



CODE OF CONDUCT

1. Business Policy

Our corporate responsibility also includes the ethical dimensions in particular. The code of conduct documents our belief that we can only be successful as an enterprise if we act with integrity. The good reputation of our company and the trust of our partners can only be maintained through responsible conduct.

The rules of conduct below describe the ethical and legal framework for our actions by way of principles and rules: Based on these rules of conduct, we want to pursue clean business policies with all our partners and also with our employees, everywhere, and at all times.

The code of conduct applies to everyone who works at or for Kluthe. These are the committees, managers, temporary workers and other employees of the Kluthe Group.

2. Tolerance and fairness

We ensure that our employees are as diverse as our client base. The diversity of our employees as well as an appreciative attitude and respectful treatment are foundational components of our corporate philosophy.

We value all employees equally depending on their productive commitment to our corporate society - regardless of ethnic and national origin, skin color, gender, sexual orientation, religion, disability, age, political orientation, pregnancy or migration status. We do not tolerate any form of harassment or discrimination in hiring and employment practices such as recruitment, application, promotion, staffing, training, wages, benefits and termination. In the event of a negative impact on our code of conduct, we will take appropriate measures. Since every treatment of people is gender-neutral, we always include all people regardless of their (self-) ascription to a gender. For better readability the words will be used in their generic forms (male, female) as far as the sense of a topic allows to. All personal names apply equally to all genders. We keep private opinions separate from professional business behavior. We also expect our suppliers and all other companies that we work with to act ethically and in compliance with the law, as well as to follow non-discriminatory, tolerant and fair hiring and employment practices.

3. Fair competition and avoidance of conflicts of interest

We reject any type of bribery, corruption and fraud. Our obligation concerning anti-corruption and anti-fraud applies to all business sectors without any exceptions, independent from cultural customs or local laws. We also expect from all third parties acting under our name, that they adhere to this basic principle. Our business partners trust the professional judgment of our staff.

In addition, all employees are obliged to disclose and avoid potential conflicts of interest. A conflict of interest exists if personal, professional or financial interests could impair the objectivity and impartiality of decision-making. Employees must always make business decisions in the best interests of the company and strictly separate private interests from the interests of the company. Any form of conflict of interest must be avoided and, in case of doubt, reported immediately to the higher management. Loyalty to Kluthe and the integrity of our business processes are of the highest priority. Actions that could be considered fraudulent or manipulative will not be tolerated and may lead to disciplinary action.

4. Human and employee rights

Kluthe supports internationally recognized human rights and strictly cares about their observance. Cases of child labor that are identified in the supply chain are promptly addressed through remedial action so that the safety and well-being of the child is fostered. We reject all forms of child and forced labor. We respect the freedom of association of our employees and their right to appropriate payment. We ensure that fair working conditions and labor law regulations are observed in all companies in the Kluthe Group. The Kluthe Group does not use private or public security forces if, in the course of their deployment, the prohibition of torture and cruel, inhuman or degrading treatment is disregarded, life or limb is injured or freedom of association is impaired. Kluthe guarantees that wages, social benefits and the working time regulations of its employees always correspond to not less than the respective national standards. Unless applicable national laws or agreements provide for a lower maximum working time, the regular hours of work shall not exceed 48 hours per week plus a maximum of 12 hours of overtime. Overtime shall be paid at least in accordance with the relevant legal or collective agreement provisions, and the imposition of overtime shall remain an exception.

5. Health and environmental protection

Our employees are our most valuable resource. We therefore take all necessary measures to create attractive and optimal working conditions to prevent accidents and injuries that may arise in conjunction with any activity, and to ensure a safe and healthy work environment. We apply the highest standard on all of our regional sites.

To ensure health and safety at the work place is an important objective for us. Our employees are therefore tasked to apply all safety regulations at the work station. Particular diligence is required when handling hazard sources during all working activities. Respective training sessions are carried out. Similarly, our suppliers must provide a safe and healthy working environment for employees.

