

Code of Conduct for BÖHLER Business Partners

1. PREAMBLE

Operating on a global scale brings with it the responsibility to pay particular attention to the basic rules of human coexistence. That is why compliance with applicable laws and regulations and, in particular, respect for human rights are fundamental principles guiding the actions of all BOHLASIA STEELS SDN BHD (BÖHLER) companies. These requirements are directed not only toward us, but also toward our suppliers of goods and services as well as business intermediaries, consultants, and other business partners (hereafter referred to as “business partners”).

This Code of Conduct defines the principles and requirements BÖHLER imposes on its business partners. It is intended to ensure that the business practices of business partners are in accordance with BÖHLER values, as well as the applicable laws and regulations.

The principles and requirements are based on BÖHLER’s Human Rights Policy and its Code of Conduct, as well as the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact, the International Bill of Human Rights, and the United Nations Convention against Corruption.

2. COMPLIANCE & RESPONSIBLE CORPORATE GOVERNANCE¹

Compliance with the law

The business partners undertake to comply with all applicable national laws and international regulations.

Prohibition of active and passive corruption/prohibition of granting benefits (e.g., gifts) to employees.

The business partners undertake not to tolerate any form of active corruption (offering or granting benefits; bribery), or passive corruption (demanding or accepting benefits), or to engage in such corruption in any way.

The business partners undertake not to offer gifts or other personal benefits (e.g., invitations) to employees or close relatives of BÖHLER employees if their total value and the specific circumstances give the impression that the recipient of the benefit is expected to behave in a particular manner in return. Whether this is the case depends on the specific circumstances.

Gifts of a nominal value and hospitality within the limits of ordinary business practice are permissible.

Furthermore, business partners selling goods or services to BÖHLER employees for their personal use undertake to do so at normal market prices, or to grant discounts or price reductions only where these are granted to all BÖHLER employees.

Money laundering

The business partners undertake to comply with the applicable legal provisions for the prevention of money laundering and not to participate in money laundering activities.

Fair competition

The business partners undertake not to limit free competition, and not to violate national or international antitrust regulations.

In particular, the business partners undertake not to enter into any agreements on business matters that dictate or influence the competitive behavior of companies (e.g., price fixing or the sharing of markets or customers), nor to exchange any information on confidential matters relating to BÖHLER, such as prices, sales terms, costs, capacity utilization, inventories, etc.—not even unilaterally.

Protection of information, intellectual property, and data

The business partners undertake to adequately protect all information and intellectual property belonging to BÖHLER. In particular, the business partners must ensure that confidential information about BÖHLER is kept secret.

Furthermore, the business partners must comply with all applicable legal provisions for the protection of intellectual property (such as patents, trademarks, copyrights) and, in particular, respect the intellectual property of third parties and avoid infringements of property rights (e.g., as a result of plagiarism).

Any processing of the personal data of BÖHLER employees, customers, and business partners (e.g., collection, use, and storage) must be carried out in accordance with the applicable data protection laws.

Trade controls and sanctions

The business partners shall ensure compliance with the applicable regulations concerning trade controls and sanctions in all the countries in which they operate.

3. SOCIAL RESPONSIBILITY ²

Respecting human rights & working conditions

The business partners undertake to respect and uphold human rights as fundamental values as set out in the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, and the principles of the UN Global Compact.

Prohibition of child labor

Under no circumstances may the business partners tolerate child labor within their own operations or those of direct suppliers and must, at a minimum, comply with Convention No. 138 of the International Labour Organization (ILO) of June 26, 1973 on the Minimum Age for Admission to Employment, and ILO Convention No. 182 of June 17, 1999 on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour. In addition to the prohibition of child labor, it must also be ensured that the employment of young workers does not jeopardize their health, safety, or development.

Prohibition of forced and compulsory labor, human trafficking, and modern slavery

The business partners undertake to comply with ILO Convention No. 29 of June 28, 1930 on Forced or Compulsory Labour, including the Protocol of June 11, 2014, and ILO Convention No. 105 of June 25, 1957 on the Abolition of Forced Labour, and to prevent all forms of forced or compulsory labor, human trafficking, and modern slavery within their own business and that of their direct suppliers. Forced and compulsory labor refers, in particular, to all work or services performed by persons coerced to do so under threat of punishment, and also includes the withholding of identity cards and passports, restrictions on movement, and debt bondage.

Collective bargaining and the right to freedom of association

The business partners respect the right of employees to join a union. Furthermore, the business partners undertake to respect and promote the right of their employees to collective bargaining and freedom of association in accordance with ILO Convention No. 87 of July 9, 1948 on the Freedom of Association and Protection of the Right to Organise, and Convention No. 98 of July 1, 1949 on the Application of the Principles of the Right to Organise and Collective Bargaining.

Diversity, equal opportunities, and ban on discrimination

The business partners undertake to effectively prevent discrimination or harassment based on gender, marital status, or parenthood, ethnicity or nationality, age, disability, sexual orientation, religion, or other personal characteristics. With respect to remuneration, the principle of equal pay for work of equal value irrespective of gender in particular must be upheld. Here, the business partners must observe the principles of ILO Conventions No. 100 of June 29, 1951 on Equal Remuneration of Male and Female Workers for Work of Equal Value, and No. 111 of June 25, 1958 on Discrimination in Employment and Occupation, and the Convention on the Elimination of All Forms of Discrimination against Women.

Remuneration and working hours

Employees must be remunerated in accordance with the applicable legal regulations and collective agreements, and this remuneration must be sufficient to meet the basic needs of employees and their families and to provide them with a decent standard of living.

