

CORPORATE POLICY

of K1-MET GmbH

Code of Conduct

K1-MET GmbH is a cross-company centre of Excellence for metallurgical and environmental process developments and is operated by both the Austrian steel industry and renowned Austrian universities (Montanuniversität Leoben and Johannes Kepler University Linz).

As a reliable partner, we also feel responsible in dealing with our business partners, shareholders from industry and science and employees. For this reason, we have drawn up a Code of Conduct to support our employees in the responsible performance of their business activities. It is the basis for morally, ethically and legally impeccable behaviour of all employees of K1-MET GmbH.

Our employees are an essential part of our company's success and form a significant part of trust as well as our reputation. For this reason, it is important for us to establish clear principles on ethics and morals in business life. This Code of Conduct is an essential basis for that. It is intended to become an integral part of our corporate culture through the example set by each individual.

Linz, on June 2017

The Management

T. Bürgler (m.p.)

J. Schenk (m.p.)

1.) Introduction and objective

Due to its research activities and cooperation with university and industrial research institutions, K1-MET GmbH is subject to a wide range of social, political and legal conditions that should be observed. Violations of these framework conditions can cause considerable financial disadvantages for the company and will cause lasting damage to the reputation of the organization.

This Code of Conduct forms the basis for all business actions and decisions at K1-MET GmbH. It is the basis for morally, ethically and legally impeccable conduct of all employees¹ of the Group.

In the event of a violation of statutory provisions, internal guidelines, regulations and directives or of provisions of this Code of Conduct, every employee must expect disciplinary consequences. In addition, violations may also result in criminal and civil law consequences for the person concerned, such as claims for recourse and damages.

The Code of Conduct is updated as required by resolution of K1-MET management and will be amended by special guidelines if necessary.

2.) Scope

This Code of Conduct applies to all employees of K1-MET GmbH.

In addition, it is in the interest of the company that the Code of Conduct is brought to the attention of any key business partners (industry or scientific partners, consultants, etc.).

3.) Responsibility for the implementation

Each individual employee is responsible for compliance with and implementation of the Code of Conduct.

The executives (i.e. management + area managers) of the company shall be role models for the employees in implementing the contents of the Code of Conduct through lived practice.

When interpreting the rules of the Code of Conduct, employees must also be guided by common sense and question whether, based on reasonable ethical and moral standards,

¹ In this text, the term "employee" is used for both male and female employees; other gender-specific designations also apply automatically to both genders in the following.

a specific course of action could give rise to criticism. In the case of statutory regulations, there is no room for discretion.

In the event of any ambiguities or questions, each employee's direct supervisor is available to provide appropriate advice and decision-making support.

The compliance office responsible for K1-MET GmbH is also the highest authority for the binding interpretation of the Code of Conduct in matters of dispute and interpretation.

The Compliance Office can be reached at the following contact address:

- **K1-MET Compliance Office: compliance@k1-met.com**

The contact details of the Compliance Officer of K1-MET GmbH and this Code of Conduct are available on the homepage at <http://k1-met.com/compliance>.

4.) Compliance with laws and other external and internal regulations

All employees are required to inform themselves comprehensively about the laws, other regulations and internal guidelines and rules applicable to their respective areas of responsibility and, in cases of doubt, to contact the responsible bodies (see section 3.).

5.) Fair Competition

Transparent and fair conduct on the market sustainably ensures the competitiveness of the company as a whole. Restrictions on free competition and violations of competition and antitrust regulations are not compatible with the corporate philosophy and culture or the self-image of the company.

In their association work, however, the Company's employees must likewise observe the principles outlined above and conduct **themselves in** compliance with antitrust law.

6.) Corruption/Bribery/Gift Acceptance

All employees are strictly prohibited from offering or accepting benefits, either directly or indirectly², if doing so is intended to improperly influence business transactions or could even create such an impression.

Offering or accepting money or benefits of monetary value is not permitted under any circumstances.

7.) Respect and integrity

Based on the UN Charter and the European Convention on Human Rights, human rights are considered fundamental values to be respected and observed by all employees.

