



**Code of Conduct**  
**BUTTING Group**



**BUTTING**

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## Foreword

Living responsibility has always been the fundament of our corporate culture here in the BUTTING Group (hereinafter referred to as BUTTING). Living responsibility creates trust. A trusting, appreciative relationship with employees, customers, suppliers and service providers, coupled with courage, diligence and careful work, have been the foundation for our sustained success as a family business – for more than 245 years.

Alongside quality Management, Occupational Health and Safety Management, and Environmental and Energy Management, Compliance Management is an important pillar of our integrated Management System. For us, compliance means that all our business activities always comply with legal requirements and ethical principles.

With this Code of Conduct as the basis of our compliance management, we want to set rules to ensure that our actions are above reproach, always correct and exemplary. Alongside the Code of Conduct, our BUTTING self-conception and our understanding of management should define our actions and shape our company culture – for the good of our employees, our company and all our business partners.

BUTTING – more than pipes – for a better quality of life

A handwritten signature in black ink, reading 'H. Butting'. The signature is fluid and cursive, with the first letter 'H' being large and prominent.

(Hermann Butting)  
7th generation company owner

# 1. Corporate values

## 1.1 Self-conception of BUTTING

As an owner-managed, self-determined family business, we work together toward a better quality of life, for our society, for our customers and for our families. BUTTING was founded more than 245 years ago as a coppersmith's shop in Crossen an der Oder. Today we are an internationally operating company with over 2.200 employees worldwide. Our self-conception and the values we live by are the foundations of our corporate actions.

- **Family Business**



We are a self-determined family business managed by the 7th generation of the Butting family. Our aim is to hand over a healthy company to the next generation!

- **Family of Employees**



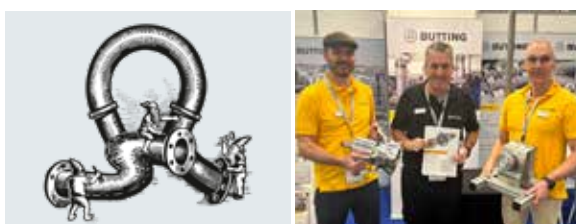
Even though we are a highly educated, multicultural family of workers, we still consider ourselves to be lifelong learners. We owe our innovative strength and ability to find solutions to many years of experience and teamwork, as well as to new ideas and unique personalities!

- **Top Performance**



We are enthusiastic about our joint top performance! We are proficient in the sectors of materials and welding technology, manufacturing technology, machining and quality assurance as well as the handling of major projects and we invest continuously for a successful future.

- **BUTTING Fans**



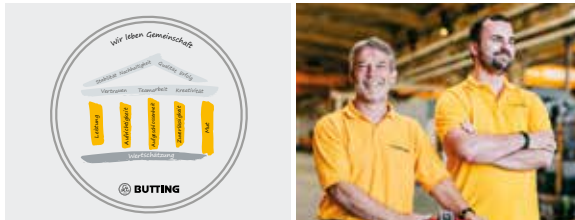
We are well-known for quality and reliability. We take responsibility for our work and are accountable for our mistakes. We provide our customers with a service that they are satisfied with.

### • Purpose and Quality of Life



We support the success of our clients and promote sustainability and quality of life through our corrosionresistant products. With our economic success, we ensure our future as a self-determined family business and substantially contribute to the living standards of our employees and their families.

### • A Valuable Cooperation



We embrace the principles of our “House of Cooperation” to ensure our cooperation is successful and enjoyable:

- Esteem
- Performance
- Honesty
- Open-mindedness
- Reliability
- Courage

### • A Powerful, Global Network



We create a powerful network with worldwide cooperation partners - and through global market presence with BUTTING companies.

### • Healthy, Safe and Environmentally Friendly



When organizing our employee's workspaces, we prioritize the health and safety of both our employees and visitors. Ensuring workplace safety is our highest priority in daily operations. We use resources sparingly, protect the environment and act in harmony with people and nature.

