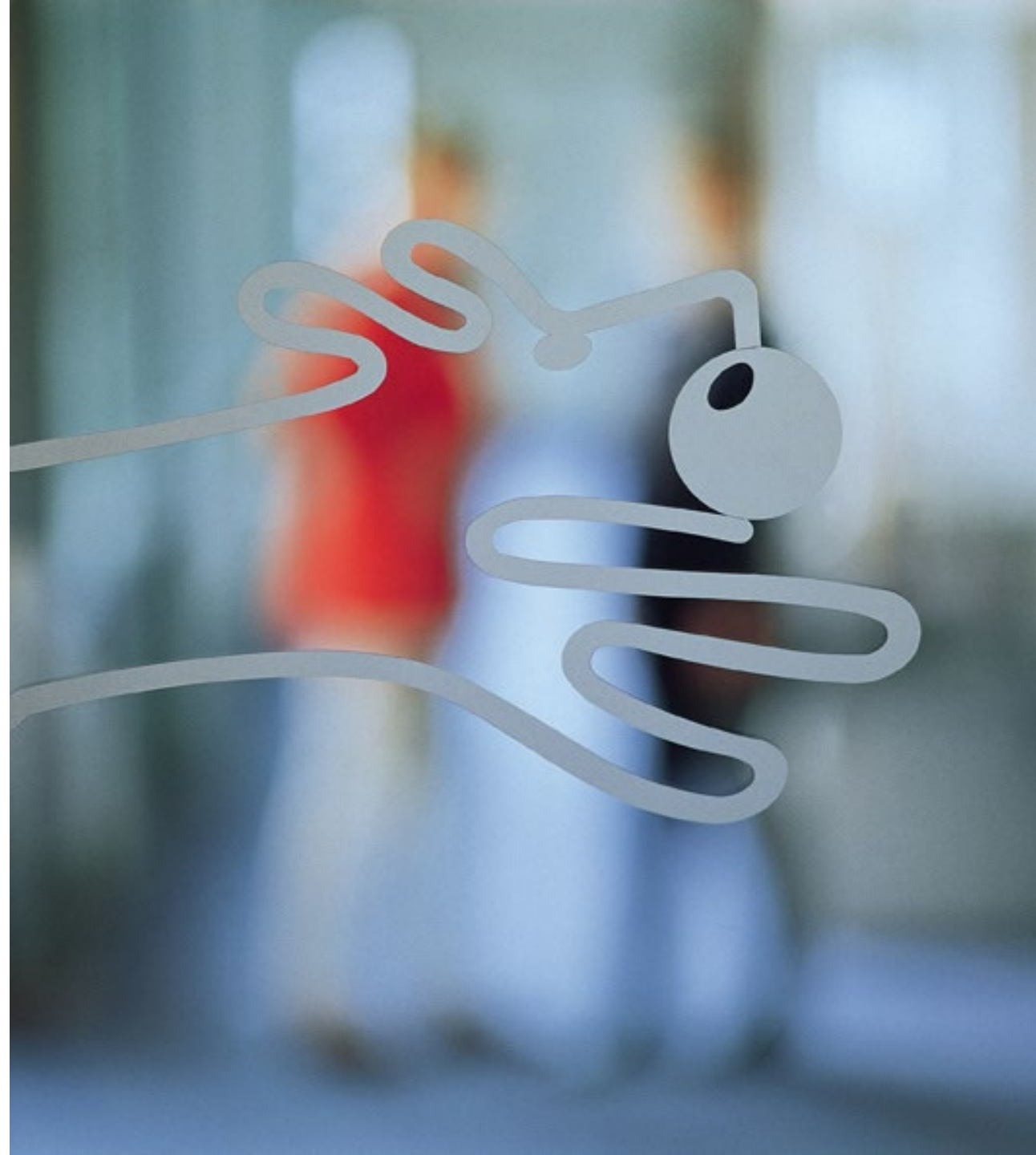


**klöckner & co**

Your partner for a  
sustainable tomorrow

# COMPLIANCE MANAGEMENT SYSTEM 5.0

**Corporate Compliance Office**



# AGENDA

1. Compliance Management System 5.0
2. Compliance Organization
3. Reporting Line



# 1 COMPLIANCE MANAGEMENT SYSTEM 5.0

## Definition of “Compliance”

The meaning of Compliance is:

- Behaviour according to the regulations
- of the Klöckner & Co Group as a whole
- its statutory bodies
- and all employees
- with regard to the abidance of all legal rules and regulations
- as well as to the corporate Guidelines

# 1 COMPLIANCE MANAGEMENT SYSTEM 5.0

## Compliance Principles

- The Klöckner & Co SE Compliance Management System is based on the frame concept of the OECD\* concerning the principles of good corporate governance, latest edition 2015.
- The CMS considers further the Compliance Principles of FCPA, UK Bribery Act and the German Corporate Governance Code.

