



## Stahlwerk Annahütte Supplier Code of Conduct

Stahlwerk Annahütte is fully aware of its responsibility as a global company and the associated responsibility towards the society. This document summarizes core principles and standards of Stahlwerk Annahütte for its suppliers in accordance with globally accepted guidelines and principles.

The cooperation between Stahlwerk Annahütte and its suppliers is based on a culture of trust and mutual respect. Both parties understand that safeguarding the standards described is the foundation for mutual, lasting and successful cooperation. This is why Stahlwerk Annahütte expects all its suppliers to comply with the principles of the United Nations Global Compact ([www.unglobalcompact.org](http://www.unglobalcompact.org)) and to act in accordance with this Supplier Code of Conduct and to stand up for these values.

### Observance of laws

The suppliers are obliged to comply with the applicable national laws and regulations of those countries in which they conduct business.

## Human Rights and Social Standards

---

### Occupational safety

The suppliers fully comply with applicable statute governing health and safety at work. All hazards and the resulting health risks encountered by the employees must be properly assessed, and necessary safeguard measures must be taken. In addition, they must provide their employees with on-going training on occupational safety regulations. Safety information and, if required, adequate personal protective equipment are available.

### No child, forced or compulsory labor

The suppliers prohibit and refrain from any kind of child labor within their organization. Additionally, suppliers must prohibit any kind of forced labor including modern slavery or human trafficking in their organization and any contribution to it.

### Respect for the fundamental rights of employees

The suppliers respect and comply with the fundamental rights granted to all employees under applicable national statute. Furthermore, suppliers fully recognize the labor standards issued by the International Labor Organization (ILO)

([www.ilo.org](http://www.ilo.org)), taking into due account the applicable laws and regulations in different countries and at different sites.

The suppliers

- shall respect the health, safety and privacy rights of their employees.
- promote equal opportunities and equal treatment.
- prohibit any form of discrimination on the basis of ethnicity, nationality, sex, color, cultural background, race, age, disability, political outlook, religious beliefs or sexual orientation. The prohibition of discrimination in the workplace is also related to recruitment, compensation, promotion or termination.
- fully comply with applicable national statute on working time.
- pay their employees a remuneration which is in line with applicable national statute.
- respect the right of their employees, to the full extent of applicable national statute, to form a workers' council, collective bargaining unit or other employee representations, and to enter into collective bargaining.

## Conduct in Business Environment

---

### Anti-Corruption

Any form of or attempt at corruption including blackmail and bribery as well as other illegal practices shall not be tolerated within the business relationships, this applies to active as well as passive bribery. Corruption is the offering, giving or receiving of benefits, directly or indirectly, with the intention or effect to influence a business or public authority decision process.

### Avoiding conflicts of interest

In the suppliers' business dealings with Stahlwerk Annahütte, suppliers take decisions based on objective criteria only. Any factors that might influence the suppliers' decisions due to private, business or other conflicts of interest must be prevented from the start. The same applies to relatives and other related parties.



**Fair competition**

The suppliers always compete in a fair manner and comply to all applicable national and international antitrust laws. The suppliers do not enter with competitors into agreements that might constitute a breach of antitrust law, nor do they take advantage of any dominant market position they might hold. The suppliers must take action against illegal cartels.

**Anti-money laundering measures**

The suppliers refrain from any form of money laundering activities. This also needs to be ensured by them within their supply chain. Any form of terrorist financing is prohibited.

**Adherence to trade laws, export controls and sanctions**

The suppliers must adhere to national and international sanctions, embargoes and other restrictions on foreign trade laid down in law, as well as applicable energy trading regulations. The suppliers must also comply with all applicable national and international regulations governing the capital markets.

**Protection of information and data**

The suppliers are aware of the meaning of information security and data protection for their company and their employees and provide effective protection in both areas.

**Environmental Protection**

The protection of resources and the environment are highly important, both with regard to development as well as manufacture, transport, and the disposal of products.

The suppliers comply with all applicable national laws, regulations and standards to protect the environment. This includes the compliance with applicable international and national laws and regulations on the handling, storage and disposal of hazardous substances and waste.

It is expected that the suppliers minimize environmental impact and hazards, and improve environmental protection in their everyday operations. The suppliers must strive to minimize waste and air, soil and water emissions, contribute to the recycling and reuse of materials and products and continuously improve resource and energy efficiency in production processes and in the handling and transportation of goods.

**Responsible material procurement**

All suppliers who process natural resources from conflict areas shall disclose the origin of the material to Stahlwerk Annahütte. In the manufacture of products, the suppliers only use validated, conflict-free smelters and refineries for the procurement of minerals.

**Compliance with the Stahlwerk Annahütte Supplier Code of Conduct**

**Supply chain**

The suppliers will undertake reasonable efforts to encourage own suppliers and sub-contractors to comply with the principles and standards set out in the Supplier Code of Conduct of Stahlwerk Annahütte.

Stahlwerk Annahütte reserves the right to monitor whether this Supplier Code of Conduct is respected by new and existing suppliers using the following methods: supplier self-declaration, declaration via third parties, submission of certifications, and the right to conduct onsite audits to ensure the Supplier Code of Conduct is respected.

In the event of a violation of this Code of Conduct within the supplier’s sphere of responsibility that affects the interests of Stahlwerk Annahütte, the respective supplier is obliged to report this violation to Stahlwerk Annahütte without undue delay.

In the event that a supplier evidently fails to fulfill any of the principles or requirements set out in this Supplier Code of Conduct, rejects an information or audit request or refuses to pursue and implement measures for improving his sustainability performance, after having been given a reasonable period of grace, Stahlwerk Annahütte reserves the right to immediately terminate any or all contracts with the supplier for cause.

In this connection, Stahlwerk Annahütte will assess and evaluate the nature and scope of the cooperation with the supplier in question when analyzing the respective violation.

\_\_\_\_\_  
Company

\_\_\_\_\_  
Place, Date

\_\_\_\_\_  
Signature

Stahlwerk Annahütte Max Aicher GmbH & Co. KG  
Max-Aicher-Allee 1 + 2  
83404 Ainring – Hammerau, Germany  
Mail: stahlwerk@annahuette.com  
Web: www.annahuette.com

