

Code of Conduct

tkaccelis.com

tkaccelis



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If you have a printed copy of this document, you can download an online version with all links here:
www.tkaccelis.com/code-of-conduct-en

Dear Colleagues,

We all share responsibility for tk accelis. It is our shared task to protect the Group and maintain the trust of our colleagues, business partners, customers, as well as the wider community in which we operate. This Code of Conduct serves as the foundation for that purpose. In this context, personal responsibility, openness, and transparency—as well as conduct that is always in compliance with the law and ethically sound—play a particularly important role.

Our Code of Conduct sets out our binding principles and rules. It thus provides important guidance for members of the Executive Board, managing directors, managers, and all employees.

The Code of Conduct sets out our standards for ourselves within the Group and defines how we want to treat one another. At the same time, it is a global commitment to responsible conduct toward our partners, society, and the environment. The behavior of every single person at tk accelis is crucial to our long-term corporate success and the reputation of our Group.

We're counting on you!

The Executive Board of tk accelis Group AG & Co. KGaA,
represented by tk accelis Management AG

About Our Code of Conduct

The Code of Conduct reflects our shared values and guiding principles. Even if the Code of Conduct does not provide a solution for every situation, it nevertheless contains important information and guidelines for all employees to act in a compliant, ethical and integrity-driven manner.

Specific rules and regulations for individual situations and circumstances in the workplace are clearly set forth in the relevant Group policies and agreements. These policies and agreements apply without exception to all tk accelis employees and are binding. Employees who fail to comply with these requirements must expect appropriate consequences.

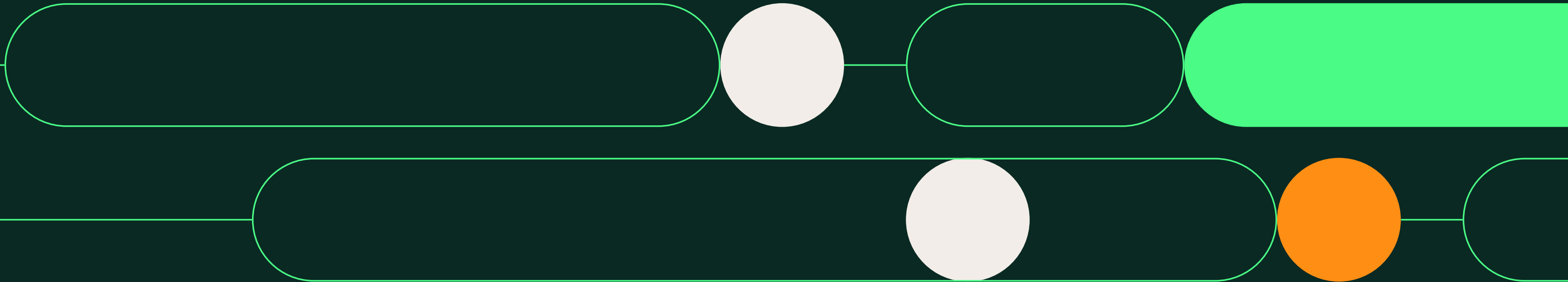
Our Code of Conduct summarizes the principles and rules that are essential to us. It reflects the standards we set for ourselves and for our business partners, as well as our stakeholders.

It applies to all companies, employees, managers, and members of the Executive Board and management of tk accelis.*

* tk accelis complies with all applicable local laws. In the event of a direct or indirect conflict between local laws, regulations, or guiding principles and this Code of Conduct, the local regulations take precedence. Neither this Code of Conduct nor the tk accelis Group Policies give rise to any legal claims or obligations that do not already exist under applicable local law.

What We Stand For

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What We Stand For

What Sets Us Apart

We transform complexity into clarity. At the heart of this is our “Materials-as-a-Service” strategy: we support our customers throughout the entire value chain, going far beyond traditional materials trading. With tailored solutions, exceptional service, and our expertise in materials and logistics, we help secure global supply chains.

