



# CODE OF CONDUCT

## **KRAIBURG Group**

August 22, 2022

Replaces version January 01, 2022

KRAIBURG and its group companies and subsidiaries (“KRAIBURG”) conduct their global business in compliance with all applicable laws and regulations, avoid violations of the law at all times, commit to act upon the highest ethical standards and treat others with respect and integrity, according to the principles laid down in this Code of Conduct and in compliance with DIN ISO 9001 and 14001.

All suppliers, customers and other business partners of KRAIBURG (together: “Business Partners”) are held to adhere to this Code of Conduct and DIN ISO 9001, DIN ISO 14001 and DIN ISO 50001 in the same way. All Business Partners are expected to carefully read this Code of Conduct and conscientiously act in accordance with its rules. KRAIBURG does not tolerate any acts and behaviour in contradiction to this Code of Conduct.

In more detail:

### **Corruption and Bribery**

KRAIBURG and its Business Partner, including all directors, officers and employees and anyone acting on their behalf, must respect and comply with criminal law at all times. In particular, corruption and bribery - in the private sector and towards public officials - is penalized. Directors, officers and employees must not demand, allow themselves to be promised or accept a benefit for themselves or for a third person in return for the fact that they provide or will in the future provide improper advantages (receiving a bribe). Inversely, the offer, promise or granting of an improper benefit (bribing) is not allowed and will not be tolerated. This especially applies to public officials or persons entrusted with special public service functions in view of their official function as well as private individuals (as long as they exceptionally do not have a legally effective permission of their supervisor).

As regards private individuals, it may be allowed to grant or receive benefits that are reasonable and appropriate with respect to the specific business relationship. The value of benefits received or granted should generally not exceed USD/EUR 50. If benefits in excess of this amount are to be granted or received, approval from the respective compliance-officers and/or management board must be obtained in advance. Approval can only be granted if the benefit is not related to a specific business.

### **Antitrust laws**

Competition and free market economy are essential elements of a free society. Their protection lies within in the interest of KRAIBURG and its Business Partners. All directors, officers and employees and anyone acting on their behalf must comply with applicable European and national competition/antitrust laws at all times. Inter alia, the following is or may be prohibited:

- Fixing and coordination of prices, mark-ups, or other pricing matters (e.g. discounts, allowances, terms of credit).
- Exchanging of non-public sensitive business information (between competitors), as for example turnovers, prices, strategies, customer data or market shares.

- Partitioning of markets, particularly allocation of customers and territories.
- Non-compete and exclusivity obligations, unless they are exempted from the cartel prohibition.
- Resale price maintenance obligations, i.e. agreements that obligate the customer to resell at minimum or fixed prices
- Abuse of a market dominant position.
- Coordination or arranging of independent tenders in a formal public or private tendering procedure.

### **Labour law compliance**

Forced labour is strictly prohibited, including prison labour and slavery. The same is true for child labour. Unless national laws stipulate a higher age limit, no person younger than the age for completing compulsory education or younger than 15 years (except as provided for by ILO Convention No 138) shall be employed. Workers under the age of 18 years shall not perform any hazardous work and may be restricted from night work. Wages and benefits shall be equal or exceed the level required by applicable laws and regulations. All other applicable labour law rules, for instance as regards maximum working hours, must be applied. The legal right of employees to freedom of associations and collective bargaining is respected according to applicable laws.

### **Compliance with health, safety and environmental regulations**

Moreover, KRAIBURG and its Business Partners are obligated to ensure a safe and healthy workplace at all times. They will always comply with applicable safety regulations.

They are committed to ecologically sustainable business practices. Thus, all directors, officers and employees are bound to protect ground, water, air, biological diversity and cultural assets. Environmental pollution and damages must be avoided by using appropriate environmental protection measures consistent with applicable laws. Waste of resources shall be minimised. An environmental management system according to ISO 14001 or any equal system shall be implemented.

### **Equal opportunity, anti-discrimination and respectful conduct**

KRAIBURG and its Business Partners treat all people, especially those with different origin and experience, with respect and integrity. Discrimination on the basis of race, gender, religion or ideology, disability, age or sexual or political orientation will not be tolerated. The companies admit to an open-minded, upright and tolerant business culture and are committed to the protection of Human Rights. Employees must not be subject to corporate punishment or physical, psychological, sexual or verbal harassment or abuse.

Waldkraiburg, August 2022

### **Code of Conduct Business Partner Declaration**

We hereby confirm:

- 1) We have received the Code of Conduct („Code of Conduct“).
- 2) In addition to any contractual obligations with KRAIBURG, we, and all our domestic and foreign subsidiaries, will respect and comply with the principles and requirements of this Code of Conduct.
- 3) On demand of KRAIBURG, we will provide a written self-assessment in the required form within adequate time.
- 4) We commit ourselves to pass on the content of this Code of Conduct to our suppliers and sub-contractors to convince them to comply with the principles and requirements of this Code of Conduct.
- 5) This declaration will become integral part of any contractual obligations with KRAIBURG.

Company: \_\_\_\_\_

City, date: \_\_\_\_\_

Name, title: \_\_\_\_\_

Signature: \_\_\_\_\_

(Please send sign-off version back)