

ZENTRALE

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COMPLIANCE

In terms of corporate management, accounting and compliance European Staal Austria GmbH relies on the highest currently applicable standards. Our policies and principles should ensure management and control of our business activities based on responsibility and value factors. They imply safeguarding the interests of shareholders, comprehensive compliance measures, based on detailed and transparent disclosure of information, and relevant regulations for preventing and resolving conflicts of interest. We strive to continually improve our corporate philosophy and business practices, which are ethical and morally sound and are in line with the highest global standards.

Our compliance policies require timely, complete and accurate disclosure of information relating to the Company's business, financial condition and operating results, in compliance with relevant laws and regulations.

European Staal Austria GmbH opposes and stands up against any form of unfair competition, corruption or excessive leniency and fraud.

Now therefore, below we provide information about existing internal control systems taking effect during various interactions with business partners.

1. Whistleblower channels

To ensure proper and flawless accomplishment of contracts, as well as to avoid corruption, fraud and/or excessive leniency, we have set up a network of special information channels - "Whistleblower channels of European Staal Austria GmbH":

- Telephone hotline: +43 5 78245 - 194
- Email: ulrike.wiesinger@europeanstaal.eu
- Postal address: Lunzerstrasse 105, 4030 Linz,
for the attention of managing director, Mr. Karl-Heinz Sebian

2. Compliance in business conduct and adherence to ethical regulations

In the event of:

- violation of contractual terms by an employee and/or representative of European Staal Austria GmbH,
- proposal or suggestion to agree upon additional clauses or conditions that appear unacceptable and/or are not enshrined in the underlying contract; and/or
- violation of contractual terms, corporate ethical principles or generally applicable business practices during the performance of contractual obligations by an employee and/or representative of European Staal Austria GmbH,

our business partners can inform us about such an event in accordance with the practices described here.

Management will carefully analyze all incoming information.

3. Monitoring mechanisms

European Staal Austria GmbH reserves the right to ensure the enforcement of its rights and legal interests by means of process monitoring when agreeing, implementing and/or terminating contractual obligations. This also includes the development and implementation of internal audits and control systems.

European Staal Austria GmbH currently has the following testing and monitoring mechanisms in place:

- ordinary and extraordinary review of the conclusion, performance and/or termination of contracts between European Staal Austria and its business partners
- ordinary and extraordinary review of business partners of European Staal Austria ("Know Your Customer") during the conclusion, execution and/or termination of contracts
- ordinary and extraordinary review of employees and/or representatives of European Staal Austria,
 - by means of reports, as well as cost control of employees and/or representatives, and/or
 - via continuous and constant review and analysis of information.

All monitoring mechanisms are carried out exclusively within the framework of and in accordance with Austrian laws and regulations.


4. Rights of European Staal Austria GmbH

If we are informed by a business partner of an incident as defined in point 2 of this policy, or if the company becomes aware of such an incident, it will take all appropriate measures to safeguard its rights and interests, including the right to file applications and complaints with the relevant governmental and regulatory authorities to enable or support the administrative and/or criminal prosecution of all persons involved in the offense.

All instructions contained herein are for informational purposes only and are not binding on the parties.

Each party shall bear any costs incurred in connection with the enforcement and execution of the present information letter itself.

European Staal Austria GmbH

A handwritten signature in blue ink, appearing to read 'K. Sebian', written over a light blue horizontal line.

Karl-Heinz Sebian
Geschäftsführung