The corporate culture of K1-MET GmbH recognizes and welcomes that every human being is unique and valuable and is to be respected for his or her individual abilities. K1-MET GmbH therefore prohibits, among other things, any form of human trafficking as well as child and forced labour and does not tolerate any form of discrimination in any form whatsoever. The latter also applies to sexual harassment in any form, for example through obvious advances, demeaning comments, jokes, foul language, suggestive gestures or the display of relevant visual material in business and production facilities of the company. Such conduct may be classified as harassment even if it was not so intended.

These principles also apply to conduct towards external partners.

8.) Conflicts of interest

In the course of business, it is possible that employees may find themselves in situations where their personal or economic interests conflict or may conflict with the interests of the company. In such situations, K1-MET GmbH expects its employees to act exclusively in the interests of the company. Since such conflicts of interest cannot always be ruled out, K1-MET GmbH obliges its employees to deal with such issues in a transparent manner.

Every employee is obligated to disclose actual or potential conflicts of interest, even if only the appearance of such a conflict of interest could arise, immediately and in full to

² Benefits may include gifts, invitations, purchases at non-arm's length, interest-free loans, etc.

the respective supervisor without being asked and, if necessary, to request special approval.

Conflicts of interest may arise in particular in connection with the following aspect:

- Secondary activities may contradict the duties in K1-MET GmbH or lead to a conflict of interests and therefore require prior written approval by the management in any case.

9.) Handling of Company Information/Confidentiality

Confidential information of any kind obtained in the course of professional activities, including information outside the scope of one's own activities, may neither be used for the pursuit of one's own interests nor made available for the use of the interests of third parties.

It must be ensured that company information of any kind (documents, extracts, files, drawings, plans, forms, etc., including copies thereof on paper as well as electronic or other data carriers) is always kept secure. If such information has to be taken outside the company for business reasons, it must be secured against inspection or access by third parties.

Strict confidentiality must be maintained with regard to all company and business secrets, in particular research and development processes, acquisition strategies or acquisition targets, and significant investments, irrespective of the source of the information. If external partners (e.g. industrial and scientific partners) are involved, suitable non-disclosure agreements must be concluded with the involvement of the authorized signatory.

Information from which company and business secrets can be derived must also be treated confidentially and may only be made available to those employees who require it in the course of their professional activities. It must be kept securely by the employees. This also applies to information in which contractual partners of K1-MET GmbH have an interest in secrecy, in particular if a corresponding secrecy agreement has been concluded for this purpose.

The obligation to maintain confidentiality shall continue without restriction after termination of the employment relationship.

In addition, the relevant confidentiality provisions of the respective service contracts shall apply.

10.) Corporate Communications

All verbal and written announcements and press releases that affect the interests of K1-MET GmbH are made exclusively via the managing directors or area managers. This refers to both classic and digital communication.

11.) Internet

The communication facilities of K1-MET GmbH, such as the Internet and e-mail, are primarily used for operational requirements.

12.) IT Usage

IT devices (PC, notebook, etc.) must always be stored in a suitable manner and equipped with password protection within the scope of technical possibilities.

Only the data immediately required should be carried on business trips.

Personal passwords may not be passed on to other employees or third parties. Clear and verifiable regulations must be made for substitutions.

If company-related data is stolen or cannot be found, the respective supervisor must be notified immediately. If this concerns electronic data, the passwords must be blocked or other suitable steps taken immediately in consultation with the responsible area manager or the management.

13.) Reports of Misconduct

It may happen that employees of K1-MET GmbH discover violations of provisions of the Code of Conduct, of other internal guidelines and regulations or of legal requirements.

If employees identify such misconduct, they are free to report it immediately. The following options are available for this purpose:

- Information to the direct supervisor, or
- Information to the management, or
- Information to the compliance body (compliance@k1-met.com)

Compliance violations should first and foremost be reported openly, i.e. by stating the name of the whistle-blower. All reports received will be carefully investigated and treated confidentially if requested. To promote an open and trusting communication, it is expressly stated that employees who report identified violations of laws, the Code of Conduct or other internal policies and regulations will not suffer any negative consequences of any kind as a result. This applies equally to other persons who contribute important information to the investigation of such misconduct.

K1-MET GmbH expressly reserves the right to take disciplinary action against employees who intentionally or through gross negligence make false allegations.