



Code of Ethics

RIVA STAHL GMBH

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Preamble

This Code of Ethics (hereafter also: the “**Code**”) was introduced by Riva Stahl GmbH (hereafter, the “**Company**”) through a shareholder resolution of September 25, 2014.

The Company, which belongs to the Riva Group, works in the distribution of steel products and related business fields in the national and international context. Riva Group is one of the world’s largest steel manufacturers and market leader in Italy.

Owing to its technically-specific competences, the company enjoys great respect – both among its clients as well as other companies in the industry.

Against this backdrop, the company recognises its societal and social responsibilities and is obliged to fulfil this responsibility in all its entrepreneurial activities.

The Code specifies the Company’s ethical principles and values. It serves as the guiding principles for a collective basis of values with regards to the social and societal responsibility as well as fair competition. Through the introduction of this Code, the Company commits to fulfilling the following principles.

1. General principles of the Company

1.1. Compliance with the laws

When undertaking all business actions and making all business decisions, the Company shall be obliged to follow the respectively-valid laws as well as the other prevailing provisions of the countries in which it has a presence. Business partners must be treated fairly. Contractual agreements shall be honoured whereby changes in the framework conditions shall be taken into consideration.

1.2. Orientation to generally-valid values and principles

The Company shall orient its actions to the generally-valid ethical values and principles – particularly integrity, honesty, respect for human dignity and non-discrimination.

2. Principles of societal/social responsibility

2.1. Human rights

The Company shall respect and support the honouring of internationally-recognised human rights. In particular, it shall honour the human rights in accordance with the U.N. Human Rights Charter (General Declaration of Human Rights, Resolution 217 A (III) of the General Assembly of 10/12/1948).

2.2. Discrimination ban

The Company shall reject any form of discrimination in accordance with the respectively-valid rights and laws. This refers particularly to any discrimination towards employees based upon race, ethnic origin, gender, religion or ideology, handicap, age or sexual orientation.

2.3. Health protection

The Company shall guarantee workplace safety and health protection at the work site in accordance with the European and national directives. The Company shall support on-going continued development measures in order to improve the work environment.

2.4. Working conditions, ban on forced and child labour

The Company shall support the technical, professional and personal development continuing education of the employees within the framework of advanced training programmes and shall honour their professional achievements.

The Company shall honour the right of its employees to freely form coalitions and assemble in accordance with the respectively-valid rights and laws. The Company shall follow the labour standards with regards to the maximum permissible working time and wages – particularly with regards to the wage level – in accordance with the valid laws and directives.

Employees must be protected from corporeal punishment and from physical, sexual, psychological and verbal abuse. The employees' private sphere shall be respected. The ban on forced labour of any kind shall be respected. Particularly the Convention on Forced or Compulsory Labour from 1930 (Convention 29 of the International Labour Organisation) and the Convention on the Abolition of Forced Labour from 1957 (Convention 105 of the International Labour Organisation) shall be respected.

The Company shall respect the provisions of the ban on child labour – particularly the ban on the minimum age for permissible employment from 1973 (Convention 138 of the International Labour Organisation) as well as the Convention on the Ban and Prompt Measures for the Elimination of the Worst Forms of Child Labour from 1999 (Convention 182 of the International Labour Organisation) shall be respected. If the German directives regarding child labour prescribe stricter standards, then these stricter directives shall take precedence.

2.5. Environmental protection

The Company shall be obliged to sustainably fulfil the goal of protecting the natural resources for the current and future generations. Laws and directives, which have been decreed to protect the environment, must be followed and respected.



2.6. Communication

The Company shall communicate in an open and dialog-oriented manner regarding the standards of this Code of Conduct and its implementation in its dealings with the employees, clients, suppliers as well as other interest groups and stakeholders.

3. Conflicts of interest

At all times during their work for the Company, its employees shall make decisions in the Company's best interests while remaining impartial and objective and avoid situations in which personal interests could conflict with those interests of the Company. Thus, any activities within the parameters of representing those interests, e.g. serving on the Works Council as well as in the trade unions, shall not be restricted.

4. Company information/ business secrets

The Company and its employees shall honour and safeguard the business and trade secrets of the Company and other parties. Confidential information as well as confidential documents may not be passed on to third parties or made accessible in any other manner unless an authorisation has been issued in this regard, it encompasses publicly-accessible information or an enforceable ruling issued by a government agency or a court compels such a disclosure.

Confidential information shall be considered to be, for example, technical information on equipment, products, procedures, new industrial applications and the negotiating conditions for sales and purchases.

All information shall likewise be considered to be confidential which is obtained during the implementation of or within the framework of the work activities and their dissemination or use could constitute a risk to the Company's interests, create detriment for the Company or produce an unfair financial benefit for employees working for the Company.

Operational and personal information shall be subject to the strictest data protection directives.

5. Principles of fair competition

5.1. Corruption ban

The Company shall reject corruption and bribery. In its dealings with business partners and government institutions, the interests of the Company and the private interests of the employees on both sides shall be kept strictly separated from each other. Decisions shall be made free of any extraneous considerations and personal interests. The respectively-valid criminal law on corruption must be followed. In this regard, among other things, the following must be respected:

The granting of personal advantages by the Company and its employees to domestic or foreign public officials (such as civil servants or public service employees) with the goal of obtaining advantages for the Company, oneself or third parties shall not be permitted.

Non-cash personal benefits as a counter-performance for preferential treatment in business dealings with the Company may neither be offered, promised, granted nor approved. Likewise, in dealings with business partners, personal advantages of value for preferential treatment in business dealings may neither be demanded nor accepted. During the course of business dealings, the Company's executive management and employees may offer, promise, demand, grant or accept no gifts, payments, invitations or services which are granted with the intention of inappropriately influencing a business relationship. In principle, this is not the case for gifts which are bestowed and invitations which are extended within the framework of customary business hospitality, common customs and courtesy.

If such violations have occurred, they must be promptly reported to the competent company office so that these corresponding measures can be introduced

5.2. Conduct towards competitors

The Company shall respect fair competition. Thus, it shall follow the valid laws which protect and promote competition – particularly the valid anti-trust and other laws for regulating competition.

In its dealings with competitors, these provisions forbid particularly concluding agreements and other activities which unfairly influence the prices or conditions, illegally allocate the sales territories or clients or impermissibly impede free and open competition.

In view of the fact that the delimitation between banned monopolies and permissible cooperation can be problematic, the Company will designate a contact person for its employees who can be contacted in cases of doubt.

6. External relationships

The selection of the suppliers must always be undertaken based upon objective parameters such as quality, cost-effectiveness, performance and efficiency. The relationships to the press as well as other media representatives and external business partners shall be maintained only by persons whom the Company has expressly authorised in this regard.

7. Sphere of applicability

The Company shall ensure that the Code is followed by implementing suitable measures in this regard.

Moreover, the Company shall also endeavour to convey the principles of this Code of Ethics to its direct suppliers, to promote the adherence to its contents by its suppliers as best as possible and to request that they likewise follow the Code. Moreover, the Company shall be required to recommend to its direct suppliers that they, upon their part, demand that their own suppliers follow this Code of Ethics.



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