



CODE OF CONDUCT FOR
voestalpine's LOBBYISTS
(LOBBYING CODE OF CONDUCT)

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1 INTRODUCTION AND OBJECTIVES

In its business segments, voestalpine is a global technology Group that boasts combined expertise in materials and processing, focuses on product and system solutions made of steel and other metals in technology-intensive industries and niches, and applies the most demanding quality standards.

The Group makes a material contribution to society's sustainability above and beyond its infinitely recyclable materials and its efficient facilities. Furthermore, voestalpine is aware of its particular responsibility on account of specific steelmaking processes for environmental protection and climate change mitigation and considers itself an active participant in the shaping of a sustainable and resource-efficient industry. Using its sectoral expertise as well as its technologies and positions, voestalpine wants to make a constructive contribution to resolving challenges related to environmental, climate, and energy policies and help to shape the parameters of an ecologically and economically viable industry through dialogues with stakeholders: the public at large, affected communities, scientists, politicians, interest groups, non-governmental organizations (NGOs), etc.





At its core, voestalpine's corporate culture is defined by responsible action. The present Code of Conduct governs dealings with stakeholders in Austria as well as at the European and international level. It provides clear and transparent rules and regulations for lobbying activities in the broadest sense as per the Austrian Lobbying and Agent Transparency Act (Bundesgesetz zur Sicherung der Transparenz bei der Wahrnehmung politischer und wirtschaftlicher Interessen, also known as Lobbying- und Interessenvertretungs-Transparenz-Gesetz, Lobby-G).

2 SCOPE

This Code of Conduct applies to all employees (hereinafter: "Employees")¹ of the voestalpine Group, including management board members, managing and/or executive directors as well as other executives. Whenever lobbying activities are supported by external parties, care must be taken to ensure that the latter also commit to compliance with the present Code of Conduct.

The voestalpine Group encompasses all companies in which voestalpine AG has a direct or indirect stake of at least 50% or where it exercises control in other ways.

3 PRINCIPLES

Any and all lobbying activity on behalf of voestalpine must be carried out transparently and responsibly in compliance with all applicable laws (especially lobbying laws such as the Austrian Lobbying and Agent Transparency Act) as well as in compliance with all other requirements external and internal to the Group (above all voestalpine's Code of Conduct).

voestalpine's Code of Conduct serves as the basis for all business-related actions and decisions within the voestalpine Group and provides guidelines for the morally, ethically, and legally correct conduct of all of its Employees. In particular, all lobbying activity must comply with the following conduct guidelines stipulated in the Code of Conduct.

¹ Whilst the masculine grammatical form is used to improve legibility, it generally covers all genders.

Corruption, Bribery, and the Acceptance of Gifts

All Employees are strictly prohibited from offering benefits,² directly and indirectly, with the aim of influencing stakeholders' decisions in prohibited ways or even whenever particular conduct could create the appearance of influence peddling. Solely gifts of a low value as well as meals and entertainment that are part of customary business practices are excluded from this rule, but country-specific and internal requirements applicable to stakeholders must be taken into consideration as necessary. Offerings of money or noncash benefits are absolutely prohibited.

Political Donations

voestalpine does not make any donations or other monetary payments of whatsoever nature to politicians, political parties, organizations affiliated with political parties, or precursor organizations that pursue political ends in lieu of solely social goals. This also includes ads placed in media belonging to political parties or (media) organizations affiliated with political parties.

4 SPECIAL PROVISIONS

Transparency

Transparency is a key criterion of any lobbying activity. Any lobbying activity thus must be clearly identifiable as such.

Honesty

voestalpine's positions must always be disclosed, honestly and properly, to public and private office holders. In any event, facts may not be presented in potentially distorting ways.

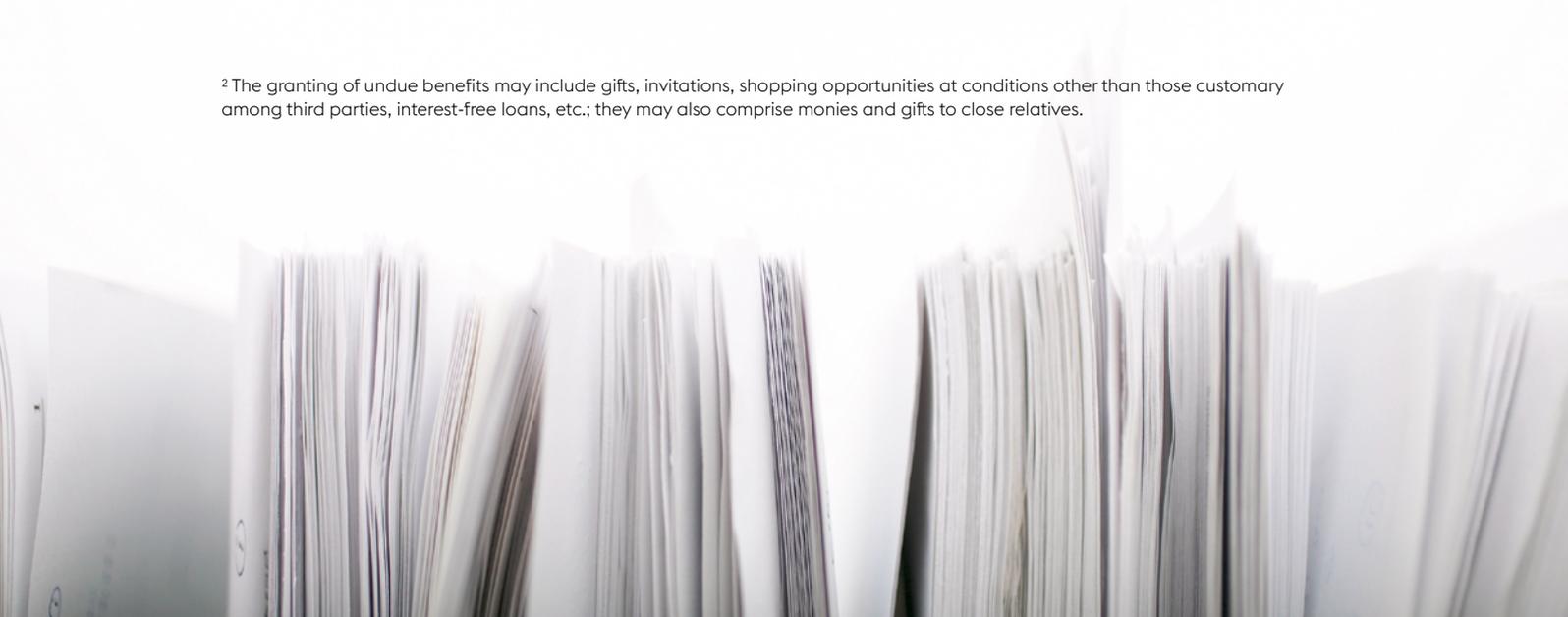
Respect

Dealings with counterparties must be respectful and based on customary forms of polite conduct and language, taking the given counterparties' professional and personal reputation into account.

Confidentiality

Conversations with office holders must be kept confidential unless expressly stipulated otherwise. Confidential information may not be disseminated nor used for any other purposes.

² The granting of undue benefits may include gifts, invitations, shopping opportunities at conditions other than those customary among third parties, interest-free loans, etc.; they may also comprise monies and gifts to close relatives.



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voestalpine

ONE STEP AHEAD.