

klöckner & co

multi metal distribution



Klöckner & Co SE

A Leading Multi Metal Distributor



Helmut Geisen
Chief Compliance Officer
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**Head of Corporate
Compliance Office**

Compliance Management System

Release: May 2010

Agenda

01 Compliance Management System

02 Compliance Organization

03 Reporting Line



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 and national Guidelines



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 2004

*OECD = Organisation for Economic Co-operation and Development, Phoenix, USA <http://www.oecd.org/dataoecd/57/19/32159487.pdf>



Compliance Targets

Targets of the Klöckner & Co SE Compliance Management Systems:

- 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



Key aspects of the Klöckner & Co Compliance Program

The key aspects of the Klöckner & Co SE Compliance Program are based on the Compliance Principles and the findings of the group wide Compliance Risk Assessment. It is dealing with:

- Competition law
- Anti-Corruption
- Data protection



„Tone from the Top“

Klöckner 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



01 Compliance Management System

- Helpdesk Legal & Commercial
- Compliance Training
- Guidelines & Leaflets
- Publication of Compliance Messages
- Compliance podcast of the Top Management
- Compliance Risk Scan



- Compliance Audit
- Whistleblower „Let us know“

- Compliance Reporting
- Ad-hoc Reporting
- Global case tracking
- Sanctions for misconduct
- External efficiency check



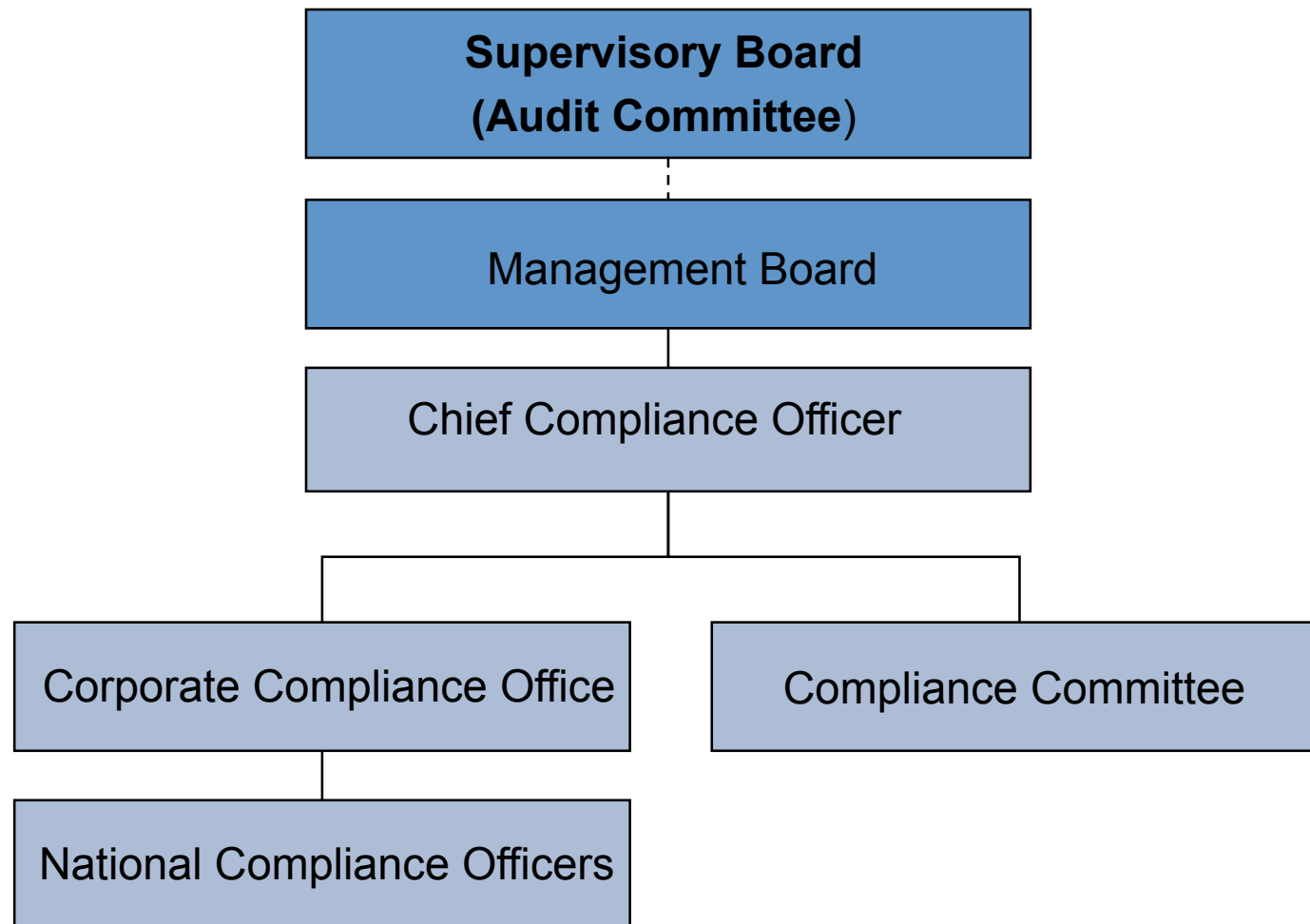
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03 Reporting Ablauf

