

Code of Conduct for Suppliers

Since 1949 Karl Mertl Handelsges.m.b.H. has been a reliable partner for steel pipes and has worked sustainably with renowned suppliers. As a medium-sized family business, we emphasize economic, social and environmental responsibility and live by these values.

The basis for this is provided by the applicable national laws as well as the following internationally recognized guidelines and standards:

- UN Guiding Principles on Business and Human Rights
- UN Convention on the Rights of the Child
- Conventions and Recommendations of the International Labour Organization (ILO) on principles and rights at work
- The 10 Principles of the United Nations Global Compact (UNGC)
- Charter of Fundamental Rights of the European Union
- UN Declaration on the Rights of Indigenous Peoples (UNDRIP)

The management is committed to respecting applicable laws, human rights, and social standards as well as environmental protection.

We expect our suppliers to support us in this matter and to participate actively.

Mag. Marie Gruscher

Ing. Mag. Jürgen Spannraft

Management

1. Human Rights

We expect our suppliers

- not to tolerate child labor and to comply with the ILO conventions on the minimum age of employment,
- to treat their employees with respect and not to allow any form of violence, whether psychological or physical,
- to ensure that all work is performed voluntarily without the threat of punishment, and that no forced labor, slave labor, or comparable forms of labor are used,
- not to allow any discrimination in their operations, whether based on gender, sexual orientation, skin color, religion, nationality, ethnic or social origin, political views, worldview, age, or other personal characteristics,
- to respect the rights, culture, and livelihoods of indigenous communities, and
- not to tolerate any sexual assault within their organization.

2. Working Conditions

Our suppliers shall ensure that

- working conditions are fair and comply with all applicable legal requirements,
- occupational health and safety are given the highest priority and that appropriate systems are maintained for this purpose,
- employees receive fair and adequate remuneration in accordance with legal regulations or industry minimum standards,
- working hours comply with applicable laws or industry standards,
- security personnel they employ operate in accordance with internationally recognized human rights standards and applicable laws, and do not contribute to intimidation, coercion, or any other human rights violations, and
- they respect their employees' right of freedom of association and collective bargaining.

3. Business Relationship

Our Suppliers

- maintain a fair and transparent business relationship with us and comply with all relevant national and international laws and regulations,
- adhere to national and international rules on fair competition and anti-corruption and strictly comply with applicable antitrust laws,
- do not offer or accept any benefits or gifts in order to obtain improper or unlawful competitive advantages,
- comply with national and international regulations aimed at preventing money laundering and the financing of terrorism, and
- fully observe all applicable rules on insider trading and securities laws.

4. Material Compliance

Our suppliers must ensure that

- their products comply with all agreed specifications and applicable legal requirements relating to product safety,
- all applicable customs, import, and export regulations — including sanctions — are fully observed, also in the procurement of raw materials and other inputs,
- delivered products are free from prohibited or restricted substances and that all information and disclosure obligations are fulfilled in a complete and timely manner. This includes, in particular, compliance with the REACH Regulation (EC) No. 1907/2006 and Directive 2011/65/EU (RoHS), each as amended, and
- due diligence and verification obligations along the supply chain relating to conflict minerals are met in accordance with the EU Conflict Minerals Regulation (EU) 2017/821, as amended. Suppliers must provide an up-to-date Conflict Minerals Reporting Template (CMRT) and an Extended Minerals Reporting Template (EMRT) from the Responsible Minerals Initiative (RMI) on an annual basis.

5. Environment

Our suppliers are obliged to

- comply with all applicable national and international environmental regulations,
- use available resources in an environmentally responsible and efficient manner and, where possible, support recycling practices,
- minimize emissions and handle chemicals in a safe and responsible way,
- act ethically and in full compliance with the law when procuring raw materials and other goods, and refrain from obtaining land, forests, or water resources in violation of legitimate rights,
- maintain an effective system for waste prevention, reduction, recycling, and reuse, as well as hazardous materials management,
- treat wastewater appropriately before discharge or disposal,
- reduce the environmental and climate impacts of their business activities,
- use renewable energy sources wherever possible, and
- protect biodiversity and avoid deforestation or the destruction of protected ecosystems.

6. Data Protection

Our suppliers shall

- comply with all applicable national data protection laws and regulations,
- respect the right of individuals to control their personal data,
- protect and keep confidential any data, information, and intellectual property received in the context of the business relationship, unless such information is already publicly available,
- ensure that their activities do not infringe the intellectual property rights of third parties.

7. Reporting System

Our suppliers will,

- establish a complaint system through which their employees can report violations of the principles of this Code of Conduct in a protected environment,
- inform their employees about this system.

In addition to the supplier's internal reporting channels, substantiated suspicions of violations of the principles of this Code of Conduct may also be reported to us confidentially via email at compliance@mertl.com.

8. Implementation

This Code of Conduct constitutes a binding framework to safeguard the mentioned values throughout the supply chain. Our suppliers commit to complying with this Code of Conduct within their organization and to communicating its contents to both their employees and their sub-contractors, whom they likewise obligate to adhere to these principles.

Suppliers must identify risks within their supply chain and take appropriate measures where necessary. In the event of suspected violations, the supplier will promptly inform us of the identified violations and risks, as well as the measures taken.

We reserve the right to verify compliance with the principles of this Code of Conduct through risk-based audits, including on-site audits. The supplier agrees that we may, at our own expense, conduct such audits at the supplier's facilities, with reasonable prior notice, through persons commissioned by us. The supplier may object to specific audit measures if they would necessarily violate mandatory data protection regulations.

If a breach of this Code becomes known, we expect corrective actions to be taken within a reasonable timeframe. In cases of human rights violations, immediate remediation is required. If no appropriate measures are taken, or if the violations are severe, we reserve the right to terminate all contracts and end the business relationship. The right to extraordinary termination remains unaffected, particularly in cases of intentional and highly serious violations.

By signing this Code of Conduct, the supplier commits to comply with the principles and requirements stated herein.

Place, date: _____

Company: _____

Address: _____

Name: _____

Position: _____

Signature: _____

Company stamp: