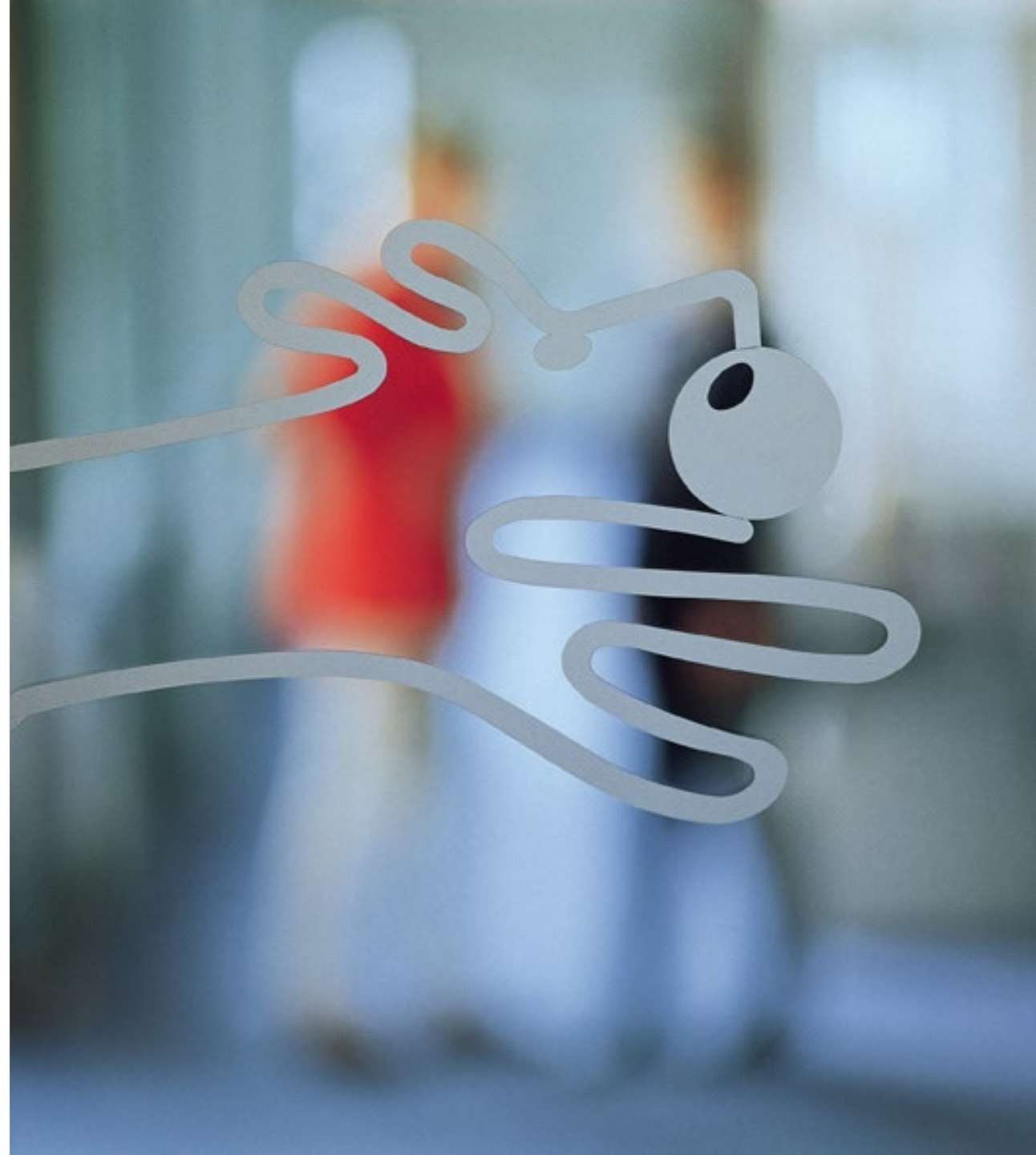


COMPLIANCE MANAGEMENT SYSTEM 5.0

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/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