While carrying out their work employees are instructed to protect natural resources and to ensure that the business activities of Kluthe impact the environment as little as possible by using material efficiently, low-energy acting as well as waste recycling. Furthermore, greenhouse gas emissions are reduced as far as possible. Land grabbing and the illegal use of natural resources in the supply chain are prohibited. Every responsible party needs to consider ecological and social criteria with regards to the selection of suppliers, advertisement materials and other external services in addition to economic considerations.

6. Protection of personal data and confidential information

The respective legal regulations are having to be obeyed. To express them once more in our own words: We strictly enforce the adherence of the regulations to protect personal data and we respect the general human rights of all persons concerning their personal data.

Confidential information and documents about clients, the company or employees must be protected in a suitable manner against the eyes of third parties as well as non-involved colleagues in a suitable manner. Personal data must only be collected, processed or utilized to the extent that such is required for the corresponding purpose. The use of data must be transparent for the affected party. The right of the concerned party to information and correction as well as objection, blocking and deletion must be granted as applicable. Employee data are protected through respective operational agreements.

An appropriate standard must be maintained during the technical safeguarding against unauthorized access to data and information as well as the loss or the destruction in accordance with the current state of technology.

Likewise, suppliers are required to comply with applicable data privacy and information security laws and regulations when personal data is collected, stored, processed, transferred and disclosed.

7. Trade and Tax Compliance, Conflict Minerals and Supply Chain

As a global family company, we are committed to complying with all applicable laws, regulations, governmental regulations or guidelines in the countries in which we operate.

We are aware of our corporate responsibility in complying with and implementing national and international tax obligations, all anti-money laundering laws, applicable export and import laws, including the requirements of economic sanctions, anti-terrorism regulations and embargoes.

Suppliers must comply with the laws applicable in the respective countries with regard to occupational safety, working conditions and health standards, and ensure safe working conditions. This is to be ensured, among other things, by providing safe facilities, plant infrastructure and machinery controlled by the supplier.

As part of the responsible sourcing of our raw materials/minerals, we take appropriate measures to prevent the use of raw materials from conflict and risk areas in our products. Furthermore, in terms of sustainable procurement, land, forest and water rights as well as the rights of minorities and indigenous peoples in the countries and regions of origin are respected. In addition, we reject illegal forced evictions by private or public security forces and deal with them appropriately when they become apparent. Due to our corporate duty of care in relation to the supply chain, we also ensure that our suppliers comply with and promote the contents of our Code of Conduct.

8. Implementation

As part of the respective activities on behalf of Kluthe, every employee is obligated to adhere to the basic principles specified in this code of conduct. Violations against these principles or against statutory regulations may have serious consequences for the company.

9. Monitoring

To ensure compliance with the aforementioned standards, we perform Health Checks in our subsidiaries on a regular basis. These Health Checks are being executed internally and by renowned experts with the aim to identify any threat to our values and our understanding of doing business in a responsible way as described in this Code of Conduct.

10. Information and Notifications

With the whistleblower system, we do not give violations any leeway. Illegal and unethical behavior harms the Kluthe Group and its stakeholders. Whistleblowing is a valuable contribution to clarification, combating misconduct as well as prevention.

The Kluthe Group assures that behavior with integrity does not lead to any disadvantage and we do not tolerate any retaliation against whistleblowers. We guarantee neutral examination and evaluation of suggestions, points of criticism and hints via the whistleblowing system and we motivate each individual to intensively deal with what is happening in the company and to get involved.

The hints can be reported directly on our homepage www.kluthe.com either by providing contact data or anonymously. Our whistleblower system is hosted by a third-party provider. The whistleblower system is available to whistleblowers 24/7 in several languages. Questions and comments about the whistleblower system can be submitted at compliance@kluthe.com. However, this contact channel is separate from the whistleblower system and should not be used to report concerns.

We inform all employees as comprehensively as possible about the work and administrative processes as well as the goals of the company and the departments. New employees are provided with clear and comprehensible documents on the terms and conditions of their employment before starting their employment. In return we receive information on points of criticism and improvement measures. All employees are supported and encouraged to voice their concerns and seek solutions to issues covered by the Code of Conduct in a confidential and anonymous manner, without fear of retaliation.

This also applies to suppliers, who must establish and maintain a fair and effective grievance mechanism through which employees can raise their complaints.

Heidelberg, 10/07/2024 by Martin Kluthe