## 1.2 Our Code of Conduct

Values which determine behaviour are the basis of every action. Every corporate culture develops based on of the values lived by those who bear responsibility. In the “House of Cooperation” we have attempted to outline the values that have shaped the BUTTING culture through generations. We are dedicated to these values.

For us, esteem is the foundation of our successful teamwork. We are convinced that every individual deserves consideration and respect. This means, for example, that we approach each other positively, maintain good manners even in e-mail correspondence and talk with rather than about one another. People who contribute to the well-being of the company are supported by BUTTING in developing their potential.

This forming the foundation for the following supporting pillars:

- **Performance** means for us that each individual is 100 % committed to the success of BUTTING. It is not only important that every employee fulfils the tasks assigned to them conscientiously. We also support one another as a team and are successful together. If we are unable to perform as expected, we clarify the causes together and find possible solutions. In this way, we are committed to progress, growth and securing a sustainable future for BUTTING.
- **Honesty** means for us that our words and actions are in harmony. We know the limits of our own actions and do not make promises that we cannot keep. We stand by our convictions, address difficulties and openly admit our own mistakes at an early stage.
- **Open-mindedness** means for us that we are open towards other people, new technologies and new forms of teamwork and organisation. To remain competitive in the future, we as a company must embrace change as an opportunity and utilize it for our own benefit. To this end, we see ourselves as learners every day. We question existing interdependencies and develop new ideas for our own tasks, processes, the department or the company. In doing so, we incorporate arguments and ideas from employees and colleagues into our decision-making process..
- **Reliability** means for us that we build long-term relationships. We achieve this by practicing diligence, discipline, reliability and loyalty towards the company, colleagues and business partners This is why, for example, we complete our tasks and appointments reliably and on schedule, or communicate difficulties and possible delays to downstream departments at an early stage. The discreet handling of personal information and company know-how is a matter of course for us..





- **Courage** means for us that every individual takes decisions independently within his area of responsibility and implements new ideas. We therefore try out innovations on our own initiative if this benefits our corporate objectives and progress. Every individual employee fulfils the tasks assigned to them responsibly and is accountable for the consequences of their own actions. But we also stand up for our own ideas even if they do not directly affect our own area of responsibility.

If these values are lived, we firmly believe that an atmosphere of trust, creativity, motivation and genuine teamwork is created. Every individual employee should be able to fulfil his potential as far as possible. The reward is enjoyment of (team)work, quality, innovation and outstanding performance. This is the way to achieve “Progress by Tradition”.

With this corporate culture, it is a matter of principle for us to maintain a non-discriminatory working environment. On the occasion of World AIDS Day 2020, for example, BUTTING joined the appeal of Deutsche Aidshilfe and signed the declaration of non-discriminatory treatment of HIV-positive people in the workplace.



### 1.3 Our employees are our most valuable asset

As a family business, it is important to us to focus not only on strong product quality and customer satisfaction, but especially on a healthy and positive corporate culture. We are convinced that our employees are the key to the success of our company and that we can only realize our full potential through close cooperation and a clear shared vision.

An important aspect of our corporate culture is therefore a Code of Conduct that is binding for all employees. We expect them to actively support this code and integrate it into their daily work. Our goal is to work together to promote a positive corporate culture and thereby maintain the long-term health of our employees and achieve success.



## 2. Operating in accordance with law and ethics

### 2.1 Compliance with legal, social and and political requirements

As a globally operating company, BUTTING must comply with a wide range of social, political and legal conditions in Germany and abroad. It is a matter of course to us to conduct our business in accordance with the applicable laws and regulations in all countries in which we operate.

BUTTING undertakes to abide by fair, ethical and transparent business practices. We do not purchase materials or services that do not comply with national or international laws and conventions. At the same time, we are committed to using raw materials that have a legal and sustainable origin. We therefore do not knowingly purchase raw materials from conflict regions ("conflict minerals").

