trade, import and export control regulations must also be excluded by our business partnerships, as the financing of terrorism.

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18. Fair competition

We are committed to fair competition and abide by these laws and rules. We refrain from agreements on prices, conditions and strategies with competing companies, suppliers, other companies and trading companies that hinder fair competition. We do not participate in any anti-competitive boycotts.

19. Prohibition of discrimination

We do not tolerate unequal treatment of employees. This applies, for example, to harassment or discrimination based on gender, national, ethnic or social origin, but also skin colour, political conviction, ideology, religion, age, disability, health status, pregnancy or sexual orientation. We respect the personal dignity, privacy and personal rights of each and every employee.

20. Social responsibility

We respect the rights of minorities and indigenous people. As part of systematic risk management, we always consider the impact of our business activities on human rights in our business and value chains.

21. Protection from child and forced labour

We strictly reject child or forced labour without exception and expect the same from our business partnerships. Our supplier companies are required to comply with the recommendations from the ILO-conventions on the minimum age for the employment of children.

22. Dealing with internal company information

We attach importance to the careful and responsible handling of the products manufactured, the work equipment used and the company's intellectual property.

Krefeld, 30.10.2023



Jürgen Beesen –
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President of Steel Service Krefeld (USA), Inc. and
President of Steel Service Krefeld (Canada) Inc.