

## The KESSLER principles for responsible & legal conduct

### Preface

Dear colleagues,

We all share responsibility for the KESSLER Group. It is our duty to maintain the trust of our colleagues, business partners, customers and our entire field of operation and to safeguard the integrity of our company, and this Code of Conduct is intended to serve as a basis for this commitment. Personal responsibility, openness, transparency, legal compliance and ethical behaviour are central to this philosophy.

Our Code of Conduct summarises the binding basic rules and principles that apply to all members of the Executive Committee, those with management responsibility and employees. It serves as an important guideline and defines how we deal with each other and how we want our company to appear to the outside world. It is also a global commitment to responsible behaviour towards our partners, society and the environment. The behaviour of each and every one of us at KESSLER makes a significant contribution to our sustainable business success and to maintaining our reputation.

We are counting on you!

The Management Board of the KESSLER Group

Katherina Herwanger

Dr Lena Herwanger

Julius Herwanger

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## Overview

1. Compliance with the law
2. Corporate social responsibility and sustainability
3. Respect for human rights
4. Fair competition
5. Rejection of bribery and corruption
6. International trade
7. Tax requirements
8. Property and intellectual property rights
9. Product safety, occupational health and environmental protection
10. Data protection
11. Documentation of business transactions
12. Avoiding conflicts of interest
13. Respecting other cultures and values
14. Coordinated publications
15. Responsibility for implementation
16. Reporting possible misconduct

*\* For the sake of readability, the neutral forms of male, female and various other genders have been used throughout. All personal references apply equally to all genders.*

## 1. We comply strictly with the law

As a company, we comply with national and international laws and regulations. We are committed to this principle of conduct in all functions of the business and in all the countries in which we operate. It is embedded in our values and beliefs and is a matter of course for us.

Employees who act unlawfully will face legal consequences. Complying with the law is therefore also in the interest of an employee's own protection.

All employees are required to obtain the necessary information about the laws applicable to their area of responsibility and to comply with them. In cases of doubt, the supervisor must be informed and consulted to provide clarification.

Furthermore, we will not tolerate any illegal behaviour by third parties with whom we have business relationships.

## 2. We are committed to social responsibility & sustainability

KESSLER is fully aware of its social responsibility.

Placing people at the centre of all our activities is as important to us as our stated business objectives. Although we strive for success, we are never ruthless. We are open and loyal to our customers and employees, and we act with reliability and integrity. As a company, we recognise that we also have a social responsibility. We create space for individual development and recognise achievement.

Everything we do has a long-term impact. Resource conservation, energy efficiency, environmental protection and employee development secure our future. By acting honestly and sustainably, we aim to help shape a fair world based on the division of labour.

## 3. We respect human rights in our value chain

Human rights are universal, inalienable and indivisible rights to which every human being is equally entitled. Respect for these fundamental rights is an integral part of our corporate culture.

We are committed to respecting internationally recognised human rights in all our business activities and expect our business partners in the supply chain to commit to these values and implement them in their value chains.

We conduct appropriate due diligence, particularly when selecting suppliers and when dealing with existing suppliers. We demand and encourage fair working conditions. Respect for human rights is an integral part of our supplier assessment.

We do not tolerate any behaviour that contributes to or supports human rights abuses. In the event of human rights abuses, we will take appropriate corrective action.

## 4. We support fair competition

Rules to protect fair competition are an essential part of a free market economy and of our business.

Competition can only function if it is free and fair. Coordinated competitive behaviour hinders competition. We therefore do not coordinate our competitive behaviour with competitors. We obey the laws that protect competition.

In particular, we are prohibited from agreeing on prices and conditions, allocating markets or regions, allocating customers or coordinating supply, development or production strategies. It is also forbidden to exchange information with competitors that could form the basis of a concerted agreement (in particular with regard to prices, costs, margins, conditions, customers, offers, product developments, production capacities).

Violations of these prohibitions will be prosecuted by the antitrust authorities and may have serious consequences for the company.

## 5. We reject bribery and corruption

Bribery and corruption are illegal and unethical. They are inconsistent with our principles and will not be tolerated by us and will be dealt with severely if committed by employees. Such actions must never be tolerated and we accept any loss of business that may result.

We do not offer or grant improper benefits to our current or prospective business partners, either in private business dealings or to public officials. Nor do we solicit, accept or allow ourselves to be promised improper benefits. Corruption includes the payment or acceptance of bribes, kickbacks (disguised illegal payments) and facilitation payments.

We act with restraint when accepting and giving gifts and other benefits (such as invitations to meals or events). Acceptance and provision must not exceed normal business hospitality, custom and courtesy.

