

## Our Code of Conduct

In a fast changing and highly competitive world, it is essential that we focus on what is really important to us at Kurt Kitzing. Our values! They are the basis for our economic activity and remind us what we stand for.

This means much more than just complying with laws and internal regulations. Our values are the key to integrity in our business activity. Our Code of Conduct serves as a guideline for the management and for each individual employee to live these values and commitments together throughout the whole company and to anchor them in all our actions. It helps us to make responsible and ethical decisions in critical situations.

By complying with our Code of Conduct, the law and any regulations we can achieve our ambition and earn the respect and trust of our customers, investors, employees and stakeholders.

Therefore, we ask you, dear colleagues, to read this Code of Conduct carefully and use it together with us as a benchmark for our daily behavior.

Your Managing directors

A handwritten signature in blue ink, appearing to read "Frank Hahlbohm".

Frank Hahlbohm

A handwritten signature in blue ink, appearing to read "Jens Schmidt".

Jens Schmidt

This Code of Conduct summarizes the essential principles and rules for our actions and describes what we expect from our business partners and stakeholders.

## Correct behavior

Kurt Kitzing stands for integrity.

Our reputation is very important to us. We therefore firmly reject any form of corruption and bribery by

- not offering or accepting any bribes. All of our employees act in accordance with this requirement and actively prevent bribery. To this, we also review everybody with whom we do business or from whom we purchase services.
- reporting actions against the prohibition of corruption to the responsible legal-and-compliance-organization.
- by representing our positions in accordance with applicable legal provisions. We do not provide financial support to political parties or organizations associated with them.

We are responsible for truthful reporting to investors, employees, customers, business partners, the public and all government agencies. Accordingly, we follow the law and any regulation standards in our business. We ensure our books and records are kept completely, accurately, and truthfully. They are prepared on time and in accordance with the applicable rules and standards.

Our accounts and records include all data, certificates and other written materials provided for financial reporting and disclosure purposes, and materials collected for other purposes. We provide correct and complete information for financial reporting purposes.

We never enter into anticompetitive agreements with competitors. Aside from that we comply with trade and export control regulations.

Of course, we expect the same from our business partners.

## Respectful behaviour

Management and employees treat each other fairly and with respect. In doing so, Kurt Kitzing protects the basic rights of employees by obliging ourselves to comply with internationally recognized labor and social standards.

That means for us

- that the principles of equal opportunities and equal treatment are guaranteed regardless of skin color, ethnic or social background, religion, age, disability, sexual identity, world view and gender. According to law, no discrimination based on these characteristics, no sexual harassment or other personal attacks on individuals or groups will be tolerated,
- that nobody is employed or forced to work against their will. All forms of forced labor are prohibited.
- that child labor is strictly prohibited.
- that we pay fair wages for labor and adheres to all applicable wage and compensation laws globally. We observe "equal pay" principles and do not discriminate on the basis of gender.
- that we adhere to all applicable working-hours regulations globally
- that we pay attention to our health and well-being and guard against the risk of work-related accidents. We observe the safety regulations at our workplace, avoid risky behavior and when we recognize dangerous situations, we take appropriate action.

We also assert these claims in cooperation with our partners.

### **Responsible behavior within our society**

We see ourselves as an active member of society and are therefore involved in various ways.

#### *Sustainability and environmental protection*

are a corporate responsibility, social responsibility and an important success factor for our company. It is our goal to protect the environment and conserve resources. We succeed in doing this by committing ourselves to energy efficiency and climate protection and by continuously working on developing sustainable solutions for our businesses.

#### *We provide donations and other forms of social commitment*

only in the interest of the company. We do not make any financial offer, donations and sponsorship measures to political parties, party-affiliated or party-like organizations, individual elected officials or candidates for political office.

#### *political engagement*

Continuous dialog with political decision-makers is highly relevant for the success of our company. We are committed to political neutrality and comply with the law and our company guidelines.

We count on our suppliers to also support these goals and work together with them to improve their sustainability performance.

### **Responsible handling of company information, Privacy and Security**

We protect the knowledge on which our success is built. In everything we do and communicate, we take care to protect our knowledge from unauthorized disclosure and misuse. Confidential information and our intellectual property - from individual expertise to protected patents - are among our most valuable assets. That's why we take care in protecting these assets and respecting the intellectual property of others.

We comply with all applicable information protection and cybersecurity policies, requirements and guidance and have implemented appropriate controls over the sharing of confidential information. Confidential information is not shared on social media or public platforms.

We respect the personal rights of all people and adhere to high standards when processing personal data. We process personal data carefully and in a manner that is comprehensible, in compliance with the applicable legal requirements. We protect personal data from unauthorized access and loss. For us, this is an essential prerequisite for doing business with integrity.

### **Responsible digitization**

We use the advantages of digitization in our company. Digitization ensures our competitiveness. To do this, we need to further develop our digital skills. We are aware of the effects of digitization on our employees, customers and society.

Because of that we are committed to managing this change responsibly and ethically for the benefit of all stakeholders by

- ensuring that all technology use is consistent with our values and our Code of Conduct, policies and regulations,

- ensuring that digital solutions are used to the benefit of all employees, customers and stakeholders.
- trying not to reinforce prejudice, but to avoid it
- openly communicating information on technical functions and the intended use of digital solutions and appropriate monitoring and control instruments for customers and other users provide.
- firmly anchoring the protection of personal data in all our digital solutions - in accordance with our Code of Conduct
- maintaining high quality and safety standards as with all our products.

### Responsible use of company property

From stationary devices to office equipment and digital devices to vehicles - there are numerous assets that we need for our work. We treat our company property responsibly and protect it from loss, damage, theft and misuse. Of course, the same also applies to handling the property of our customers, business partners and third parties. The careful and respectful handling of company property is firmly anchored in our values. This also includes responsible handling of intangible assets such as our intellectual property, copyrighted materials, financial records and image matters.

### Partnership

Relationships with our customers, suppliers and other business partners are elementary for Kurt Kitzing. We only maintain business relationships with reputable partners who comply with the law. We protect the interests of our customers through the careful selection of suppliers and other business partners as well as through the standards that we place on our own actions.

We oblige our suppliers and business partners to comply with our code of conduct ("Code of Conduct for Kurt Kitzing Suppliers and Business Partners"). That is why we cooperate with excellent partners worldwide.

In line with its commitment under the GlobalCompact, Kurt Kitzing expects us and our suppliers and business partners worldwide to comply with the following guidelines:

- International Bill of Human Rights, consisting of:
  - Universal Declaration of Human Rights;
  - International Covenant on Civil and Political Rights; and
  - International Covenant on Economic, Social and Cultural Rights;
- European Convention on Human Rights;
- Principles of the Ethical Trading Initiative (ETI) as a coalition of companies, unions and non-profit organizations that promote respect for workers' rights worldwide,
- OECD Guidelines and OECD Convention against Bribery of Foreign Public Officials
- Agenda 2030 on sustainable development
- UN Convention against Corruption

### **Implementation and contact person**

Kurt Kitzing expects his employees, his customers, his suppliers and business partners to report possible violations of this code of conduct. In this way we all help together to clarify and eliminate misconduct and thus protect ourselves and the company against risks or damage that can result from this.

We may report information that prompts us to act either directly to the managing directors, Frank Hahlbohm and Jens Schmidt, or by e-mail to [codeofconduct@kurtkitzing.de](mailto:codeofconduct@kurtkitzing.de). Kurt Kitzing will take appropriate disciplinary action in the event of verifiable violations. Kurt Kitzing will apply the same principles to allegations of wrongdoing brought by third-parties.