BUTTING emphasizes compliance with the legal regulations on the employment of its own and external employees and does not tolerate illegal employment or undeclared work.

#### In PRACTICE

##### **Example from the daily routine at BUTTING**

A business partner asks you as a BUTTING employee to handle a transaction that lies in a legal grey area. You then consult with your manager and report the case to the Compliance Officer.

##### **What does this mean for you at BUTTING?**

As an employee I know the legal regulations relevant to my area of responsibility and comply with them. If necessary or in case of doubt, I ask my manager, the relevant specialist departments or the Compliance Officer for advice. Furthermore, I respect the local laws, values and ethical concepts of my respective BUTTING location and business partner.

## 2.2 Political framework

BUTTING complies with all the control regulations when purchasing, manufacturing or marketing goods or transferring or acquiring technologies. Before dispatching or exporting any goods, BUTTING collects the required authorizations from the responsible authorities and submits all statutorily prescribed end user declarations voluntarily.

BUTTING is strictly opposed to the production of NBC weapons and to the further development of suitable carrier technologies. BUTTING complies with all applicable foreign trade and customs regulations. To this end, BUTTING has certified an Authorized Economic Operator (AEO) who is responsible for compliance with the applicable regulations. Furthermore, an integrated business partner check is carried out.

## 2.3 Respect human rights

As a family-run industrial company, we share responsibility for our employees, customers, suppliers, service providers and society as a whole. One important dimension of this responsibility is respect for human rights.

We are therefore committed to respecting and protecting all human rights, in particular the rights set out in the United Nations Universal Declaration of Human Rights. These include, among others:

- The right to life, liberty and security of the person
- The prohibition of torture and inhuman treatment
- The right to freedom of thought, conscience and religion
- The right to freedom of expression and information
- The right to work and fair working conditions
- The right to education and participation in cultural life
- The prohibition of discrimination of any kind
- The prohibition of child labour
- The prohibition of slavery and slave trade

We are committed to ensuring that our business activities and supply chains do not cause any human rights violations. To this end, we will regularly review our suppliers and business partners for their compliance with human rights standards and take action if necessary.

We ask all employees to respect and comply with our Code of Conduct on respecting human rights. Together, we can help to create a just and humane world.

## In PRACTICE

### **Example from the daily routine at BUTTING**

As a BUTTING employee, you receive a notification that human rights have been violated in our supply chain (e.g. child labor, forced labor, discrimination). As a BUTTING employee, you are aware that this is not compatible with the values of our family-owned company. You forward this information immediately through your manager or the known Whistleblowing Systems.

### **What does this mean for you at BUTTING?**

As a BUTTING employee, I am sensitized to all human rights issues in addition to the applicable legal provisions. I know the basic regulations and requirements. I am also alert to possible human rights violations - both within the company and in the upstream and downstream value chain. In the event of a violation, I contact the relevant authorities and report the offence.

## **2.4 Anti-corruption program**

We condemn any active or passive bribery as well as attempts to do so. We actively prevent attempts at corruption, e.g. through the dual control principle in selected processes, through defined processes for approval with division of labour and implemented approval limits.

Gifts, favors, hospitality, offers of entertainment and other benefits are only granted or accepted if they remain within the scope of what is permitted by law or if they do not exceed the scope of business practices in the region concerned and at the same time do not have an unreasonably high value.

In case of any doubt, employees can contact the Compliance Officer and involve him in the decision-making process. Based on the corruption index published by Transparency International, an annual risk analysis of all transactions is carried out regarding the corruption risk of the recipient country and the country of our business partner.

## In PRACTICE

### **Example from the daily routine at BUTTING**

As a BUTTING employee you are confronted with a demand for a bribe during a business negotiation while travelling. Unless you are in danger of life and limb, you refuse the payment.

### **What does this mean for you at BUTTING?**

I am aware that as an employee of BUTTING I must refrain from any form of corrupt behavior. I have therefore familiarised myself with the guidelines of the Code of Conduct. My goal is to do business with quality and integrity.