We are tk accelis

Our name says it all: It combines speed (“accelerate”), outstanding precision (“excellence”), and quick availability (“access”). The “tk” honors our thyssenkrupp heritage. This identity is brought to life by 15,500 dedicated employees at approximately 400 locations worldwide. Our guiding principle, “Moving industries – from source to success,” drives us to operate reliably and directly on-site every day.

We are shaping the resilient supply chains of tomorrow

We understand our customers’ requirements in detail and develop tailor-made solutions—from materials and processing to integrated services. Together, we increase transparency and resilience in the supply chain, coordinate partners, data, and processes, and continuously improve.

In this way, we support our customers in successfully implementing their projects, now and in the future.

We all hold ourselves to the highest standards

We act with an entrepreneurial spirit: confidently, boldly, and with a focus on performance—with the goal of being the best. The commitment and expertise of each and every individual form the foundation for this. The development of our employees is particularly important to us. Health and safety in the workplace are our top priorities.

We live by shared values

We act in the best interests of tk accelis as a whole. Openness and mutual respect characterize our interactions. We build on strong values: reliability and honesty, credibility, and integrity. Compliance is a given for us. We take responsibility for society.



What We Stand For



Our values and guiding principles apply to all our decisions, actions, and conduct.

We act in the best interests of tk accelis

We protect and promote the reputation and values of tk accelis. They are essential to our sustainable and long-term corporate success. We are aware that unlawful or inappropriate conduct can cause significant harm to our company. We are committed to meeting the high ethical standards set forth in this Code of Conduct. Likewise, we aim to remain true to our values and guiding principles.

We intend to continuously improve and make tk accelis more agile and adaptable in response to future challenges.

Openness defines how we work together

We value openness, promote a Speak-Up Culture, and ensure transparency regarding risks within our respective areas of responsibility. Wherever people work, mistakes

happen. Dealing with mistakes openly allows us to correct them, identify the sources of errors, and take steps to prevent them from recurring. We therefore consistently and explicitly encourage our employees to communicate openly whenever things aren't running smoothly in one area or another.

We Value Diversity

Diversity and inclusion are integral parts of our human resources policy. We have enshrined this, among other things, in our principles for managers and by signing the "Diversity Charter".

Our interactions are characterized by appreciation and respect. A culture of mutual trust and respect is of great importance to us. We promote equal opportunity and do not tolerate discrimination. We aim to create a work environment that is free of prejudice. Any form of discrimination, harassment, or bullying contradicts the values and guiding principles of tk accelis.

What We Stand For

We are built on strong values: reliability and honesty, credibility and integrity

We lead by example and keep our promises. We take personal responsibility for our decisions, actions, and behavior. In matters concerning tk accelis, we always act to the best of our knowledge and belief.

Our managers are aware that they bear a special responsibility. They take their duty of care toward their employees seriously. In doing so, they fulfill their role as role models by leading by example and fulfilling their corporate responsibilities. In their actions, they are guided in particular by this Code of Conduct. They create a trusting work environment and are always available as supportive colleagues.

Compliance is a given for us and is our top priority

We always comply with the applicable laws in each country as well as all internal group policies. This includes ensuring that all necessary processes and controls are followed. If

national laws contain stricter regulations than those in effect at tk accelis, national law takes precedence.

For us, however, compliance means far more than simply adhering to laws and regulations. For us, compliance is a question of mindset—every single day, for every single person at tk accelis. Always and everywhere. We would rather consciously forgo a business opportunity or fail to meet internal goals than violate the law.

Violations of internal policies or of legal or regulatory requirements can have serious consequences for tk accelis or for employees, managers, and other individuals. Violations will not be tolerated.

