



Code of Conduct
BUTTING Group



BUTTING

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Foreword

Living responsibility has always been the basis of our corporate culture here at 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 basis 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 our business activities are always in line with legal requirements and ethical principles.

With this Code of Conduct as the basis for our compliance management, we want to set rules so that our actions are always above reproach, 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



Hermann Butting

1. Corporate values

1.1 BUTTING's mission statement

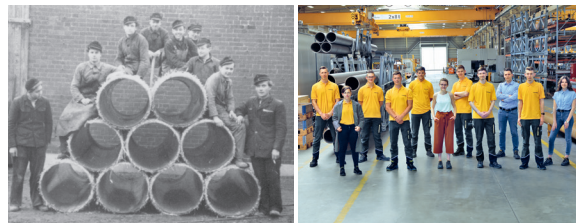
As an owner-managed, self-determined family business, we work together for a better quality of life, for our society, for our customers and for our families. BUTTING was founded as a coppersmith's shop in Crossen on the river Oder over 245 years ago. Today we are an internationally operating company 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**



We are a well-trained, international family of employees and yet we understand ourselves as people who learn something new every day. 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**



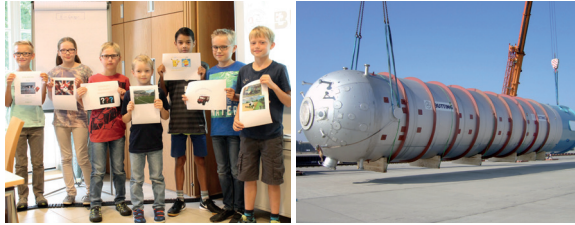
A top performance achieved together is our inspiration! We are strong in the sectors of materials and welding technology, manufacturing technology, machining and quality assurance as well as the handling of major projects and we invest continuously for a successful future.

- **BUTTING fans**



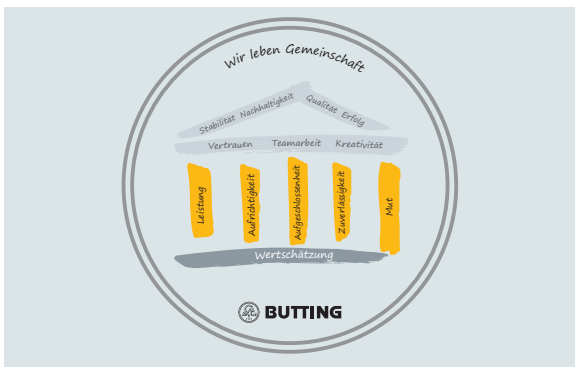
We are well-known for quality and reliability. We assume responsibility for our work – as well as for our mistakes. We provide our customers with a service they are enthusiastic about!

• **Sense and quality of life**



We support the success of our clients and with our corrosion-resistant products we support sustainability and quality of life. With our economic success we assure our future as a self-determined family business and contribute substantially to the living standard of our employees and their families.

• **A valuable cooperation**



In order to make our cooperation successful and enjoyable, we live out the values of our "House of Cooperation":

- Esteem
- Performance
- Honesty
- Openness
- 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**



In organising the workplaces of our employees we give special attention to the health and safety of our employees and visitors on site. Safety at work has number one priority in our daily activities. 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 on the basis 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 the generations. We feel under an obligation 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 cooperate positively with one another, show good manners even when sending e-mails, 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 is the foundation for the following supporting pillars:

