



# Code of Ethics

Hennigsdorfer  
Elektrostahlwerke GmbH





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# Preamble

This code of ethics (henceforth also: the “**Code**”) has been adopted by all companies (henceforth the “**Companies**”) of Riva Group Germany, specifically H.E.S. Hennigsdorfer Elektrostahlwerke GmbH by shareholders’ resolution of 8 September 2014, Supervisory Board resolution of 18 September 2014 and works agreement for the Hennigsdorf plant of 11 September 2014 – last modified by amendment agreement of 4 May 2022, and for the Horath & Trier plants of 25 April 2022.

The Companies belonging to the Riva Group operate in the field of steel production and processing and related business areas both nationally and internationally.

The Companies enjoy the recognition of their customers as well as other businesses in the industry due to their specialised expertise.

In this context, the Companies recognise their corporate and social responsibility, and undertake to fulfil this responsibility in all their business activities.

The Code sets out the Companies’ ethical principles and values. It serves as guidance for a common set of values regarding corporate and social responsibility and fair competition. With the adoption of this Code, the Companies are committed to upholding the following principles.



# 1. General principles of business conduct

## 1.1. Compliance with the law

In all business activities and decisions, the Companies undertake to comply with applicable laws, sanctions and embargo provisions and other relevant regulations in the countries in which they operate. Business partners are to be treated fairly. Contracts shall be honoured, although changes in the underlying conditions shall be taken into consideration.

## 1.2. Guided generally applicable values and principles

The Companies' actions shall be guided by generally applicable ethical values and principles, in particular integrity, honesty, respect for human dignity and non-discrimination.



## 2. Principles of corporate/social responsibility

### 2.1. Human rights

The Companies respect and support the observance of internationally recognised human rights. In particular, they observe human rights in accordance with the United Nations Universal Declaration of Human Rights (UDHR, Resolution 217 A (III) of the General Assembly on 10 December 1948).

### 2.2. Non-discrimination

The Companies reject any form of discrimination within the scope of applicable rights and laws. This includes, in particular, discrimination against employees on grounds of race, ethnic origin, gender, religion or belief, disability, age or sexual identity.

### 2.3. Health and safety

The Companies ensure occupational safety and health protection in the workplace within the scope of European and national regulations. The Companies support continuous development to improve the working environment.



## **2.4. Working conditions, prohibition of forced labour and child labour**

The Companies support the technical, professional and personal development of their employees in the context of training programmes, and recognise their professional achievements.

The Companies respect the right of their employees to freedom of association and assembly within the scope of applicable rights and laws. The Companies shall comply with labour standards concerning maximum working hours and pay, in particular the level of pay, in accordance with applicable laws and regulations.

Employees shall be protected from corporal punishment and from physical, sexual, psychological or verbal abuse. Employees' privacy shall be respected. The prohibition of forced labour of any kind shall be observed. In particular the Forced Labour Convention, 1930 (Convention No. 29 of the International Labour Organization) and the Abolition of Forced Labour Convention, 1957 (Convention No. 105 of the International Labour Organization) shall be observed.

The Companies shall observe regulations prohibiting child labour; in particular the Minimum Age Convention, 1973 (Convention No. 138 of the International Labour Organization) and the Worst Forms of Child Labour Convention, 1999 (Convention No. 182 of the International Labour Organization) shall be observed. If German regulations on child labour provide for stricter standards, these shall take precedence.

## **2.5. Environmental protection**

The Companies are committed to the goal of protecting natural resources for present and future generations into the long term. Laws and regulations put in place to protect the environment must be observed and complied with.



## 2.6. Communication

The Companies shall communicate openly, with a view to dialogue, about the requirements of this code of conduct and about its implementation with respect to employees, customers, suppliers and other interest and stakeholder groups.



## 3. Conflicts of interest

In their work for the Companies, employees of the Companies shall at all times make decisions impartially and objectively in the interests of the Companies, and shall avoid situations where personal interests may conflict with those of the Companies. This shall not restrict trade union activities.





## 4. Company information/trade secrets

The Companies and their employees shall respect and protect trade and business secrets of the Companies and others. Confidential information as well as confidential documents may not be disclosed or otherwise made accessible to third parties without authorisation, unless or until such authorisation has been granted, the information is in the public domain, or this is required by an enforceable decision of an authority or court.

Confidential information includes, for example, technical information about facilities, products, processes and new industrial applications, as well as terms and conditions of sales and purchases.

Similarly, all information shall be deemed confidential which is obtained in the course of or in connection with work activities and whose disclosure or use could jeopardise the interests of the Company, cause harm to the Company, or confer an undue economic advantage on persons working for the Company.



## 5. Principles of fair competition

### 5.1. Anti-corruption

The Companies reject bribery and corruption. In dealings with business partners and government institutions, the interests of the Companies and the private interests of employees on both sides are strictly separated. Decisions are made free of extraneous considerations and without regard to personal interests. The applicable anti-corruption criminal law must be complied with. Accordingly, the following points, among others, must be observed:

The granting of personal benefits by the Companies and their employees to domestic or foreign public officials (such as civil servants or government employees) with the aim of obtaining advantages for the Companies or themselves or third parties is not permitted.

Personal pecuniary benefits in return for preferential treatment in business dealings between companies may not be offered, promised, granted or approved. Likewise, in dealings with business partners, personal benefits of value may be neither demanded nor accepted in return for preferential treatment in business dealings. Management and employees of the Companies may not offer, promise, demand, grant or accept gifts, payments, invitations or services in business dealings that are granted with the intention of unfairly influencing a business relationship. This is generally not the case for gifts and invitations that are within the normal scope of business hospitality, custom and courtesy.

The above matters must be brought to the attention of the relevant unit in the company so that it can take appropriate action.



## 5.2. Conduct towards competitors

The Companies respect fair competition. They therefore comply with applicable laws that protect and promote competition, in particular applicable antitrust laws and other laws regulating competition.

In dealings with competitors, these regulations prohibit, in particular, agreements and other activities that unfairly influence prices or conditions, unlawfully allocate sales territories or customers, or illegally impede free and open competition.

In view of the fact that it can be difficult to draw a dividing line between prohibited collusion and permitted cooperation, the Companies shall designate a contact person for their employees who can be contacted in case of doubt.



## 6. External relations

Suppliers must always be chosen on the basis of objective parameters such as quality, cost-effectiveness, performance and efficiency. Relations with the press and other media representatives or external dialogue partners shall be conducted only by persons expressly authorised by the Companies to conduct such relations.



## 7. Scope

The Companies shall take appropriate measures to ensure compliance with the Code.

The Companies shall also endeavour to communicate the principles of this code of ethics to their immediate suppliers, promote compliance with its contents among their suppliers to the best of their ability, and ask them to follow the Code too. The Companies are also asked to recommend to their immediate suppliers that they ask their suppliers in turn to follow this Code of Ethics.



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