

INNOVATIONS IN PROCESS

CORPORATE GUIDELINES

CORPORATE PHILOSOPHY AND
CODE OF CONDUCT



DRADURA





CORPORATE GUIDELINES

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The most recent applicable version of this document is available on the intranet.

“THE
PERMANENT
OPTIMIZATION
OF ALL
PROCESSES
BRINGS
IMPROVEMENTS
FOR US
AND OUR
CUSTOMERS”

CORPORATE PHILOSOPHY

INNOVATIONS IN PROCESS

DRADURA is one of the world's leading manufacturers of wire goods. We aim to secure and further expand this position in the future. We want to contribute to the success of our customers and offer new solutions in terms of efficiency, speed and environmental friendliness.

Our guiding principles are "Safety", "Customer First" and "Act as ONE TEAM".

Without change there can be no progress. That is why we are open to change and promote it wherever we can expect to see improvements for us or for our customers. Every employee takes responsibility for the optimization of processes and procedures in his or her sphere of activity. But also for fulfilling his or her duties to the best of their abilities. Through these actions, we not only observe and improve individual processes. We improve the entire production process as well as processes within the company and outside. This also applies to cooperation with our partners and customers. In this way, we jointly safeguard the long-term welfare of our company, all its employees and all stakeholders.

We strive to create a working environment characterized by mutual respect, trust, integrity and sustainability. The basis for the application of these values is the Code of Conduct.



CODE OF CONDUCT

1. INTRODUCTION

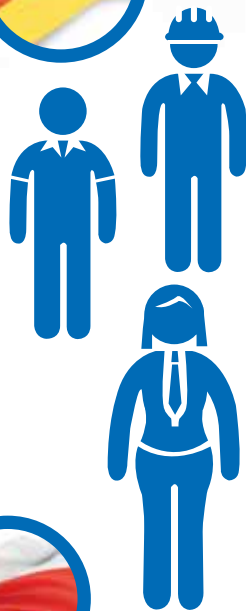
Our guiding principles “Safety”, “Customer First” and “Act as ONE TEAM” are the foundation for all actions at DRADURA. In addition to this, we are giving direction in our daily work by a number of other guidelines. These include our CSR policies, our environmental protection guidelines, the principles of the United Nations Global Compact, the OECD Anti-Bribery Convention, as well as further guidelines that can be found in the Appendix of this document.

Our Code of Conduct sets out the main principles and thus serves us as a guideline for adherence to ethical standards and in creating a working environment characterized by integrity, respect, trust and sustainability. By keeping to the rules set out in the Code of Conduct, we ensure the long-term welfare of the company and its employees.

DRADURA Group GmbH

DRADURA Altleiningen GmbH

DRADURA Polska Sp. z o.o.



2. SCOPE



DRADURA USA Corp.

The rules formulated in the Code of Conduct apply without exception to all owners, managers, employees and all other persons engaged in company work. For clarity of understanding, all categories of persons – regardless of gender – are collectively referred to in what follows as “employees”. The scope of these guidelines extends to all business sectors, all companies and all locations. This Code of Conduct does not replace any other behavioral guidelines, but complements them. We also apply the standards formulated in the Code of Conduct to our partners, suppliers and customers.



DRADURA Italia S.R.L.

3. PRINCIPLES OF CONDUCT



3.1. PRINCIPLES FOR DEALING WITH EACH OTHER

The way we treat each other is characterized by respect and acceptance. We respect social manners and strive for polite cooperation. We always act with integrity and are aware of our responsibility as role models. We always act as 'One Team'.

3.2 RESPONSIBILITY FOR THE COMPANY'S REPUTATION

We all are responsible for the indisputable reputation of the entire DRADURA family and for our personal reputation. For this reason, every one of us must behave in public at all times in such a way that his or her behavior does not reflect negatively on the company.

3.3 OPEN COMMUNICATION AND DEALING WITH CRITICISM

We communicate in a goal-oriented and clear manner. We encourage the open exchange of opinions, criticism and ideas. Conflicts are inevitable in everyday dealings with each other. But they help us to look at our positions critically and to learn from them. We view mistakes as an opportunity. We examine them and eliminate their causes and defects.

3.4 TAKING AN ACTIVE ROLE

We encourage all colleagues to act on their own initiative. At the same time, we expect them to observe the responsibility that comes with this and to work towards our common goals.