- **Performance** means for us that every individual commits himself 100 % to the success of the BUTTING Group. Here it is not only important that every individual diligently takes on the tasks assigned to him. We also support one another as a team and are successful together. If we cannot provide the performance expected, we clear up the causes together and find possible solutions. In this way we are committed to progress, growth and securing the future of the BUTTING Group over the long term.
- **Honesty** means for us that what we say is in line with what we do. We know the limits of our own actions and don't make promises that we can't keep. We stand up for our convictions, face up to difficulties and admit our own mistakes openly at an early stage.
- **Openness** means for us that we are open towards other people, new technologies and new forms of teamwork and organisation. In order to continue to be competitive in future, we must as a company regard changes as opportunities and take advantage of them. That is why we see ourselves as learning every day. We question existing interdependencies and develop new ideas for our own tasks, processes, the department or the company. In so doing, we take arguments and ideas of employees and colleagues into account when reaching decisions.
- **Reliability** means for us that we build long-term relationships. We succeed in this when we live the values of care, discipline, reliability and loyalty to the company, colleagues and business partners. That is why, for example, we complete our tasks and appointments reliably and on schedule, or communicate difficulties and possible delays to the downstream departments at an early stage. 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 fulfils the tasks allocated to him responsibly and stands up for the consequences of his 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 will develop. 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 self-evident for us that we maintain a non-discriminatory approach to one another in our working lives. 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 believe that our employees are the key to our company's success and that it is only by working closely together and sharing a clear vision that we can develop our full potential.

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. Acting in accordance with law and ethics

2.1 Compliance with legal, social and and political framework conditions

As a company that is active worldwide, BUTTING must take account of varying social, political and legal conditions in Germany and internationally. It is a matter of course to us that in every country where we work, we operate our business in line with existing laws and regulations.

BUTTING undertakes to abide by fair, ethical and transparent business practices. We do not purchase any materials or services that do not comply with national or international laws and conventions. At the same time, we undertake to use raw materials with legal and sustainable origins. So we also do not knowingly purchase raw materials from conflict regions (“conflict minerals”).

BUTTING sets particular store on conforming with statutory provisions on the employment of our own and of third party employees and does not permit illegal employment or moonlighting.

In PRACTICE

Example from everyday BUTTING life

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.

For you at BUTTING this means

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

2.2 Political framework conditions

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 authorisations from the responsible authorities and submits all statutorily prescribed end user declarations voluntarily.

BUTTING is strictly opposed to the manufacturing of ABC weapons and against the enhancement of support technologies suitable for this purpose. BUTTING complies with all applicable foreign trade and customs regulations. To this end, BUTTING has certified an Authorised Economic Operator (AEO) who is responsible for compliance with the applicable regulations. In addition, an integrated business partner check is carried out within the ERP system.

2.3 Respect for human rights

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

We are therefore committed to respecting and protecting all human rights, in particular those 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 the trading of slaves

We are committed to ensuring that our business activities and supply chains do not cause 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 where necessary.

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

In PRACTICE

Example from everyday BUTTING life

As a BUTTING employee you are advised that a violation of human rights has occurred in our supply chain (e.g. child labour, forced labour, discrimination). As a BUTTING employee you are aware that this is not compatible with the values of our family business. You immediately pass on this information through your manager or via the known whistleblowing systems.

For you at BUTTING this means

As an employee of BUTTING I am sensitised to all human rights issues in addition to the applicable legal provisions. I know the basic regulations and guidelines. I am also vigilant in regard to possible human rights violations – both in the company and in the upstream and downstream value chains. In the event of a violation I will contact the offices in charge and report the violation.

2.4 Anti-corruption programme

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

Gifts, favours, hospitality, offers of entertainment and other benefits are only given or received if they remain within what is legally permitted or if they do not go beyond normal business practice in the relevant region and are not of disproportionately high value and do not constitute a bribe.

In case of 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 with regard to the corruption risk of the goods-receiving country and the country of our business partner.

In PRACTICE**Example from everyday BUTTING life**

As a BUTTING employee you are confronted with a demand for a bribe during a business negotiation while travelling. Unless you are facing danger to life and limb, refuse to pay.

For you at BUTTING this means

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

2.5 Money laundering

Money laundering describes the process of concealing the origin of illegally received or suspicious sums in order to make these appear legitimate. In most countries, money-laundering is a criminal offence. Fighting money-laundering is the term used to describe controls 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 and have business relations only with customers and business partners that pursue legitimate business activities and use legitimate financial means. To minimise the risk of money laundering, BUTTING uses a business partner check integrated in the ERP system. Participating business partners are checked with regard to applicable sanctions lists.

