

EMPLOYEE CODE OF CONDUCT .



PREAMBLE

The Oryx Stainless Group (hereinafter referred to as “Oryx”) is committed to maintaining the highest standards of ethical conduct. This Code of Conduct reflects the business practices and principles of behavior that support this commitment. Our management is responsible for setting the standards of conduct contained in this Code and for updating these standards as appropriate to reflect legal and regulatory developments.

We expect every employee, officer and director to read and understand this Code of Conduct and its application to the performance of his or her business responsibilities. We will hold each of our employees, officers, and directors accountable for adherence to this Code. Those who violate this Code will be subject to disciplinary action, up to and including termination.

COMPLYING WITH LAWS AND REGULATIONS

Oryx and its employees must, at all times, comply with applicable laws and regulations. Oryx will not condone the activities of employees who achieve results through violation of the law or unethical business behavior. This includes any payments for illegal acts, indirect contributions, rebates, and bribery. Moreover, Oryx and its employees shall generally always comply with all applicable laws, including laws concerning, e.g., data and privacy protection, immigration laws concerning hiring of documented workers, antitrust laws, environmental laws, occupational health and safety laws and securities laws concerning disclosure requirements and insider trading.

Oryx and its employees will furthermore make sure that all laws regarding money laundering, as amended and/or tightened from time to time, are complied with.

All business conduct should be well above the minimum standards required by law. Accordingly, employees must ensure that their actions cannot be interpreted as being, in any way, in contravention of the laws and regulations governing the Oryx operations.

Employees uncertain about the application or interpretation of any legal requirements should refer the matter to their supervisor.

GENERAL EMPLOYEE CONDUCT

Oryx expects its employees to conduct themselves in a businesslike manner. Gambling, fighting, swearing and similar unprofessional activities are strictly prohibited while on the job.

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Employees must not engage in sexual harassment or conduct that could be construed as such. All employees within Oryx are to be treated equally regardless of their gender, religion, background, education or age.

CONFLICTS OF INTEREST

Oryx expects that employees will perform their duties conscientiously, honestly, and in accordance with the best interests of Oryx. Employees must not use their positions, or the knowledge gained as a result of their positions for private or personal advantage. Regardless of the circumstances, if employees sense that a course of action they have pursued, or they are presently pursuing or they are contemplating pursuing, may involve them in a conflict of interest with their employer, they should immediately communicate all the facts to their supervisor.

Employees shall be extra alert regarding and avoid the following situations:

- Acquiring a business or financial interest for their own accounts, if such interest could influence or create the impression of influencing their decisions in the performance of their duties on behalf of Oryx.
- Accepting preferential treatment, such as gifts or personal favors, that could, in any way, influence, or appear to influence, business decisions in favor of any person or organization with whom or with which Oryx has, or is likely to have, business dealings.

KICKBACKS AND SECRET COMMISSIONS

Regarding Oryx's business activities, employees may not receive payment or compensation of any kind from sources other than Oryx. In particular, Oryx strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others. Any breach of this rule can result in immediate termination and possibly prosecution under applicable laws.

COMPANY ASSETS

Employees will not misappropriate any of Oryx's assets or be involved with any fraudulent actions or dishonesty about Oryx's assets. If employees become aware of any evidence of misappropriation, fraud or dishonesty, they should immediately inform their supervisor.

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When an employee's position requires spending Oryx's funds or incurring any reimbursable personal expenses, that individual must use good judgment on Oryx's behalf to ensure that good value is received for every expenditure.

Oryx's assets are purposed for Oryx only and not for personal benefit. This includes assets for personal use, such as computers.

REPRESENTATIONS AND COMMUNICATION

All employees share a serious responsibility for Oryx's good public relations. When communicating publicly on matters that involve Oryx's business, employees must not create the impression to speak for Oryx on any topic, unless they are certain that the views they express are those of Oryx, and it is Oryx's desire that such views be publicly disseminated.

Employees must take care to separate their personal roles from their positions with Oryx when communicating on matters not involving Oryx's business. Employees must not use Oryx identification for other communications than Oryx's business, such as for personal matters.

When dealing with anyone outside Oryx, including public officials, employees must take care not to compromise the integrity or damage the reputation of Oryx.

PRIVACY AND CONFIDENTIALITY

When handling financial and personal information about customers, suppliers or others with whom Oryx has dealings, observe the following principles:

- Collect, use and retain only the information necessary for Oryx's business. Whenever possible, obtain any relevant information directly from the person concerned.
- Retain information only for as long as necessary or as required by law. Protect the physical security of this information.
- Limit internal access to information to those with a legitimate business reason for seeking that information.
- Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.

CYBER SECURITY

Each employee shall keep him and herself informed of and comply with any and all state-of-the-art measures with regard to cyber security, including (without limitation):

- shall not store confidential or business-related data on private computers or data carriers (“stick to your own device”) or make his or her professional data carriers and computers accessible to non-authorized persons;
- shall keep up with software updates; Limit internal access to information to those with a legitimate business reason for seeking that information;
- shall connect surely, in particular do not connect their device to an unsecured connection;
- shall define and change strong passwords from time to time; and
- shall not click on links or open attachments included in emails received from senders that are not 100% trusted.

REPORTING ILLEGAL OR UNETHICAL BEHAVIOR

Employees are encouraged to promptly contact a supervisor, manager or our human resources department if he or she believes to have observed a violation of this Code of Conduct or any other illegal or unethical behavior by any officer, director or employee or by anyone purporting to be acting on Oryx’s behalf and if the employee has any doubt about the best course of action in a particular situation. Such reports may be made anonymously. Confidentiality will be protected and subject to applicable law, regulation or legal proceedings.

REPORTING BY SUPERVISORS

When a supervisor, manager or other person receives reports of violations or questionable behavior pursuant to this Code of Conduct, that person shall be responsible for bringing such reports to the attention of his or her supervisor in accordance with the reporting procedures contained in this Code of Conduct. Persons receiving such reports must endeavor to honor any confidentiality or anonymity requests made by the reporting person, subject to applicable law, regulation or legal proceedings.

WHISTLEBLOWER SYSTEM

To ensure the safety and confidentiality of all our employees, customers, suppliers and other parties when reporting violations to our codes of conduct and other offences, we have implemented an anonymous internet-based whistleblower system. This system can be accessed [here](#).

NO RETALIATION

Oryx will not permit retaliation of any kind against anyone who makes a report or complaint in good faith that a violation of this Code of Conduct or other illegal or unethical conduct has occurred.