

Code of Conduct for Suppliers of Breitenfeld Edelstahl AG

Company management

Breitenfeld Edelstahl AG considers it its duty to act in a customer-orientated, economical, safe, socially and environmentally conscious manner. The company endeavors to conduct its business competently on an ethical and moral basis and to compete fairly in all markets in which it operates.

This includes compliance with applicable laws and the acceptance of anti-trust prohibitions and restrictions on competition. We want to avoid gaining unauthorized advantages over customers, suppliers or competitors at all costs.

Breitenfeld Edelstahl AG stands for integrity, responsibility and sustainability.

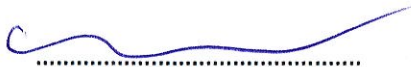
Our actions are geared towards pursuing economic, social and ecological goals in harmony. We expect our suppliers to share the same values and actively implement them within their sphere of influence. This Code of Conduct serves as a binding framework for cooperation with our suppliers and regulates the standards to which we align our relationships with our partners.

Compliance with this Code of Conduct is a prerequisite for long-term and trusting cooperation with Breitenfeld Edelstahl AG.

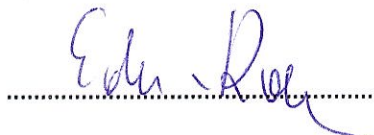
We expect our suppliers to pass on and demand these principles on to their suppliers and subcontractors in a suitable form.

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Board of Directors:



Andreas Graf (CTO)



Huberta Eder-Karner (CFO)

Status: 03/2025

1 Sustainability in supplier management

When selecting our suppliers, we pay attention not only to qualitative and economic criteria, but also to social and ecological requirements such as respect for human rights, fair working conditions and competition, the prevention of corruption as well as environmental and health protection requirements.

1.1 Compliance with laws, international standards and certifications

Our suppliers are bound to comply with applicable laws, regulations and international standards. This includes in particular:

- **Labor law regulations:** Compliance with national and international labor law regulations, including the standards of the International Labor Organization (ILO).
- **Human rights:** Respect for the rights set out in the UN Declaration of Human Rights.
- **Anti-corruption:** Prohibition of bribery, granting of advantages and all forms of corruption.
- **Compliance with embargoes and trade restrictions:** No business with sanctioned individuals, companies or regions.
- **International certifications:** Suppliers should preferably implement management systems based on recognized standards such as ISO 9001 (quality management) and ISO 14001 (environmental management).
- **UN Sustainable Development Goals (SDGs):** Suppliers are encouraged to actively contribute to achieving the UN Sustainable Development Goals, particularly in the areas of climate, social justice and responsible production.
- **Environmental regulations:** Compliance with national and international environmental regulations for the protection of nature and the natural habitat and the goal of continuously improving operational environmental protection.

2 Social responsibility

2.1 Respect for human rights

Suppliers agree to comply with human rights principles and promote them. This includes in particular:

- **Prohibition of child labor:** compliance with the minimum legal working age and compulsory education.
- **Prohibition of forced labor:** Ensuring that all employment relationships are voluntary.
- **Fair treatment:** Respectful treatment of all employees without abuse, harassment or violence.

2.2 Freedom from discrimination

Suppliers must not tolerate any form of discrimination, whether due to age, gender, ethnic origin, religion, disability, sexual orientation or political opinion. Diversity and equal opportunities should be promoted.

2.3 Working conditions

Suppliers are obliged to create safe and healthy working conditions. These include:

- Compliance with working hours and granting of adequate rest periods.
- Fair remuneration that at least meets legal or industry standards.
- Provision of protective clothing and safety measures to prevent accidents at work.

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2.4 Team spirit

Suppliers are responsible for creating a work environment that is based on teamwork, mutual respect and a positive corporate culture. The exchange of ideas and constructive cooperation should be encouraged.

2.5 Standards of cooperation

Suppliers are required to make their business practices transparent and to maintain clear standards for a cooperative partnership with Breitenfeld Edelstahl AG.

3 Environmental responsibility

Environmental and climate protection are important to us. Our suppliers are urged to treat all natural resources used in their company (e.g. energy, water, land) with care.

3.1 Resource conservation and climate protection

Suppliers are obliged to minimize the consumption of natural resources such as water, soil and raw materials as well as their energy use. They should take measures to reduce greenhouse gas emissions.