\* OECD = Organization for Economic Co-operation and Development, Paris, France  
[G20/OECD Principles of Corporate Governance | READ online \(oecd-ilibrary.org\)](https://www.oecd-ilibrary.org/g20/oecd-principles-of-corporate-governance)

# 1 COMPLIANCE MANAGEMENT SYSTEM 5.0

## Compliance Targets

- Secure lawful behaviour of the Company, its legal representatives, Management and Staff on the basis of a corporate culture of trust
- Identification and reduction of risks resulting from compliance violations by preventive measures
- Earliest possible detection of compliance violations occurred
- Mitigation of damages in case of actual compliance violation and circumvention of its continuity by implementation of suitable measures
- Competitive edge through compliant corporate governance

# 1 COMPLIANCE MANAGEMENT SYSTEM 5.0

## Key aspects of the Compliance Program

- Competition Law
- Anti-Corruption
- Anti-Money Laundering
- Export Control
- Sanction List Screening

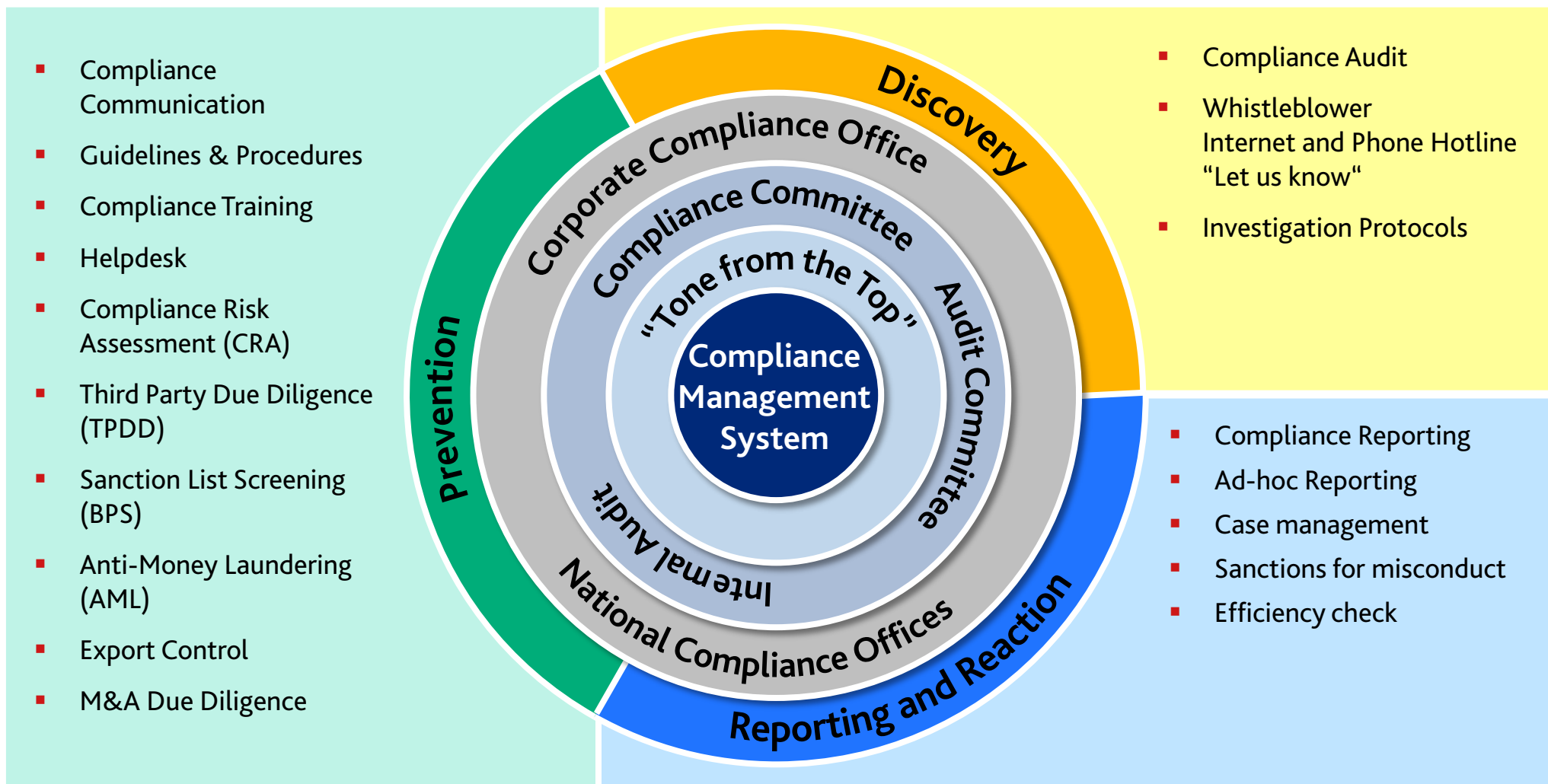
# 1 COMPLIANCE MANAGEMENT SYSTEM 5.0

## „Tone from the Top“

Klößner stands for:

