



CODE OF CONDUCT FOR voestalpine BUSINESS PARTNERS

This Code of Conduct defines the principles and requirements voestalpine imposes on its suppliers of goods and services and on business intermediaries, advisors, and consultants and other business partners. These principles and requirements are based on voestalpine's Code of Conduct and on the principles set forth in the UN Global Compact.

Compliance with the legal regulations

- » The Business Partner undertakes to comply with the legal regulations of the applicable legal system(s).

Fair competition

- » The Business Partner undertakes not to restrict free competition and not to infringe on national or international antitrust law rules.

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

- » The Business Partner undertakes that it shall not tolerate any form of active corruption (offering and granting benefits; bribery) or passive corruption (demanding and accepting benefits), nor shall it collude with such conduct in any manner whatsoever.
- » The Business Partner undertakes that it shall not offer gifts or other personal benefits (e.g., invitations) to voestalpine employees or their close family members, where the total value of such benefits and the specific circumstances create the impression that a particular action is expected from the recipient of the benefit in return. The question of whether this is the case will depend on the specific circumstances of the individual case. Gifts of de minimis value and hospitality falling within the range of what is customary in business will, in any event, be permissible.
- » The Business Partner furthermore undertakes that it shall offer customary market prices to employees procuring goods or services for their own personal use, and/or that it shall only grant rebates or other price reductions if they are granted to all voestalpine employees.

Respect and integrity

- » The Business Partner hereby undertakes that it shall respect and comply with human rights as fundamental values on the basis of the European Convention for Human Rights and the UN Charter. In particular, this applies to prohibitions on child labor, forced labor and any form of human trafficking equal treatment of all employees, and the right of employee representation and collective bargaining.
- » The Business Partner furthermore undertakes that it shall assume responsibility for the health and safety of its employees.

Supply chain

- » The Business Partner will appropriately promote compliance with the substance of this Code of Conduct by its own business partners.