

## Code of Conduct for ASSAB Business Partners

This Code of Conduct defines the principles and requirements ASSAB imposes on its suppliers of goods and services and on business intermediaries, advisors, and consultants and other business partners. These principles and requirements are based on ASSAB's Code of Conduct and on the principles set forth in the UN Global Compact.

### Compliance with the legal regulations

- The Business Partner undertakes to comply with the legal regulations of the applicable legal system(s).

### Respect and integrity

- The Business Partner hereby undertakes to respect and comply with human rights as fundamental values on the basis of the European Convention for Human Rights and the UN Charter. In particular, this applies to prohibitions on child labor and forced labor, prohibitions on any form of human trafficking and modern slavery, the equal treatment of all employees, and the right of employee representation and collective bargaining.
- The Business Partner furthermore undertakes to assume responsibility for the health and safety of its employees.

### Fair competition

- The Business Partner undertakes not to restrict free competition and not to infringe on national or international antitrust law rules.
- In particular, the business partner undertakes in this connection to refrain from making any arrangements regarding business issues that determine or influence companies' competitive behavior (e.g. fixing prices or dividing up markets or customers) as well as to refrain from sharing information on ASSAB's confidential matters such as prices, sales terms, costs, capacity utilization, inventories etc.—even unilaterally.

### Prohibition on active or passive corruption/prohibition on granting benefits (e.g., gifts) to employees

- The Business Partner undertakes not to tolerate any form of active corruption (offering and granting benefits; bribery) or passive corruption (demanding and accepting benefits), nor shall it collude with such conduct in any manner whatsoever.
- The Business Partner undertakes not to offer gifts or other personal benefits (e.g., invitations) to ASSAB employees or their close family members, where the total value of such benefits and the specific circumstances create the impression that a particular action is expected from the recipient of the benefit in return. The question of whether this is the case will depend on the specific circumstances of the individual case.
- Gifts of de minimis value and hospitality falling within the range of what is customary in business will, in any event, be permissible.
- The Business Partner furthermore undertakes that it shall offer customary market prices to employees procuring goods or services for their own personal use, and/or that it shall only grant rebates or other price reductions if they are granted to all ASSAB employees.

### Environmental protection

- The business partner undertakes to observe all applicable laws and requirements as well as internationally recognized environmental protection standards.
- The business partner undertakes furthermore to avoid any risks to people and the environment, to minimize effects on the environment and to use resources economically.

### Money laundering

- The business partner undertakes to comply with applicable statutory requirements regarding the prevention of money laundering and to refrain from participating in money laundering activities.

### Protection of information, intellectual property and data

- The business partner shall adequately protect any and all information and intellectual property belonging to ASSAB. In particular, the business partner shall ensure that ASSAB's confidential information remains secret.
- Any and all processing of the personal data of ASSAB's employees, customers and business partners (e.g. collection, use and storage) must comply with applicable data protection laws.

### Supply chain

- The Business Partner will appropriately promote compliance by its own business partners with the substance of this Code of Conduct for ASSAB's business partners.