

# Group Regulation

## Communications

Version 02



governance



thyssenkrupp

# Group Regulation

## Communications

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## Revision history

Version	Adopted by	Changes	Valid from
01	Group Executive Board	Original draft	27.05.2015
02	Group Executive Board	Completely new version	01.10.2021

## 1. Objectives

The aim of this Group Regulation is to determine and implement our communications standards in the areas of external communications, internal communications, digital communications, brand communications, activities in the political engagement and corporate citizenship activities (corporate social responsibility, memberships, ticket purchases).

The Group Regulation serves to position thyssenkrupp firmly in all the markets in which we operate. The objectives are to:

- secure and strengthen the reputation of thyssenkrupp
- communicate messaging based on our group strategy and financial planning (overarching message)
- maintain a one voice policy while still enabling communications to be directed to the relevant target group
- support suitable internal communications and intensify networking within a group of companies
- use, promote and expand digital communications so that content can increasingly be provided via our own channels/platforms
- manage, maintain and develop the thyssenkrupp brand
- ensure an appropriate level of corporate social responsibility
- promote a policy environment that supports the business interests of thyssenkrupp.

## 2. Addressees, scope and exceptions

This Group Regulation applies to all companies, employees, managers and board members of the thyssenkrupp group, the regulation-relevant investments and the third parties included under Section 2 of the [Group Regulation Document Architecture](#).

## 3. External communications

External communications at thyssenkrupp include press work, public relations work, capital market communications (equity analysts and investors, fixed-income analysts and investors, rating analysts, banks and other financial institutes), communications to other external stakeholders (e.g. policymakers/political decision-makers), brand and marketing

communications (see Section 6) and digital communications (websites, microsites, blogs, social media communications, etc.).

The aim of external communications at thyssenkrupp is to support the Company's strategy, strengthen and protect its brand and reputation, and strengthen support from the capital market. In this way communications create the basis for openness, transparency and trust among all stakeholders and thus have a direct influence on the success of the Company.

### **3.1 Communications with external target groups**

#### **3.1.1 Fundamentals**

As an exchange-listed stock corporation, thyssenkrupp AG must comply with statutory requirements for external communications. Compliance with the following rules helps avoid the risk of liability for the group of companies and its employees, damage to its reputation and other negative impacts of inconsistent communications.

The aim of these rules is to ensure consistency in external communications. Consistent communication strengthens the thyssenkrupp brand as an important asset of the Company. A one voice policy applies to the group's press work: clear communication channels and consistent and coordinated messaging, as set out in this section.

#### **3.1.2 Persons authorized to issue information**

The Executive Board of thyssenkrupp AG has determined a strictly limited group of persons who are authorized to speak on behalf of the Company in the context of press/public relations work ("Persons authorized to issue information"):

- the members of the Executive Board of thyssenkrupp AG,
- the members of the segment boards,
- the heads of the regional platforms,
- the heads of the Group Functions Communications (PS/COM), Corporate Finance (PF/FIN) and Investor Relations (PF/IRM),
- the press officers of thyssenkrupp AG, the segments and the regional platforms,
- and the persons authorized by the above-listed persons.

No other employees of the group of companies are authorized to issue information in the context of general press/public relations work. They pass on any requests for information and inquiries they receive to the persons authorized to issue information.

### **3.1.3 Coordination & consistent messaging**

All inquiries must be examined to determine whether they may impact capital market communications and thus at least potentially the share price or compliance communications of the group. This applies in particular to all statements on the market and competitive environment, current and future business developments, economic developments, strategy and personnel decisions and major orders.

For strategically important key areas or areas with comparable effects on a large number of companies in the group, statements are drawn up that provide the framework for consistent communications. They can be obtained from the press officers at headquarters and the segments and from the communications departments of the regional platforms.

## **3.2 Capital market communications**

### **3.2.1 Contacts with equity analysts and investors**

Contacts with equity analysts and investors are handled exclusively by PF/IRM. PF/IRM contacts the relevant segments/companies to prepare specialist themes. Any inquiries received from equity analysts and investors must always be referred to PF/IRM.

### **3.2.2 Contacts with fixed-income analysts and investors, rating analysts, banks, credit insurers and other financial institutes**

Contacts with fixed-income analysts and investors, rating analysts, banks, credit insurers and other financial institutes are handled exclusively by PF/FIN. Any inquiries received from fixed-income analysts and investors, rating analysts, banks, credit insurers and other financial institutes must always be referred to PF/FIN.

## **3.3 Ad hoc disclosures /insider law**

Capital market communications at thyssenkrupp AG, in particular when dealing with inside information, are subject to statutory obligations (including ad hoc disclosures). In this connection the requirements of the [Group Regulation Insider Law](#) must be met.

## **3.4 Crisis communications**

In crisis situations, thyssenkrupp's reputation depends to a very large extent on how we communicate. Key to this are fact-based and empathetic messaging and a fast response.

The central Communications department must be informed as quickly as possible about all critical incidents – in particular accidents involving injuries/fatalities/significant material damage, plant closures or other measures associated with job cuts, as well as the sale of companies/company units and serious violations of company regulations.