We take responsibility for society

tk accelis is mindful of its social responsibility. We are committed to the ten principles of the United Nations Global Compact. In addition to economic considerations, our decision-making processes also take social, environmental, and ethical concerns into account. Our guiding principle, “Moving industries– from source to success,”

clearly expresses what we stand for: We ensure stable supply chains and guarantee the reliable flow of materials—from procurement to our customers’ success. With tailored solutions, technology, and services, we create long-term value along the entire value chain. In doing so, we act responsibly and contribute to sustainability and workplace safety.

We actively involve Group management, the individual tk accelis companies, and take into account the interests of internal and external stakeholders—such as employees, investors, customers, partners, suppliers, and policymakers—in our sustainability activities to meet our high standards.



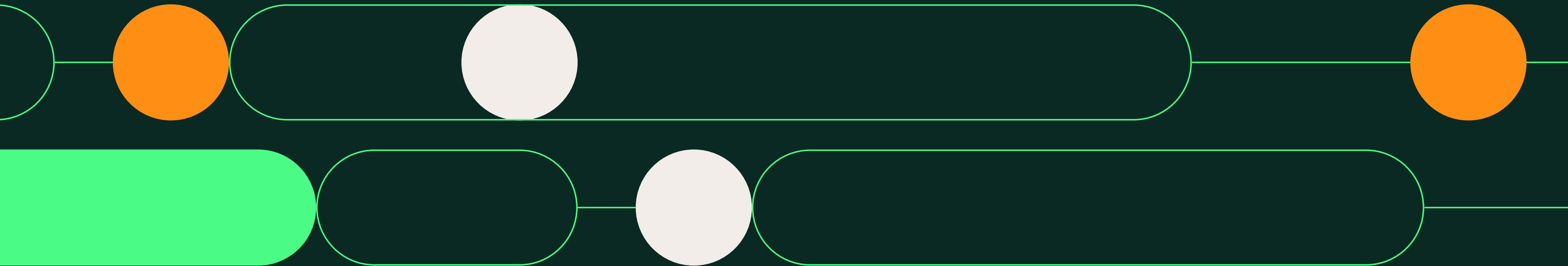
Compliance Commitment



tk accelis Whistleblower System

Our conduct and our responsibility as a member of society

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Our conduct and our responsibility as a member of society

tk accelis is committed to the highest sustainability standards. This includes good corporate governance as well as environmental and social responsibility. As an international corporation, we source raw materials, goods, and services worldwide. In doing so, we put people first. This applies equally to everyone—both our own employees and our suppliers.

In our tk accelis Policy Statement, we describe what we mean by human rights and environmental due diligence obligations. It also sets out our expectations in this regard for our employees, our suppliers, and their subcontractors.

Human Rights and Fair Working Conditions

As a globally active corporation, we are mindful of our responsibilities and actively contribute to improving human rights standards. We respect and support compliance with internationally recognized human rights and fair working conditions.

We adhere to the principles of the United Nations Global Compact, the United Nations Universal Declaration of Human Rights, the International Covenants on Civil and Political Rights and on Economic, Social, and Cultural Rights, and the core labor standards of the International Labor Organization (ILO). We expect the same from our suppliers.

Protection of Freedom of Expression, Personal Rights, and Privacy

We respect the dignity, privacy, and personal rights of every individual. We protect and uphold the right to freedom of thought and expression.

Forced and Child Labor

We strictly reject all forms of forced labor, compulsory labor, and child labor, as well as modern slavery and human trafficking.

Our conduct and our responsibility as a member of society

Environmental and Climate Protection

Environmental and climate protection are high priorities at tk accelis. In line with the Paris Agreement and the Science Based Targets Initiative, we are aiming to achieve the ambitious goal of net-zero emissions across our entire value chain by 2050. As a global Materials-as-a-Service provider, we take responsibility for the environment. That is why we are continuously working to reduce the environmental impact of our own business operations as well as that of our value chain.

