

What guides us:

The BENTELER Code of Conduct

FOREWORD



**DEAR LADIES AND GENTLEMEN,
DEAR EMPLOYEES,**

BENTELER is a globally active specialist in the field of metal processing. A family of driven professionals who make mobility safer and more sustainable. And above all: A company that employees, customers, partners and society can trust.

Acting responsibly is a priority for us. We are committed to integrity, sustainability and social issues in the countries where we operate or maintain business relationships.

Our corporate culture is at the core of all our activities. Our aim is to achieve excellence together – actively embodying our three corporate values of Courage, Ambition and Respect. We place our customers at the center of everything we do. As a reliable development partner, we support them in achieving their goals, with the highest quality, on time and at fair prices. We are defined by our pioneering spirit: the ambition to find new solutions.

The following guidelines summarize our organizational structure, our values, the standards we set ourselves and, in particular, our Code of Conduct. These guidelines contain the fundamental standards of our corporate actions.

As an employee or partner of the BENTELER Group, please ensure that your conduct complies with these principles. Our managers have a special role-model function in this regard.

If you have any questions or require advice on the BENTELER Code of Conduct, employees are welcome to contact their supervisors, HR department, compliance organization or legal department at any time; business partners, please contact your BENTELER contact person.

Salzburg, September 2025

The BENTELER Group Executive Board

Ralf Göttel, CEO

Tobias Braun, CFO

OUR ORGANIZATION

The BENTELER Group is organized into four divisions: BENTELER Automotive Components, BENTELER Automotive Modules, BENTELER Steel/Tube and HOLON. The holding company, BENTELER International AG, headquartered in Salzburg, Austria, controls the strategic orientation of the group. In addition, BENTELER Business Services GmbH, based in Paderborn, Germany, performs additional holding functions.

Our more than 23,000 employees at approximately 90 locations in more than 20 countries worldwide provide first-class manufacturing and distribution expertise – passionately and close to the customer. In doing so, we are guided by our values of Courage, Ambition and Respect.

BENTELER Automotive Components

consolidates our activities in component manufacturing. As a development partner for the world's leading automotive manufacturers, we create tailored solutions for our customers. The product portfolio includes components for chassis, structures, engine and exhaust systems. This division also includes the companies BENTELER Mechanical Engineering, BENTELER Glass Processing Equipment and BENTELER Lightweight Protection.

BENTELER Automotive Modules

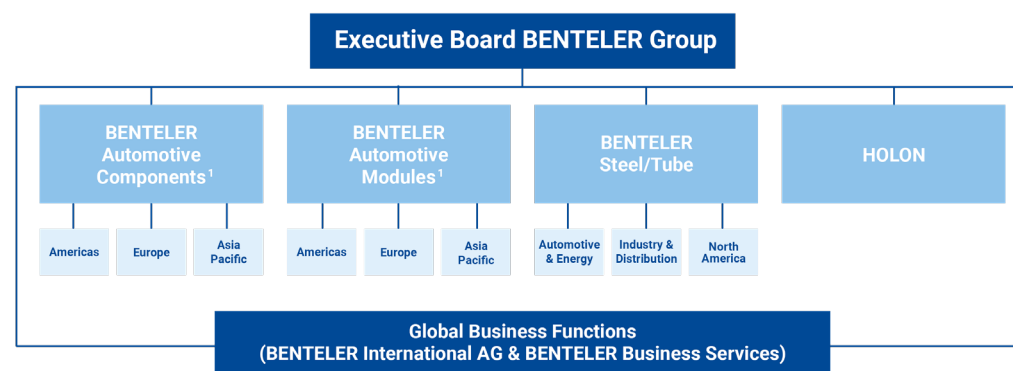
is a full-service supplier with complete focus on customer orientation. The division specializes in the production and assembly of modules for the world's leading automotive manufacturers.

BENTELER Steel/Tube

specializes in seamless and welded quality steel tubes for the automotive, energy and industrial market segments. We offer customized tube solutions from material definition to process integration.

HOLON

is the first OEM for autonomous movers with the standards and scaling potential that we know from the automotive industry. With our platform technology, vehicle expertise and strong partner network, our goal is to redefine passenger transport in both the public and private sectors.



