COMPLIANCE

CODE OF CONDUCT

In its business units, voestalpine is a global steel and technology group that combines materials and processing expertise, focuses on product and system solutions in technology-intensive industries and niches using steel and other metals, and applies stringent quality standards. As a reliable partner, voestalpine takes ownership of the challenges facing its customers. Furthermore, it is fully aware of its responsibilities in its dealings not only with customers, suppliers, and other business partners but also, and in equal measure, with its employees and shareholders.

The voestalpine Code of Conduct encourages employees of the voestalpine Group to be conscious of their individual responsibilities when carrying out their business activities. It provides the basis for the morally, ethically, and legally sound conduct of all of the Group's employees.

Our employees are integral to the Group's success and are therefore key to both the trust placed in voestalpine and its reputation. This is precisely why it is important to establish unequivocal policies and principles on matters of ethics and morality in business. The Code of Conduct provides the relevant parameters to that end. By enabling each and every employee to put its principles into practice, it is also designed to form a central element of the Group's corporate culture. The Management Board is explicitly and emphatically committed to both this Code of Conduct and a zero-tolerance policy toward violations thereof.

COMPLIANCE MANAGEMENT SYSTEM

The Compliance management system encompasses risk analysis/prevention, identification, and reaction. In addition to a Group Compliance Officer, additional Compliance officers have been appointed for all divisions and a number of business units as well as larger Group companies. The Group Compliance Officer reports directly to the Chairman of the Management Board, but is not bound by instructions.

The Compliance organization is responsible for the following areas:

- Antitrust law;
- Corruption;
- Compliance with capital market regulations;
- Fraud (internal cases of theft, fraud, embezzlement, breach of trust);
- Conflicts of interest; and
- Special issues that are assigned to the Compliance officers by the Management Board of voestalpine AG (e.g., UN or EU sanctions).

All other Compliance issues—e.g., environmental law, taxes, accounting, labor law, protection of employees or data—are not part of the Compliance officers' sphere of responsibility. Other organizational units are responsible for these Compliance issues.

COMPLIANCE GUIDELINES

The provisions of the Code of Conduct are supplemented and fleshed out by Group guidelines as follows:

- **ANTITRUST LAW**
  This guideline describes the prohibition of agreements restricting competition; establishes rules for dealing and interacting with industry associations, professional associations, and other sector organizations; and defines particular rules of conduct for employees of the voestalpine Group.

- **BUSINESS CONDUCT**
  Among other things, this guideline regulates conduct relative to gifts, invitations, and other benefits; donations, sponsoring, and secondary

employment; as well as private purchases of goods and services by employees from customers and suppliers.

» **GUIDELINE ON DEALINGS WITH BROKERS AND CONSULTANTS**
This guideline prescribes the procedure to be followed prior to contracting with or engaging sales representatives, marketing and other consultants, or lobbyists. An objective analysis of business partners' environment and scope of activities before establishing business relationships with them serves to ensure that the business partners also comply with both applicable law and the voestalpine Code of Conduct.

The Code of Conduct is available in 21 languages, and the Compliance Guidelines in 14. The entire body of Compliance rules and regulations applies Group-wide.

PREVENTION

Preventive measures are the first line of defense of an efficient Compliance management system. Comprehensive training programs to that end have been carried out across the Group in recent years. E-learning systems, in particular, are increasingly being used in addition to face-to-face training in order to achieve the broadest possible training effect. So far, web-based courses have been used to train some 14,800 Group employees in antitrust law and some 33,200 employees in matters relating to the Code of Conduct; a final test is carried out in all cases. Face-to-face training is tailored to target groups, and it is also generally carried out as part of executive training programs as well as specific training offered to non-executive employees in sales and procurement. Over and above these measures, Compliance issues are repeatedly brought to the attention of voestalpine's personnel through regular communications, especially employee magazines and poster campaigns or in the context of Group and division-level events.

» Information on the subject of Compliance in the voestalpine Group is also available on the website of voestalpine AG and, specifically for employees, on the Group's intranet.

WHISTLEBLOWING SYSTEM

A web-based whistleblower system was launched in January 2012. Reports of Compliance violations should be made openly for the most part, i.e., divulging the whistleblower's name. However, this web-based system also offers the option of reporting misconduct anonymously and of communicating with whistleblowers in ways that allow them to remain completely anonymous. The system is designed to systematically utilize information for the purpose of identifying Compliance risks within the Group early on and effectively. Initially, the areas in regard to which irregularities could be reported using this system were limited. As of the business year 2022/23, however, it has been possible to use this web-based whistleblower system to file reports concerning the following areas:

» Antitrust law, corruption, fraud, conflicts of interest, capital market compliance
» Discrimination, sexual harassment, mobbing, human rights
» Data privacy and protection
» Technical compliance with special reference to adhering to technical standards and certifications in production processes and IT security
» Environmental issues
» health & safety
» Violations in other areas