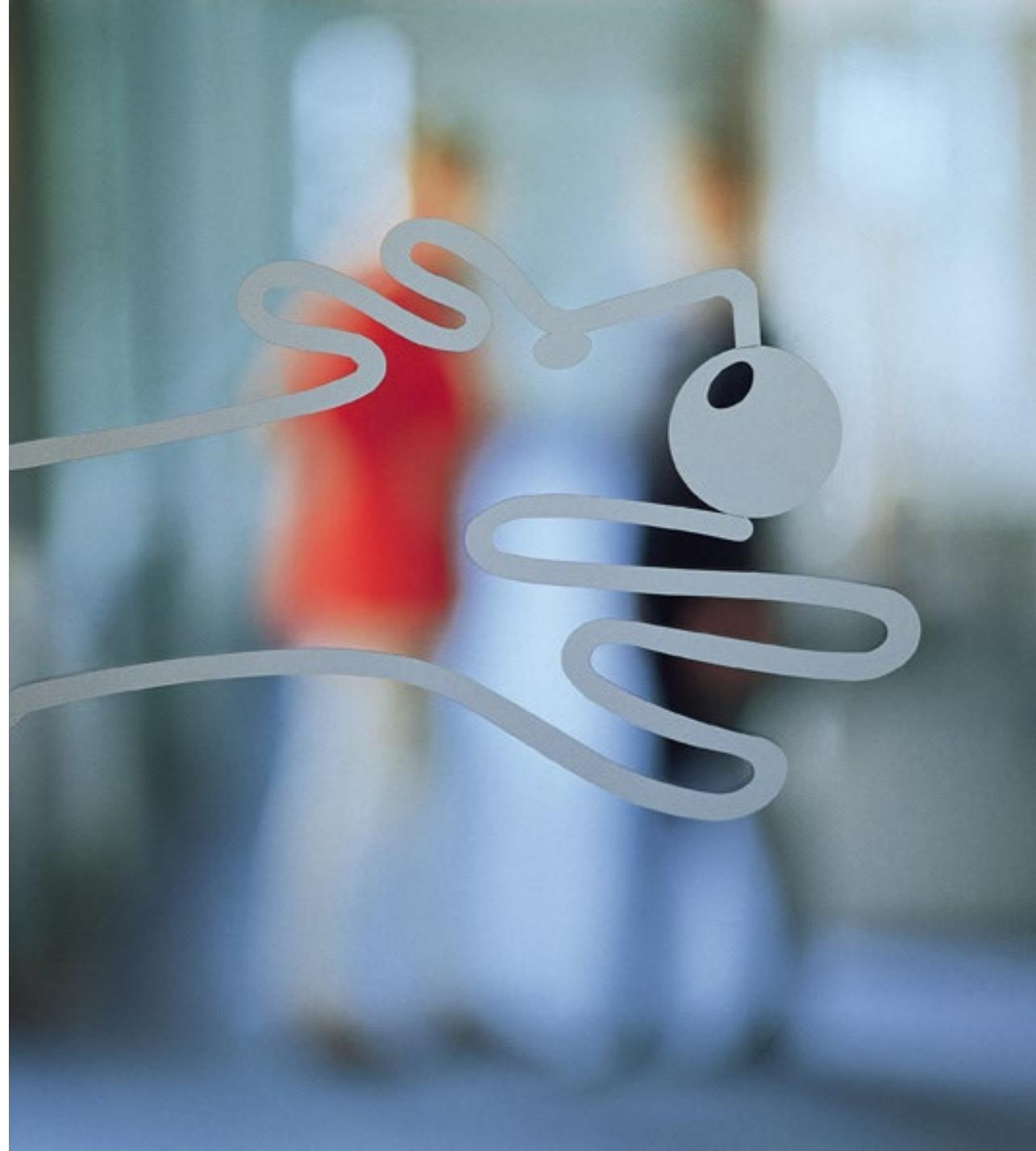


# COMPLIANCE MANAGEMENT SYSTEM 5.0

Corporate Compliance Office



# AGENDA

1. Compliance Management System 5.0
2. Compliance Organization
3. Reporting Line



# 1 COMPLIANCE MANAGEMENT SYSTEM 5.0

## Definition of “Compliance”

The meaning of Compliance is:

- Behaviour according to the regulations
- of the Klöckner & Co Group as a whole
- its statutory bodies
- and all employees
- with regard to the abidance of all legal rules and regulations
- as well as to the corporate Guidelines

# 1 COMPLIANCE MANAGEMENT SYSTEM 5.0

## Compliance Principles

- The Klöckner & Co SE Compliance Management System is based on the frame concept of the OECD\* concerning the principles of good corporate governance, latest edition 2015.
- The CMS considers further the Compliance Principles of FCPA, UK Bribery Act and the German Corporate Governance Code.