3.5 PERSONAL DEVELOPMENT

We strive in all areas to create a work environment that enables every employee to produce his or her best performance. We support the personal development of all employees, in particular the expansion of their expertise through training. With our 'annual feedback meetings' we assess the performance and success of every employee according to objective criteria and thus promote an open feedback culture at the same time.

3.6 WORK ENVIRONMENT AND SAFETY

We are committed to the Sustainable Development Goals of the UN Global Compact. Our primary goal is to create a safe working environment for our employees and to promote their health and well being.

- Our processes, systems and operations will strive to assure all our employees are always safe.
- Trust, openness and transparency will create a constructive environment to work.



4. SPECIFIC REQUIREMENTS

4.1 COMPLIANCE WITH APPLICABLE LAW

We comply with applicable law. We respect the relevant national and international laws, regardless of our location or the location of the business. In addition, we also respect the international conventions referred to in the appendix.

Kodeks Karny
BGB
FCPA **Code pénal**

4.2 PREVENTION OF CORRUPTION AND CONFLICTS OF INTEREST

4.2.1 Prohibition of corruption and personal gain

We condemn corruption, taking advantage and bribery. We respect the relevant laws and conventions. We neither offer business partners gifts or benefits with the aim of influencing a business decision, nor do we accept such gifts or benefits. Even the appearance of such influence is to be prevented. We will not tolerate application of unfair means.

4.2.2 Conflicts of interest

We do not accept any benefits, gifts or entertainment that could lead to a conflict of interest. We avoid situations that could lead to conflicts of interest between our personal or financial interests and the interests of DRADURA.



StGB

UK Bribery Act

OECD

Codice penale

Sarbanes-Oxley Act

17 SDGs and 10 principles of UN Global Compact

Whistleblower Protection Act, legally required EU Whistleblower Directive



4.3 FRAUD PREVENTION

We do not tolerate fraudulent acts, such as embezzlement, misappropriation or other fraud – neither within our company nor in our cooperation with business partners.



4.4 ADHERENCE TO ANTITRUST AND COMPETITION LAWS

We respect laws and regulations designed to safeguard fair competition, in particular anti-trust and competition law. We will not tolerate unauthorized preferential treatment or discrimination.





4.5 DEALING WITH INFORMATION

4.5.1 Dealing with internal knowledge

We do not pass on business information that has not been approved for publication by the relevant bodies within the company. Through careful handling, we protect business secrets: in particular, process and manufacturing knowledge, patents, plans, financial data and other information that has not been approved for publication. We do not accept inaccurate reporting – neither within our company nor in terms of information intended for external consumption.

4.5.2 Ensuring the confidentiality of data entrusted to us

We protect the secrets of our customers and suppliers. We do not use them to give ourselves an unfair advantage and we do not pass them on to third parties. We only ever use the information entrusted to us to perform the task for which it was entrusted to us.

4.5.3 Data protection

We comply with all legal requirements for data protection based on the GDPR. Furthermore, the personal data entrusted to us by our employees and partners is solely used for the intended purposes to the extent legally permissible. In particular, we treat personal information confidentially.

4.5.4 Documentation and transparency requirements

We comply with documentation requirements arising from legal provisions comprehensively and with the necessary care. We also comply in full with any further documentation requirements arising from operational provisions. All our reports, records and statements are accurate, timely, understandable, comprehensive and true.

4.5.5 Information security

We comply in full with all policies and regulations on data security. Our employees are regularly trained in IT security and awareness. We are conscious that cyber attacks, data theft and data misuse represent an ever-increasing danger for a company, its employees, customers and suppliers and therefore protect our data and the data entrusted to us in accordance with the latest security standards and by trained personnel.



4.6 OCCUPATIONAL HEALTH AND SAFETY, ANTI-DISCRIMINATION

4.6.1 Compliance with legal and operational safety policies

We observe at all times all legal, trade association and occupational safety regulations.

4.6.2 Working conditions

We pay fair wages – at least the statutory and collectively agreed minimum standards – and respect the statutory and collectively agreed standards on working hours, holidays and public holidays. We rigorously reject child and forced labor. We respect the legal rights of co-determination.

4.6.3 Equal opportunities and anti-discrimination

We consider a pluralistic personnel structure as an enrichment. We explicitly condemn any form of discrimination, regardless of whether it is because of the person, his or her behavior or his or her actions. Therefore we do not tolerate discrimination against others based on race, color, gender, age, sexual orientation or identity, national origin, ethnicity, religion, marital status, physical or mental disability or veteran status and any other legally protected status.