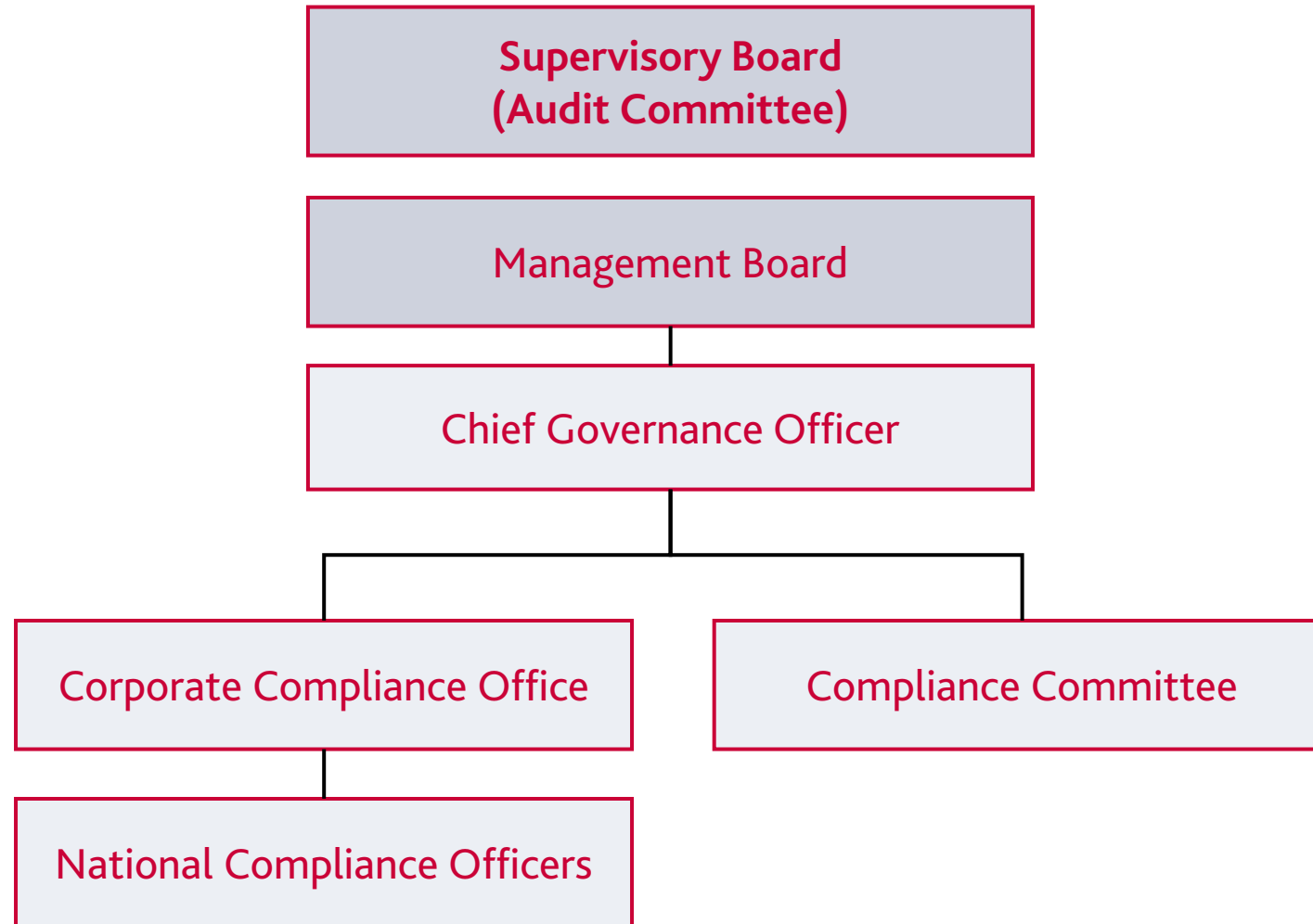
- Innovation, customer focus, motivated and responsible acting employees
- Violations against competition law and corruption won't be tolerated
- Misconduct will impose sanctions
- Prosecution by civil and criminal law

# 1 COMPLIANCE MANAGEMENT SYSTEM 5.0





## 2 COMPLIANCE ORGANIZATION



## 2 COMPLIANCE ORGANIZATION

### Corporate Compliance Office

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### 3 REPORTING LINE

