Policy Statement of the BENTELER Group according to the Act on Corporate Due Diligence Obligations in Supply Chains[1]

October 2026

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. This policy statement summarizes the position and requirements of the BENTELER Group on human and environmental due diligence in our own business area and along the supply chain.

Value-oriented corporate management and expectations we place on our employees

Integrity and respect for the rights of third parties are the key principles that define our interactions with employees, business partners and society. We respect and promote compliance with internationally recognized human rights and children‘s rights, particularly the UN Guiding Principles on Business and Human Rights and the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO) as well as compliance with relevant environmental laws.

We strongly reject all forms of forced and child labour as well as modern slavery, involuntary or exploitative prison labour and human trafficking. All employees are paid fairly and appropriately for their work. We follow the applicable rules on minimal wages and work times in each respective country, though this is only our minimum standard. We conserve natural resources, minimize our environmental impact, and act sustainably. We promote sustainable production and environmentally conscious thinking among all employees and strive to minimize our ecological footprint, while continuously improving our environmental performance. Our measures for ensuring environmental compliance encompass our entire product range and all production processes.

All our interactions with employees are based on respect. We must all make sure that 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.

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 expect our employees to comply with legal requirements and rely on them, especially managers, to implement them in their area of responsibility. Our corporate culture is at the core of all our

[1] In the event of discrepancies between the German version and the English version, the German version shall prevail.

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activities. Our aim is to achieve excellence together – actively embodying our three corporate values of Courage, Ambition and Respect.

Risk management

BENTELER has established a comprehensive risk management system to identify, assess risks and to manage defined risks. This risk management system is fully integrated into the group´s strategy-, planning- and information processes and is subject to regular review and continuous development.

Risk management at the BENTELER Group is an integral part of strategic corporate management and is the responsibility of the Executive Board of BENTELER International Austria GmbH and of division management. It is explained in detail in our Annual Report 2025. Our risk management covers all Group companies worldwide and is described in the risk management guidelines. These guidelines cover going concern risks, corporate planning risks and material ESG-related risks – and thus implicitly risks regarding human rights and environmental law. The ongoing risk management process consists of the following four phases: risk inventory, risk analysis, risk management, and risk monitoring. A risk officer from management is responsible for risk analysis and for defining countermeasures. ESG risks are subject to an upstream materiality assessment and are assessed based on the same principles as inventory risks. All impacts, risks and opportunities above the threshold are material. Furthermore, the extent of potential negative impacts on human rights was rated higher than the probability.

In addition, we particularly check the supplier selection as well as the appropriate process specifications. In the supplier selection processes, we have established that suppliers comply with the Supplier Code of Conduct, which implies, among other things, compliance with human rights and the respective environmental regulations.

Risk analysis, weighting and prioritization of risks

In particular, we are analyzing and prioritizing human rights and, on a decentralized basis, environmental risks, to comply with our due diligence obligations regarding internationally recognized human and children's rights as well as the corresponding environmental rights. This applies to BENTELER itself as well as our direct suppliers and, if necessary, our indirect suppliers.

Risk analysis in our own business area

The regular risk analysis of our own business area is carried out under the coordination of the Supply Due Diligence Committee by the relevant departments in the respective divisions or companies. Human and environmental risks are assessed on a country-by-country and industry-by-industry basis. For our own business area, this applies to the automotive suppliers, mechanical engineering and metal industries.

The weighting of risks is carried out using a structured valuation model based on five central

dimensions: The nature and extent of the business activity, the probability of the risk occurring, the severity of a possible infringement of legal interests, the company's ability to influence and the company's contribution to the cause.

The BENTELER Group has approximately 90 locations in 25 countries. As we also operate in countries where the right to freedom of association, protection against discrimination and inequality and environmental rights are not in law, or only enshrined in law to a limited extent, the preventive and corrective influence of the company in particular is an essential component in the weighting of risks. Against this backdrop, these risks are also significantly mitigated, such that no risk has been prioritized by us in our last risk analysis. Our own business area is subject to continuous monitoring.

Risk analysis in our supply chain

The analysis of risks within our supply chain follows a risk-based approach, taking into account country-specific risks and the revenue-based relevance of our business partners. Industry-related risks are considered methodically in a more refined manner at the category level in order to map human rights and environmental exposures in more detail. Industry-related risk sources serve as a reference framework, and evaluation is based on product-group-specific risk indicators and processes. For the analysis, we use a digital tool that compares our (potential) business partners with different data sources based on defined parameters. The results are evaluated by the system, and the corresponding risks are evaluated by our purchasing department.

The weighting of risks within our supply chain is carried out using a structured valuation model based on five central dimensions: Type and extent of business activity, probability of risk occurrence, severity of a possible infringement of legal interests, the company's ability to influence and the company's contribution to the cause.

The risks within our supply chain are not prioritized as all risks are treated simultaneously and uniformly in our risk management and are tracked by the responsible employees.

Environmental protection, social responsibility, and protection of our employees

Protecting the environment and efficient use of resources are core elements of our sustainability strategy. In line with this, we focus on climate protection, work on a functioning circular economy, and we attach particular importance to responsible management of water resources.