## **2.5 Money laundering**

Money laundering is the process of disguising the origin of illegally obtained or suspicious funds to make them appear legitimate. In most countries, it is a criminal offence to “launder money”. Anti-money laundering is the term used to describe the controls in place to prevent, detect and report money laundering activities.

We expressly commit to upholding all the laws to prevent, detect and report on money-laundering activities. Additionally, we want to build and maintain business relationships only with customers and business partners who pursue legitimate business activities and use legitimate financial means.

To minimize the risk of money laundering, BUTTING carries out business partner checks. The business partners involved are checked against applicable sanctions lists.

## 3. We at BUTTING

### 3.1 Leadership and responsibility

BUTTING grants its employees as much individual responsibility as possible. At the same time, we stand for compliance with the law and with BUTTING's own guidelines.

Our executives are expected to be the point of contact for employees: for questions of any kind, for professional and personal concerns, and on issues that affect compliance with statutory provision.

The dual control principle applies to all our relevant business transactions, such as the signing of contracts and the authorization of payments. This principle specifies that a transaction or document must be checked and, if necessary, signed by another person.

#### In PRACTICE

##### **Example from the daily routine at BUTTING**

One of your employees has a question about the implementation of a new guideline. You take the opportunity to openly address the guideline in question and its implementation at the next team meeting.

##### **What does this mean for you at BUTTING**

As a manager I do not tolerate any violations of our guidelines by employees. I monitor all processes adequately so that any misconduct in my area of responsibility is recognized at an early stage. If I, as a BUTTING employee, have questions about certain activities or I am unsure about their implementation, I contact my manager directly.





### 3.2 Management principles

For the worldwide use of our product solutions, our customers expect top quality, adherence to specifications and schedules, and further development or customization of products. More than 2,200 employees demand a clear direction, good working conditions and safe workplaces from us..

It is our task to fulfil these requirements in equal measure. Together with our more than 150 managers, we rise to this challenge. Managing BUTTING employees in an appreciative manner is a particular concern of ours. Our management principles provide a common direction for our actions:

- We make decisions and give our employees orientation for their actions (provide direction)
- We set an example for our employees. We reflect on ourselves and elicit feedback from others (self-managing)
- We encourage and challenge our employees so that performance and motivation are strengthened (managing employees)
- We communicate openly, respectfully and constructively (communicating well)
- In our actions we bear in mind the needs of internal and external customers in addition to the concerns of our own department (meeting customer needs)
- We are thorough-going. We monitor and control the results in our area of responsibility (securing results)

### 3.3 Cooperation

Our employees are selected and supported based on their qualifications and skills. We condemn any form of discrimination, for example by unfair treatment, harassment, bullying or defamation – including in social networks – and support a respectful partnership with one another. We have presented and explained our most important values in the “House of Cooperation”.

We guarantee equal opportunities and equal treatment, irrespective of ethnic origin, skin colour, gender, disability, world view, religion, nationality, sexual orientation or social origin. This also applies to political opinions, providing these are based on democratic principles and tolerance towards those who think differently.

#### In PRACTICE

##### **Example from the daily routine at BUTTING**

In your area at BUTTING you notice that a colleague is being insulted by other colleagues because of their origin. You do not turn a blind eye, but rather try to mediate first. Otherwise, contact your manager, an employee in the Human Resources department or the Compliance Officer in confidence to rectify the situation.

##### **What does this mean for you at BUTTING?**

At BUTTING we respect the dignity, privacy and personal rights of every individual. Our family-owned company does not tolerate any form of bullying, discrimination, harassment or insult. This applies to both the active exercise and passive toleration of such behavior.

### 3.4 Dealing with company property

BUTTING is proud of its positive development and relies on the protection as well as the preservation of its company property.