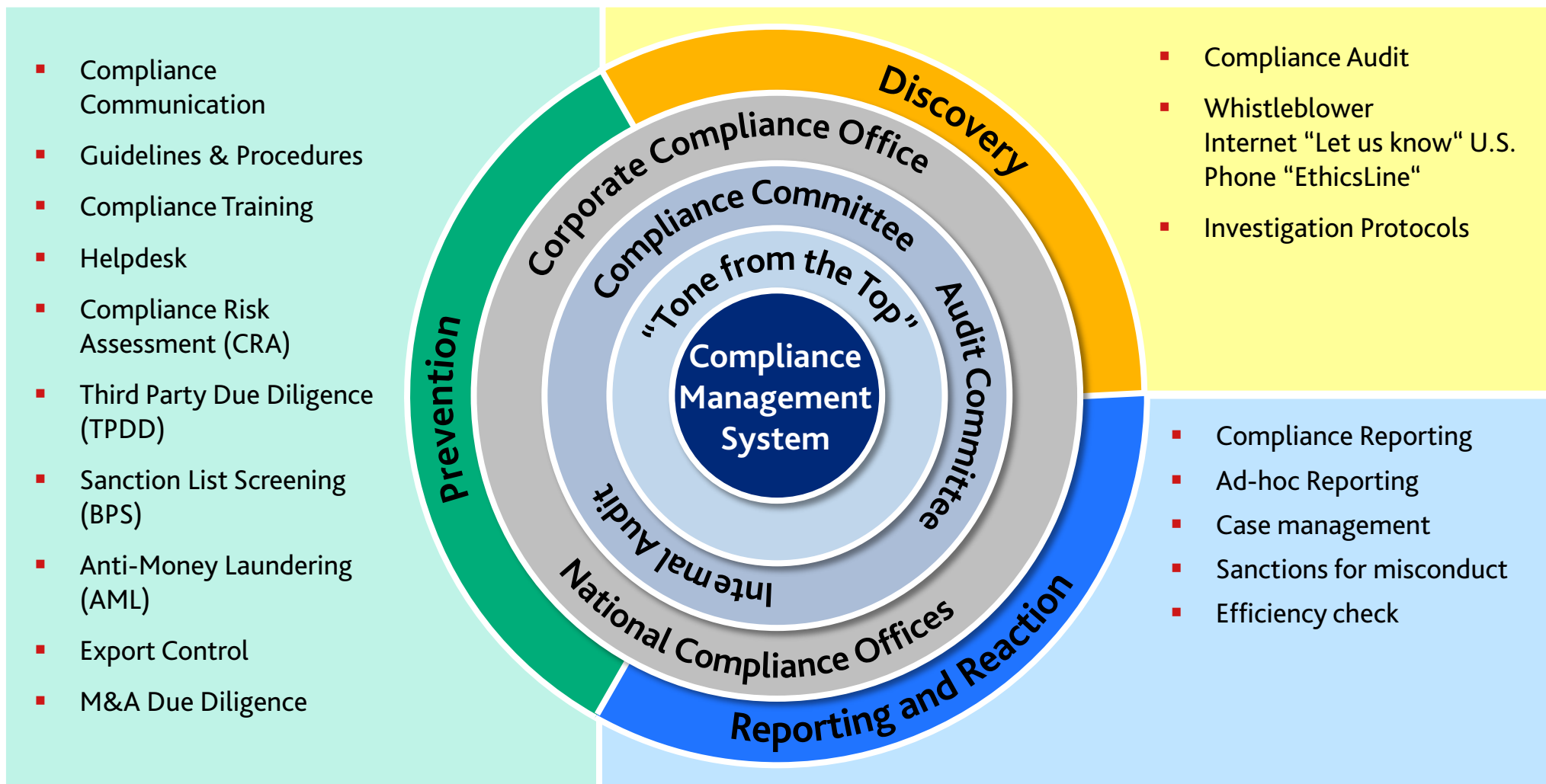
1 COMPLIANCE MANAGEMENT SYSTEM 5.0

„Tone from the Top“

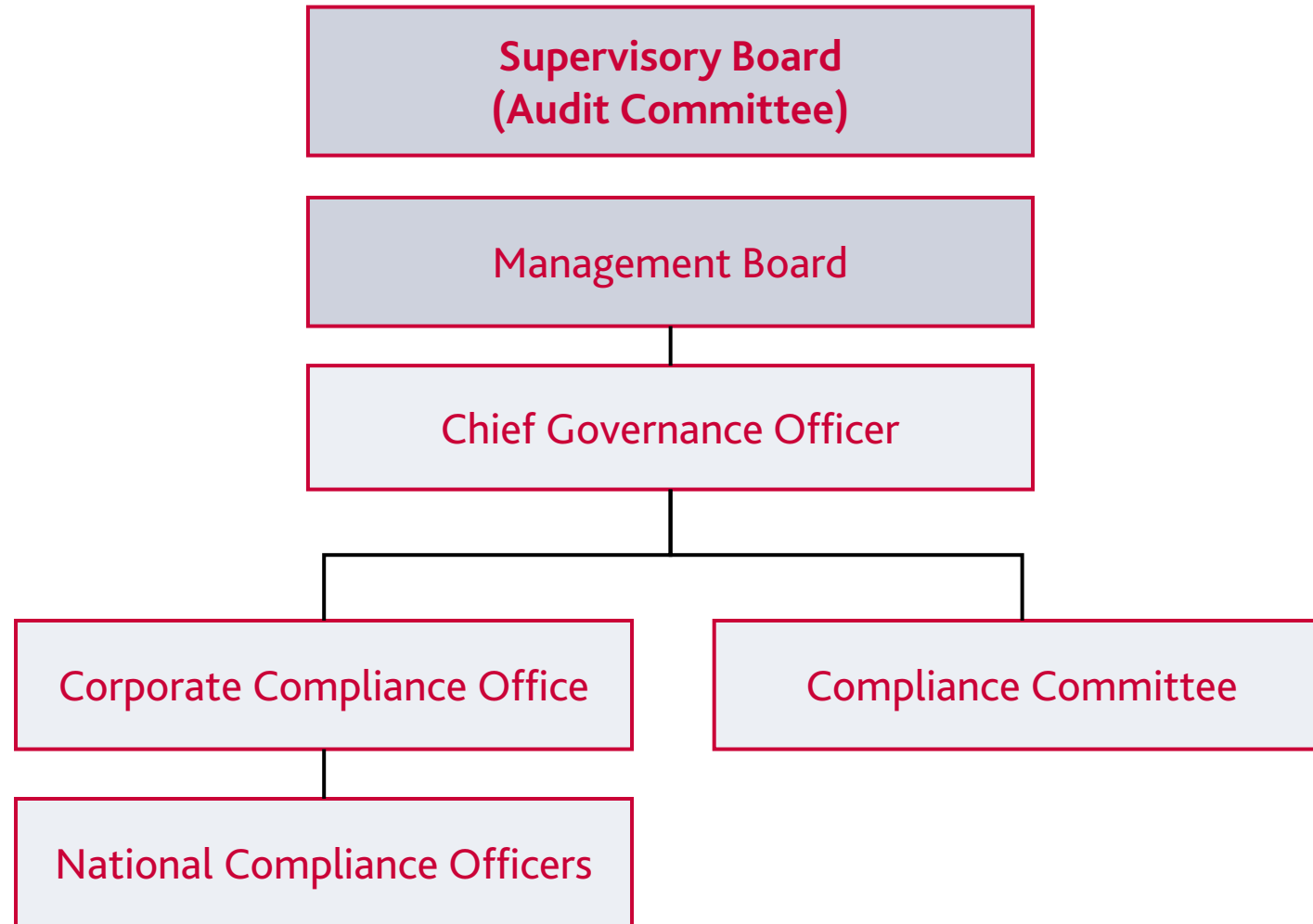
Klößner stands for:

- 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
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3 REPORTING LINE

