



TITLE

CODE OF CONDUCT / GUIDELINE FOR PROPER BEHAVIOUR OF THE EUROPIPE GROUP

No.	20300E	Rev.	2	Date	2025-05-15
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Reason for Revision:		
<input checked="" type="checkbox"/> Change of Content	<input type="checkbox"/> Verification without Change of Content	<input type="checkbox"/> Initial release

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1. PRINCIPLES

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 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.

2. 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) and the basic principles set out in the United Nations Global Compact:
 - Respect for human rights
 - Ensuring that the company is not complicit in any human rights abuses
 - Upholding freedom of association
 - Eliminating all forms of forced and compulsory labor
 - The abolition of child labor
 - The elimination of discrimination in respect of employment and occupation
 - A precautionary approach to environmental challenges
 - Promoting responsible actions in relation to the environment
 - Encouraging the development and diffusion of environmentally-friendly technologies
 - Working against all forms of corruption, including extortion and bribery

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

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3. EMPLOYEES

The success of our Company is determined by our employees. This involves a particular responsibility for us. Occupational health and safety are a fundamental part of all operational processes and meet high standards worldwide. Every manager is obliged to encourage their employees to comply with the regulations on occupational health and safety. 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.

4. 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 recognize 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.

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5. FAIR COMPETITION / ETHICAL BUSINESS PRACTICES

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 is taking a stand against anti-competitive behaviour and has implemented a Compliance Programme focusing on

- antitrust law / competition law
- corruption prevention.

Our understanding of compliance also includes the rejection of any kind of fraudulent behaviour and money laundering. EUROPIPE strictly complies with behavioural rules established in the Compliance Programme, taking into account national and international legislation.

We offer all employees, as well as our business partners, the opportunity to confidentially report violations via the EUROPIPE whistleblower system. At the same time, we use the whistleblower system to fulfil our legal obligations under the German Whistleblower Protection Act ('HinSchG').

6. 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.

7. 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.

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8. SUSTAINABILITY

We are aware of the ecological impacts 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.

9. 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.