To this end, we are continuously optimizing our energy consumption by increasing the use of electricity from renewable energy sources at our sites and converting fossil fuel-based processes to electrically powered alternatives wherever possible. In addition, we promote the use of alternative fuels in our logistics operations and strive to be the preferred provider of reduced-carbon products and services to help our customers reduce emissions throughout their value chain.

Through these measures, we actively contribute to environmental and climate protection while simultaneously reducing the impact of our activities on the climate and the environment. Compliance with all applicable legal requirements forms the basis of everything we do. In addition, we implement targeted measures that go beyond regulatory requirements.

To support the systematic management of our environmental and energy efficiency, environmental and energy management systems certified to ISO 14001 and ISO 50001 have been implemented at our many locations.



Our conduct and our responsibility as a member of society

Quality Management

Our goal is to consistently meet legal requirements as well as our customers' expectations regarding the quality of our products and processes. By continuously evaluating relevant feedback, we are constantly improving our products, processes, and services. The majority of our sites are certified to ISO 9001 and thus meet internationally recognized standards in quality management.

Sustainability in the Supply Chain

Sustainability is a central component of our corporate strategy and also plays an important role in the selection of our suppliers. Responsible conduct is therefore firmly embedded in our procurement processes.

Our expectations of our suppliers are set forth in the tk accelis Supplier Code of Conduct and in the tk accelis Statement of Principles on Compliance with Human Rights and Environmental Due Diligence Obligations. In accordance with legal requirements, we regularly review these guidelines and require our suppliers to comply with them.

Material Compliance and Conflict Minerals

tk accelis complies with all requirements relevant to its business models in the area of material compliance. These include, but are not limited to, the REACH, RoHS, California Proposition 65, TSCA, POPs, and PFAS regulations, as well as the EU CLP Regulation. Additional legal requirements may apply depending on the region. By complying with these requirements, we contribute to the protection of people and the environment.

We expect our suppliers to also comply with applicable material-related regulations and to provide tk accelis with all necessary information regarding the materials they supply, upon request.

In addition, we comply with the requirements of the German Mineral Raw Materials Due Diligence Act and the Dodd-Frank Wall Street Reform and Consumer Protection Act. We expect our suppliers to fulfill their duty of care to promote responsible raw material supply chains and to comply with all applicable legal requirements related to

conflict minerals. If products contain conflict minerals (CMRT), extended minerals (EMRT), or other high-risk raw materials, our suppliers must be able to traceably document the origin of these materials upon request. This includes, in particular, transparency throughout the supply chain up to the smelter or refinery and the country of origin of the raw materials used.



[Supplier Code of Conduct](#)

Our conduct and our responsibility as a member of society



Social Responsibility and Community Engagement

Social engagement is an important part of our identity. We support the community through donations, sponsorships, and memberships in various organizations. We expressly welcome and encourage our employees' volunteer activities—because collective action makes a difference and paves the way for the future.

Political Advocacy

Our political engagement and lobbying efforts are coordinated, open, and transparent. We act in accordance with regulatory and ethical standards. Through political engagement and lobbying, tk accelis aims to achieve its business objectives by bringing our interests into the decision-making process of policymakers, in order to actively address the challenges ahead and use our expertise to help shape the framework conditions of the future. tk accelis does not make any financial contributions to political parties, elected officials, or candidates for political office. tk accelis GmbH is registered in the lobby registry in accordance with the German Lobby Registry Act (LobbyRG) and is also registered in the European Transparency