In the environmental area, the BENTELER Group’s sustainability objectives focus on the circular economy, climate change, and water. With regard to its products, the BENTELER Group is working to build the circular economy and is in particular committed to using resource inflows efficiently, ensuring resource outflows are recyclable, and to reducing waste.

Impacts, risks and opportunities exist for BENTELER Steel/Tube, BENTELER Automotive Components and BENTELER Automotive Modules regarding the use of resources and the circular economy. Regarding the resources used, the priority is the use of steel and aluminum. Remaining in a “business as usual” scenario, in which there is a linear economy instead of a circular economy, will result in certain impacts and risks for BENTELER. Growing legal requirements and customer demands require the increased use of secondary materials. Failure to meet such demands would result in a financial risk for BENTELER. At the same time, a “business as usual” scenario may result in the generation of large quantities of waste, the disposal of which could increase costs for BENTELER. The transition to a circular economy offers significant opportunities for BENTELER, such as a potential reduction in costs through improved resource efficiency of material recycling.

Our central goal is reducing waste. The BENTELER Group plans to reduce its global waste volume by 20% through 2030 compared to 2019 levels.

In addition, the BENTELER Group has set the goal of decarbonizing its global production by 50% (Scope 1 and 2 emissions) and its supply chain by 30% (Scope 3 emissions) by 2030 compared to 2019 levels. To achieve these goals, the company includes its suppliers as important stakeholders. The BENTELER Group intends to reduce its Scope 1 & 2 emissions by 100% globally by 2040 and achieve the target of being net zero by 2050. Furthermore, the BENTELER Group aims to reduce its global water consumption by 20% through 2030 compared to 2019 volumes, in order to counteract local water shortages. This objective applies in areas facing high or extremely high water stress.

It goes without saying that we take legal requirements into account and work closely with local authorities to ensure compliance with these regulations. Regular analysis and measurements help us understand current legal requirements and take measures to ensure compliance.
Our employees are at the heart of BENTELER. In particular, we focus on the safety of our workforce and employee training. 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 have occupational safety programs in place and are constantly working on the prevention of accidents and unsafe conditions by measuring the number of accidents and other health and other proactive health and safety metrics, such as Near Misses, Unsafe Acts, and Unsafe Conditions on a monthly basis, publishing them and having a plan for corrective and preventive measures. Through technical measures as well as through employee training, we reduce the frequency of accidents and thus increase the safety of our employees.

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In line with our strategic direction, we prioritize equal treatment in employment. Equal treatment and equal opportunities are firmly anchored in our self-image. No one may be personally discriminated against - either because of origin, skin colour, gender, religion, handicap or private lifestyle, views, or trade union activities. We have established appropriate policies, such as our Group Policy Social Sustainability, as well as organizational precautions and various measures to ensure respectful interaction within the company itself and with business partners. We use e-learnings to provide our employees with target group-specific training on the topics of "Diversity, Equality, Inclusion" and "Human Trafficking". In future, we want to further intensify the measures relating to diversity and equal opportunities in our workforce. Inter alia, BENTELER is working towards the goal of having a 25% share of women in management positions by 2030. The aim is to fill as many key and management positions as possible internally. The principles of equal treatment and equal opportunities are prioritized.

In view of divergent legal regulations on the permissible age of employees worldwide, the BENTELER HR Governance Policy should be highlighted. The age of our employees is determined based on this Policy uniformly at a minimum age of 15 years and checked by means of ID card control upon recruitment. Every year, a system-based report is issued to centrally evaluate the age of all employees worldwide.

With regard to our suppliers, we check the locally applicable regulations for their compatibility with the BENTELER Code of Conduct and our Supplier Code of Conduct. Where necessary, we take complementary preventive measures, for example through additional commitments. In this way, we promote a collaboration of respect, integrity and responsibility, which contributes to the sustainable success of our company. Compliance with our measures is continuously checked by the responsible departments.

Supplier management

Given the volume of our purchasing budget and the importance of close partnerships with our customers, we rely on systematic supplier management.

Besides regular and open communication, BENTELER reviews suppliers as part of business-partner-due-diligences. This includes, in particular, the reconciliation of relevant sanction lists. All new suppliers of production materials, non-production materials and capital goods must also answer a detailed self-assessment questionnaire from BENTELER as part of the supplier evaluation and approval process. This includes, among other things, information on the prohibition on modern slavery, in particular on forced and child labour, as well as other sustainability topics. In addition, around 7,500 of our suppliers are continuously and automatically checked for risks in the supply chain, using a risk-based approach, which particularly takes account of countries of origin and precursors. In addition, we are also working on specifically checking existing suppliers, if necessary, by using topic-related questionnaires.

We also conduct quality audits with our suppliers, which may comprise social responsibility topics, such as occupational safety and health issues. In the context of an escalation regarding LKSG issues, special ESG audits can also be carried out based on our BENTELER Supplier Code of Conduct. The results from our audits can range from a supplier's action plan and further escalations to terminating the business relationship.