3. We at BUTTING

3.1 Leadership and responsibility

BUTTING gives 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 should be contacts for the employees: for all kinds of questions, professional and personal anxieties and on issues that affect compliance with statutory provisions.

The dual control principle applies to all our relevant business transactions, such as signing contracts and approving payments. It requires a second person to check, and if required, to sign a transaction or document.

In PRACTICE

Example from everyday BUTTING life

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

For you at BUTTING this means

As a manager I do not tolerate any violations of our guidelines by employees. I adequately monitor all processes so that any misconduct in my area of responsibility is detected 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 customisation of products. More than 2,200 employees expect us to provide a clear direction, good working conditions and secure jobs.

It is our task to equally satisfy these requirements. And we are meeting this challenge together with our more than 150 managers. 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 with one another

Our employees are selected and supported on the basis of their qualifications and skills. We condemn any form of discrimination, for example by unfair treatment, harassment, bullying or libelling – in social networks as well – 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 everyday BUTTING life

In your department at BUTTING you notice that a colleague is being insulted by other colleagues because of their origin. You do not close your eyes to this, but rather try to mediate first. Otherwise you contact your manager, a member of the Human Resources department or the Compliance Officer in confidence, so as to remedy this state of affairs.

For you at BUTTING this means

At BUTTING we respect the dignity, privacy and personal rights of every individual. In this respect, our family business does not tolerate any kind of bullying, discrimination, harassment or insult. This applies to both the active exercise and the passive toleration of such behaviour.

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

We expect every employee 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 for protection of our property. If you have any questions or concerns, please contact your manager or the Human Resources department.

In PRACTICE

Example from everyday BUTTING life

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 take care of it and keep wear and tear to a minimum.

For you at BUTTING this means

As a BUTTING employee I protect company-owned work equipment from access by third parties and treat it with care. I am entitled 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 and 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 labour 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 everyday BUTTING life

As a BUTTING employee you receive an offer for a purchase order in Purchasing from a business partner who at the same time plays with you in a soccer team in his and your leisure time. You inform your manager about the conflict of interest and withdraw from the negotiation.

For you at BUTTING this means

I maintain an appreciative relationship at the working level with business partners and avoid being too friendly. I always signal that even if a contract is concluded satisfactorily for both parties the acceptance of a personal benefit is out of the question for me.

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 and make sure that we fulfil our obligations under the German Act on Corporate Due Diligence Obligations in Supply Chains.

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 attach importance to 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 part 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 meet our responsibilities 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 everyday BUTTING life

As a sales employee you receive a request from a client to declare his used machine as a new machine and prepare incorrect documents for it. You then consult with your manager and report the facts to the Compliance Officer.

As an employee in Purchasing you notice that a long-standing supplier does not measure up to BUTTING's prescribed values. You contact your manager, as this business relationship needs to be reviewed.

For you at BUTTING this means

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

3.7 Competition

There can only be stable business cooperation for the benefit of all if there is fair competition and strict compliance with the legal framework. Thus BUTTING undertakes to respect and comply with the national and international rules of fair competition and not to undertake any actions that violate anti-cartel legislation. 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 purely on a competitive basis after comparing the price, quality, reliability, performance and suitability of the products or services on offer.

In PRACTICE

Example from everyday BUTTING life

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 ranked as critical from an antitrust point of view.

For you at BUTTING this means

I do not talk to competitors and their employees about topics such as financial calculation, capacities, profit margins or other factors that can influence the company's competitive behaviour. I also refrain from making any agreements regarding bidding behaviour, restricting business relations, submitting bogus offers or dividing up customers, markets, territories or production programmes.

