

To the attention of staff members:

Karl Mertl Handelsges.m.b.H. has been a reliable partner for steel tube customers since 1949. Our company is a medium-sized family enterprise, and essential values such as economic, social and ecological responsibility guide us in our activities.

We, the company's managers, are committed to observing all applicable laws, to respect human rights as well as social and environmental standards. We expect you – our staff members – to actively contribute to this commitment, so as to ensure compliance. The present compliance guidelines describe the kind of conduct that is indispensable to achieve this goal.

Mag. Marie Gruscher

Ing. Mag. Jürgen Spannraft

Company Management

1. Observance of laws and regulations

Applicable laws and internal regulations must be observed in all company-related and commercial operations. Staff members actively obtain information about the requirements and provisions governing their specific area of responsibility. When in need of clarification, they contact their immediate superior or the company management.

2. Corruption and fair competition

Fair trade practices are an integral element of our corporate culture. Any action that classifies as corruption is therefore prohibited. Accepting or offering advantages is not allowed; low-value gifts and customary hospitality are the only exceptions. These must not create the impression, though, that undue influence is exerted. In the pursuit of fair trade practices, anti-trust and competition regulations must be observed; price and other agreements with competitors are therefore prohibited.

3. Confidentiality

Confidential information and trade secrets of any kind, which are obtained in the course of business operations, must not be disclosed to third parties. Please make sure that confidential information is kept in a safe place and that intellectual property is protected.

Personal data may only be communicated, both internally and externally, on the basis of statutory stipulations.

Staff members are also bound to their confidentiality obligation after terminating their employment relationship with the company.

4. Interaction with others

We are committed to interacting with others in a polite, respectful and cooperative manner.

There is no room in our company for discrimination, mobbing or sexual harassment. This attitude also applies to dealings with business partners and authorities.

Mutual fairness and loyalty shall govern our relations to staff members.

5. Use of resources and attention for the environment

We are committed to using our resources with sustainability. In other words, we and our staff members give adequate consideration to protecting the environment. Company property shall be handled with care and must not be used for personal purposes without authorization.

6. Health and safety at the workplace

We pay attention to a safe working environment and take all necessary measures to prevent accidents and to avoid damage to health. All staff members are regularly informed about safety standards and measures. We therefore expect them to strictly comply with all relevant safety regulations as well as to act responsibly so as to protect their own safety and health.

7. Integrity

We expect our staff members to act solely in our company's interest, when faced with a conflict of interests, and to inform us accordingly without any delay.

8. Observing the Compliance Guidelines

The company management and all staff members undertake to abide by the present Compliance Guidelines. We ask all staff members to report – also anonymously – any justified suspicion concerning a violation of the present code to the respective superior or the company management or to send an e-mail to compliance@mertl.com. Information received on possible violations of the Compliance Guidelines will be treated with utmost confidentiality. Depending on the seriousness of the violation, we will take all legal and disciplinary measures, if necessary.

The Compliance Guidelines in their currently valid version must be observed. They can be accessed on the Intranet at "Compliance" and are available in writing at the personnel department. We will duly inform you of any changes in the regulations on compliance.