Depending on the nature of the crisis, the extent to which it affects us and the potential for reputational damage, the regional platforms should coordinate crisis communications when several segments are impacted and/or the local resources of the segments are unsuited to providing an appropriate response.

Each segment and BU should define concrete scenarios for their respective area and prepare corresponding best practice cases in collaboration with the regional platforms (actions, messaging and training). Each segment is therefore responsible for defining its own processes and responsibilities in the event of crisis communications.

Further information is provided in the Crisis Communication Manual in [Annex 1](#). This manual was not drawn up against the background of a specific crisis, but rather provides a framework for guidance.

### **3.5 Press trips**

#### **3.5.1 Objectives**

Press trips are an important element of media work. They are organized by the Communications departments of thyssenkrupp AG and the businesses and facilitate an intensive local exchange between management and the media.

This may also include a social program (evening event, cultural program etc.). thyssenkrupp can meet certain costs in connection with the trip, e.g. for the social program or for meals, accommodation or transportation. These expenses must be carefully reviewed with regard to compliance and tax aspects, because they can lead directly to the granting of cash-equivalent benefits to journalists.

#### **3.5.2 Rules for press trips at thyssenkrupp**

Press trips are carried out at thyssenkrupp in accordance with the following provisions and conditions:

- The press trip serves the purpose described under Section 3.5.1 and is organized and carried out in compliance with applicable laws and internal regulations by PS/COM or in consultation with PS/COM.
- Participants in press trips are selected exclusively on the basis of objective criteria in the interest of broad and balanced reporting on thyssenkrupp.
- The press trip is based on a program which is prepared in advance and sent to the participating media representatives ahead of the trip.

- Press trips must be reviewed in advance by a compliance officer and assessed in a compliance report.
- Any appearance that the aim or the effect of the press trip is to exert inappropriate influence over the reporting of the journalists must be strictly avoided. The focus must clearly be on the business purpose of the trip. A social program of appropriate type and scope is permissible if it bears a relation to the business purpose of the trip. The same applies in the event that personal benefits are to be granted to the participants in connection with the trip. For invitations and gifts, the non-binding value limits of the corresponding [Supporting Document](#) serve as a guideline.
- Flight and hotel upgrades at thyssenkrupp’s expense must be avoided and are only permissible in justified exceptional cases. Accordingly, hotel accommodation must be booked in line with thyssenkrupp’s binding specifications for business trips. Invitations to journalists to fly first class are generally not permitted.
- Payment of travel allowances or other direct cash benefits is not permitted.
- Where costs are being met by thyssenkrupp, the consent of the publishing house for which the journalists work must be obtained ahead of the trip on the basis of the trip program and with disclosure of the costs to be met by thyssenkrupp.
- Tax on travel expenses shall be duly paid in accordance with the procedure stipulated by Group Function Taxes for non-cash benefits.

The above provisions and conditions apply in particular to trips with a social program and/or trips for which costs are met for meals, accommodation or transportation of the media representatives.

### 3.5.3. Documentation

The press trip must be documented in detail by the responsible communications department as follows:

Documentation	Timing
1. Consent	Prior to trip

2. Names of participants, incl. publication/publishing house/media institution, purpose of trip, program for trip (final version).	Prior to trip
3. Compliance report	Prior to trip
4. Transparent documentation by the communications department of all costs of the trip, including costs booked locally, taking into account the applicable travel expense policy. With the exception of local costs of meals, costs are to be posted according to origin.	After trip
5. Scope and value of all benefits the media representatives have received (accommodation, meals, transportation, social program, travel allowances), including invoices and other documentation records.	After trip
6. Press reports published in connection with the trip.	After trip
7. Description of where and to what extent variances have occurred versus the planning and/or official program (where appropriate).	After trip

### 3.6 Use of COM advisors

The use of COM consulting companies can in particular involve compliance risks for the group of companies. In order to reduce these risks, the relevant TRAs ([TRAdesk](#)) must be followed when commissioning the consultant. If necessary, the locally responsible COM colleague involves the responsible compliance officer who will carry out any necessary clearing for the consultant.

## 4. Internal communications/overarching leadership communications

Through consistent messaging and a clearly defined communications cascade, internal communications ensures that thyssenkrupp's overarching strategy (e.g. portfolio decisions, performance targets, fundamental decisions, information on leadership personnel at

Corporate/segment level) is perceived as a whole and the thyssenkrupp brand is protected and strengthened as a significant asset of the group. As with external communications, the one voice policy also applies here: clearly defined communications channels and messages which are determined and agreed between Corporate and the businesses at an early stage.

## **5. Digital communications**

This section defines the rules for employees and thyssenkrupp companies on social media.

### **5.1. Employees on social media**

thyssenkrupp regards the progressive digitization of society and communications, above all via social media, as a great opportunity. In the future it will be important for thyssenkrupp employees to act as representatives of the brand and the company. There also needs to be a groupwide awareness of the far-reaching responsibility all employees bear for the external perception of the thyssenkrupp brand.

It is desirable and in the interests of the Company for its employees to be active in the digital world. The job of Communications (COM) is to define a uniform, groupwide framework for this. The Supporting [Social Media Guideline](#) provides support to employees for external communications on social media.