\* OECD = Organization for Economic Co-operation and Development, Paris, France  
[G20/OECD Principles of Corporate Governance | READ online \(oecd-ilibrary.org\)](https://www.oecd-ilibrary.org/governance/g20-oecd-principles-of-corporate-governance)

# 1 COMPLIANCE MANAGEMENT SYSTEM 5.0

## Compliance Targets

- Secure lawful behaviour of the Company, its legal representatives, Management and Staff on the basis of a corporate culture of trust
- Identification and reduction of risks resulting from compliance violations by preventive measures
- Earliest possible detection of compliance violations occurred
- Mitigation of damages in case of actual compliance violation and circumvention of its continuity by implementation of suitable measures
- Competitive edge through compliant corporate governance

# 1 COMPLIANCE MANAGEMENT SYSTEM 5.0

## Key aspects of the Compliance Program

- Competition Law
- Anti-Corruption
- Anti-Money Laundering
- Export Control
- Sanction List Screening

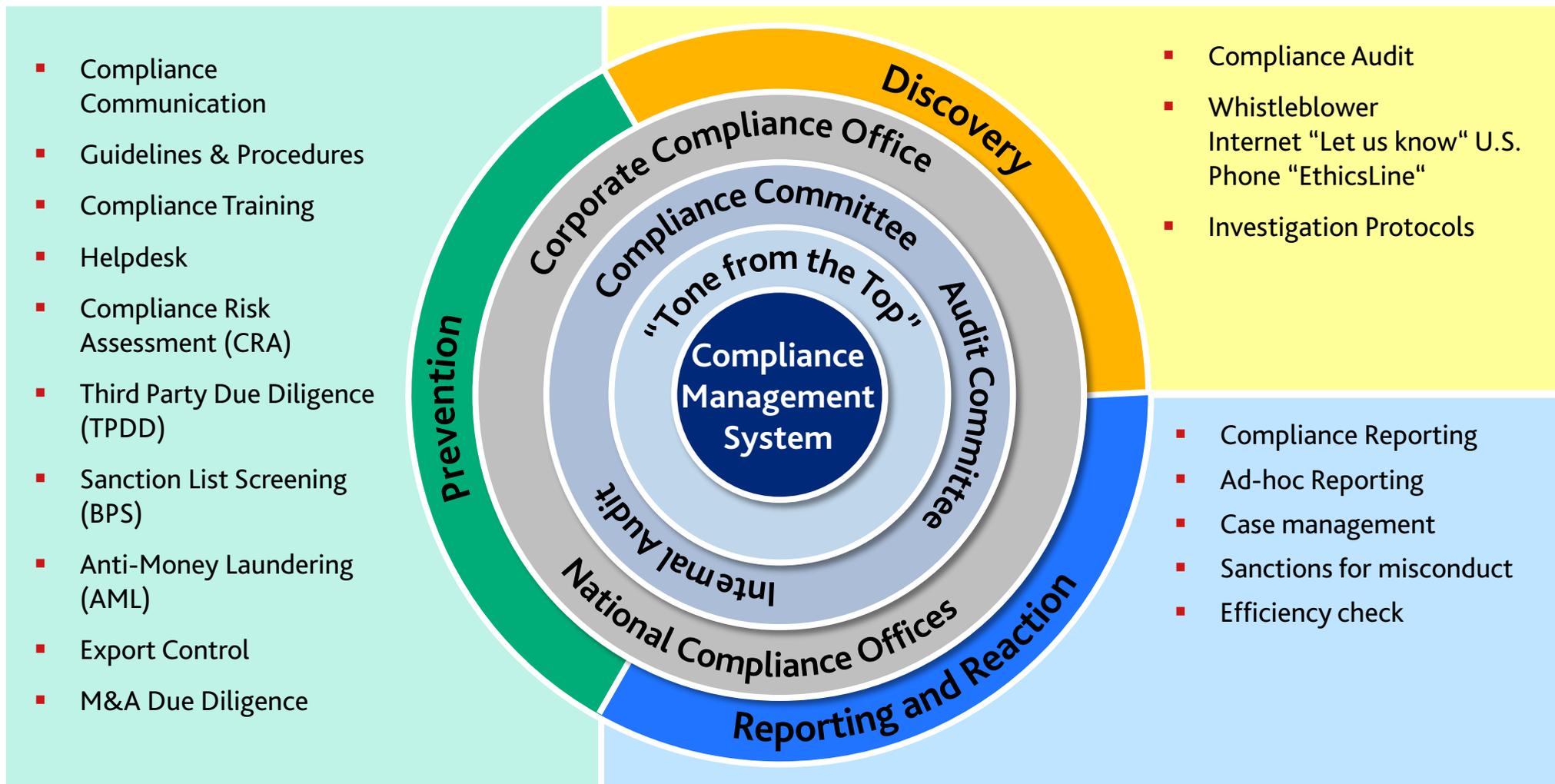
# 1 COMPLIANCE MANAGEMENT SYSTEM 5.0

## „Tone from the Top“

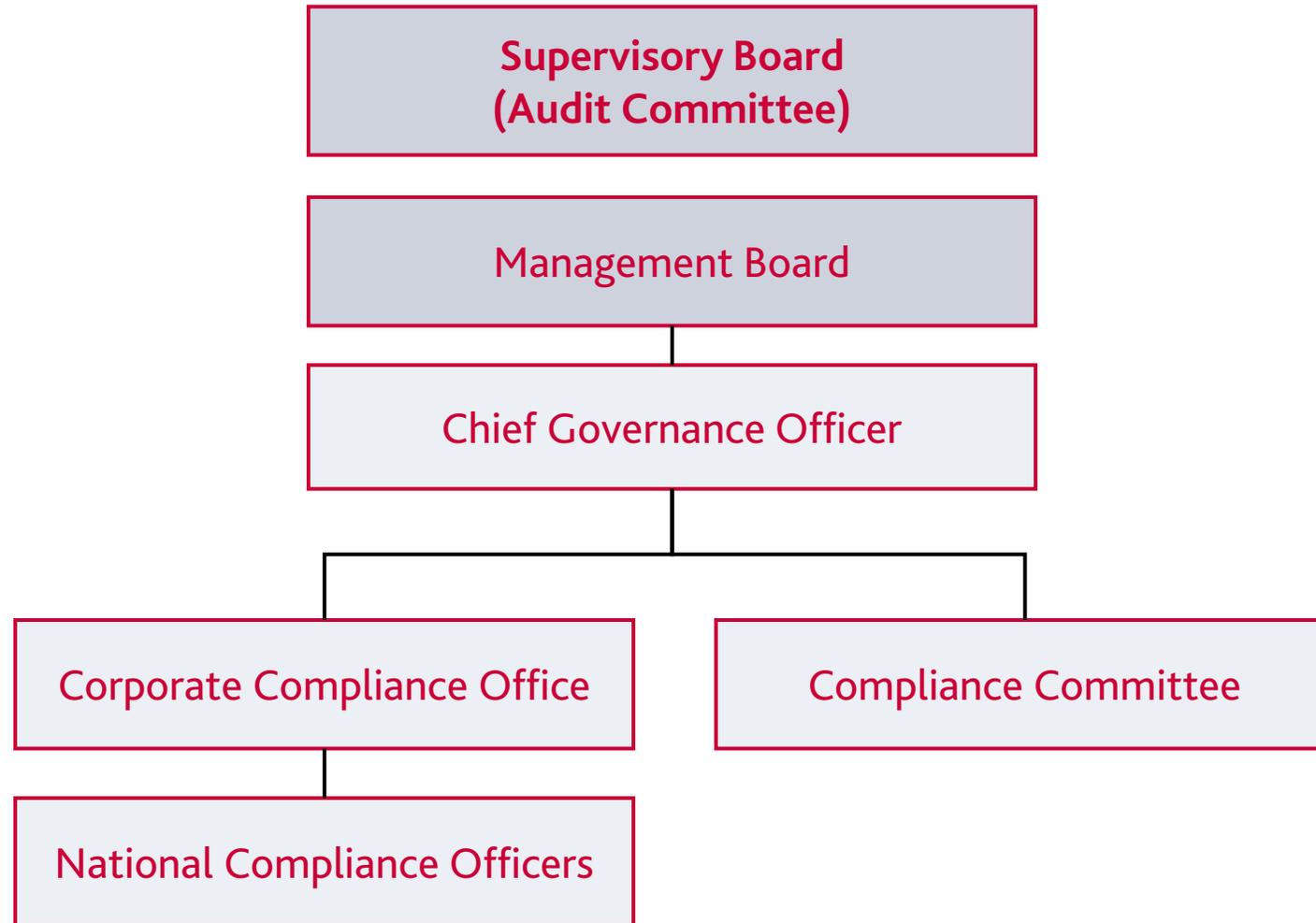
Klößner stands for:

- Innovation, customer focus, motivated and responsible acting employees
- Violations against competition law and corruption won't be tolerated
- Misconduct will impose sanctions
- Prosecution by civil and criminal law

# 1 COMPLIANCE MANAGEMENT SYSTEM 5.0



## 2 COMPLIANCE ORGANIZATION



## 2 COMPLIANCE ORGANIZATION

### Corporate Compliance Office

- Chief Governance Officer  
Moritz Fischer  
Phone: +49 203 307 2116
- Head of Corporate Compliance Office  
Ralf Oberhuber  
Phone: +49 203 307 2119
- Corporate Compliance Officer  
Jeffrey Friedman  
Phone: +1 678 318 1142

E-Mail: [compliance@kloeckner.com](mailto:compliance@kloeckner.com)

### 3 REPORTING LINE

