

## **Compliance – Policy for the group of companies of steep holding GmbH**

### **Function and objectives of the Compliance Policy**

The companies of the steep holding GmbH group of companies (hereinafter referred to as "steep" or "steep Group") commit themselves to a value-oriented, ethical and lawful conduct (compliance), which is the basis of their business and social activities.

This guideline

- serves to prevent violations of legal provisions, in particular of competition law and provisions on the prevention of corruption. It also serves to prevent violations of internal guidelines and organisational instructions of steep.
- establishes binding rules which must be observed by every employee of the steep group.

Adherence to the compliance guidelines is not only important for the long-term success of the company's business activities, but also helps to protect steep and its employees from disadvantages.

### **I. Responsibility**

The reputation of the companies in the steep group is largely determined by the appearance, actions and behaviour of each individual employee, especially the managers. Illegal or inappropriate behaviour, even on the part of just one employee, can already cause considerable damage to the company.

Every employee is required to respect, maintain and promote the reputation of the companies of the steep Group. Every employee must be aware of these guidelines.

The members of the management board and all managers are responsible for the employees entrusted to them and must act as role models. They must therefore ensure that this guideline is actively implemented.

### **II. Legal regulations and internal guidelines**

Observance of the law and the law is the top priority for the steep Group.

The employees of the steep Group must observe the laws and regulations relevant to their work as well as internal guidelines and instructions.

Failure to comply with legal regulations can lead to criminal and labour law consequences for the employee concerned, but can also result in fines at the company's expense of a considerable amount and the exclusion of the company from participation in award procedures. In addition, the reputation of the company with customers, suppliers and the public can suffer considerable damage.

### **III. Anti - Discrimination**

The steep group opposes all forms of discrimination and exploitation of people. In its business or employee-related decisions, it always takes care to avoid unequal treatment and discrimination on the grounds of race, age or appearance, ethnic origin, gender, religion or belief, disability or sexual identity and other protected characteristics.

It therefore observes the rights of its employees and the legal provisions in place to protect them, in particular the regulations on minimum wages and occupational health and safety, as well as the prohibition of child labor and illegal employment.

### **IV. Temporary employment**

Temporary employment contracts have a direct impact on the employees concerned. Legal violations in this context can equally endanger the permission according to § 1 of the German Law on Temporary Employment (AÜG) and damage the reputation and competitive position of the steep Group. It is therefore of particular concern to strictly adhere to the provisions of the Act on the Provision of Temporary Workers in particular.

### **V. Compliance with tax law**

The basis for long-term successful company operations is, among other things, that the legal framework for proper accounting, balancing and financial reporting as well as the applicable tax laws are complied with in an unrestricted and comprehensible manner. To this end, all movements of financial resources are documented by correct and, in particular, legally compliant accounting and documentation.

### **VI. Export control**

National customs and export regulations as well as the relevant EU and US regulations must be observed. For each export project, it must be carefully and timely checked whether the project complies with the legal regulations, in particular whether there are any licensing requirements or export bans.

Any export activity requires the approval of the person responsible for export or the export control office of steep.

This concerns

- all deliveries and services to foreign countries or in foreign countries and
- all deliveries and services within Germany, if concrete circumstances are known which indicate that the business partner/recipient wishes to export on his part.

If an embargo is affected or persons, companies etc. to be checked are found in sanctions lists, the project must be stopped immediately and the project management, the person responsible for exports and the legal department must be informed immediately.

Details are regulated by the organisational instruction "Export" of steep GmbH.

## **VII. Business relations with subcontractors and suppliers**

The steep Group expects its subcontractors and suppliers to share the steep Group's value principles and to comply with all legal requirements. We therefore expect our subcontractors and suppliers to apply the following principles:

- compliance with all applicable laws;
- the renunciation of corruption;
- respect for the human rights of their employees;
- compliance with the laws against child labor;
- compliance with the legal minimum wage requirements;
- assuming responsibility for the health and safety of its employees;
- compliance with the relevant national laws and international standards on environmental protection;
- the commitment that these value principles are also implemented / adhered to in its own supply chain.

More detailed regulations are contained in the "Code of Conduct for suppliers of steep GmbH".

## **VIII. Competition Law and Antitrust Law**

Fair competition is a prerequisite for free market development and the associated social benefits. Every employee is obliged to observe the rules of fair competition.

If a contract is awarded on the basis of an invitation to tender, the company will neither discuss nor coordinate offers with other bidders. This applies to any type of tender, whether it is a public or private tender.