### **5.2. thyssenkrupp digital COM channel strategy**

The aim of the digital COM channel strategy is to ensure that all thyssenkrupp companies project a consistent image on the internet. The architecture of the digital channels (websites, blogs and social media) is defined by PS/COM. New channels (e.g. first-time use of Facebook, Twitter etc.) can only be opened with the approval of COM competent (local) colleagues (possibly with involvement of PS/COM). The approval process is described in the thyssenkrupp [brandfactory](#) ([Design specifications](#)>[Online templates](#)>[Social media](#)).

The domain strategy is in line with the group's communications and brand strategy. New domains are based on the brand architecture (see Section 6.3 Brand architecture). The creation of a new domain requires the approval of PS/COM at group level and in the respective segments at segment level.

## **6. Brands**

### **6.1 The umbrella brand thyssenkrupp**

The umbrella brand represents the strategy of thyssenkrupp by positioning the Company as an international group of companies comprising largely independent industrial and technology business with shared values. As the owner of the brand, thyssenkrupp AG is

solely responsible for corresponding trade mark applications for the thyssenkrupp umbrella brand and for defining specific brand attributes and the brand promise. This promise describes our fundamental position: All our actions are oriented in their entirety towards our customers and improving their businesses. More details of the brand promise can be found in the [brandfactory](#) (Brand>Brand identity>Our brand promise).

**engineering.tomorrow.together.**

Fig. 1: Logo/logotype of the brand claim

In addition thyssenkrupp AG has a logo/logotype of our brand claim “engineering. tomorrow. together.” (see Fig. 1) as well as a thyssenkrupp logo/logotype (see Fig. 2). For the logotype we differentiate between the primary logo, the secondary logo and the signet. The primary logo is the thyssenkrupp Corporate logo, which is to be used as standard. The secondary logo is only used when the primary logo cannot be used or for panorama formats. The signet is only used for selected high-end decorations. Details of how to use the logos are provided in the [brandfactory](#) as design principles ([Basic elements>Logo](#)).



Fig. 2: Primary logo (left), secondary logo (center) and signet (right)

thyssenkrupp AG has registered the thyssenkrupp logo/logotype, the logotype und signet and the brand claim in many countries. For this reason, the group companies pay a brand license fee to thyssenkrupp AG for use of the umbrella brand. Companies which do not use the umbrella brand (e.g. second brands) are exempt from payment of the license fee.

## 6.2 Corporate Design

The corporate design of the thyssenkrupp umbrella brand is defined for all licensed companies of thyssenkrupp AG. Instructions on use and materials for download are available in the [brandfactory](#). The corporate design approval process, which regulates the approval of communications materials in the correct corporate design, is also available in the brandfactory.

## **6.3 Brand architecture**

### **6.3.1 Objectives of the brand architecture**

In the brand architecture there is one strong umbrella brand supported by a groupwide brand architecture. This brand architecture has the following goals:

- Strengthen the thyssenkrupp umbrella brand, e.g. prioritized communication of the thyssenkrupp umbrella brand as the strongest brand.
- Protect valuable existing brands, e.g. definition, registration, use and defense of valuable corporate brands, product brands and/or service brands.
- Increase the clarity of the brand structure and offer, e.g. communication of no more than two adjoining brands.
- Create orientation within the thyssenkrupp group.

The brand strategy of thyssenkrupp AG and the associated brand architecture are described in the brandfactory ([Brand>Brand architecture](#)).

### **6.3.2 Guidance**

In line with the brand strategy, the thyssenkrupp umbrella brand is to be communicated primarily. This ensures that the thyssenkrupp brand is appropriately positioned and presented in the market. As a further orientation aid for customer communications (e.g. in advertisements or brochures), the segment and optionally the business unit can be named. If further guidance is required, the customer industries (e.g. automotive) or the product categories offered should be used. It is up to the segments to define which orientation aids are primarily to be used for the respective segment.

### **6.3.3 Product and service brands**

In addition, thyssenkrupp AG companies can also have registered product or service brands (subject to the required agreements in accordance with Section 6.3.5). Product brands can refer to physical products as well as to processes and procedures. Product brands are divided into brand product groups and individual brand products

All product brands are written in lower case. All information on how to use product and service brands is also available in the [brandfactory](#) ([Basics> Brand architecture](#)).

#### **6.3.4 Independent brands**

The use of so-called independent brands, which include no or less prominent reference to the thyssenkrupp umbrella brand, is possible (subject to the required agreements in accordance with Section 6.3.5).

Independent brands are characterized by the fact that their association with the thyssenkrupp group is not the focus of communication. This may be due to a particularly strong market position of the independent brand, which is wholly owned by thyssenkrupp, and/or for strategic (e.g. two-brand strategy) or legal (e.g. in the case of joint ventures) reasons.

#### **6.3.5 Approval and validation processes and roles under trademark law**

Registration of product and/or service brands and independent brands must be coordinated in advance with the Communications function of the segments, which then obtain approval via PS/COM-BD and via PL/L&C-IPS so that a legal review of the names can be carried out with regard to collisions with third-party rights and their protectability.

Other than this, the general regulations apply regarding required agreements in accordance with the catalogue of transactions requiring approval ([Transactions Requiring Approval; TRA](#)).

