



Code of Conduct

Internal



kersten
bending technology

Introduction

Kersten is a leader in the production of high-quality curved products in steel, stainless steel and aluminium for a broad scope of markets and applications.

We enjoy contributing to the rapidly changing world with our advanced technologies; bending technologies, engineering, prototyping, certified welding, drilling, milling, heat- and surface treatments, etc. At Kersten, we translate our customer's creativity into reality. Our expert engineers develop innovative solutions.

From curved parts and constructions for bridges, buildings and art objects, to curved components for automotive, machinery, tank construction, industrial equipment and offshore solutions.

We are a professional company doing business with integrity to ensure that people as well as the environment are treated with respect. We act in a responsible manner, ensuring that our social, environmental and ethical standards are high.

Code of Conduct (internal)

This Code of Conduct embodies a framework outlining the standards of integrity for which we strive. It provides an understanding of what is expected of our employees in each situation.



The Kersten group is committed to conduct its business with honesty and integrity, to follow the law and to make sure that each employee and business partner is treated respectfully. Kersten is proud of its excellent reputation as a responsible and reliable partner.

Notwithstanding local company specific values, business principles or other local codes already in place, this code of conduct contains the seven main business standards as rules of ethical behavior all Kersten employees must follow.

When in doubt, please discuss with your manager or send your question to Kersten by using the contact form on our social intranet Kersten Connect.

Business integrity

1.1 Compliance with laws

Kersten must comply with all (local) laws and regulations applicable to its business activities. Kersten trusts you to make yourself familiar with the applicable laws and regulations and ask your manager how to comply with them.

1.2 Prevention of fraud

Kersten expects you to conduct your work in a reliable and honest way, not to steal or misuse any company property or property of your colleagues nor to mislead anyone or set up a scheme with the intention that you benefit in a way that was never intended by Kersten.

1.3 No corruption or bribery

Do not in any way (try to) bribe another person, organization or company. You shall not offer or accept anything of value from someone with the intention to obtain assistance in business matters. Kersten avoids any appearance of bribery or conflict of interest under all circumstances. Therefore, you should never accept (or offer) a gift or entertainment with a value exceeding EUR 100 or the local currency equivalent. Should you reckon that declining or not offering will be against (local) business courtesies, please discuss with your manager.



1.4 Avoid conflicts of interest

Avoid any situation where your judgement might be affected as a result of conflicting loyalties between Kersten and another person or business. Can your involvement in such situation be fully disclosed without embarrassing yourself or Kersten? If not, inform your manager so that neither you nor Kersten' integrity will be at stake.

1.5 Accurate accounting and reporting

All books, records, accounts and financial statements, time and expense reports should be recorded consistently and accurately, reflecting the true view and conforming to all applicable legal requirements and internal control policies.

Fair and timely disclosure of information

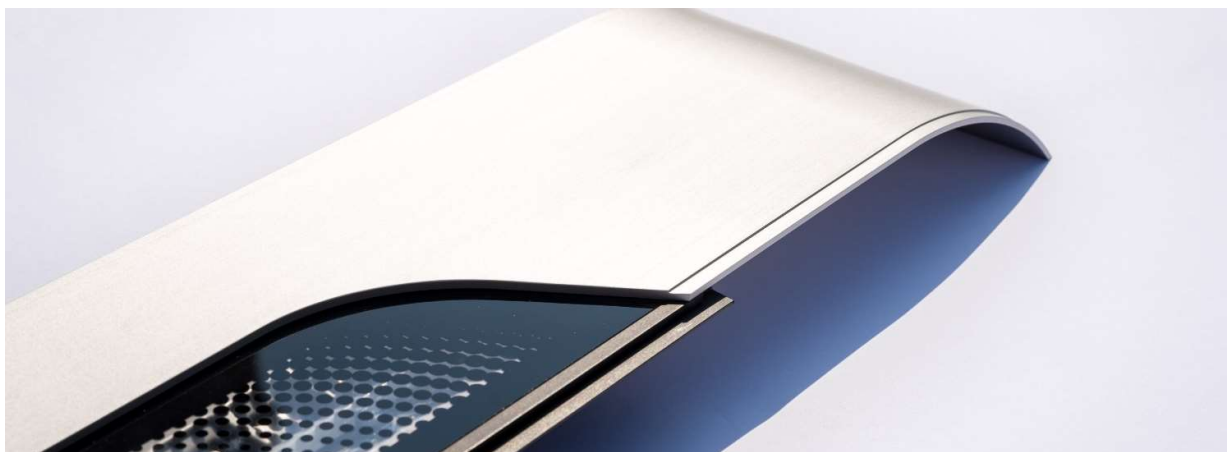
Any commercial or financially sensitive information regarding Kersten may not be disclosed to the public nor communicated to the press without consulting Kersten first. Furthermore, every employee should refrain from disclosing information, by any means of communication, that may harm the image of Kersten or any of its employees. You may not disclose any confidential information regarding Kersten, its customers and suppliers. Always take appropriate measures to keep such information strictly confidential.

Dealing with suppliers

Kersten companies must select their suppliers on the basis of objective comparison criteria, including commercial conditions, reputation, sustainability and reliability. Suppliers that adhere to the standards as reflected in this Code of Conduct should be contracted by preference.

Responsible work conduct

Kersten's IT and communication systems are built for business purposes. The capacity, software and security are not designed for private purposes and any use for private purposes should be limited as much as reasonably possible.



During office hours it is therefore prohibited to regularly use private email or social media, visit websites, download data or install software for private purposes as that can harm Kersten' systems or reputation.

Responsible work environment

Kersten strives continuously to improve health and safety aspects within your work environment. The management and each employee is responsible for creating and maintaining a workplace culture that is free of harassment and discrimination, respecting all colleagues. Alcohol is not permitted in Kersten facilities although exceptions can be made for special events. Any use of drugs is strictly prohibited.

Corporate responsibility

Kersten is committed to take its responsibility in the field of energy, waste, purchasing, personnel, health and safety very seriously and each of you is expected to do the same.

Proper authorizations and approvals

We expect you either to notify your manager or to obtain proper authorization with respect to certain business matters. We consider such behavior essential business practice. It is not the intention to restrict entrepreneurial spirit, but to mitigate the risk of inappropriate representation and binding of Kersten.



Speak up!

These business standards should be observed consistently by all Kersten' employees. Working for and dealing with a group of companies with an excellent reputation is something to be proud of.

Should you however become aware of any conduct that you believe violates this Code of Conduct, you can contact Kersten by using the contact form on our social intranet Kersten Connect. This can also be done anonymously.

Kersten will not permit retaliation against any employee who, in good faith, seeks advice or reports improper behavior under this Code of Conduct.



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