Our company property includes not only physical items, such as machines, tools and office materials, but also intellectual property, such as patents, trademarks and trade secrets.

We expect our employees to handle our property with care and to use it specifically for business purposes. Unauthorized use, dissemination or publication of our property may have serious consequences, including financial loss, infringement of our intellectual property and damage to our reputation.

Every employee is expected to protect our property and ensure that it is kept safe and

secure. Report any theft, loss or damage to our property immediately to your manager or via our whistleblowing system.

We are convinced that every employee of our company respects and complies with these rules of conduct to protect our property. If you have any questions or concerns, please contact your manager or the Human Resources department.

## In PRACTICE

### **Example from the daily BUTTING routine**

After consulting your manager, you borrow a tool for private use for a certain period of time and return it reliably at the agreed time without being asked. It goes without saying that you ensure careful handling and low wear and tear.

### **What does this mean for you at BUTTING?**

As a BUTTING employee I protect company-owned work equipment from access by third parties and treat it with care. I am authorized to borrow tools and media for private purposes - but only in exceptional cases, with negligible wear and tear and in agreement with my manager.



### 3.5 Conflicts of interest

Wherever possible, BUTTING avoids conflicts of interest. We also take an active part in eliminating conflicts of interest once they have been detected.

This applies to conflicts of interest within the company as well as to conflicts with customers, suppliers and other business partners (e.g. banks, insurance companies) and competitors. We expect that our employees will devote all their labor power to BUTTING and will take up other activities only to a legally permitted extent or as provided for in their contracts of employment.

#### In PRACTICE

##### **Example from the daily routine at BUTTING**

As a BUTTING employee in Purchasing, you receive an offer for a purchase order from a business partner who also plays in a private football team with you. You inform your manager about the conflict of interest and withdraw from the negotiation

##### **What does this mean for you at BUTTING?**

I cultivate a respectful relationship at working level with business partners and avoid overly friendly behavior. I always signal that even if a contract is concluded satisfactorily for both parties, I will not accept any personal advantage.

### 3.6 Cooperation with business partners

At BUTTING we know how important it is to work together with our customers, suppliers and service providers on a long-term basis, in a spirit of partnership and trust. We are aware that we bear responsibility for our supply chain. In our German companies, we ensure that we fulfil our obligations under the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG). However, we also value a safe and sustainable supply chain in the BUTTING companies in and outside of Europe.

Our Code of Conduct for cooperation with customers and suppliers is based on the principles of transparency, fairness and sustainability. We strive to build long-term relationships with our business partners based on trust and respect.

Transparency is an important part of our cooperation. We emphasize the importance of providing our customers, suppliers and business partners with all relevant information about our business processes, products and services. We also expect our business partners to inform us transparently about their business processes, products and services.

Fairness is another important principle in our cooperation. We strive to offer fair prices and conditions for our products and services. We also expect our suppliers and service providers to offer us fair prices and conditions. It is very important to us that our business relations take place on an equal footing and that we support and respect one another.

Sustainability is a central component of our business strategy and our Code of Conduct. We ensure that our business processes and products are as environmentally friendly and resource-efficient as possible. We also expect our business partners to implement sustainable business practices and to comply with applicable environmental and social standards.

The German Act on Corporate Due Diligence Obligations in Supply Chains is an important guideline for us to ensure that we fulfil our responsibility in the supply chain. We are committed to ensuring that our suppliers comply with the requirements of the law and that we work together to make the supply chain transparent and sustainable.

## In PRACTICE

### **Example from the daily BUTTING routine**

As a sales employee, you receive a request from a customer to declare their used machine as a new machine and to create incorrect documentation for it. You then consult with your manager and report the matter to the Compliance Officer

As an employee in Purchasing you notice that a long-standing supplier is not fulfilling the values specified by BUTTING. You contact your manager, as this business relationship needs to be reviewed.