#### **6.3.6 Responsibilities in the approval process**

The decision with regard to all IP rights (brands, patents, utility models and designs) is made by the OPC (Operative Patent Council). OPCs have been established in all BUs in the group of companies and generally meet every three months.

Trademark coordinators (TM coordinators) are appointed in a global role for all BUs. They have the following tasks:

- Liaison between the BU and IPS in all trademark matters
- Collection of trademark-relevant information such as inquiries from legal review to trademark registration, trademark infringements by third parties, proof of use (see also Section 6.4.2 Proof of use)
- Ensuring conformity of names to be applied for with the brand architecture and prevention strategies with regard to brands that are not used but are worthy of retention
- Proposing the measures agreed by the BU to the OPC
- Requesting all brand decisions made by the OPC from IPS, and

- Obtaining proof of use to maintain the registered trademarks.

The local TM coordinators in the respective BUs for the NAFTA, LATAM, China and APA regions support the global TM coordinators in fulfilling the above tasks in the regions.

The Communications function of the respective segment assesses the decision to register a trademark under strategic aspects and in terms of compatibility with the brand architecture. Finally the respective segment obtains approval from PS/COM-BD.

IPS handles applications for registration of trademarks, verification of the submitted proof of use, and the defense of trademark rights in the event of attacks by third parties or infringements of third-party rights.

The company initiates the trademark application, informs the TM coordinator about the use of the trademark and about possible infringements of trademark rights (by third parties).

The following is an example of the process flow for trademark inquiries:

- The company initiates the trademark application with the responsible (local or global) TM coordinator.
- If the assessment is positive, the TM coordinator forwards the application to the Communications function of the respective segment (exception at Bearings and Forged Technologies: here BU, not segment).
- If the assessment is positive, the TM coordinator forwards this to the OPC, which decides on the measures to be carried out under trademark law.
- IPS carries out the necessary trademark checks and measures (incl. agreement with PS/COM-BD) and sends the results and recommendations to the global TM coordinator.
- The global TM coordinator forwards the results to the BU and is involved in discussion of the next steps.

### **6.3.7 Validation**

The guidance defined in Sections 6.3.2 to 6.3.4 must be subjected to a regular validation process. Adjustments in the structure may arise from changes in the management structure of thyssenkrupp AG or from strategic issues, e.g. focusing on specific customer groups or trademark aspects. Corresponding adjustments must be agreed with PS/COM-BD.

Independent brands must be subjected to a regularly validation process to establish whether their status as independent brand is still justified. If this is not the case, the brand no longer



carries the status of independent and attempts must be made to integrate it under the thyssenkrupp umbrella brand. Routine validation is initiated by PS/COM-BD and carried out together with the Communications function of the segments.

### **6.3.8 Other brands outside the brand architecture**

Trademark registrations or the maintenance of old brands (e.g. company trademarks) may become necessary even if they are no longer used, e.g. Krupp. This is to prevent their use by third parties. Appropriate procedures must be agreed with PL/L&C-IPS.

The trademark used of the abbreviation of the umbrella brand “tk” for products or services is only allowed in very exceptional circumstances in lower case and requires the prior approval of PS/COM-BD and PL/L&C-IPS.

## **6.4 Trademark aspects**

### **6.4.1 Use of the brand by third parties**

Use of the thyssenkrupp logo by third parties (e.g. suppliers, customers, associations, universities etc.) for reference purposes is only possible with the approval of thyssenkrupp AG (PS/COM-BD). A review process for this has been defined which is available in the [brandfactory](#) ([Basic elements>Logo>Third-party use of the thyssenkrupp logo](#)).

### **6.4.2 Proof of use**

In almost all legal systems of the world, trademarks must be used in order to be legally valid. In order to maintain trademark protection, it is therefore generally not sufficient for the trademark to be registered with the relevant trademark office in the respective country. It must also be used for business purposes (i.e. not only within the company).

In some jurisdictions (e.g. Germany, China, Brazil), there is an obligation to use the trademark after a certain grace period (usually three to five years), otherwise third parties are entitled to cancel it. In other legal systems (e.g. USA), trademarks are only registered when they are used.

In principle, the following can be considered as proof of use of product brands:

- photos of the relevant product and/or the product packaging with an image of the brand (with time stamp, country and location of the photograph, and name of the photographer)
- brochures or catalogs (stating the area and period of distribution), and
- customer correspondence such as order confirmations, invoices (which indicate the use of the trademark for the product).

- In addition, the jurisdictions of some countries require the use of a superscript ® to indicate a registered trademark.

As the specific proof required and to be provided varies according to the legal system in question, details must be agreed with IPS for each brand.

The global TM coordinators are responsible for providing proof of use for all product and service brands of their BU, as well as for the umbrella brand with regard to the classes of goods and services that are relevant for the BU, in individual cases also beyond that.

IPS coordinates, where necessary, the provision of proof of use by the various country managers.