Our expectations of suppliers

Our values and our Code of Conduct are concretized by the BENTELER Code of Conduct available in English, German as well as 13 other language versions as well as the BENTELER Supplier Code of Conduct. They are regarded by us as important criteria for a long-term successful cooperation with our business partners. We therefore encourage our business partners to introduce and implement similar criteria in their organizations.
We expect our business partners, direct and indirect suppliers to comply with the applicable laws and regulations in their business decisions and actions and to respect human rights, and in particular the rights of children. We also expect compliance with the applicable labour regulations, the UN Guiding Principles on Business and Human Rights, the International Labour Organization's (ILO) core labour standards, and the applicable environmental regulations. In addition, our business partners must commit themselves to complying with the BENTELER Code of Conduct and the BENTELER Supplier Code of Conduct.

If workers are exposed to potential safety or health risks, appropriate measures shall be taken to prevent such risks and to ensure a safe working environment.

In particular, forced labour or any other form of labour based on human trafficking must not be used. The freedom of movement of workers within the workplace must not be unduly restricted. Likewise, there must not be unreasonable restrictions on entry or exit from the workplace. Child labour is unacceptable to us. The relevant provisions laid down in the ILO conventions on the legal minimum age for the employment of children must be complied with. Working time must not exceed the maximum working time permitted by local law. The remuneration paid to workers must comply with the applicable local laws. Any form of brutal or inhumane treatment of workers is forbidden. Our suppliers must commit themselves to not tolerate harassment or unlawful discrimination in their workforce, and to comply with contractual obligations that go beyond this. In addition, companies must respect the right of their employees to form trade unions and/or works councils or to join trade unions of their choice, in accordance with local legislation. If its workers are exposed to possible safety or health risks, appropriate measures shall be taken to prevent such risks and to ensure a safe working environment.

We expect our suppliers to take measures to protect the environment, in particular to protect water, air and soil, and to preserve biodiversity. These must cover the entire product range and

all production processes. The entire life cycle of the products must be considered, starting with the extraction of raw materials, through development and production to waste disposal, recycling and noise protection. All necessary environmental permits, consents and registrations must be obtained. All regulatory, legal, and operational requirements and reporting obligations must be complied with, in particular the Minamata Convention, the POP-Convention and the Basel-Convention. The consumption of resources (including water and energy) and the creation of waste should be reduced or avoided. Waste must be disposed of responsibly or recycled. Wastewater must be cleaned or, if not necessary, disposed of separately from sewage. The release of (potentially) environmentally harmful substances should at best be avoided, or at least kept to a minimum, and should be monitored in accordance with local legislation. Run-off rainwater must not be contaminated. The right to food, water and health must not be violated by the activities of our suppliers.

Complaint management and violations

All persons can report complaints in connection with human rights and environmental risks via our digital whistleblower system, which, together with the corresponding applicable policy, is made available on the BENTELER website under "Contact". Where possible under the applicable regional legal provisions, breaches may be reported anonymously upon request. Information received will be treated confidentially and in accordance with the need-to-know principle and checked by our responsible relevant department. Further information can be found in the BENTELER Whistleblower Policy, which also contains information on the plausibility check and investigation of complaints.

If necessary, our Supply Due Diligence Committee discusses about human rights-related and corresponding environmental rights-related incidents. The results of investigations are used to evaluate our risk management and for preventive measures. The effectiveness of the complaint management is reviewed annually and, where appropriate, on a case-by-case basis.

If we detect violations of the protected rights listed in this statement, appropriate remedial action will be taken immediately. These depend on the seriousness of the infringement.

Regarding our suppliers, according to our processes we initially focus on direct communication with them to ensure that our internal requirements and the applicable legal requirements are met. If necessary, we will carry out an ESG audit in accordance with the requirements of the BENTELER Supplier Code of Conduct. If there is a need for appropriate action, an action plan is agreed with the supplier, which includes an appropriate time slot for the implementation of the necessary measures. Another escalation stage is the possibility to interrupt the business relationship and block the supplier for new orders and, if necessary, terminate the business relationship.

Reporting

As a family business that can look back on a successful business tradition since 1876, BENTELER faces up to its corporate responsibility and thus contributes to mastering future challenges. We make our contribution to sustainability, work as a proactive partner with our business partners and shape the future together with them. Mutual trust and respect are key, also regarding all the people in the regions where we do business.
All opportunities and risks, including ESG-related opportunities and risks, which are thus relevant to the environment and human rights, are recorded in a software program, reported to the Executive Board of BENTELER International Austria GmbH and the Audit Committee every six months in the risk report, and integrated into the strategy process.
In addition, our Supply Due Diligence Committee reports regularly to our Sustainability Steering Committee on the results of monitoring our risk management in accordance with the Act on Corporate Due Diligence Obligations in Supply Chains.

We further believe that with this statement, which provides annual information on our commitment, and the steps and actions described herein, we contribute to transparency and enable our business partners to make better, more informed decisions about our products and services – marking BENTELER's strong commitment to sustainability, social responsibility, and compliance.

Ralf Göttel	**Thomas Glynn**
Chairman of the	Member of the
Executive Board	Executive Board