

Department:	Leadership & Strategy	Valid From:	28/10/2023
Rev. Number:	1.0	Review Date:	

CODE OF CONDUCT

Code of Conduct of the Montanstahl Group

- 1. General Principles:** The code is guided by principles inspired by the United Nations Global Compact. These include the safeguarding of human rights, abstaining from business relations linked to human rights violations, rejecting all forms of forced or compulsory labor, encouraging direct and constructive dialogue with employees, abolishing child labor, eliminating discrimination in hiring and employment, cautiously approaching environmental challenges in line with current legislations, supporting eco-friendly and sustainable technologies, and opposing all forms of corruption, including extortion and abuse of office.
- 2. Legal Compliance:** Montanstahl emphasizes compliance with applicable legal provisions in all countries where it operates. Employees are expected to strictly apply legal provisions related to their activities and refer to their direct manager in case of doubts or need for clarifications. The legal provisions take precedence over the Code of Conduct in case of any divergence.
- 3. Human Rights:** The company commits to upholding human rights for both direct employees and external collaborators. Explicitly rejected behaviors include child labor, forced or compulsory labor, discrimination in any form, harassment, bullying, behaviors harmful to personal dignity, and actions that could endanger anyone's physical integrity according to current legal prescriptions.
- 4. Employee Behavior:** Employees are required to adhere to the Code of Conduct. Unacceptable behaviors include those contradicting this Code and other company policies. Employees are encouraged to contribute to the improvement of working conditions and adhere strictly to work instructions, especially regarding safety and health.
- 5. Stakeholder Behavior:** Montanstahl considers stakeholders essential in promoting company principles. Partners are selected in line with the directives of the Code of Conduct, and where appropriate, a specific Code of Conduct is drafted for them to follow.
- 6. Behavior Towards Customers:** The aim is to establish correct relationships with customers based on clear, acceptable, and shared commercial terms. Montanstahl encourages healthy competition and continuous improvement in performance and customer service, strictly avoiding legally prohibited commercial practices.
- 7. Health and Safety:** Employee health and safety is a primary value. The company rejects any threat to these from work activities and promotes prevention activities, including facilities for periodic clinical analyses.



Department:	Leadership & Strategy	Valid From:	28/10/2023
Rev. Number:	1.0	Review Date:	

8. **Environment and Sustainability:** Recognizing the importance of the environment, Montanstahl is committed to its protection through environmental management systems, monitoring environmental impact, and embracing sustainability in its organizational development.

9. **Corruption and Fraud:** Any form of corruption, extortion, or fraud is prohibited. Gift management and personal remuneration outside the company contract must be legal, transparent, and ethically acceptable.

10. **Confidentiality and Data Protection:** Confidentiality and data protection, especially electronic, are crucial for the company, employees, and stakeholders. Montanstahl and its employees must be aware of the risks associated with using electronic devices and adhere to company policies and all applicable laws.

11. **Violation Reporting:** Employees have the right to report possible violations of the Code of Conduct. The company views such reports as crucial in verifying the implementation and effectiveness of its principles. Employees can present their reports anonymously or identified to superiors or designated officials.

This document reflects Montanstahl's commitment to ethical practices, legal compliance, and the welfare of its employees and stakeholders.

Revision History

Rev.	Date	Description	Written by	Approved by
1.0	28/10/2023	Release	Filippo Stumm (Legal & Compliance Director)	Wolfgang Stumm (CEO)