The business partners agree to set clear guidelines for employee working hours. The regulations on working time must comply with legal requirements and, among other things, ensure that employees do not suffer from excessive physical and mental fatigue.

Occupational health & safety

BÖHLER demands that all business partners provide safe and healthy working conditions for all the business partner's employees or those employees working under their supervision. This includes the provision of personal protective equipment. In all cases, the business partners must comply with the occupational health and safety obligations applicable under the law of the place of employment. Furthermore, BÖHLER recommends the introduction of an occupational health and safety management system, such as ISO 45001 or OHSAS 18001, where there is not already a corresponding legal obligation to do so.

Security personnel

Business partners who provide private or public security personnel to protect BÖHLER premises must ensure that, in the course of providing their services, the rights of all parties concerned are respected.

Business partners who rely on private or public security personnel to protect their own business premises must also ensure that human rights are respected by the security personnel.

Local communities and indigenous peoples

BÖHLER expects all business partners to support local communities and indigenous peoples in the vicinity of its companies. In particular, the business partners must ensure that their business activities have no negative impact on the health, safety, and livelihoods of local communities and indigenous peoples. In this regard, the business partners also undertake to respect the prohibition of unlawful forced evictions and, when acquiring, building on, or otherwise using land, forests, or waters, not to unlawfully deprive indigenous peoples or local communities of the land, forests, or waters on which their livelihoods depend.

4. ENVIRONMENT & CLIMATE PROTECTION ³

The business partners undertake to comply with all applicable laws and regulations, and with internationally recognized environmental protection standards. In particular, the business partners must comply with the requirements of the international Minamata (mercury), Stockholm (persistent organic pollutants), and Basel (hazardous waste) conventions.

Furthermore, the business partners undertake to avoid any risks to people and the environment, to minimize the impact on the environment, and to use resources sparingly.

BÖHLER recommends the introduction of an environmental management system, such as ISO 14001 or EMAS.

Carbon footprint

BÖHLER is committed to the goals of the Paris Agreement, as well as to reducing its carbon footprint further through a commitment to low-carbon production and extensive research and development of new technologies, and strives to achieve climate neutrality over the long term.

However, both we and our business partners influence the carbon footprint of our products. Consequently, BÖHLER's business partners are obliged to develop reduction targets for CO₂ emissions within their own field of business and along the supply chain (Scope 1, 2, and 3 of the Greenhouse Gas Protocol), and to take suitable measures to contribute to achieving the goals of the Paris Agreement.

The business partners must inform BÖHLER about both their own CO₂ emissions and those deriving from their upstream activities. The business partners should have the set reduction targets independently verified according to scientific methods (e.g., as part of the "Science Based Targets initiative").

5. SUPPLY CHAIN MANAGEMENT

BÖHLER requires all business partners to take fit and appropriate measures to identify negative impacts on human rights or the environment which arise anywhere in the supply chain, and to eliminate such negative impacts or, where this is not directly possible, to minimize the extent of these impacts.

Business partners also undertake to pass on the contents of this Code of Conduct for BÖHLER Business Partners, in particular the contents of points 3 ("Social responsibility") and 4 ("Environment & climate protection"), to their own suppliers and subcontractors, to obtain corresponding undertakings to comply, and to check their compliance in the supply chain.

To facilitate the fulfillment of the above-mentioned obligations, BÖHLER recommends that its business partners establish a risk management system for supply chains and/or obtain certification in accordance with recognized initiatives, such as the RMI (Responsible Mining Index), Responsible-steel or IRMA (Initiative for Responsible Mining Assurance) for raw materials.

Raw materials and source minerals

The business partners undertake to comply with all applicable laws and regulations on conflict minerals (tin, tantalum, tungsten, and gold), and to ensure that they can provide information on the origin and supply chain of conflict minerals.

6. REPORTING MISCONDUCT ⁴

BÖHLER has set up a web-based whistleblower system (<https://www.bkms-system.net/voestalpine>) for use by both its employees and external whistleblowers. Unless already subject to a corresponding legal obligation, BÖHLER recommends that its business partners set up a similar system in which violations of the issues noted above can be reported either openly or anonymously.

Furthermore, the business partners undertake to make their own employees and direct suppliers aware of the options to submit reports via the BÖHLER whistleblower system.

7. COOPERATION AND PARTICIPATION ⁵

BÖHLER is entitled to control or audit the processes established by its business partners to comply with the principles and requirements of this Code of Conduct, including the due diligence measures taken with respect to human rights and the protection of the environment, as well as the timely implementation of any corrective measures, or to have them checked or audited by a third party commissioned by BÖHLER. The business partners shall provide BÖHLER or a third party commissioned by BÖHLER with all requested information and documents for inspection, and give them the opportunity to talk to or interview managing directors, executives, and employees, insofar as this is reasonably necessary for these purposes.

In the event of violations, BÖHLER takes appropriate measures that may ultimately lead to the suspension or termination of the supply relationship.

In addition, at BÖHLER's request, the business partners undertake to participate in training courses on the principles and requirements enshrined in this Code of Conduct and to confirm their participation in writing.

¹ Keywords: Legality, corruption, acceptance of gifts, bribery, corruptibility, compliance, money laundering, antitrust law, data protection, General Data Protection Regulation (GDPR), secrecy, export controls

² Keywords: Freedom of association, women's rights, children's rights, minorities, maximum working hours, health & safety, private or public security forces, prohibition of torture, life and limb, forest, land, and water rights

³ Keywords: Climate protection, energy efficiency

⁴ Keywords: Whistleblower

⁵ Keywords: Supply Chain Due Diligence Act (LkSG)