## 6. We comply with international trade regulations

KESSLER conducts a considerable amount of cross-border trade. It is in our own interest to protect this trade and to comply with its rules. We therefore comply with all export and import bans, export controls, economic sanctions, embargoes and official approval requirements under national and international law.

Restrictions and prohibitions may result from the nature of the goods, their intended use, the country of origin or destination, or the person of the business partner. Compliance is subject to regular inspection by the authorities. Violations may result in significant sanctions.

The Export Controls Officer at KESSLER must be consulted before any actions and instructions relating to export control regulations are carried out.

## 7. We comply with tax regulations

Tax laws and regulations are binding on us and must be strictly complied with.

The assessment of tax issues is often complex and difficult. In cases of doubt, the supervisor must be consulted and, if necessary, clarification sought from our company's CFO or from external tax advisors or auditors.

## 8. We value physical property and protect and respect intellectual property.

We treat KESSLER's property and the property of other companies responsibly. We also respect the intellectual property of others. As a technology company, KESSLER invests a great deal of effort in development and design. In doing so, KESSLER relies on the protection of its own inventions and know-how. We therefore handle trade secrets with particular care. Confidential information must not be passed on to unauthorised third parties; every employee must ensure that this is the case.

This also applies to confidential information we receive from our business partners. Where special circumstances (e.g. sensitive development projects) require special confidentiality, this will also be maintained internally with colleagues.

## 9. Protecting people and the environment

In terms of product safety, we set the highest standards for the quality and safety of our products and services. We monitor the quality of our products in the marketplace and help our customers avoid risks.

We also provide a safe working environment. Safety regulations must be strictly adhered to and monitored for effectiveness. Any shortcomings in occupational safety must be identified and rectified immediately.

We use natural resources sparingly and strive to use them economically in our products. We avoid harmful effects on the environment. We will comply with environmental legislation as a matter of course.

## 10. We treat personal data confidentially

We collect, store, process and use personal information about our employees and contractors in accordance with applicable laws and only for the purposes for which it was provided. We treat personal information responsibly and confidentially. We fully comply with the laws enacted to protect personal data. KESSLER's data protection officer advises on all data protection issues and monitors data protection regulations.

## 11. We document business transactions accurately & promptly

Internal and external reports must be accurate, complete and tell the whole story so that the recipient is properly informed. In doing so, we adhere to the correct presentation of facts and a factual style of writing.

Documents required for ongoing or anticipated internal or governmental investigations must not be destroyed, removed or altered.

## 12. We promote KESSLER's interests

To avoid conflicts of interest, we separate business interests from personal interests. Secondary employment with competitors, customers and suppliers requires special prior approval from KESSLER.

If close family members of our employees work for competitors, customers or suppliers of KESSLER, or are involved in financial investments, this must be declared.

We do not use our work at KESSLER for private gain. The hiring of business partners for private purposes is to be avoided.

## 13. Respect for other cultures and attitudes

As part of a global society, respect for other cultures and values is a matter of course for us. We will treat each other fairly, respectfully and openly. We do not discriminate. We are politically neutral within the company.

## 14. Our publications are coordinated

Only authorised persons may make official statements on behalf of KESSLER. Statements concerning KESSLER must be agreed with the management before publication.

## 15. Responsibility for implementation

We are all responsible for implementing and complying with this Code of Conduct. The KESSLER Group actively promotes the communication of the guidelines and agreements on which this Code of Conduct is based. The individual divisions and departments of the company are responsible for ensuring that these policies and guidelines are implemented and that no employee is disadvantaged by complying with them.

Our managers are the first point of contact for questions about understanding the rules. They ensure that all employees are aware of and understand the Code of Conduct. As part of their leadership role, they prevent unacceptable behaviour and, if necessary, take appropriate action to prevent violations in their area of responsibility. Good, trusting relationships between employees and managers are characterised by honest and open communication and mutual support.

## 16. Reporting possible misconduct

Serious information helps to counteract violations at an early stage and to prevent damage to KESSLER, our employees and business partners. All KESSLER employees, as well as customers and suppliers, have the opportunity to submit information or complaints on all topics mentioned in the Code of Conduct and beyond, anonymously if they wish.

Open communication is an essential part of our corporate culture. Employees must be able to address mistakes openly and, above all, at an early stage. Therefore, the first point of contact should always be your supervisor and senior management. If you are a third party, please get in touch with your contact at KESSLER.

KESSLER protects the interests of whistleblowers not only by setting up secure reporting systems, but also by promising to treat incoming information confidentially and to protect whistleblowers who act to the best of their knowledge from any disadvantages. When investigating reports, we also take into account the legitimate interests of those affected by a report. Please note that suspicions and allegations against an individual can have serious consequences.