### **What does this mean for you at BUTTING?**

As a sales employee at BUTTING, I know the customer's fundamental values and consistently compare them with our values. As a buyer at BUTTING, I am familiar with the company's specifications. If I am unsure whether the proposed transaction is legal, I immediately contact the relevant specialist department and seek advice there.



### 3.7 Competition

The only way to ensure stable business cooperation for the benefit of all is through fair competition and strict compliance with the legal framework. Therefore, BUTTING commits to respecting and complying with the national and international rules of fair competition and not undertaking any actions violating antitrust law. We do not make any bogus proposals, do not have discussions with competitors about prices, capacities or not competing with one another, and do not make any agreements on dividing up customers, territory or production programmes. For selected project business, BUTTING works in partnership and in compliance with all competition law requirements. This collaboration allows us to pool the expertise and resources of different organisations and business partners to achieve the best possible results for our customers.

Our agreements with customers and suppliers are complete and clear, and subsequent changes and additions are documented. This also applies to arrangements for the payment of bonuses, credits, commissions, and advertising or sales promotion allowances. We select our suppliers solely on a competitive basis after comparing the price, quality, reliability, performance and suitability of the products or services on offer.

#### In PRACTICE

##### **Example from the daily routine at BUTTING**

At the trade fair a competitor engages you in a conversation about BUTTING's pricing policy. You break off the conversation because it is to be categorized as critical from an antitrust point of view.

##### **What does this mean for you at BUTTING**

I do not talk to competitors and their employees about topics such as financial calculations, capacities, profit margins or other factors that could influence the company's competitive behavior. In addition, I refrain from making agreements regarding bidding behavior, the restriction of business relationships, the submission of sham bids or the allocation of customers, markets, territories or production programs.

## 4. Dealing with knowledge and information at BUTTING

### 4.1 Secrecy

Confidential information is all information that is not publicly accessible. It is a company asset, which is why any unauthorized disclosure could harm the interests of BUTTING or third parties working for us. In the same way as we treat non-public data confidentially, we respect and protect confidential information from third parties.

#### Example from the daily routine at BUTTING

A former colleague who has moved to a competitor asks you in confidence for construction drawings. You do not pass on any information and refer to his and your duty of confidentiality as stipulated in your employment contracts.

#### What does this mean for you at BUTTING?

As a BUTTING employee I am aware of the duty of confidentiality stipulated in my employment contract. The protection of confidential information is taken very seriously at BUTTING. I always adhere to this basic principle, even after termination of my contract.

In PRACTICE

### 4.2 Information security

We undertake to protect information and data appropriately to ensure its confidentiality, integrity and availability. Unauthorised access, use, and disclosure of information are strictly prohibited.

Every employee is responsible for accessing only the information and data required for their tasks and responsibilities. Access rights are assigned according to the principle of least privilege. The use of strong passwords is mandatory. Passwords should be updated regularly and not shared with third parties. The sharing of passwords is prohibited.

Employees must be attentive and recognize potential phishing attempts. It is prohibited to open unknown email attachments or download unauthorized software.

All information should be classified according to its sensitivity. Data should be handled and backed up according to its classification.

Mobile devices must be secured with passwords or biometric authentication. Secure connections and safeguards must be used when accessing company data from external locations.

Corporate networks and resources should be used in a security-conscious manner. Connection to unsecure networks or unauthorised network devices is prohibited.

Every employee is required to report any security incidents or suspicious activities immediately. Quick action and an appropriate response are crucial to limit potential damage.

Compliance with the information security guidelines is mandatory for all employees. Violations may result in disciplinary action.

The BUTTING IT systems are subject to regular monitoring, maintenance and security tests. A system and access analysis is carried out annually by external agencies.

## 4.3 Data protection

BUTTING is committed to handling all personal data responsibly, with due care and in compliance with applicable data protection regulations.

It is prohibited to use confidential business information directly or indirectly during and after termination of the employment relationship for personal benefit, for the benefit of third parties or to the detriment of BUTTING.

