

## EST Edelstahl-Schneidtechnik GmbH - Code of Conduct

### Our Commitment to Ethical Business Practices

At EST Edelstahl-Schneidtechnik GmbH, we are dedicated to upholding the highest standards of ethical behaviour in all aspects of our business operations. As a provider of stainless-steel and nickel alloy plates and cutting services, including plasma, waterjet, and laser cutting, based in Germany, we recognize the importance of integrity, transparency, and respect in our interactions with customers, suppliers, employees, and the communities in which we operate. This Code of Conduct outlines the principles and guidelines that govern our conduct and serves as a framework for ethical decision-making in our daily activities.

### 1. Compliance with Laws and Regulations:

We adhere to all applicable laws, regulations, and industry standards in the countries where we operate.

We are committed to:

Ensuring compliance with environmental, health, and safety regulations to protect the well-being of our employees and the communities we serve.

Respecting international trade laws and regulations governing the import and export of goods.

Upholding fair labour practices and respecting the rights of our employees, including but not limited to, non-discrimination, equal opportunity, and fair wages.

### 2. Ethical Business Practices:

We will conduct all business activities with honesty, integrity, and transparency, and we are committed to preventing money laundering activities.

We will not engage in bribery, corruption, or unethical practices, including conflicts of interest.

Gifts, entertainment, and other courtesies must be reasonable, and in compliance with company policies and applicable laws.

### 3. Confidentiality and Data Protection:

We are dedicated to safeguarding confidential information, trade secrets, and customer data from unauthorized access, use, or disclosure, recognizing the critical importance of protecting sensitive data in our industry.

Access to confidential information and proprietary data will be restricted to authorized personnel on a need-to-know basis, and appropriate security measures, such as encryption, access controls, and password protection, will be implemented to prevent unauthorized disclosure or misuse.

Confidential information must be securely stored and transmitted using approved methods, such as encrypted channels and secure file transfer protocols, to mitigate the risk of data breaches or unauthorized interception.

Employees are responsible for exercising diligence and discretion when handling confidential information, including refraining from discussing sensitive matters in public areas or disclosing proprietary information to external parties without proper authorization.

Any suspected or actual breaches of confidentiality, data breaches, or unauthorized access to sensitive information must be reported immediately to the designated data protection officer or IT security team for investigation and remediation.

Compliance with data protection laws, regulations, and contractual obligations regarding the collection, processing, and storage of personal data is mandatory, and employees must adhere to data retention policies and procedures to ensure lawful and responsible handling of personal information.

#### 4. Workplace Respect and Diversity:

We value diversity and inclusion as essential elements of a thriving and innovative workplace.

We are committed to:

Fostering an inclusive culture that respects and embraces the unique perspectives, backgrounds, and experiences of all individuals.

Promoting equal opportunities for professional growth and advancement, regardless of race, ethnicity, gender, age, religion, disability, or sexual orientation.

Prohibiting discrimination, harassment, or retaliation of any kind and providing mechanisms for reporting and addressing such behaviour promptly and confidentially.

#### 5. Health and Safety:

We are committed to providing a safe and healthy work environment for all employees, contractors, and visitors, recognizing the unique hazards associated with working with heavy steel parts.

Employees must undergo comprehensive safety training specific to their roles, including proper handling techniques, equipment operation, and emergency procedures.

Personal protective equipment (PPE), such as gloves, safety goggles, helmets, and steel-toed boots, must be worn as required when working with heavy steel parts.

Machinery and equipment used for cutting and processing steel must undergo regular maintenance and inspection to ensure safe operation and prevent accidents.

Rigorous safety protocols and lockout/tagout procedures must be followed during maintenance, repair, and servicing of machinery to prevent unintended startup or release of stored energy.

Adequate ventilation systems and respiratory protection measures must be in place to minimize exposure to fumes, dust, and other airborne contaminants generated during cutting and processing operations.

Ergonomic principles should be applied to minimize the risk of musculoskeletal injuries associated with lifting, carrying, and manipulating heavy steel parts.

Regular risk assessments and hazard identification processes will be conducted to identify and mitigate potential safety hazards, with input from employees and safety experts.

Employees are encouraged to report any safety concerns, near misses, or hazardous conditions promptly to their supervisors or the safety committee for investigation and corrective action.

Continuous improvement in safety performance through ongoing training, hazard prevention measures, and employee engagement is integral to our commitment to maintaining a safe workplace environment.

## 6. Environmental Stewardship:

We will minimize our environmental impact by promoting sustainable practices, resource conservation, and pollution prevention.

We are committed to:

Implementing eco-friendly practices to reduce waste, conserve resources, and mitigate pollution.

Complying with environmental regulations and standards related to waste management, emissions, and energy conservation.

Partnering with suppliers who share our commitment to environmental responsibility and sustainability.

## 7. Quality and Customer Satisfaction:

We prioritize delivering exceptional quality products and services while ensuring utmost customer satisfaction.

Through stringent quality control measures and advanced technology, we maintain consistency and precision in our stainless-steel and nickel alloy plates and cutting services, including plasma, waterjet, and laser cutting.

Our dedicated customer service team provides prompt and responsive support, addressing inquiries and concerns with personalized assistance.

We actively seek and value customer feedback, using it to drive continuous improvement and innovation in our processes.

By fostering a culture of excellence and collaboration, we aim to exceed customer expectations and build long-lasting relationships based on trust and satisfaction.

With our commitment to quality and customer-centricity, we strive to uphold our reputation as a reliable and trusted partner in the stainless steel and nickel alloy industry.

Employees must adhere to quality standards, procedures, and best practices to ensure product reliability, accuracy, and performance.

## 8. Conflict Resolution and Reporting:

We encourage open communication, constructive feedback, and resolution of conflicts through dialogue and mediation.

Employees are encouraged to report any concerns, violations, or unethical behaviour to their supervisors, HR, or through established reporting channels without fear of retaliation.

## 9. Social Responsibility:

We recognize our responsibility to respect and uphold human rights in all aspects of our operations, supply chain, and business relationships.

We are committed to promoting fair labour practices, including but not limited to, providing safe working conditions, fair wages, and prohibiting forced labour and child labour.

Adequate wages are essential to ensuring the well-being and dignity of our employees. We will strive to provide wages that meet or exceed legal requirements and industry standards, considering factors such as local cost of living, inflation rates, and prevailing wage levels.

We will not tolerate any form of discrimination or harassment in the workplace and will take appropriate measures to address and prevent such behaviour.

Suppliers and business partners are expected to adhere to similar standards of human rights and social responsibility.

We will actively engage in efforts to monitor and mitigate any potential human rights violations within our sphere of influence, working collaboratively with stakeholders to uphold fundamental rights and dignity for all individuals.

## 10. Continuous Improvement:

We are committed to continuous learning, improvement, and innovation in all aspects of our business.

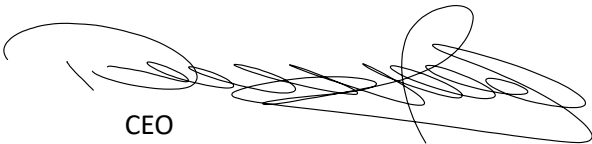
Feedback, suggestions, and ideas for enhancing our operations and upholding our values are welcomed and encouraged.

## Conclusion:

At EST Edelstahl-Schneidtechnik GmbH, we take pride in our reputation for integrity, reliability, and excellence. By adhering to this Code of Conduct, we uphold our commitment to ethical business practices, responsible corporate citizenship, and long-term sustainability.

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