4. Dealing with knowledge and information at BUTTING

4.1 Secrecy

Confidential information is all information that is not freely accessible. This information amounts to a corporate asset, and so any unauthorised disclosure may damage the interests of BUTTING or of third parties acting on our behalf. In the same way as we treat non-public data confidentially, we respect and protect confidential information from third parties

Example from everyday BUTTING life

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 the duty of confidentiality stipulated in their and your employment contracts.

For you at BUTTING this means

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 the contract.

In PRACTICE

4.2 Information security

We undertake to protect information and data appropriately to ensure its confidentiality, integrity and availability. Unauthorised accessing, 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 granted according to the principle of least privilege. The use of strong passwords is mandatory. Passwords should be updated regularly and not given to third parties. The sharing of passwords is prohibited. Employees must be attentive and recognise potential phishing attempts. Opening unknown email attachments or downloading unauthorised software is prohibited.

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 binding 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.

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

In PRACTICE

Example from everyday BUTTING life

A colleague asks for a file containing personal data of business partners. You forward this file only after you have ascertained for what purpose the colleague needs it. In addition, you encrypt the file with a password and enquire about the applicable guidelines.

For you at BUTTING this means

I help protect the personal data of colleagues, former employees, customers, suppliers, business partners and other data subjects. I will only use personal data if it is required for specified and lawful purposes in accordance with the Data Protection Act. For the data subjects in question I make the use of the data transparent and delete it immediately as soon as the legitimate purpose no longer exists.

4.4 Dangers 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. Among other things, 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 use the opportunities of digitalisation, but at the same time also take responsibility. Together we can act more safely.

In PRACTICE

Example from everyday BUTTING life

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

For you at BUTTING this means

I take my responsibility in the digital sphere very seriously. In this way I protect myself and also BUTTING as a company as well as our clients. I always act with the awareness that I bear full responsibility for any content I share or post 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 assume our responsibility.

We are committed to minimising our environmental footprint and 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 work for a just and inclusive society.

In PRACTICE

Example from everyday BUTTING life

Because an internal process needs to be adapted, an on-site meeting with colleagues from a company of the BUTTING Group is initially planned. Before booking the business trip, check whether a trip is absolutely necessary or whether the purpose of the meeting may also be achieved with a videoconference. In this way you avoid climate-damaging CO₂ emissions – and also save costs.

For you at BUTTING this means

Sustainability requires conscious, appropriate and responsible action. As a BUTTING employee I make sure I do not make decisions based on economic considerations alone. At the same time I consider 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 contribute substantially to the company's success.

At BUTTING, the areas of quality, environmental protection and occupational health and safety are brought together 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 everyday BUTTING life

In order to process orders quickly the employees in the Sales, Production and Assembly departments are extremely busy. As an employee you always make sure you comply with BUTTING's high quality standards, guarantee safety for yourself and your colleagues and do not place an unnecessary burden on the environment despite your heavy workload.

For you at BUTTING this means

As an employee I know that BUTTING acts in compliance with applicable laws and regulations and to fulfil binding obligations. I make every attempt to identify, analyse and avoid quality, workplace and environmental risks at an early stage. In my daily work, achieving customer satisfaction through top quality is both a requirement and an incentive for me.

6. Support and help

6.1 Scope of validity and responsibility for each individual

This Code of Conduct applies to all German companies of the 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

Basically, every situation is different – a Code of Conduct cannot prescribe the right behaviour 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 behaviour 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 breaches

BUTTING reserves the right to investigate any breaches of this code and to inflict appropriate punishment within the scope of the statutory and company regulations.

6.4 Our BUTTING whistleblower system

Our whistleblower system is an important instrument. 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 you with a confidential and secure platform where you can share your concerns or information with us. Whether it is a case of corruption, fraud, discrimination, workplace safety violations or other ethics violations, we take all whistleblower reports seriously and conduct a full 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. As an alternative, the reporting system accessible via the BUTTING homepage can be used. Submissions can be made openly or anonymously, in person, electronically, in writing or by telephone.

Overall, our whistleblowing system is an essential 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.



Your contact person

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We stand for the Code of Conduct:

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