## 7. Names of companies and domains

### 7.1. Names of companies in the thyssenkrupp group

The companies are generally required to use thyssenkrupp as a component of their name in order to strengthen the thyssenkrupp umbrella brand (exception: second brand companies). New company names must first be agreed with the Communications and Legal functions of the respective segment and, if necessary, with the corresponding regional organization. The segment then submits a written application to PS/COM-BD for approval. Dispensing with the use of the thyssenkrupp name component is possible in exceptional cases for inactive companies and companies with low sales and whose membership of the group is limited in time. thyssenkrupp AG reserves the exclusive right to use the thyssenkrupp name component alone as a company. The thyssenkrupp name component may only be used in conjunction with a country name and without further additions by the regional headquarters, national holding companies, or companies with general functions.

The following guidelines apply:

- **Operating units:** thyssenkrupp + identification of business activity + country name (if relevant, city names possible in exceptional cases) + legal form

The business activity should follow the segment/business unit/operating unit logic of the thyssenkrupp management structure.

- **Regional platforms, regional offices, national holding companies:** thyssenkrupp + country name + legal form

The use of the thyssenkrupp name is generally not permitted for joint ventures that are not under the economic management of thyssenkrupp. Possible exceptions are subject to a comprehensive check on a case-by-case basis.

The use of an abbreviation of the thyssenkrupp name component in the name of a group company is generally not permitted. In very exceptional cases, operating companies may use the abbreviation “tk” in their name with the prior agreement of PS/COM. In the case of joint ventures, an abbreviation may exceptionally be used if the names of the partners must appear in the name of the joint venture in accordance with national law and this is possible via an abbreviation. Use of the abbreviation “tk” for joint ventures requires the approval of PS/COM and tkS/L&C-LEX and is only permissible if thyssenkrupp holds an interest of at least 50% in the company. Companies established in preparation for transactions (exit companies) generally use thyssenkrupp in their name until they leave the group of companies. In exceptional cases, variances must be agreed in advance with PS/COM and tkS/L&C-LEX.

Upon leaving the group of companies, the right to use the thyssenkrupp name component lapses. In justified exceptional cases, a suffix may be permitted for a transitional period using the thyssenkrupp name component. These exceptions must be agreed with PS/COM.

## **7.2 Domain names**

All thyssenkrupp-related domain names with the components “thyssenkrupp”, “thyssen”, “krupp” or “tk” are owned by thyssenkrupp AG. All other domains must be owned by the legal entity that uses the corresponding brand. If there is no such brand, the domain is owned by the legal entity that uses the domain.

Only affiliated companies that use “thyssenkrupp” as part of their name may use domains with the “thyssenkrupp” component. Distribution or service partners, representatives, sellers or other partners are not permitted to use domains or email addresses containing the “thyssenkrupp” component.

The web architecture is as follows:

- 2nd level domains contain the “thyssenkrupp” component
- 3rd level domains are descriptive and can contain products, business units and business fields (e.g. thyssenkrupp-steel.com or thyssenkrupp-materials.com)
- All other domains with the “thyssenkrupp” component or with product brands of the affiliated companies have no content but are redirected to the central domain thyssenkrupp.com.

thyssenkrupp AG manages 3rd level domains on behalf of the affiliated companies. Costs for registration and maintenance are met by the company using the domain.

All new domains with the components “thyssenkrupp”, “thyssen”, “krupp” or “tk” require the approval of PS/COM and PL/L&C-IPS before they can be registered or used. Domain names with these components that are registered to an affiliated company must, in consultation with PS/COM and PL/L&C-IPS, either be deleted or transferred to thyssenkrupp AG. thyssenkrupp AG will meet the costs incurred for transfer.

All domains must be registered via tkANNE, which also manages all domains in the group. All domains of the affiliated companies must be transferred to tkANNE.

Exception Steel segment: All domains here are registered via ANNE@Steel ([anne.at.steel@steeleurope.com](mailto:anne.at.steel@steeleurope.com)).

The domain names for the IT infrastructure are determined in the “oneNC one Naming Convention thyssenkrupp global Naming Convention”.

## **8. Political and social engagement**

### **8.1 Political engagement**

This section covers and regulates activities in the area of political engagement and associated points of contact. In particular it relates to the following activities:

- political engagement and lobbying
- individual memberships (not private) of association boards, working groups and political initiatives for thyssenkrupp, such as professional associations
- writing position papers in the aforementioned associations, working groups and initiatives
- contacts and encounters with politicians, decision-makers and public officials, visits and meetings by these persons and visits to and meetings with them
- participation in business delegations during state visits and
- publication of politically relevant content

Political engagement should be coordinated, open and transparent, and regulatory and ethical standards must be met systematically.

thyssenkrupp supports the United Nations Convention against Corruption and expressly rejects corrupt behavior in line with this convention.

thyssenkrupp is strongly committed to political lobbying in compliance with international and national law. thyssenkrupp respects and promotes freedom of opinion and expression in accordance with Article 5 of German Basic Law and Article 19 of the UN Universal Declaration

of Human Rights, the independence of the media, the right to information and the protection of personal rights. thyssenkrupp's political lobbying activities are based on the principles of integrity and professionalism.

thyssenkrupp complies with legal requirements on lobbying. No undue influence is to be exerted under any circumstances on policymakers and legislators.