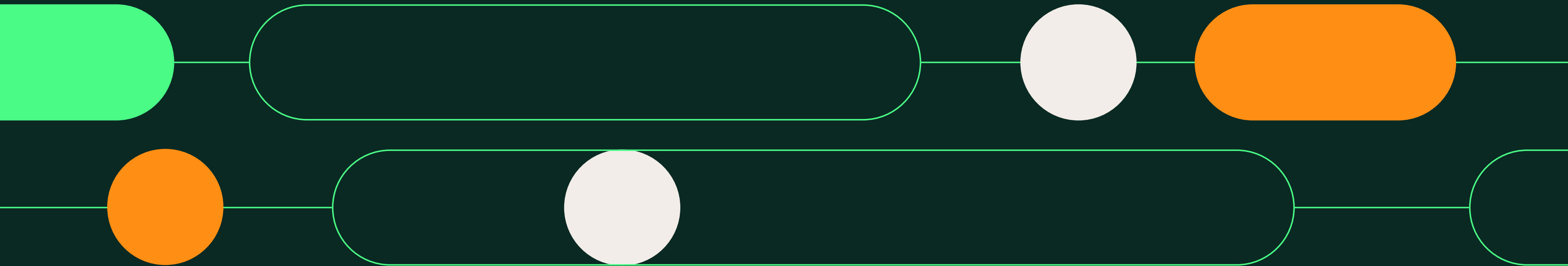
Register. In countries outside the EU, tk accelis reviews entries in national and international lobby registries as needed and, if necessary, completes registration at a later stage if required.

Public Presence and Communication

We are aware that we may be perceived as representatives of tk accelis even in our private lives. Through our conduct and public demeanor—especially toward the media—we uphold the standing and reputation of tk accelis. We take care not to associate our role and work at tk accelis with the expression of our private opinions. We protect ourselves and tk accelis by ensuring that we do not disclose any personal, confidential, or proprietary information. As employees, we also serve as ambassadors for tk accelis on social media platforms—and are therefore jointly responsible for the company's public image.

Our conduct and our responsibilities in the business environment

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Our conduct and our responsibilities in the business environment

Prohibition of Corruption and Bribery

Our business success is based on the quality of our products and services. We are committed to the principles of the UN Global Compact and support the United Nations Convention against Corruption. We expressly reject corrupt behavior.

Personal gain is never a motive for a business relationship. We expect the same level of integrity from our customers and suppliers. We strictly reject any form of corruption, bribery, theft, embezzlement, fraud, or extortion, whether involving public officials or in the private sector.

Invitations and Gifts

Good business relationships with our customers are important to us. The same applies to suppliers and other stakeholders. Invitations and gifts can strengthen these relationships, but we never use them to unfairly influence business relationships or decisions.

Avoiding Conflicts of Interest

We make business decisions free from personal interests and motives and exclusively in the best interest of tk accelis to avoid decisions that could give rise to conflicts of interest.

Fair Competition: Compliance with Antitrust and Competition Law

We always conduct ourselves fairly in competition and comply with applicable antitrust and competition laws. We do not engage in agreements that violate antitrust laws or other business practices that restrict competition. We neither exchange competitively sensitive information with competitors nor abuse a dominant market position.

Data Protection and Artificial Intelligence (AI)

The protection of personal data—particularly that of employees, customers, and suppliers—is of particular importance to tk accelis.

We respect the right of our employees, customers, and suppliers to informational self-determination. We process personal data only to the extent permitted by law.

We use artificial intelligence (AI) responsibly and in line with our corporate values. AI helps us to improve our work, make processes more efficient, and support decisions. We use AI only when it is appropriate, understandable, and secure. In particular, the protection of people, data, and business processes is our top priority. We critically review the output of AI, observe legal and ethical boundaries, and obtain expert advice in due time in cases of uncertainty.

We support our employees in using AI safely and competently and provide appropriate training and information.

Our conduct and our responsibilities in the business environment

Prevention of Money Laundering and Terrorist Financing

At tk accelis, we are committed to ensuring that we are not misused for money laundering or, even less so, for terrorist financing. With the help of our security systems and controls, we strive to prevent such misuse.

Foreign Trade Law

We comply with the foreign trade regulations of the countries in which we conduct business.

Our Group companies organize their internal responsibilities and processes in such a way that only business activities that are legally permissible and consistent with the principles of tk accelis are conducted.

