



Code of Conduct /
Guideline for Proper Behaviour
of the EUROPIPE Group



PRINCIPLES

EUROPIPE is one of the leading manufacturers of longitudinally and helically welded large-diameter pipes in the world. Our strengths lie within the segment of pipes which are subject to particularly high requirements. Here we aspire to maintain our position as innovation and quality leader.

We want to set standards: for our customers and partners, for our employees and shareholders. These standards are set by responsible entrepreneurial action. At the same time we are committed to our corporate social responsibility.

For this reason, we have developed a guideline for proper behaviour: our Code of Conduct. This code shall apply to every employee of EUROPIPE, all managing directors, managers and staff members. Furthermore, we also expect from subcontracted personnel, consultants and our suppliers to act on the basis of these principles of behaviour.

This Code of Conduct shall apply to the whole EUROPIPE Group. Our subsidiaries are free to establish more detailed principles as long as the content and principles are in line with the Code of Conduct of EUROPIPE. In doing so, they shall comply with national law as applicable.



INTEGRITY

We reaffirm our commitment to comply with basic national and international regulations:

- We act within the framework of the United Nations Universal Declaration of Human Rights.
- We follow guidelines and standards issued by the International Labour Organisation (ILO).
 - ▶ We condemn any kind of discrimination.
 - ▶ We do not tolerate child labour and forced work.
 - ▶ We ensure the protection of labour rights and the freedom of association for our employees.

We expect from our managers that they increase the awareness of these fundamental principles within their area of responsibility.

INTEGRITY



LEADERSHIP PRINCIPLES

LEADERSHIP PRINCIPLES

We rely on our managers' ability to identify, challenge and promote employees' capabilities.

Every manager is responsible for his and her team members. He or she will gain his and her team members' appreciation and trust through exemplary behaviour, performance and social competence.

Managers shall:

- communicate our policy, strategy and corporate goals,
- practice a cooperative style of leadership based on the esteem of every employee,
- lead by setting clear specifications and realistic targets,
- delegate authorities and responsibilities as far as possible while taking into account their duty of supervision,

- identify and recognise good performance and competence of their team members,
- make use of established leadership tools as for instance the structured employee appraisals,
- resolve conflicts in a fair, matter-of-fact and consistent manner.

EMPLOYEES

The success of our Company is determined by our employees.

This involves a particular responsibility for us. We do not only ensure occupational health and safety, but we also create an environment in which employees can develop both in professional and personal terms.

In order to achieve our common goals, we expect from our employees and managers:

- a responsible behaviour,
- reliability and commitment in their promises both towards external parties and in internal collaboration,
- an open and proactive communication,
- an honest and respectful way of dealing with each other.