### In PRACTICE

#### **Example from the daily routine at BUTTING**

A colleague asks for a file containing personal data of business partners. You only forward it after you have made sure for what purpose he needs it. You also encrypt the file with a password and enquire about the applicable requirements.

#### **What does this mean for you at BUTTING?**

I help to protect the personal data of colleagues, former employees, customers, suppliers, business partners and other data subjects. I will only use personal data for specified and legitimate purposes as defined by the Data Protection Act. I make the use of the data transparent for those concerned and delete it immediately as soon as the legitimate purpose no longer exists.

## 4.4 Potential risks of new media

New media and technologies have become an integral part of our everyday working lives. However, there are also dangers that we should be aware of. For example, there is a risk of carelessly disseminating information that is not intended for the public. The protection of our clients and of our own know-how as the basis of our market and technological leadership has absolute priority. Thus, the confidentiality and secrecy stipulated in the employment contract also applies in the sphere of social networks.

To minimise the dangers, we have laid down the following rules of conduct, among others:

- Protect your passwords and access data
- Watch out for phishing emails and do not open unknown attachments or links
- Always use secure connections

We want to take advantage of the opportunities offered by digitalization, but at the same time we also want to take responsibility. Together we can act more safely.

### In PRACTICE

#### Example from the daily routine at BUTTING

You see a photo of a customer's machine posted by a private individual on a social network. You happen to know that there is a non-disclosure agreement with this customer and that no photos may be published. You report this to Marketing instead of responding yourself.

#### What this means for you at BUTTING?

I take the responsibility I have in the digital sector very seriously. In doing so, I protect myself, BUTTING as a company and our customers. I always act with the awareness that I am fully responsible for all content that I share or publish on social media. I always indicate that this reflects my personal opinion.

## 5. Responsibility in society

### 5.1 Sustainability

As a family business we have both an economic responsibility and a responsibility to society and the environment. We are aware that our actions have an impact on people and the environment, and we want to do our part to shape a sustainable future.

With our Code of Conduct on sustainable responsibility in society, we want to continuously improve and live up to our responsibility.

We are committed to minimising our ecological footprint and to developing and using environmentally friendly technologies and processes. We are also committed to resource-saving production and strive to reduce our waste and emission levels.

As a company, we are part of society and want to do our part in improving it. We support social projects and are work for a just and inclusive society.

### In PRACTICE

#### Example from the daily routine at BUTTING

Because an internal process is to be adapted, an on-site meeting is first planned with colleagues from BUTTING. Before booking the business trip, you check whether a trip is necessary or whether a video conference would also serve its purpose. In this way, you avoid climate-damaging CO2 emissions - and save additional costs.

#### What does this mean for you at BUTTING?

Sustainability requires conscious, appropriate and responsible action. As a BUTTING employee, I make sure that I do not make decisions solely on economic grounds. At the same time, I weigh up the possible consequences for the environment, society and my colleagues.



## 5.2 Quality, health, safety and the environment

As one of the world's leading processors of premium quality stainless steels and clad materials, we also lead by example in the areas of occupational health and safety, environmental protection and the careful use of resources.

The high quality of our products as well as environmental protection, occupational health and safety and the search for energy-saving opportunities are part of our corporate philosophy – BUTTING's mission statement - and make an important contribution to the company's success.

At BUTTING, the areas of quality, environmental protection and occupational health and safety are combined in an integrated management system.

Our main objectives through the use of the IMS are the continuous and sustained optimisation of our processes, increased customer satisfaction and the improvement of our environmental and energy balance as well as our working conditions. We always align occupational health and safety protection with international requirements. Every manager and employee is personally involved in the continuous optimisation of the activities and processes and actively makes suggestions for improvement.

### In PRACTICE

#### Example from the daily routine at BUTTING

To process orders quickly, the sales, production and assembly departments are very busy. Despite the high workload, as an employee you always make sure to maintain BUTTING's high-quality standards, to guarantee safety for yourself and your colleagues and not to pollute the environment unnecessarily.