4.7 PROTECTION OF THE ENVIRONMENT AND CLIMATE

4.7.1 Compliance with legal and operational environmental protection standards

We adhere to or exceed all statutory environmental protection regulations.

4.7.2 Consideration of environmental impact in all operational decisions

When making operational decisions, we consider the impact on the environment and choose the most environmentally friendly alternative, where economically feasible.

4.7.3. Environmental activities

We profess and are committed to sustainable business practices and actively practice internal and external projects for environmental protection and increased energy efficiency within the framework of our environmental policy. We proactively support our customer in at least achieving the jointly set targets for the reduction of greenhouse gases.

4.8 HANDLING COMPANY PROPERTY

We handle company property carefully and in accordance with the rules. Every employee is responsible for his or her own actions in this regard. We report damage, misuse, loss, theft, embezzlement or destruction of company property on our own initiative.







5. APPLICATION

5.1 RESPONSIBILITIES AND HELP

5.1.1 Personal responsibility of every employee

Each individual is responsible for ensuring that he or she complies with the principles of conduct in everyday life. A honest and trustworthy attitude towards the code of conduct is appreciated. It is the duty of every employee to stay informed of changes to the code of conduct. Ignorance does not protect against consequences. Company management makes available the valid version of the Code of Conduct via the intranet and provides information about any changes through the usual channels. New employees will be familiarized with the principles of conduct within one month of entering the company's employment.

5.1.2 Contact persons for clarification of questions

Questions regarding application of the Code of Conduct can be addressed in the first instance to your immediate supervisor, local Compliance Coordinator or Managing Director.

Further information materials and application examples can be found here:

The main guidelines are accessible through our website:
<http://www.dradura.com/en/company>
Subsection Corporate Responsibility

Further information for our employees is available through our intranet, section Compliance

Contact:

See contact information on your local notice boards

See section Compliance in our intranet

5.2 REPORTING VIOLATIONS

5.2.1 Reporting

We all work towards compliance with the Code of Conduct in direct contact with our colleagues. Where we cannot satisfactorily resolve an infringement of the principles via contact, the case can be referred to the immediate superior or the local Managing Director. The claim can be also reported verbally or in writing via e-mail or through our whistleblower system. If you wish, you can even submit your report anonymously. To do so, simply scan the QR code or go to 'Contact' on our website.



You can report anything that makes you sick to your stomach or that you suspect should not be done. Especially if it harms others or at least could harm others...

We treat all reported violations in confidence. Nevertheless, in some cases, disclosing this information to third parties may be unavoidable: for example, at the opening of an investigation in which the reporting person is to be heard as a witness. But, as mentioned above, we can also report anonymously.

5.2.2 Protection against reprisals for reporting in good faith

We do not tolerate any reprisals against employees who report a violation in good faith.

5.3 SANCTIONING OF VIOLATIONS

Reported violations of the Code of Conduct will be clarified by the relevant superior or investigated by the local management. If during this process the suspicion of criminal conduct strengthens, the case will be referred to the authorities. An infringement can thus result in personnel as well as civil and criminal legal liability.





APPENDIX

Relevant national and international conventions:

United Nations Global Compact

www.unglobalcompact.org

German Corporate Governance Code

www.dcgk.de/en/code.html

OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions

www.oecd.org/daf/anti-bribery/ConvCombatBribery_ENG.pdf

OECD Guidelines for Multinational Enterprises

www.oecd.org/daf/inv/mne/48004323.pdf

UN Convention Against Corruption (UNCAC)

www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf

Transparency International/Social Accountability International: Business Principles for Countering Bribery

www.transparency.org/whatwedo/publication/business_principles_for_countering_bribery

ISO 37301: Compliance management systems - Guidelines

www.iso.org/iso/home/store/catalogue_tc/catalogue_detail.htm?csnumber=62342

As stated above, we abide by the law wherever we do business. However, we want to bring to your attention some laws you might not immediately recognize as being relevant to you. Both apply not only to actions in their respective countries but, under certain conditions, to actions in any other country:

(USA) Foreign Corrupt Practices Act (FCPA)

www.justice.gov/criminal-fraud/foreign-corrupt-practices-act

(UK) Bribery Act 2010

www.legislation.gov.uk/ukpga/2010/23/contents





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