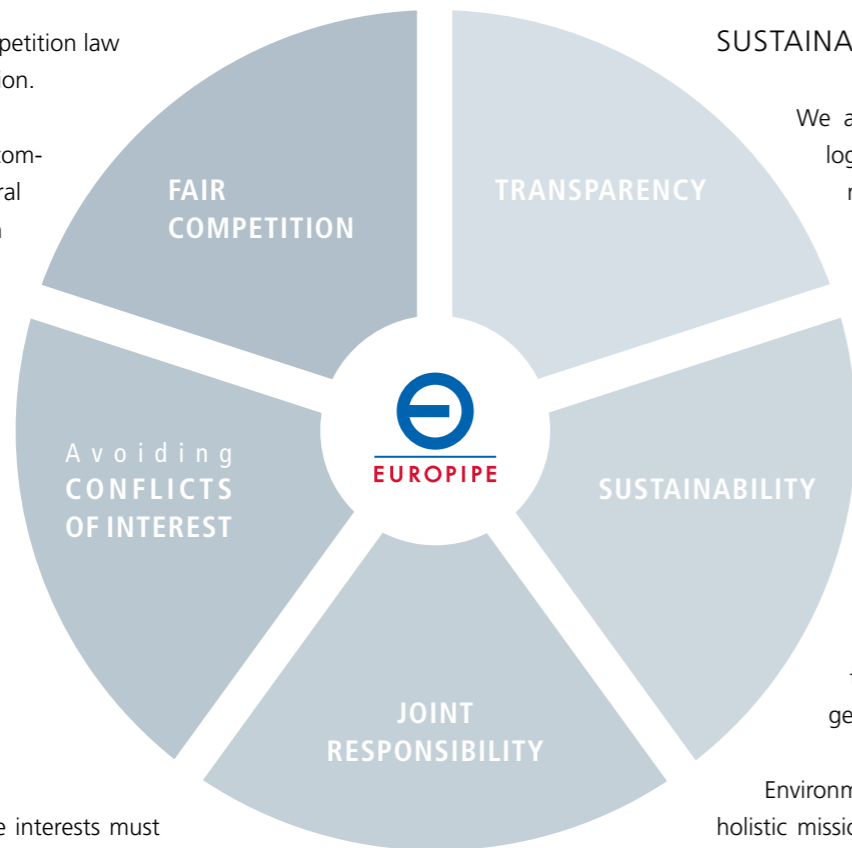
FAIR COMPETITION

We declare our commitment to a free and fair competition on the merits. We are aware of the fact that competition on the merits is determined by price and quality. Practices like corruption or price collusion that undermine this principle will ultimately be damaging to all market actors.

Therefore, EUROPIPE has set up a Compliance Programme focusing on

- antitrust law / competition law
- corruption prevention.

EUROPIPE strictly complies with behavioural rules established in the Compliance Programme, taking into account national and international legislation.



CONFLICTS OF INTEREST

Corporate and private interests must always be clearly separated from each other in order to make sure that decisions are made objectively in the best interests of the Company. We expect from our Board of Management, managers and employees proper behaviour when handling conflicts of interests.

This implies responsible and measured handling of gifts and invitations (e.g. meals, events, holidays), always keeping in mind that this is a 2-way process which therefore includes taken as well as given gifts and invitations.

TRANSPARENCY

The Integrated Management System implemented by EUROPIPE together with our process organisation ensures traceability and auditability of our transactions. All employees are required to maintain transparency of their business transactions.

SUSTAINABILITY

We are aware of the ecological impact of our business. By implementing and further developing our Environmental Management System we continuously work towards improving our ecological footprint and minimise the use of resources. In doing this we contribute to safeguarding the future of following generations.

Environmental protection is a holistic mission for us and must be firmly rooted in everyone's mind.

JOINT RESPONSIBILITY

The Board of Management, all managers and employees shall equally respect the principles of the Code of Conduct. We expect everyone to align his or her behaviour in accordance with the principles established.

Mülheim an der Ruhr, October 2016



Falko Schröter

Dr.-Ing. Falko Schröter

A. Liessem

Dr.-Ing. Andreas Liessem

EUROPIPE GmbH

P.O. Box 100504
45405 Mülheim an der Ruhr
Germany

Pilgerstraße 2
45473 Mülheim an der Ruhr
Germany

Phone +49 208 976-0
Fax +49 208 976-30 00

www.europipe.com

This Code of Conduct is included in the EUROPIPE Group's directive 20300 which is part of the EUROPIPE Management System.

In case of questions, comments or the awareness of an infringement of this code, please contact your local employee representation of the following contact:

 EUROPIPE	EUROPIPE GmbH	HR Manager +49 208 976-4440 coc-mue@europipe.com
 MÜLHEIM PIPECOATINGS	MÜLHEIM PIPECOATINGS	HR Manager +49 208 976-2121 coc@muelheim-pipecoatings.com
 BERG EUROPIPE	BERG EUROPIPE	HR Manager +001 850 784-8275 coc@bergeuropipe.com
 BERG STEEL PIPE <small>*Company of the Europe Group</small>	Berg Steel Pipe	HR Manager +001 850 784-8275 coc@bergpipe.com
 BERG SPIRAL PIPE <small>*Company of the Europe Group</small>	Berg Spiral Pipe	HR Manager +001 251 330-2840 coc@bergspiral.com