



Code of Conduct of Karl Buch Walzengiesserei GmbH & Co. KG and Buch Business Center GmbH

The present code of conduct is a voluntary agreement and guideline with which Karl Buch Walzengiesserei GmbH & Co. KG and Buch Business Center GmbH want to ensure adherence (compliance) to competition and antitrust laws and adherence to global requirements in terms of ethical and moral conduct in particular. This also implies promoting fair and sustainable relations with customers and suppliers, as well as with our own company staff.

We operate in a constantly changing world with finite resources. This means for Karl Buch Walzengiesserei GmbH & Co. KG and Buch Business Center GmbH and their employees constantly focus on improving processes and procedures, as well as sustainability when dealing with resources. We can also expect our business partners to observe these principles.

1. Observance of Laws, Standards and Ethical Conduct, Trade Secrets

The companies comply with the applicable laws and standards of the respective countries in which they operate. We are guided by the generally applicable ethical values and principles, in particular integrity, legality and human dignity.

The companies act according generally accepted business practices and maintain trusting relationships with authorities and partners. Our business partners also undertake to comply with the laws of the respective applicable legal system(s).

Internal affairs and trade secrets/ business secrets of business partners are treated confidentially by the company and its employees. Passing on confidential information to third parties or making it publicly available is prohibited.

2. Fair Competition / Bribery, Venality and Corruption

The companies commit themselves to fair competition. We observe competition-protecting laws, in particular antitrust law, as well as other competition-regulating laws.

Illegal agreements on prices or other conditions, sales territories or names of customers and suppliers contradict the corporate principles.

The companies reject bribery and corruption and do not tolerate these ways of behavior.

The staff has to make sure that no personal dependencies or obligations to customers or suppliers occur. The business partners commit themselves to not offer any gifts or personal benefits to the staff, if its total value exceeds the tax exemption limit per person per year and if specific circumstances give an impression that the recipient expects a particular behavior in return. If gifts of a higher value are offered, it has to be discussed with the respective superior beforehand. Gifts of modest value and entertainment in the context of business practice are permitted.

Our business partners undertake to only provide goods or services for personal use at a current market price resp. discounted prices or other perquisites, if they are granted to all staff members of the company.

3. Global Guidelines

The companies and the business partners commit themselves to respect and observe the human rights in accordance with the European Conventions on Human Rights and the UN Charter. We reject child labor as well as all forms of forced labor, serfdom, slavery or similar circumstances. We also expect our business partners and suppliers to observe these principles when carrying out their business activities.

4. Discrimination, Harassment, Freedom of Opinion and Privacy

The companies will not tolerate any form of harassment or violence in the workplace.

We reject discrimination based on personal characteristics such as race, ethnic or national origin, gender, physical or mental disabilities, age, religion, sexual orientation etc. in general.

The companies do not tolerate any form of physical, psychological and sexual violence.

The right to freedom of opinion and expression is guaranteed and the privacy of employees is respected. Personal data are treated confidentially and are not disclosed to unauthorized persons.

5. Health and Occupational Safety

The companies comply with national and international regulations for ensuring health and safety at work. We attach particular importance to the health and safety of our employees and our contractors.

Our business partners also agree to undertake responsibility for the safety and health of their staff.

6. Environment and Energy

The companies observe the objectives of a sustainable environmental protection. We use natural resources responsibly.

This also includes the efficient use of all types of energy.

Siegen, 10th March 2020



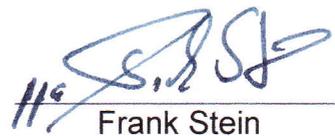
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Managing Director



Kai Leyendecker

Chief Financial Officer
(CFO)
Member of the Board



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Member of the Board