

Human Rights Policy

June 2021

Release Management	
Scope	Klöckner & Co Group
Release	V 1.0
Classification level	Internal
Coming into effect	October 1 st , 2016
Last update	---
Last review	June 1 st , 2021
Responsible Department	Corporate Compliance Office
Resolved by	Board of Management of Klöckner & Co SE
Enclosures	----

Content

1	INTRODUCTION AND OBJECTIVE	2
2	SCOPE OF POLICY.....	2
3	COMMITMENT TO STAKEHOLDERS.....	3
4	SPECIFIC PROVISIONS	3
5	GOVERNANCE AND ACCOUNTABILITY.....	4
6	REVIEW AND MONITORING.....	5
7	REPORTING CONFLICTS.....	5

1 Introduction and Objective

Klößner is conscious of its role in society and its responsibility toward business partners as well as shareholders and employees. The Company is thus committed to clear principles and value-oriented, ethical and lawful company management, which form the framework for our commercial and corporate actions.

The Klößner Human Rights Policy articulates our respect for all Human Rights. This Policy focuses on the areas that have been identified as priorities for our industry.

The Policy adheres with:

- The United Nations (UN) Universal Declaration of Human Rights and the two International Covenants making up the International Bill of Human Rights
- The International Labor Organization's (ILO) Declaration of Fundamental Principles and Rights at Work
- The United Nations Global Compact
- The Klößner & Co SE Code of Conduct

The Klößner Human Rights Policy sets out the principles for our actions and behavior in relation to human rights. The Policy and associated practices are expected to strengthen over time as the Company gains a better understanding of and becomes more experienced in promoting human rights.

In support of this Policy, we will continue to develop operating procedures to create an environment where human rights are respected, and to also help ensure that we do not engage in activities that directly or indirectly violate human rights.

2 Scope of Policy

This Policy applies to all employees of Klößner subsidiaries and affiliates worldwide. The Klößner Human Rights Policy complements and brings together the human rights aspects from other Company policies and guidelines. These include our Code of Conduct, Health & Safety, Environment and Human Resources policies and the Anti-Corruption guidelines.

In implementing this Policy, we are subject to the laws of the many countries in which we operate and we are committed to comply with all such applicable laws. Where our Policy, procedures and external commitments are more stringent than local laws, we operate in accordance with our standards. In situations where local law is less stringent than the International Human Rights Declarations, we endeavor to develop a response on a case-by-

case basis while using our Policy as a guideline. Where local law prohibits us from upholding certain aspects of this Policy, we comply with these local laws while seeking to respect human rights.

3 Commitment to Stakeholders

Employees

We are committed to respect the human rights of our employees. We develop our employment policies with the aim to achieve uniform worldwide application of the relevant aspects contained in the International Human Rights Declarations. We are committed to train our employees to be aware of, respect and protect human rights in the workplace and in the local communities directly impacted by our operations.

Business Partners

We respect and promote human rights when engaging with subcontractors, suppliers, customers, joint venture and other partners. We will do this, as appropriate, through proactive engagement, monitoring and contractual provisions.

Local Communities

We respect human rights and to develop an understanding of the cultures, customs and values that prevail in our local communities by developing an inclusive and open dialogue with the people affected by our operations. The Klöckner Equal Employment Opportunity Commitment requires conducting open and inclusive dialog with local communities, including engaging with often under-represented groups such as women and minorities

4 Specific Provisions

Promoting Health and Safety

Klöckner is committed to work towards a goal of zero accidents or injuries and towards the general well-being of our employees in the workplace. This is endorsed by the Health and Safety Policies and Procedures.

Promoting Freedom of Association

Klöckner upholds freedom of association and the effective recognition of the right to collective bargaining. We also work with our subcontractors and suppliers to promote the achievement of this principle.

Eliminating Forced or Compulsory Labor

Klöckner opposes the use of forced or compulsory labor. We will also work with our subcontractors and suppliers to avoid indirectly benefiting from or promoting such illegal practices.

Abolishing Child Labor

Klöckner opposes the use of child labor. We will work in collaboration with business partners to prevent and remove any instances of child labor in a manner that is consistent with the best interests of the child.

Eliminating Unlawful Discrimination in the Workplace

Klöckner is committed to ensure that each employee and potential employees are treated with fairness and dignity. Accordingly, any unlawful discriminatory practice based on race, color, gender, sexual orientation, age, religion, ethnicity, national or social origin, property, political or other opinion, disability, birth or any other legally required basis will not be tolerated. The Company seeks to provide each employee with equal opportunity for advancement without discrimination.

Eliminating Harassment and Violence

Klöckner is committed to promote a work environment free of any form of harassment, exploitation, abuse or violence as defined by the laws of each country in which we operate.

Providing Competitive Compensation and Benefits

Klöckner aims to pay competitive wages based on local market assessments and seeks to provide commensurate compensation for each employee and benefits that comply with or exceed the minimum legal requirements of the country where employees are employed.

Upholding Conditions of Employment

Klöckner complies with all laws regarding conditions of employment including basic and over-time working hours, and will abide by agreements negotiated with employee representatives.

5 Governance and Accountability

The Klöckner Group Management Board has overall responsibility for the implementation of this Policy. Our human rights performance will be reported to the Board of Directors at least annually.

6 Review and Monitoring

Klöckner will periodically review the Policy and our implementation with respect to its suitability and effectiveness. We welcome feedback from, and dialog with, interested parties.

7 Reporting Conflicts

If you believe that a conflict arises between the language of the policy and the laws, customs and practices of the place where you work, or if you have questions about this policy or if you would like to report a potential violation of this policy, you may confidentially raise those questions and concerns through the existing processes.

You may direct questions or report potential violations to local management, Compliance, Human Resources, the Legal Department or Safety. The Company is committed to investigating, addressing and responding to the concerns of employees and to taking appropriate corrective action in response to any violation.

Contact

Name	Ralf Oberhuber
-------------	-----------------------

Position	Head of Corporate Compliance Office
----------	-------------------------------------

Phone	+49 203 307 - 2119
-------	--------------------

Name	Jeffrey Friedman
-------------	-------------------------

Position	Corporate Compliance Officer
----------	------------------------------

Phone	+1 678 318 1142
-------	-----------------

Central E-Mail	compliance@kloeckner.com
----------------	--------------------------