

1. Our principles and values

The GKD Strategy Brochure forms the basis for our actions and conduct. Our objective is to permanently improve customer satisfaction.

We therefore align ourselves with customer requirements and, by doing this, secure our own success. Beside our customers, we also cooperate closely with our suppliers/service providers. Sharing common values helps us strengthen customer-supplier relationships.

This Code of Conduct sets out the rules for correct behavior in daily business operations and is aimed at satisfying both legal requirements and ethical standards. After all, we are fully aware of our responsibility to act as a fair and correct partner toward employees, customers, suppliers/service providers, business partners and the general public. We adhere to applicable legal provisions as well as internal provisions.

This Code of Conduct has been approved by the Executive Board and is based on the ten principles of the UN Global Compact (see appendix). As employees of GKD – Gebr. Kufferath AG, we are all committed to observing the rules in this Code of Conduct as the basis for all of our actions in daily business operations. We thereby stand for safety, quality, and sustainability in the interests of our customers, establish the prerequisites for a trusting working environment, and both promote and protect the good reputation enjoyed by GKD – Gebr. Kufferath AG.

We expect our suppliers/service providers, business partners, and customers to share these core values of GKD – Gebr. Kufferath AG and ensure that their activities are in line with the principles set out in this Code of Conduct.

We do not tolerate any kind of violations against legal requirements, this Code of Conduct, or other provisions. Infringements are sanctioned in line with applicable legal and contractual regulations and can lead to dissolution of an existing contractual relationship with the employee, customer, supplier/service provider, or business partner in question.

2. Our conduct

2.1 Personal interactions

Protection of personality: We all treat one another fairly and respectfully. We protect the personality of employees and do not tolerate any kind of exclusion/marginalization.

Discrimination and harassment: We do not tolerate any discrimination or harassment of a sexual/personal nature or any insults directed toward employees, customers, suppliers/service providers, or business partners as a result of their gender, race, religion, age, origin, sexual orientation, disabilities or political/trade union activity.

Health and labor legislation provisions: We protect the health of our employees. We adhere to the relevant legal provisions and regulations and offer optimum working conditions.

Motivation and further training of employees: We consider motivated employees and their identification with the objectives of our company as a key driver of success. We therefore place great emphasis on helping our employees move forward, focusing on applicable, position-based further training, as well as development and promotion of future leadership potential.

2.2 Safety

Protection and prevention: We always protect people first in all of our activities. Beside priority protection of employees, customers, suppliers, business partners, and stakeholders, we also protect our sites, equipment, buildings, facilities, and materials. We avoid damage through our permanent safety and risk-conscious conduct.

Safety legislation stipulations: Safety is one of our central concerns. We adhere to the legally applicable safety requirements and standards, as well as the OHSAS 18001 standard and the future DIN ISO 45001 standard.

2.3 Information

Confidentiality: We do not forward any confidential information regarding GKD – Gebr. Kufferath AG, its customers, suppliers, business partners, or interested parties to third parties.

Communication: We maintain an open dialog with all interested parties and communicate with our employees, customers, suppliers, business partners, supervisory authorities, the world of politics, the interested general public, as well as the media transparently, honestly, sincerely, and fairly in a way that is easy to understand and caters to our objectives.

• **Data protection:** We treat the data of employees, customers, suppliers, and business partners with all due diligence and confidentiality. This data is processed exclusively within the scope of the legal provisions and internal regulations.

2.4 Competition

Competition law: We do not engage in any consultations with competitors or business partners that have a restriction of competition as their object or effect. We do not hinder any employees or exploit any business partners. Our understanding of business is based on the basic principles of loyalty, integrity, and respect.

Awarding contracts: When awarding contracts, we adhere to legal stipulations, as well as the applicable provisions of GKD – Gebr. Kufferath AG. We treat all bidders and suppliers/service providers equally and ensure a fair and transparent process.

Conflicts of interest: All of our employees avoid situations in which their own personal or financial interests come into conflict with those of the company in fulfilling their duties and are committed not to present any competition to the company. Should a conflict of interests occur or if we are uncertain about a case, we immediately inform the respective superior.