#### What does this mean for you at BUTTING?

As an employee, I know that BUTTING acts in accordance with applicable laws, regulations and binding obligations. I try to identify, analyze and avoid risks to quality, the working environment and the environment at an early stage. In my daily work, customer satisfaction through the highest quality is both a requirement and an incentive for me.

## 5.3 Our participation in the UN Global Compact

At BUTTING, we understand the need to be transparent about our commitment to sustainability and corporate responsibility. Our strategy and goals are firmly focused on addressing material issues and promoting sustainable aspects. We aim to fulfill the growing expectations for sustainability, and thus, we are approaching this challenge with resolve and foresight.

As BUTTING, we have joined an internationally recognized sustainability initiative. Since September 2024, BUTTING has been a signatory to the UN Global Compact. Based on the Ten Universal Principles and the 17 Sustainable Development Goals, the UN Global Compact strives to create an economy that is more inclusive and sustainable for all people, communities and markets, today and in the future. Through our participation in the UN initiative, BUTTING demonstrates our commitment to realizing this vision.

The initiative is not a certifiable standard or regulatory tool, but an open forum for initiating change processes and sharing ideas. In national and regional networks, concrete solutions are jointly developed that contribute to the global vision of the UN Global Compact.

The UN Global Compact supports companies in acting responsibly and developing innovative solutions to achieve the Sustainable Development Goals.

As BUTTING, we look forward to working with the network and being an active participant for a more sustainable future!

## 6. Support and help

### 6.1 Scope of validity and responsibility for each individual

This Code of Conduct applies to the entire BUTTING Group.

Compliance with the law is a matter of course in our entrepreneurial activity. On the other hand, violations cannot be reconciled with our values, since they damage the reputation of our company and may also have serious legal consequences.

### 6.2 Open questions and decision-making

In principle, every situation is different – a Code of Conduct cannot prescribe the right behavior for every case. Against this background our Code of Conduct formulates rules and principles that all BUTTING employees must comply with and implement in a meaningful way. If a BUTTING employee is not sure about the appropriate behavior to adopt in a particular case or has questions of a general nature, they will be aided in making a decision by considering the following questions:

- Can BUTTING's good reputation, law-abidingness and social responsibility be preserved as a result of my decision?
- Is my decision in line with the company's rules and regulations?
- Will my decision stand up to scrutiny by a third party?
- Can I make a decision impartially, in the best interest of the company and free from self-interest?
- What would my manager or my colleagues say if they knew?
- Could my decision also be made transparent?

### 6.3 Reporting channels and the consequences of violations

BUTTING reserves the right to investigate violations of this code and to apply appropriate consequences within the framework of company and legal regulations.

## 6.4 Our BUTTING whistleblower system

Our whistleblower system is an important tool. We encourage employees, customers, suppliers and partners, as well as the public, to report any violations of applicable laws, regulations or internal guidelines. We are convinced that every individual can contribute to maintaining a responsible corporate culture based on our values.

The whistleblower system provides a confidential and secure platform for everyone to share their concerns or information with us. Regardless of whether it is a case of corruption, fraud, discrimination, workplace safety violations or other ethical breaches, we take all reports seriously and conduct a comprehensive investigation.

In this context, BUTTING leaves it up to its employees to address concerns of any kind to the assigned manager, the compliance officer or the contact person in the respective company, to the human resources department or to the legal department of the BUTTING Group.

Alternatively, the reporting system can also be used via the BUTTING homepage. Reports can be made openly or anonymously, in person, electronically, in writing or by telephone.

Overall, our whistleblowing system is an integral part of our business practices. We are proud to be committed to the highest standards of integrity and ethics and we will continue to work hard to ensure that we adhere to our Code of Conduct at all times.

## We are committed to the Code of Conduct:

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**BUTTING**

We have refrained from gender-specific language in this publication in the interest of readability.

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