

## OUR GUIDELINES: THE BENTELER CODE OF CONDUCT.

**BENTELER**   
makes it happen

BENTELER MAKES IT HAPPEN.

## OUR PRINCIPLES.

**DEAR SIR OR MADAM,  
DEAR COLLEAGUES,**

BENTELER is a family-owned company that is now in its fourth generation. Responsible behavior is a key concern and that is why we are committed to promoting social causes at our sites. For our customers, we are a dependable partner who puts them center stage, helping them develop and achieve their goals. We are also a proud pioneer, passionate about finding fresh, innovative solutions. To meet the challenges of the future, we need employees ready to take responsibility, plus executives who can help them develop, encourage them, and lead them. We are actively shaping a corporate culture designed to ensure that we keep growing. We aim to deliver outstanding performance through teamwork. We are respectful and appreciative, and we keep our promises. These guidelines cover our organization, our goals, our mission, our values, and our Code of Conduct.

As a BENTELER employee or partner, please be sure to stick to these principles. In particular, executives with personnel or management responsibility must set an example. If you breach these principles, you can expect to face disciplinary measures and you could make yourself liable to prosecution. We will be happy to advise you on how to apply our BENTELER Code of Conduct. If you have any questions, please consult with your superior, HR department, compliance organization, or legal department.

Salzburg/Paderborn, November 2019

**BENTELER INTERNATIONAL AG**  
The Board of Directors  
**BENTELER Business Services**  
The Management

**BENTELER Automotive**  
**BENTELER Steel/Tube**  
The Management Boards

# OUR ORGANIZATION.

## **THE BENTELER GROUP**

is organized into the Divisions of BENTELER Automotive and BENTELER Steel/Tube. Expertise from these Divisions is combined and shared across the Group. We leverage our size and international reach to ensure our customers succeed in reaching their goals. The holding company BENTELER International AG in Salzburg, Austria, is responsible for the global strategic management of the Group and our Divisions. Today BENTELER employs 30,000 people worldwide.

## **BENTELER AUTOMOTIVE**

provides development, production and services in automobile technology worldwide. We develop and produce solutions in which quality, safety and efficiency are critical. BENTELER products ensure safety in mobility, giving confidence to customers and end-users. Our product portfolio includes components and modules for chassis, body, engine and exhaust systems. Almost all the major vehicle manufacturers are among our customers. Together we successfully implement new ideas and solutions.

## **BENTELER STEEL/TUBE**

develops and produces seamless and welded quality steel tubes. As one of the leading manufacturers, we offer our customers problem-solving expertise worldwide, in areas ranging from material definition to process integration. Together we develop customized tube solutions for the automotive, energy and industry market segments.

## OUR GOALS.

Over its 140-year history, BENTELER has continued to grow and develop. We want to pursue that path on a profitable basis by concentrating on our core strengths.

### REGIONAL DIVERSIFICATION

We shape our portfolio to the needs of regional growth markets. We think "local for local" and go to where our customers need us.

### CUSTOMER PROXIMITY

We offer ever more differentiated high-quality products, services and systems. We tackle challenges together with our customers to develop solutions that lead to success.

### EXCELLENCE IN IMPLEMENTATION

We combine first-class manufacturing and sales expertise with a lean, efficient organization.

### STRONG CORPORATE CULTURE

We pursue a performance culture, we develop our employees and we improve our organization steadily and continuously.

## OUR MISSION.

We at BENTELER are passionate about getting things done. We have been creating solutions that make the difference since 1876 thanks to our first-class expertise in metal-based products, systems, and services for the engineering, automotive, and energy sectors.

BENTELER is a reliable, forward-thinking partner that understands you and realizes what counts. We develop solutions for today and tomorrow – for our customers, for our employees, for society. We are an international family of 30,000 driven professionals: we only stop when everything fits. At BENTELER we give our all, but we never give up.

### BENTELER IN 84 WORDS:

BENTELER develops solutions that make the difference – for our customers, employees and society. We are passionate about producing safety-relevant products, services and systems for the energy, automotive and engineering sectors that lead to success. And we do that in close proximity and collaboration with our customers. With our technological expertise and strong focus on successful implementation, we keep our promises. At BENTELER we give our all – with courage, ambition and respect – but we never give up.  
**BENTELER. The family of driven professionals. Since 1876.**

## OUR VALUES.

Long-term success calls for employees with an entrepreneurial spirit who are ready to act independently and respond flexibly to changes.

BENTELER therefore has a performance-oriented corporate culture and clear values that define our actions.

