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Introduction and scope

As an owner-managed family business with over 350 years of experience, we see ourselves as a strong and reliable partner for our customers and suppliers. As a multi-specialist in the machining and processing of long metal products in more than 400 material grades in a wide variety of dimensions and shapes. The customers we supply can be found in different business sectors and can rely on us as a partner with comprehensive company certifications and approvals, which were confirmed and certified by external certification and accreditation bodies within recurring monitoring audits. In addition to the hot and cold forming of bar and wire products, our production portfolio also includes an extensive repertoire of work sequences for the forming, surface and heat treatment of our grades, which correspond to the current state of the art technology and fully meet or even exceed current standards.

However, we measure ourselves not only by the qualitative, timely and innovative manufacture of our products, which meet the comprehensive requirements of our partners, but also by adhering to and ensuring a responsible and legally compliant approach to the procurement of our raw materials and services at national and international level. To conclude, we strictly follow our "Responsible sourcing policy guideline" and involve our employees, raw material suppliers, customers, agents, consultants and company representatives in this process. We do not view legal guidelines and regulations as a risk when implementing them but rather see them as an opportunity to guarantee and maintain fair and equitable cooperation and to ensure this in the supply chain.

Sustainability codex

As a nationally and internationally active company, we regard the statutory provisions of the "Corporate Due Diligence Obligations in Supply Chains" (LkSG), the "Corporate Sustainability Due Diligence Directive" (CSDDD) and the "Environmental, Social and Governance Directive" (ESG) as a minimum standard and also demand these from our external providers within the supply chain. At the end of 2024, we received the bronze Eco-Vadis award at the first attempt. Our aim is to achieve a significant improvement with the upcoming assessments through targeted improvement measures. In this context, we ensure the following aspects and requirements are met.

Compliance with laws and regulations

Our qualified specialists in our process areas ensure that applicable laws and regulations are recognized, checked and implemented where applicable. This includes requirements relating to environmental protection, occupational safety, labor law and ethical conduct.

Environmental protection

Protecting our environment is very important to us. Since 2014, we have therefore been certified according to the environmental management standard DIN EN ISO 14001 and fully comply with the high requirements for our company due to its location in an FFH area (Council Directive on the conservation of natural habitats and of wild fauna and flora). The CO₂-footprint, resource efficiency, waste management and a functioning circular economy are prioritized by us and organized to an appropriate extent according to the state of the art.



Human rights and labor conditions

Our employees are our most important asset and ensure the effectiveness of our company through their ongoing commitment and professional expertise. We expect the same from our partners and oblige them to pay fair wages, to apply legally compliant working hours, to ensure suitable working conditions, to avoid discrimination and to prohibit child and forced labor.

Health and safety at the workplace

The safety of our employees has the highest priority and is guaranteed by state-of-the-art safety mechanisms and safety measures. We also demand this from our partners through the application of current occupational health and safety standards, through training and preventive measures and through the introduction of appropriate risk management and its evaluation.

Ethical behavior and corporate integrity

Maintaining ethical conduct and corporate integrity are essential minimum requirements that we place on ourselves and our partners. This includes actively combating corruption, applying responsible business practices and a high degree of transparency that discloses how these measures are ensured.

Compliance with social and environmental standards in the supply chain

A binding requirement to implement the aforementioned points within the entire supply chain is demonstrably ensured by our suppliers and service providers and confirmed in writing to Walzwerke Einsal GmbH.

Reporting and monitoring

Updates are carried out based on periodic audits, key data checks and risk assessments, which are used to determine and present the current degree of compliance with the aforementioned aspects. Our partners, their partners and we do this regularly to ensure continuous improvement.

Training and further education

We and our partners provide regular training for our own employees on how to handle, monitor and maintain the above defined aspects. Recurring training courses and the integration of new personnel are also considered, and personnel qualifications are ensured.

Consequences of non-compliance

Walzwerke Einsal GmbH undertakes to comply with the measures and procedures described and, in the event of proven deviations, to take corrective measures to comply with this voluntary commitment. Our supply and service partners are also involved in this procedure and act autonomously in their fulfillment. Our partners are also aware that a non-initiated or persistent breach of this commitment may lead to the termination of the business relationship.

**Assurance of compliance with legal regulations and requirements**

Defined aspects and requirements go hand in hand with various national, European and international regulations, guidelines and directives. As a partner, Walzwerke Einsal GmbH assures its customers in this respect that it will implement the applicable regulations to an appropriate extent and ensure compliance within the supply chain. In this context, we would like to give assurance of compliance with the following regulations in advance but also point out that all other applicable legal regulations are complied with. Please contact us for specific assurance via your contact partner.