Information Security

We effectively protect our information assets from unauthorized access, loss, and manipulation. Information is a key production factor for tk accelis, and we handle it carefully and responsibly. All employees contribute to this by handling data, processes, and systems with care, security awareness, and responsibility, and by immediately addressing any potential risks or security incidents.

Through regular training, we continuously strengthen the security awareness of our employees and regularly review our technical and organizational safeguards to identify any need for action.

Transparent Financial and Sustainability Reporting

Due to our global business activities, we are subject to accounting and reporting requirements both domestically and abroad. Accurate and complete records maintained by all employees are also indispensable for the strategic planning and further development of the Group. These records not only serve to ensure compliance with regulatory requirements but also help us improve our business processes.

Open and truthful reporting and communication regarding the company's sustainability performance to investors, employees, customers, business partners, the general public, and government institutions are an integral part of how we see ourselves and conduct our business.



Our conduct and our responsibilities in the business environment

Tax and Customs Compliance

Through our business activities, both domestically and internationally, we are subject to a wide range of tax and customs obligations.

In addition to complying with applicable tax and customs laws, we adhere to all relevant internationally recognized standards and principles. Furthermore, we do not engage in aggressive, tax or customs avoidance schemes, or the use of artificial arrangements.

We ensure that taxes are paid in the jurisdictions where the underlying economic activities take place and where value is genuinely created.

Confidential Business and Insider Information

We take all necessary steps to appropriately protect confidential information and trade secrets from access and disclosure to unauthorized employees and other third parties.

This also applies to the use of artificial intelligence (AI). AI creates new opportunities for us, but also entails significant responsibility. In addition to handling company information with care, we ensure that AI is used transparently. We make sure that data is accurate and respect the rights of the individuals concerned.

Employees who have access to insider information do not trade in stocks or other tk accelis financial instruments, nor do they disclose this information outside the scope of their work for tk accelis.



Our conduct and our responsibilities in the workplace

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Our conduct and our responsibilities in the workplace

Occupational Safety and Health

At tk accelis, the focus is on the individual. All employees should be able to work and return home safely. It is therefore our goal to create safe and healthy working conditions as part of a preventive approach.

Together, we strive for a progressive safety and health culture. Occupational safety, health protection and health promotion are leadership tasks. The employees take personal responsibility, are actively involved and help to shape our safety and health culture.

We work systematically for continuous improvement. We always comply with applicable law and other requirements. This also applies to commitments that we have undertaken ourselves. We take appropriate action in the event of infringements.

Occupational safety, health protection and health promotion are an integral part of all operational processes. They are included in the technical, organizational, economic and social considerations right from the start. This applies already in the planning phase. Our guiding principle always applies to everything we do:

“Zero compromise on safety and health. This is our value. **Because we care.**”

Our conduct and our responsibilities in the workplace

Fair Treatment and Freedom from Discrimination

Employees must not be disadvantaged, given preferential treatment, or be harassed because of characteristics such as age, ethnic origin and nationality, gender and gender identity, physical and mental abilities, religion and belief, sexual orientation and identity, social background, political or other beliefs, or membership in a labor union. We do not tolerate any unacceptable treatment of employees or the threat of any form of negative treatment. This includes, for example, psychological or physical coercion, discrimination, sexual or personal harassment, abuse, verbal insults, bullying, or other personal attacks.

Cooperation with Employee Representatives

We recognize the right of all employees to form or join labor unions and employee representative bodies on a democratic basis, in accordance with national regulations, as well as to engage in collective bargaining. For tk accelis, close and

trusting cooperation with employee representative bodies is a key component and a proven cornerstone of corporate policy. The foundation of mutual trust and cooperative collaboration is an open and constructive dialogue characterized by mutual respect.

Working Hours

We comply with the applicable national laws regarding working hours, rest periods, and time off. In the absence of national legal regulations, the standards of the International Labour Organization (ILO) apply.