2.5 Assets

Third-party assets: We respect the assets of third parties. In particular, we also comply with the legal stipulation for the use of third-party intellectual property.

Assets of GKD – Gebr. Kufferath AG: We treat work equipment, furnishings, fittings, and all other assets of GKD with care. We use the equipment and resources made available to us for business and other approved purposes and do not tolerate any misuse or willful damage. We ensure that the intellectual property of GKD – Gebr. Kufferath AG is suitably protected and also respected by third parties.

Bribery and corruption: We do not tolerate any kind of bribery or other corruption. Public and private managerial staff and decision-makers may not give gifts, either indirectly or directly, or offer any other benefits that violate the legal penal provisions on bribery and corruption. We do not accept gifts or benefits from third parties. Gifts are classed as all benefits that bring either a direct or indirect financial or other advantage. Exceptions concerning insignificant donations are stipulated in internal directives.

2.6 Financial

Money laundering: We comply with the relevant legal obligations regarding prevention of money laundering.

Taxes: We adhere to the applicable tax regulations. We do not provide any assistance for or support tax evasion or tax fraud through our employees, customers, suppliers/service providers, business partners, or third parties.

Accounting: We ensure correct accounting in line with recognized principles. We ensure that the financial presentation of our business is performed correctly.

2.7 Environment

Handling of resources: We use natural resources economically and have a long-term commitment to further reducing our effects on the environment and climate sustainably. We are committed to making our environmental impact measurable and constantly striving for and then implementing optimization potential in terms of our added value chain. We also protect our environment by using state-of-the-art equipment and machinery. In our decisions, we take economic, social, and ecological factors into consideration and thereby align our actions for the long-term success of GKD – Gebr. Kufferath AG.

Environmental law: We are committed to complying with all legal requirements with regard to preventive, production-integrated, and downstream environmental protection and taking into account the requirements of the DIN EN ISO 14001 standard.

2.8 Energy

Handling of resources: We use energy resources economically and have set ourselves the objective of optimizing our energy consumption sustainably in the long term. We are committed to continuously and measurably increasing our energy efficiency and to continuously searching for optimization potential for our energy consumption and then implementing this in our added value chain.

Energy law: We are committed to complying with and regularly checking all legal requirements in terms of energy efficiency and energy consumption, as well as the requirements of the DIN EN ISO 50001 standard. We are also committed to complying with such requirements when they do not result from legislation, but rather from agreements we have entered into with our customers or other third parties.

3. Suppliers

We have high expectations of our suppliers and require them to adhere to the same strict principles that we apply when managing their business, particularly with regard to the way they treat their employees. As an importer, we pay attention to the precise designation and classification of products (goods), the precise specification of their value, and their country of origin. Local customs and import legislation, regulations, and processes of national authorities are adhered to here.

In our procurement we take into account environmentally friendly and energy-efficient products, systems, and services. To this end, we expect our suppliers to provide us with "active" support with regard to potential optimization of our energy use and energy consumption, our energy efficiency, and reducing our environmental impacts.

4. Confidential Compliance - Reporting Office (whistle-blowing)

Employees report suspected or actual violations against this Code of Conduct or other internal regulations, as well as illegal activities to their superior or the Confidential Compliance Reporting Office of GKD – Gebr. Kufferath AG. This office is also available for corresponding notifications from customers, suppliers, and business partners. Reported incidents are accepted and investigated in line with a standardized process. All information provided, including the identity of the informer/whistle-blower, are treated as confidential. Employees that report suspected or actual infringements in good faith therefore do not need to worry about negative consequences.

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Appendix

UN Global Compact

1. Businesses should support and respect the protection of internationally proclaimed human rights.
2. Businesses should make sure that they are not complicit in human rights abuses.
3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. Businesses should uphold the elimination of all forms of forced and compulsory labor.
5. Businesses should uphold the effective abolition of child labor.
6. Businesses should uphold the elimination of discrimination in respect of employment and occupation.
7. Businesses should support a precautionary approach to environmental challenges.
8. Businesses should undertake initiatives to promote greater environmental responsibility.
9. Businesses should encourage the development and diffusion of environmentally friendly technologies.
10. Businesses should work against corruption in all its forms, including extortion and bribery.