### COURAGE

For us that means: being inquisitive and seeking out new paths. Courage for us is pursuing our goals with passion and dedication, but also taking responsibility for the result. We bravely change what is already there, to produce even better results. For what we think is right and important, we fight with tenacity and discipline. Not against each other, but together, for the best result.

### AMBITION

For us that means: striving for excellence and orientating ourselves to the requirements of the future. We always go the extra mile – that sets us apart from the competition and is necessary if we are to achieve great results. We think outside the box, across Divisions, to the advantage of our customers and the Group as a whole.

### RESPECT

For us that means: valuing each other and the contribution that each individual makes. We keep our promises and stand together, for each other. We have trust in one another and we give each other the space to develop and implement new ideas. And when ideas fail, we are always open to learning from them.

At BENTELER, "employee" is a neutral term. It not only covers male and female personnel but also executives and other staff such as interns.

## OUR CODE OF CONDUCT.

### **SOCIAL RESPONSIBILITY AND LEGAL COMPLIANCE**

We are conscious of our social responsibility and act accordingly. We observe the principle of legality and respect the generally accepted customs of every country in which we are active, together with our own internal rules, guidelines and obligations ("BENTELER-Standards"). Integrity and respect for the rights of third parties are the key principles that define our interactions with employees, business partners, and society. In particular, we practice and promote compliance with internationally recognized human rights and children's rights. We reject any and all forms of forced labor and child labor.

### **INTERACTIONS WITH EMPLOYEES**

All our interactions with employees are based on respect. No one must suffer discrimination on the basis of national origin, skin color, gender, age, religion, disability, or personal lifestyle. Likewise, we must all make sure that the health and safety of every employee is assured.

All employees must work actively for the good of the company. They must safeguard its resources and be willing to engage in further training. Accordingly, our management practices rely on the delegation of responsibility and on trusting collaboration. This means all employees must be kept properly informed of all issues affecting their work and – wherever possible – involved in the decision-making progress. They must also be paid fairly and appropriately for their work. We follow the applicable rules on work times in each respective country, though this is only our minimum standard.

### **COMPETITION LAW AND ANTITRUST LAW**

We support fair competition within the relevant legal framework, and will not permit cartel agreements. These include the allocation of territories or customers, agreements on pricing, delivery conditions, or delivery capacities and exchanging sensitive information with competitors. We are aware that any breach of competition or antitrust law can result in extensive fines and other serious damage, both to the BENTELER Group and to the individuals involved.

### **CORRUPTION, GIFTS, AND BENEFITS**

No employee may accept any advantage or benefit, particularly in connection with the arranging, awarding, delivering, execution, and payment of orders. This applies regardless of whether the recipient represents a state agency, an organization, or a commercial enterprise.

Accepting or presenting gifts or other benefits is permitted only if their value is negligible. Likewise, neither the giver nor the recipient must become dependent on the other. Necessary approvals must be obtained from the responsible superior.

## OUR CODE OF CONDUCT.

### INTERNATIONAL TRADE

We comply with all international agreements, national laws, and regulations governing international trading and financial transactions. This includes laws and regulations concerning imports and exports. All employees responsible for such transactions must know, understand, and comply with all applicable laws, regulations, guidelines, and procedures.

### ENVIRONMENTAL PROTECTION

We use natural resources sparingly and protect the environment, encouraging an environmentally friendly ethic in all our employees. Our measures for ensuring environmental compliance encompass our entire product range and all our production processes. They cover the complete life cycle of a product, from the use of raw materials through development, production, usage, disposal, and recycling.

### DATA PROTECTION

Whenever we use confidential data, we pay due regard to the protection of privacy and the security of commercial data and trade secrets. Everyone involved is under an obligation to keep such matters confidential and never to provide unauthorized access to any third party in any manner whatsoever. We observe all legal and contractual requirements, keeping ourselves up to date on a regular basis concerning the latest technical developments.

### RELATIONSHIPS WITH BUSINESS PARTNERS

All agreements with our business partners must be complete and clearly comprehensible, and they must be made in the written form. Suppliers and service providers are to be selected purely on a competitive basis. All our business activities must be conducted exclusively for the benefit of the BENTELER Group – personal or private relationships or motivations may not play a role here. Internal procedural instructions for such activities (e.g. the two-man rule) must be observed.

Our values and Code of Conduct are essential to any successful long-term collaboration. We therefore encourage our business partners to introduce and implement similar principles.

## CONTACT

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