Violations of antitrust law have considerable consequences. Any agreement that violates a ban on cartels is null and void and can have far-reaching consequences for the economic situation of the company. As a result, the company must expect investigations (including unannounced searches) by the Federal Cartel Office or other authorities. High fines can be imposed on the company as well as on employees. And criminal proceedings may be initiated.

Assessments under cartel law can be difficult. There are various types of conduct that can lead to a violation of antitrust law.

In particular, it should be avoided,

- discuss with competitors prices, output, capacity, sales, tenders, profits, profit margins, costs, distribution methods or any other factors which determine or influence the competitive behaviour of the undertaking with a view to inducing a similar behaviour by a competitor
- enter into agreements with competitors to refrain from engaging in competition, to restrict business relationships with suppliers, to submit bogus bids in response to requests for proposals, or to allocate customers, markets, territories or production programs;
- acquire information relevant to competition through espionage, bribery, theft or wiretapping;
- knowingly disseminate false information about a competitor or its products or services.

## **IX. Combating Corruption and Avoiding Conflicts of Interest**

The steep Group attaches great importance to ensuring that its employees do not get into conflicts of interest or loyalty during their work.

Business decisions are made in the best interests of the company and not on the basis of personal interests. We win orders fairly through the quality and price of our services and products and not by offering others undue advantages.

It is a criminal offence to accept or grant improper advantages, as well as to bribe or accept bribes. They lead to personal criminal liability of the persons acting in each case or the company's management bodies. In particular, offering an advantage for the performance of an unlawful official act by a public official (see § 332 StGB) as well as bribery and corruption in business dealings (see § 299 StGB) are punishable.

Corruption can endanger the existence of the company. In the case of corruption, the company may be excluded from public contracts. It is of utmost importance that the respective legal provisions for the prevention of corruption are strictly observed.

- In particular:
- No employee may offer, promise or grant - directly or indirectly - benefits in the form of cash or in any other way to public officials in connection with business activities in order to influence official decisions or to obtain an unjustified advantage.
- The same applies with regard to unjustified advantages over persons in the private sector.
- The establishment of independent business relationships with persons who are also public officials or employees of business partners is not permitted.
- No employee may use his position to demand, accept or be promised advantages.
- In principle, private and business matters must be strictly separated.
- Internal regulations and instructions to combat corruption and avoid conflicts of interest must be strictly observed.

## **X. Confidentiality and data protection**

### **1. Confidentiality**

The employees of the steep Group are bound to secrecy in all confidential internal and external matters of the steep Group companies. Confidential documents and information must be handled and stored with particular care.

Confidential are all documents and information which are expressly classified as confidential. This can be internal information, but also, for example, classified information from the public client or other information from business partners which is to be classified as confidential or secret in accordance with confidentiality agreements.

Furthermore, confidential is all information of which the employee knows or must know that it is not public knowledge and should not be made public.

In cases of doubt, an obligation not to disclose the relevant information must first be assumed.

### **2. Data protection and data security**

Personal data is only collected, processed or used by the steep group as far as this is necessary for previously defined, clear and legal purposes. A high standard of technical protection against unauthorised access to personal data is guaranteed.

All employees are obliged to comply with data protection regulations and relevant internal guidelines and instructions.

## **XI. Environment and Safety**

The protection of the environment and the conservation of natural resources are corporate goals of high priority for the steep group. Our company aims to conduct its business in an environmentally friendly manner through appropriate management responsibility and the commitment of its employees. Every employee must contribute to this goal through his or her own behaviour.

Every employee must pay constant attention to safety. The applicable laws and company regulations on occupational safety and health must be observed. Violations can have considerable consequences (especially claims for damages and criminal proceedings).

All employees are required to report any irregularities to their supervisor so that a quick and appropriate response can be made.

## **XII. Compliance Implementation and Control**

The management of our group of companies actively promotes company-wide communication and implementation of the compliance guidelines. A Compliance Team has been set up for this purpose.

All employees must be adequately informed about these Compliance Guidelines.

steep expects its employees to report any compliance infringements which they become aware of, or the threat of such infringements. Employees can contact their respective superiors, the management of the human resources department of steep GmbH or the Compliance Team. Information to the management of the personnel department can also be provided anonymously. There is no legal obligation for employees to report misconduct.

## **XIII. Individual regulations**

This compliance guideline is concretized for employees by internal regulations on individual compliance topics.

steep holding GmbH