Compliance with and implementation of the European ESG regulations

We confirm that we implement and comply with the ESG requirements of the European Union. This is in accordance with Directive (EU) 2022/2464. The sustainability report prepared by applying this CSRD (Corporate Sustainability Reporting Directive) includes all aspects of the ESRS standards (European Sustainability Reporting Standards) found to be material, in accordance with Regulation (EU) 2023/2772. We assure you as a customer that we will provide you with comprehensive support in fulfilling your legal obligations regarding the aforementioned requirements and provide you with the necessary data and information to a sufficient extent.

Reach Regulation 1907/2006 and further amendments

We assure you of full compliance with the Reach Regulation 1907/2006 and its amendments in accordance with the laws of the European Union.

RoHs Regulation 2011/65/EU; 2015/863 and other amendments

We assure you of full compliance with regulation 2011/65/EU, 2015/863 and further amendments in accordance with the laws of the European Union. If the material is not known from your order definition or corresponding harmonized standards, an IMDS entry can be made by our company.

Regulation (EU) 2025/40 and amendments about packaging and packaging waste

We assure you of full compliance with Regulation (EU) 2025/40 and further amendments in accordance with European Union law and the sections and subsections of the regulation in effect at the time of the assessment. We maintain conformity declarations of the packaging materials used and will provide them upon explicit request.

Conflict minerals and other regulations (e.g. Dodd-Frank Act, Section 1502)

We confirm that none of the defined conflict minerals “3TG” (tantalum, tin, tungsten and gold) has been intentionally added to the material supplied. Rather, in the case of technically necessary alloying, we guarantee that the material was mined by a legally authorized company in accordance with the “CMRT” document. The currently valid version of the conformity document can be completed and provided by Walzwerke Einsal GmbH on request. In addition to this regulation, we also confirm compliance with the Dodd-Frank Act Regulation, Section 1502. To confirm compliance, we will provide you with a complete analysis by sending you our test certificate in the event of an order.



Regulation 1935/2004 and further additions regarding food contact materials

We confirm full compliance with Regulation 1935/2004 of the European Parliament and of the Council of October 27, 2004, and Commission Regulation 2023/2006 of December 22, 2006 in accordance with European Union law.

Conformity regarding maximum permissible levels of lead, mercury, cadmium, chromium (VI) oxide and radioactivity

We guarantee that the materials supplied by us are free from the following ingredients, considering the maximum limits stated:

- < 0.1% lead
- < 0.1% mercury
- < 0.01% cadmium
- < 0.1% chromium (VI) oxide
- < 0.1 Bq/g radioactivity

To ensure compliance with this requirement, we carry out continuous tests in accordance with the state of the art.

Avoidance of deep-sea mining

We guarantee that the raw products we purchase from our partners for processing do not originate from deep sea mining and can prove this by means of supplier confirmation.

Material data sheet for delivered products

If required, we will send you a material data sheet on request. The material data sheet complies with Regulation 1907/2006 and other supplements.

Pressure Equipment Directive 2014/68/EU and other supplements according to our scope of application

Walzwerke Einsal GmbH is certified in accordance with the currently valid Pressure Equipment Directive and AD Merkblatt W0. The applicable scope can be viewed on our homepage www.einsal.com. If material is not included in the scope of application, it is also possible to carry out a subsequent qualification. Please contact us if required.

Implementation of Regulations (EU) 2026/1963, (EU) 2026/1384, and (EU) 2026/1930 to mitigate the negative trade-related effects of global overcapacity on the Union's steel market

We hereby confirm our full compliance with Regulations (EU) 2026/1963; Regulations (EU) 2026/1384 and (EU) 2026/1930, and the implementation of the resulting requirements for the import of products in accordance with the categories of goods defined in Annex I to Regulation (EU) 2026/1384.

Sanctions and embargoes in accordance with the official provisions of the European Union

We confirm full compliance with the legal provisions of the European Union regarding customs and embargo matters. This includes the applicable and valid sanctions on e.g. restrictive measures in view



of Russia's actions destabilizing the situation in Ukraine (EU 833/2014). In addition, we undertake to check the legal provisions and all customer requirements for any applicable sanctions and embargo laws for applicability and to comply with the legal provision

Energy consumption and CO₂ emissions

We are constantly working to reduce our CO₂ emissions and are continuously implementing projects to improve our energy efficiency and carbon footprint. We will be happy to provide you with information on our current CO₂ projects on request.