3.2 Protecting the environment

We trust that our suppliers act responsibly in the manufacturing and distribution of their products and/or services. To protect the environment, we expect our suppliers to meet binding obligations regarding environmental protection, employee health and safety in the workplace. Suppliers should use sustainable production methods. The use of environmentally friendly technologies should be promoted.

Compliance with environmental standards in accordance with ISO 14001, EMAS or ISO 50001 is explicitly welcomed.

3.3 Waste management and handling of hazardous substances (REACH, RoHS, ...)

Waste and the use of hazardous substances such as chemicals or contaminated material pose a risk to people and the environment. We actively demand that our suppliers minimize or eliminate these risks. Compliance with legal regulations for labelling, transport, storage, use and disposal must be ensured by the supplier within their sphere of influence.

Waste must be disposed of properly and recycled where possible. Suppliers shall implement programs to minimize waste and reuse materials.

Hazardous substances must be stored, transported and disposed of safely. Suppliers are obliged to use environmentally friendly alternatives where possible.

The supplier is under obligation to provide information on the proper use of production input materials and operating materials that are subject to legal regulations and/or restrictions (REACH, RoHS, CMRT, 2013/59/EURATOM) upon request by Breitenfeld Edelstahl AG.

3.4 Protection of biodiversity

Attention must be paid to sustainable land use and the protection of natural habitats.

4 Business ethics and compliance

4.1 Fair competition

Suppliers agree to comply with competition law regulations and refrain from any agreements that restrict competition.

4.2 Confidentiality and data protection

Business secrets and personal data must be treated confidentially and protected against unauthorized access. Suppliers are obliged to implement IT security measures and ensure compliance with the EU General Data Protection Regulation (GDPR).

4.3 Combating bribery and corruption

Breitenfeld Edelstahl AG does not tolerate any form of bribery or corruption. Suppliers must prevent their employees from demanding or accepting any benefits that could lead to a conflict of interest.

Suppliers must not grant or accept any unauthorized benefits. Gifts and invitations may only be made within the framework of standard business practices.

4.4 Transparency

All information about products, services and company practices must be correct and comprehensible.

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5 Conflict minerals

Suppliers agree not to use conflict minerals originating from regions where human rights are violated. Supply chains must be transparent and disclosed on request (CMRT - Conflict Minerals Reporting Template).

6 Supply chain management

Suppliers bear responsibility for their entire supply chain. They agree to:

- commit their own suppliers to uphold sustainability code with similar or identical values.
- introduce transparent processes and control mechanisms.
- integrate sustainability aspects into their purchasing practices.
- consider international standards such as the OECD Guidelines for Responsible Supply Chains.

7 Auditing and sanctions

7.1 Audits

Breitenfeld Edelstahl AG reserves the right to conduct audits to verify compliance with this Code of Conduct. This also includes on-site inspections.

7.2 Sanctions for violation

In case of non-compliance with this Code of Conduct, Breitenfeld Edelstahl AG reserves the right to take action. This may range from requesting the rectification of irregularities to terminating the business relationship.

8 Further principles

8.1 Open communication

Suppliers shall promote a culture of open communication and dialogue. Errors or problems shall be reported at an early stage and resolved jointly.

8.2 Dialogue with cooperation partners

All business information of Breitenfeld Edelstahl AG and its partners must be treated confidentially. Respectful interaction and transparent dialogue are the basis of every business relationship.

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8.3 Customer orientation

Suppliers are committed to understanding the needs of customers and providing high-quality products and services. The aim is to promote long-term relationships and trusting relationships.

Contact person & contact:

Compliance representative: Thomas Cseve

e-mail: compliance@breitenfeld.at

Date: 06.03.2025

Place: St. Barbara im Mürztal

9 Review and explanation

Breitenfeld Edelstahl AG reviews the content of this Supplier Code of Conduct at regular intervals and reserves the right to adjust due to changed conditions or legal regulations and to bring these to the attention of the supplier. By accepting this document, the supplier confirms that he has read and understood the Code of Conduct for Suppliers and that he agrees to comply with all requirements contained in it.

If we do not receive any feedback from you, we will take this as tacit consent on your part with the Code of Conduct.

9.1 Declaration of the supplier

We hereby acknowledge the Code of Conduct for Suppliers and agree to comply with the principles and requirements of the Code of Conduct for Suppliers. Should contradictions arise between the Code of Conduct for Suppliers and the existing contractual relationships, the respective more extensive regulation shall apply.

Signed by:

Position:

Name of the organization:

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Signature of the supplier:

Place, date:

[Signature/company stamp]