¹ BENTELER Automotive Components and BENTELER Automotive Modules both continue to operate legally under the umbrella of BENTELER Automobiltechnik GmbH

OUR ASPIRATION

Over the past approximately 150 years, BENTELER has consistently developed – from a small hardware store in Bielefeld to a global metal processing specialist. Our goal is to continually achieve sustainable and profitable growth while making mobility safer and more sustainable together with our customers.



CLOSE TO THE CUSTOMER

We understand customer proximity geographically and strategically: we aim to offer our customers worldwide innovative, top-quality solutions tailored to their needs. Our global presence ensures that we are always close to, and in direct contact with, our customers regionally. In addition, we continuously provide increasingly higher-quality and differentiated products, services and systems. Together with our customers, we tackle challenges to develop solutions that drive success.

EXCELLENCE IN IMPLEMENTATION

We combine first-class manufacturing and distribution expertise with a lean and efficient organization. To this end, we continuously optimize our operational and administrative processes, for example through digitalization, standardization, and our global shared-service approach.

STRONG CORPORATE CULTURE

At BENTELER, we work passionately to find the best solutions for our customers. We live by a performance-driven culture. To remain successful in the long term in a rapidly changing market environment, we rely on employees who think entrepreneurially, act independently and respond flexibly to change. Alongside developing our employees, we continuously improve our organization.

SUSTAINABLE ACTION

As a company founded in 1876, long-term thinking is part of our DNA. Our goal is to create a more sustainable future for everyone – our employees, our business partners, society. All our business areas are required to promote environmentally conscious and socially responsible practices. Every employee has a responsibility to contribute towards achieving our sustainability goals through their behavior.

OUR VALUES

We aspire to give the maximum for our customers every day. As a family of driven professionals, we make things happen. We keep our promises and give our all without giving up.

In all our activities, we are guided by our corporate values: Courage, Ambition, Respect.



COURAGE

For us, courage means being curious and exploring new paths. It involves pursuing our goals with passion and determination while also taking responsibility for the outcome.

We are not afraid to disrupt the status quo for better solutions. We fight with perseverance and discipline for what we believe is right and important. Not against each other, but together for the best result.

AMBITION

For us, ambition means striving for excellence and orienting ourselves towards the demands of the future. That's why we are committed to going the extra mile to achieve great solutions and set ourselves apart from the competition.

We think beyond our divisions for the benefit of customers and the group as a whole.

RESPECT

For us, respect means treating each other with dignity. We keep our promises and stand up for each other. We trust one another and give each other space to develop and implement ideas independently. Mistakes can happen and we are open to learning from them.

A woman with long dark hair, wearing a light blue button-down shirt, is smiling and shaking hands with a man. The man is wearing a dark blue suit jacket and a white shirt. The background is a bright, slightly blurred office setting with geometric shapes in shades of blue and white.

OUR CODE OF CONDUCT

We promote and demand responsible action within the BENTELER Group. Our Code of Conduct is based on internationally recognized standards and applies to all employees of the BENTELER Group worldwide. These principles determine our long-term and successful cooperation. We therefore encourage our business partners to establish and implement similar principles.

1. SOCIAL RESPONSIBILITY AND LEGAL COMPLIANCE

We are conscious of our social responsibility and act accordingly. In doing so, we adhere to the principle of legality and respect the generally recognized customs of the countries in which we are active. We expect our employees to comply with legal requirements and rely on them, especially managers, to implement them in their area of responsibility.

In addition, we adhere to self-imposed regulations, guidelines and obligations ("BENTELER standards"). Integrity and respect for the rights of third parties guide our interactions with employees, business partners and society.

In particular, we respect and support compliance with internationally recognized human and children's rights. We strongly reject all forms of forced and child labor as well as modern slavery, involuntary or exploitative prison labor and human trafficking.

2. INTERACTION WITH EMPLOYEES

Our interaction with all employees is based on respect. No one may be personally discriminated against – either because of race, skin color, gender, religion, handicap or lifestyle.

All employees are actively committed to our company. They protect its resources and are willing to engage in continued education. For this reason, our management is based on the principles of delegated responsibility and mutual trust. This includes ensuring that everyone is adequately informed about all matters relevant to their work and, wherever possible, is involved in the decision-making processes.

All employees are compensated fairly and appropriately for their work. We comply worldwide with applicable regulations on working hours as a minimum standard.



3. OCCUPATIONAL SAFETY

We are committed to preventing accidents by continuously eliminating risks and empowering our employees and contractors to behave safely. We are convinced that all accidents at work are preventable, which is why we are establishing a “Think Safety First” culture. We expect our employees to comply with the prescribed safe working practices, to behave safely and to proactively promote safety in their work environment.