To avoid any appearance of a conflict of interests, thyssenkrupp – based on the waiting periods defined by Transparency International – will not employ members of the following public official groups until at least one year after the person in question has left office:

- heads of state, heads of government, ministers, deputy ministers and secretaries of state;
- members of parliament (at state and federal level);
- members of supreme courts, of constitutional courts or of other high-level judicial bodies whose decisions are not subject to further appeal, except in exceptional circumstances;
- members of courts of auditors or of the boards of central banks (at state and federal level);
- ambassadors, chargés d'affaires and high-ranking officers in the armed forces;
- members of the administrative, management or supervisory bodies of state-owned enterprises;
- civil servants who waive pensions and municipal election officials with and without pensions.

In justified individual cases (e.g. if by way of an exception an appointment is to be made before expiry of the one-year period) a statement of commitment must be obtained from the person to be appointed confirming that a position with thyssenkrupp does not infringe any valid laws, directives or contractual obligations and that the (former) employer/administrative authority has been informed in writing in advance of the planned appointment with a description of the future position. Moreover, in justified cases a formal certificate of suitability (*Unbedenklichkeitserklärung*) is to be obtained from the relevant authority. For states in which no formal certificate of suitability can be obtained, comparable suitable measures are to be taken to ensure that the planned appointment or employment in an advisory capacity is in compliance with the valid laws and regulations of these states.

In addition, thyssenkrupp will not conclude advisory agreements for the purposes of lobbying with persons who previously belonged to the above-listed groups of public officials insofar as there is a connection between the previous activity and the activity intended to be carried

out after leaving office which could adversely affect official interests. The aforementioned waiting period of one year must also be observed in this case.

At its own choice, thyssenkrupp is listed in the European Union (EU) Transparency Register (lobby register) and complies with the EU Code of Conduct. In connection with structured political lobbying in countries outside the EU, thyssenkrupp examines entries in national and international lobby registers and carries out a registration. thyssenkrupp implements the lobby register regulations in Germany.

### **8.1.1 Objectives**

The aim of thyssenkrupp's political engagement and lobbying is to have its own interests considered in the policy-making process of political representatives so as to achieve its own business objectives.

### **8.1.2 Approval and information requirements**

PS/COM Governmental Affairs is the groupwide point of contact for political questions/issues. To achieve a joint engagement, all politically related topics must be agreed with the local responsible officer. Here again the aim is to speak with one voice. The best possible use should also be made of existing contacts in the interests of the Company. To this end, it is expedient to arrange regular exchanges between employees with various links to political decision-makers.

### **8.1.3 Publicity relevant events before elections**

In a period of two weeks before elections, publicity relevant events may only take place if there is a specific political issue of outstanding importance for the respective group company and postponement could result in risks or damage for the company. Publicity exists in particular in the event of media presence and reporting. Such dates are to be coordinated with PS/COM at the earliest possible time.

This does not include non-public discussions with political representatives or the participation of thyssenkrupp employees in political events relating to ongoing discussions. The requirement of non-partisanship must be strictly observed.

## **8.2 Corporate Social Responsibility (CSR)**

At thyssenkrupp, Corporate Social Responsibility (CSR; also Corporate Citizenship) is understood as voluntary activities of the Company and its employees beyond the core business and regulatory requirements for the common good.

thyssenkrupp aims to be a good neighbor at its various company sites, engage positively with the communities and support the people who live there. Through its actions for a sustainable society the Company demonstrates social responsibility and creates value added far beyond the group of companies.

### **8.2.1 Actors and Company interests**

This section relates to Corporate Social Responsibility (CSR) activities for which resources (in particular financial, human and material resources) of the thyssenkrupp group are used.

CSR projects and initiatives may only be carried out in the interests of the Company. These interests can also include support for measures that serve the common good.

The pursuit of exclusively or primarily private interests of board members or employees using group funds is not permitted and may constitute the criminal offense of breach of trust under applicable local law.

### **8.2.2 Objectives**

CSR and similar activities are possible in the interests of the Company if at least two of the following goals are pursued and documented:

- Positively engaging with society in general or the community at our company/site and in this way creating value added for society and company.
- Meeting the expectations of customers, society, employees, analysts and investors.
- Strengthening the reputation of the brand.
- Creating causes for communications about the company in question.
- Underlining credibility with important stakeholders (e.g. government, administration, NGOs).
- Strengthening employer branding, employee motivation and loyalty.
- Promoting social and professional competencies of employees (e.g. team work, communication and leadership).

### **8.2.3 Key areas**

Based on our brand claim “engineering. tomorrow. together.” thyssenkrupp has defined the following key areas for CSR activities which address topics of importance to both society and the respective company. In general the companies must carry out their CSR activities within these key areas.

- engineering = technology and innovation

At thyssenkrupp, CSR activities in the areas of technology and innovation include support for organizations, programs and initiatives that raise the public's interest in technology and innovation. New approaches and the development of innovative products and services for sustainable infrastructure and resource efficiency are of central importance for social progress and are integral to thyssenkrupp's DNA and its business success.

- tomorrow = education

With its CSR activities in the area of education, thyssenkrupp works with local authorities, charitable organizations and educational institutes to provide access to education, improve the quality of education and enable everyone to benefit from educational opportunities. Education and access to education are a basic UN human right and at the same time a global challenge. Social and technological progress and widespread prosperity are not possible without education. This area is also important to thyssenkrupp and its companies because the group is dependent on highly skilled specialists worldwide.