Compensation

The right to fair compensation is recognized for all employees. Compensation and other benefits meet, at a minimum, the respective national and local legal standards or the levels prevailing in the national economic sectors, industries, and regions.

Use of Third-Party Personnel

Regardless of the type of contract, applicable national law regarding the engagement of third-party companies and the third-party personnel they employ (e.g., security personnel) is complied with in contractual and employment relationships. We verify this through appropriate measures.

Protection of Company Property

We use the company's property and resources properly and carefully and protect them from loss, theft, or misuse. Our company's intellectual property in the form of patents and other intellectual property rights, such as trademarks and designs, is among our most important corporate resources. We protect these valuable assets against unauthorized access by third parties. Likewise, we avoid the unauthorized use of third-party intellectual property.

Our Responsibility to Implement the Code of Conduct

We all share responsibility for implementing and complying with this Code of Conduct.

tk accelis actively promotes communication of the guidelines and agreements that specify the Code of Conduct. The individual Group companies are responsible for implementing them. In addition, they must ensure that no employee suffers any disadvantage as a result of complying with the guidelines or agreements.

Our managers are the first points of contact for questions regarding the interpretation of the regulations. They ensure that all employees are familiar with and understand the Code of Conduct. As part of their managerial responsibilities, they prevent unacceptable behavior. If necessary, they take appropriate measures to prevent violations of the rules within their area of responsibility. Trust-based and positive collaboration between employees and managers is reflected in honest and open communication and mutual support.



For further questions regarding the Code of Conduct, all employees and third parties (customers, suppliers, etc.) may also contact the central email address: codeofconduct@tkaccelis.com.
All information will be treated as strictly confidential.

Reporting Potential Misconduct

Credible reports help address violations at an early stage. This helps prevent harm to tk accelis, our employees, and our business partners. All tk accelis employees have the option to submit reports or complaints regarding any issues covered by the Code of Conduct and beyond. The same applies to customers and suppliers. Several channels are available for this purpose—and, of course, submissions can be made anonymously if desired.

Direct Contact with Supervisors or Business Partners

An open culture of communication is an essential part of our teamwork and corporate culture. Employees must be able to address mistakes openly and, above all, at an early stage. Your primary point of contact should therefore always be your supervisor. As a third party, please contact your business partner at tk accelis.

Central Reporting Channels

The department Compliance Detection at tk accelis serves as the central reporting office. tk accelis and the department Compliance Detection protect the interests of whistleblowers not only by establishing secure reporting systems, but also by committing to treat incoming reports confidentially and to protect whistleblowers acting in good faith, by all appropriate means, from any adverse consequences that may result from a report. However, when investigating reports, we also take into account the legitimate interests of the individuals affected by a report. Please be aware that suspicions and allegations against a person may have serious consequences for that individual. We therefore ask that you use the whistleblowing channels listed below responsibly.

Reporting Potential Misconduct

Whistleblower System

The department Compliance Detection specifically handles reports of compliance violations, with a focus on anti-corruption, antitrust law, data compliance, anti-money laundering, and foreign trade law, as well as violations of labor law, environmental regulations, and human rights obligations within the supply chain.

The following contact options are available:

Potential violations can be reported via our electronic whistleblower system. This whistleblower system is available in 24 languages. You can access our online whistleblower system [here](#). We also accept reports of potential misconduct by phone through the whistleblower system, which is available 24/7 worldwide. The phone numbers for the whistleblower system are as follows:



+49 711 93965439 or **+1 385 4765556**

The establishment of a secure mailbox enables communication—which can, of course, be anonymous if desired—between the Compliance Officer and whistleblowers.

You can also contact the department Compliance Detection by mail:

tk accelis Group AG & Co. KGaA
Abteilung Compliance Detection
ThyssenKrupp-Allee 1
45143 Essen

or by email at:



SpeakUp@tkaccelis.com

Employees of tk accelis may also contact their designated Compliance Officer or Compliance Manager directly.



tk accelis Whistleblower System

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