Managers act as role models in occupational safety. This especially includes ensuring the safe organization of work processes and consistent intervention in the event of safety violations and unsafe conditions. We empower and encourage our employees to report unsafe conditions through established reporting procedures to continuously improve our occupational safety performance. Employees need not fear retaliation for reporting incidents, hazards, risks or opportunities – regardless of whether the report relates to occupational safety or other aspects of the company.

4. INTERNATIONAL TRADE

We comply with international agreements, national laws and regulations governing the control of international trade and financial transactions. These include laws and regulations regarding import and export controls, as well as combating money laundering and the financing of terrorism.

Our processes ensure that our business and activities do not violate export control and sanctions law. Employees responsible for these areas must know, understand and comply with all applicable laws, regulations, policies and procedures.

5. CONFLICTS OF INTEREST, CORRUPTION, GIFTS AND GRATUITIES

Personal relationships or motivations that disadvantage the company do not influence our actions.

All employees are prohibited from accepting or offering benefits, especially in connection with the procurement, awarding, delivery, processing and payment of orders. This applies regardless of whether the recipients are representatives of government bodies, organizations or commercial enterprises.

The acceptance and giving of gifts and other benefits is only permitted if their value is negligible. Furthermore, the giver and the recipient must not become dependent on each other. Approvals necessary from superiors must be obtained.

6. COMPETITION AND ANTITRUST LAW, RELATIONSHIPS WITH BUSINESS PARTNERS

We support fair competition within the framework of legal regulations. Cartel agreements such as the allocation of territories or customers, agreements on prices, delivery conditions or capacities and the exchange of competition-sensitive information with competitors are prohibited. We are aware that non-compliance with antitrust regulations can lead to significant fines and other serious consequences for the BENTELER Group and those involved.

We make agreements with our business partners that are complete, clear and in writing. Suppliers and service providers are selected solely on a competitive basis. We conduct all business exclusively in the interests of the BENTELER Group and not on the basis of personal or private relationships and motivations. We comply with internal procedural instructions in this regard (e.g. the dual control principle).

7. ENVIRONMENTAL PROTECTION

As a globally active company, we are committed to protecting the environment: We conserve natural resources, minimize our environmental impact and act sustainably. Our measures for environmentally friendly design include, for example, increasing the use of renewable resources and improving our energy efficiency. These measures apply to the entire product range and all production processes. We consider the entire life cycle of our products, from the use of raw materials to development, production, use, disposal and recycling, by focusing on environmentally friendly, advanced and efficient technologies.

We promote sustainable production and environmentally conscious thinking among all employees and strive to minimize our ecological footprint, while continuously improving our environmental performance.



8. DATA PROTECTION

When handling confidential data, we respect privacy and ensure the security of business data and trade secrets. Everyone is obliged to protect these secrets and not to make them accessible to third parties in any way without authorization. We comply with legal and contractual requirements and regularly keep up with the latest technology. We respect and protect the intellectual property of others. We strictly reject the use and distribution of counterfeit products.

9. CYBER SECURITY

In our daily work, we adhere to internal and external cybersecurity guidelines. This includes the correct classification of information, secure handling of company information as well as the protection of access data and the restricted allocation of access rights.

We also educate our employees and business partners about correct behavior for protecting ourselves and others from cyber-attacks. Breaches of cyber security requirements and other security incidents and threats are reported to the BENTELER Service Desk.

10. PUBLIC CONDUCT

All external inquiries are referred to Corporate Communications, which issues public statements on behalf of the company. We have a positive attitude towards the use of social media networks and respect the right to freedom of expression, but we explicitly reject any discriminatory comments. These guidelines also apply to all employees in their private lives if third parties can publicly identify their affiliation with the BENTELER Group.



B-AWARE

All individuals have the opportunity to report potential violations of our guidelines and Code of Conduct through our B-AWARE digital whistleblower system.

Reports are handled confidentially within the framework of applicable legal provisions and the “need-to-know” principle.

For more information, see: <https://benteler.integrityline.app>.

NOTES & CONTACT

These guidelines cannot answer all questions that may arise regarding your actions at BENTELER. The general provisions of the Code of Conduct are therefore further specified in group-wide guidelines.

CONTACT

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