- together = together with and for society

With its CSR activities "together with and for society", thyssenkrupp aims to positively impact the social environment at its company sites and work for the people in these communities. thyssenkrupp takes responsibility for local issues wherever the group has companies: This could be areas such as solidarity, the fight for inclusion and integration, sport etc.. thyssenkrupp encourages its employees to get involved in or even launch initiatives in these areas.

If by way of an exception a CSR activity is to be carried out in a different area, it must be submitted to PS/COM-ILC for approval with documentation of the business interest associated with the activity.

## **8.2.4 Appropriateness**

### **8.2.4.1 Objectivity of government decisions**

CSR activities are not permitted where they represent a risk to the objectivity of government decisions or create the appearance of such a risk. Contributions to state institutions are only permissible if

- the Corporate Citizenship activity is appropriately publicized (transparency principle), e.g.



- in connection with a sponsored event or equivalent activity, the respective thyssenkrupp group company is publicized with details of the company name, logo or other corporate marks as well as the nature and scope of its sponsorship (representation principle) and
- the CSR activity raises the public profile of the thyssenkrupp group company (image enhancement),
- the obligations of both parties are precisely specified in writing, for example as part of a sponsorship agreement or correspondence with the state institution and
- there is an identifiable link to the object of the enterprise.

Any national regulations will remain unaffected by this.

In each case the contribution, the associated Company interest, the beneficiary's obligations, and the direct or indirect advantage for the thyssenkrupp company must be carefully documented. Reference is also made to the [Group Regulation Corruption Prevention](#) as amended.

#### **8.2.4.2 Contributions in connection with political engagement**

Financial contributions (in particular donations and sponsorships) to political parties in Germany and abroad, organizations related or similar to political parties, individual public officials or candidates for political offices are not permissible.

In the case of other contributions granted to this group of individuals by companies in connection with their business activities, reference is made to the applicable laws and relevant Compliance Group Regulations.

#### **8.2.4.3 Scale of contribution**

The scale of contributions permissible must be appropriate to the size and financial situation of the thyssenkrupp group company. The profile and earnings situation of the company are important guides in this. In addition, permissible activities must also be within generally accepted limits.

#### **8.2.4.4 Forms of activity**

In addition to donations and sponsorships, activities include for example non-cash contributions, partnerships with schools and universities, teaching assignments for employees, joint projects with business, social or environmental associations, and involvement in external activities and internal initiatives for non-profit purposes. Activities therefore encompass contributions in the form of financial and material support as well as

personnel support. CSR activities of the companies can take place either through the companies themselves or through employees acting at least partly in connection with their work.

### **8.3 Memberships and committees**

Through memberships and committee work in associations and other organizations which allow exchanges of opinions on economic, technical and other socially relevant topics, the respective thyssenkrupp companies and employees address current issues in society and outwardly represent the positions of the group of companies.

Approvals for committee work must be obtained in writing from the responsible manager.

#### **8.3.1 Actors and Company interests**

This section relates to memberships and committee work for which resources (in particular financial resources) of the thyssenkrupp group are used.

Memberships and committee work in associations for which resources of thyssenkrupp are used are only permissible for

- political lobbying
- assumption of social responsibility or
- pursuit of Company interests.

Memberships of thyssenkrupp companies in political parties or organizations related or similar to political parties are not permitted.

#### **8.3.2 Objectives**

Memberships in the meaning of Section 8.3 are only permitted in the interests of the Company. Memberships and committee work must pursue the following objectives:

- Increased business opportunities for thyssenkrupp.
- Support for economic and political developments in the respective country or region. This support must be compatible with the orientation of the group of companies.
- The aim of memberships is for thyssenkrupp to be represented on committees of the respective organization in line with thyssenkrupp's position.

Memberships and committee work should not be taken up with the sole aim of networking.

The pursuit of exclusively or primarily private interests of board members or employees using group funds is not permitted and may constitute the criminal offense of breach of trust under applicable local law.

### **8.3.3 Key areas**

Memberships and committee work are permitted in organizations that operate in the following areas:

- Business and enterprise cooperation
- Science and exchange of knowledge
- Research and development
- Promotion of technology
- Innovation
- Art and culture
- Social welfare and other socially relevant areas

### **8.3.4 Competition law aspects**

Memberships of company associations, especially when competitors of thyssenkrupp are also or could become members, and the exercise of memberships in association meetings or other gatherings of members must be examined critically taking aspects of competition law into consideration. Reference is made to the compliance guidance note [Trade association activities and conduct in meetings with competitors at association meetings](#) as amended.

Persons representing thyssenkrupp group companies in associations, alliances and other societies or organizations must exercise their membership rights solely in the interests of the Company.

## **8.4 Ticket purchases**

Ticket purchases are understood to mean the purchasing of tickets, the hiring of VIP boxes, business seats etc. and the conclusion of other contracts through which thyssenkrupp group companies can enable their employees and third parties to attend sporting, cultural or similar events. Ticket purchases offer thyssenkrupp communications and sales opportunities outside the direct business environment.

#### **8.4.1 Actors, Company interests and appropriateness**

This covers ticket purchases for which resources (especially financial resources) of the thyssenkrupp group are used.

