



Charter of the Unger Steel Group for Dealing with Staff, the Environment and Ethics

Code of Conduct

Introduction.

Dealing with staff, the environment and ethics is a central principle within the strategy of the Unger Steel Group.

We can meet the social expectations, needs and requirements for social, economic and environmental development through the active and committed dedication of all staff.

This means that we must consider the core values relating to human rights, workplace standards, the environment and ethics in our decisions.

The improvement and provision of products, services and processes is a continuous process in our company. These improvements achieve resource and energy savings among other things.

Further information can be found in the following guidelines:

- Unger Stahlbau Richtlinie Arbeitsbedingungen und Menschenrechte
- Unger Stahlbau Richtlinie Arbeitsschutz
- Unger Stahlbau Richtlinie Umwelt
- Unger Stahlbau Richtlinie Unternehmensethik

Core values.

Our core values are touched on in the following documents, among others:

- United Nations' Universal Declaration of Human Rights
- the International Labour Organization's Fundamental Conventions
- the Guiding Principles of the Organisation for Economic Co-operation and Development (OECD),
- the rules of conduct of the International Chamber of Commerce (ICC)



Dealing with staff.

The health and vitality of our employees is our highest priority.

In this context, the Unger Steel Group offers its workforce regular occupational healthcare and training on health and safety at work.

Vaccination campaigns as well as weekly fruit and vegetable days are offered for the benefit of our employees.

Company teams participate in sporting competitions, such as long-distance running and football matches; these are financially supported and promoted by the company.

Employees are informed at regular intervals by the internal newsletter "Unger Internal" about current developments and news of the Unger Steel Group and our environment.

There are training plans within the company and thus the opportunity for career development.

All of these measures promote staff team spirit and serve to improve the business climate and strengthen staff motivation, and provide strong staff loyalty.

Work guidelines.

Our standards and practices are in compliance with the human rights declaration in relation to child labour, forced labour, non-discrimination as to people, working hours, salary and allowances.

We will check and ensure that the legal and social security regulations for our staff in the respective countries are respected.

For us, the following points are clear; our counter-parties must fulfil these in detail as well:

- No unlawful or forced labour.
- No child labour: We do not employ staff who have not reached the required minimum working age, nor do we support child labour in any way. Exempted from this are legal education programs for young people.
- No discrimination as to origin, types of activity and position within the company.
- Adherence to the legal working hours and requirements in regards to working hours and rest periods.
- Respect the freedom to gather with consideration of the applicable laws and regulations.
- Adherence to termination deadlines, with consideration of the applicable laws and regulations.



Health and safety at the workplace.

In accordance with our SCC certification, the Unger Steel Group actively seeks to continuously improve the safety of all those on our construction sites and our clients' construction sites.

If services are provided to the construction site, the Unger Steel Group employees high health and safety work standards, as the health (physical conditioning, life and limb) of the staff is at stake.

The Unger Steel Group ensures that its activities do not affect the health of our staff and employees, our subcontractors and suppliers, the community and users of our products.

The Unger Steel Group takes an active approach to health and safety in the workplace. Risks are recognised, assessed and, if applicable, eliminated or minimised.

The Unger Steel Group avoids substances which are injurious to health or safety of the workplace. This also includes carcinogenic, teratogenic or mutagenic risks (CMR substances).

Unger Steel Group's business partners are obligated to adhere to the safety rules specified by us and made available to them.

Ethics.

The Unger Steel Group and our business partners also adhere to applicable laws and regulations related to the work being performed. In addition, the supplemental or parent regulations of the Unger Steel Group are to be adhered to.

The requirements in particular are:

- Competition: Adherence to applicable laws and regulations in regards to fair competition.
- Corruption: Adherence to all relevant laws and regulations in relation to corruption, bribery and extortion.

In particular, our business partners may not offer in their own interest or in the interest of the Unger Steel Group, directly or indirectly, any type of discount or other benefit to staff of the Unger Steel Group, to an authority, a political party, an employee or representative of a client in the public or private sector in order to complete a transaction or gain any other advantage that violates applicable laws and regulations.

- Money laundering: Adherence to applicable laws and regulations in regards to money laundering. Unger Steel Group's business partners may not be involved in nor support money laundering.
- Conflicts of interest: Recognition, prevention and disclosure of situations of a current or future conflict of interest through the Unger Steel Group or its partners which could unfavourably influence our actions and decisions.



Environment.

The Unger Steel Group does business in a responsible and efficient manner with resources and is committed to sustainable protection of our environment.

Our goal is the economical use of energy and raw materials, the sustainable use of renewable resources, minimisation of environmentally harmful effects, the prevention of waste and the safe and environmentally-sound disposal of residual waste.

We regularly check for the success of our environmental measures and undertake further improvements, wherever needed.

The Unger Steel Group's sites primarily work with steel. There is no hazard to water, air and soil with the processing of steel frames and sheet.

The Unger Steel Group uses the best available technologies in all production processes. Our company thus ensures the best efficiency and quality in the manufacturing of our products. Also the production of upstream and downstream areas is done using strict environmental protection measures. Optimal raw materials use is considered throughout the process, starting with planning and material procurement, so that waste in the production process is kept to a minimum. Building with steel also achieves the target of sustainability: Steel has the world's highest rate of recycling of all raw materials.

Waste.

Prevention, recovery and disposal of waste is one of the main factors in our production.

Following this requirement, production and office waste is prevented where it is generated, or it is separated and gathered and properly recycled or disposed of through certified disposal companies.

The waste from steel frames and sheet is reintegrated nearly 100% as scrap for the production of new steel. The steel raw material is also delivered and received unpacked. Water is a precious resource. We therefore work carefully and sparingly; our use is primarily in the social areas. All waste is disposed of separately by a certified waste management company in an environmentally friendly manner.

Handling hazardous materials.

Hazardous materials are captured in a central system and filed there with the relevant data sheets. Process descriptions and work instructions are created for release, import and handling of these materials in which the basic rules for handling these materials are set out.

There are hazardous materials storage areas for released and used hazardous materials. Staff and outside firms may only work with hazardous materials and products if they know of the possible hazards, and are using the necessary protective measures and adhere to them. Relevant instruction and training are performed related to the process descriptions which have been created.



Provision for emergencies.

In the case of a disruption of operations, protecting health and the environment are accorded the highest priority. There are emergency plans for disruptions which we continuously update to incorporate new knowledge.

Products and services.

The Unger Steel Group considers environmental tolerability, health and safety in the development of our products, and tries to minimise or completely eliminate negative environmental influences and effects on health and safety throughout the entire life cycle of our products.

Unger Steel Group's business partners are encouraged to provide their products and services in an environmentally friendly and socially responsible manner.