Events organized for sales purposes are only subject to these regulations insofar as they include the right to attend publicly accessible sporting, cultural or similar events.

The purchasing of tickets, the hiring of VIP boxes, business seats etc. are permitted only in the interests of the Company and solely

- to improve public awareness
- to assume social responsibility or
- as a sales promotion instrument.

The pursuit of exclusively or primarily private interests of board members or employees using group funds is not permitted and may constitute the criminal offense of breach of trust under applicable local law.

The financial cost of a permissible ticket purchase must be appropriate and within generally accepted limits based on the size and financial situation of the thyssenkrupp group company concerned. The industry, country and region, profile and earnings situation of the company are important guides in this.

#### **8.4.2 Objectives**

Ticket purchases are a sales promotion instrument to strengthen or improve awareness of the Company and its products.

#### **8.4.3 Key areas**

No specific key areas have been defined with regard to project selection, so in general there are no requirements to be met when selecting a project.

It must however be ensured that ticket purchase activities do not impair thyssenkrupp's public image.

#### **8.5 Compliance and tax aspects**

CSR activities, memberships and committee work, and ticket purchases are subject to the applicable laws and relevant compliance policies of the group of companies.

Particular attention must be given to the [Group Regulation Corruption Prevention](#) and the [Group Regulation on Competition](#).

In accordance with the [Group Regulation Corruption Prevention](#) invitations from and to business partners may only be accepted and extended if the occasion and scale of the

invitation are appropriate. The [Group Regulation Corruption Prevention](#) and the [Group Regulation on Competition](#) are explained in more detail and more specifically in the [Guidance Note on dealing with invitations, gifts and private discounts](#) and [Guidance Note on Antitrust Law](#). Except in certain special circumstances, e.g. when a contract is due to be awarded, or when stricter value limits apply at individual companies, customers or under statutory provisions, thyssenkrupp has no objection to invitations to business partners (not public officials) up to a value of approx. 100 euros (per person). For invitations to business partners beyond this limit, invitations to public officials to attend sporting or cultural events, and in other special cases, a prior compliance review is recommended.

Moreover tax requirements and tax deductibility must be reviewed on a case by case basis in accordance with the applicable national laws and regulations.

### 8.6 Global Engagement Tool and approval requirements

The [Global Engagement Tool \(GET\)](#) must be used for all CSR activities, all memberships and committee work, and all ticket purchase activities in accordance with this Regulation. In particular the approval process for these activities and all associated financial transactions are to be recorded in this tool.

Part of the approval workflow in GET includes the catalog of [Transactions Requiring Approval \(TRA\)](#) as amended, which includes the relevant rules for CSR activities, memberships and committee work, and ticket purchases.

Recording in GET and meeting the relevant TRA requirements must be completed in good time before the activities are carried out.

Exception for the Steel business segment: Until further notice Steel uses its own GET@Steel tool.

## 9. Definitions

The following defined terms as used in this Group Regulation and its annexes have the following meanings:

#	Term	Definition
1	BU	Business unit in accordance with the valid management structure
2	CO	Corporate
3	IPS	Intellectual Property Services

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4	Group companies	Group companies, individually and collectively, are companies that are part of the thyssenkrupp group.
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5	OPC	Operative Patent Council
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6	TM	Trademark
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7	Memberships	Memberships are all kinds rights to participate in organizations, formal or informal, paid or unpaid.
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Only memberships which are in the overriding interest of thyssenkrupp may be entered into on the company's behalf, regardless of whether an addressee takes out a personal membership for thyssenkrupp or it is a corporate membership and the addressee is delegated to exercise it. Holders of these memberships and committee seats can be both companies and individuals acting officially on a company's behalf.

The provisions of this Regulation can also include cases in which the membership is entered into and held by an addressee privately, but in exercising the membership the addressee clearly acts in the interests of thyssenkrupp (e.g. by passing on business cards).

The engagement of the thyssenkrupp group of companies in associations is exercised by its employees in the statutory committees or other bodies of the associations.

Memberships of organizations whose primary purpose is to provide direct company benefits (e.g. insurance benefits, company pension benefits) or memberships which are mandatory (e.g. memberships of chambers of commerce and industry, sewage associations) are not regarded as memberships in the meaning of this Regulation.

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8	Boards/Committees	Association committees are the leadership body of the organization (e.g. management and supervisory committees as well as advisory committees and boards of trustees) or working groups and sub-committees.
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9	Responsible compliance officer	Is a compliance officer in the group function Legal & Compliance. This is the responsible Regional Compliance Officer (RCO), if provided for in the respective region, or a Compliance Officer of the segment.
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Unless otherwise specified in this Group Regulation, the definitions established in the [Group Regulation Document Architecture](#) of the thyssenkrupp group shall also apply to this Group Regulation and its annexes.

## **10. Validity**

This version der Group Regulation replaces the previous version 01 of May 27, 2015, the Group Regulation Corporate Citizenship Activities, Memberships and Ticket Purchases of August 9, 2011, the Group Regulation Press Trips of November 01, 2016 and the Group Regulation on projecting a consistent group image in the version of October 2012 and is valid indefinitely from October 1, 2021.