

KMB Code of Ethics:

1. Compliance & Anti-Corruption as well as Sustainability

(CSR = Corporate Social Responsibility)

Compliance & anti-corruption as well as sustainability are strategic success factors of **kmb Metalltechnik GmbH** while observing **human, social and ethnic standards (CSR = Corporate Social Responsibility with regard to social aspects and sustainable development)**:

We shape our entrepreneurial actions:

- cooperative & responsible
- competent, affordable & reliable
- fast, flexible & innovative
- optimistic & future-oriented.

We want to live these values within our company, but also in **all our business relationships with suppliers, customers, institutions and authorities**, and to promote and ensure them in a sustainable manner.

Our philosophy in the cooperation with our business partners is based on mutual **trust, reliability, transparency, communication and sustainability**.

Our **guidelines** for this are:

- Compliance with laws, standards and guidelines as well as recognised human and labour rights,
- Precautionary measures in occupational health and safety and environmental protection,
- prohibition and outlawing of forced and child labour,
- responsibility with regard to the impact of all operational activities on the environment.
- **Export Controls and Economic Sanctions:** KMB complies with all applicable import and export control laws, sanctions and embargoes that impose restrictions on the export or re-export of goods, software, services and technology to certain destinations. In addition, KMB complies with restrictions that prohibit transactions involving certain restricted countries, regions, organisations and individuals. KMB selects suppliers in good faith. Any business partners that may be affected will be reviewed as necessary.

Compliance with these standards is a matter of course for our organisation, but we also expect our **business partners** to comply with them. (**Corporate Social Responsibility**)

In detail:

A. Human Rights, Respect and Integrity, Fair Working Conditions

- **kmb Metalltechnik GmbH** does not approve of violations of **human rights**
- **Freedom of association and assembly:**
Workers can openly communicate with the management about working conditions without having to fear any disadvantages.
They have the right to associate, to join a trade union, to appoint representation (e.g. works council) and to be elected to one. The necessary information is given in front of "assembled staff", votes are taken "secretly" if necessary.
- **Respect and integrity:**
We promote fair, trusting and respectful interaction. We respect the personal dignity and sphere of every employee and respect all people regardless of their age, sex, race, religion, any disability, sexual orientation and origin.
- **Fair working conditions:**
 - **Wages, benefits and working hours** must comply with the basic principles regarding minimum levels, working-time regulations, collective agreements and applicable laws.
 - **Prohibition of child labour:** Child labour must not be used at any stage of production.
 - **Free choice of employment:** Forced or compulsory labour is not permitted.
Workers must have the freedom to terminate employment with reasonable notice.
 - **Occupational safety and health protection:** The employer shall ensure occupational safety and health protection at the workplace at least within the framework of national regulations and supports continuous further development to improve working conditions.
Occupational medical and safety functions are provided externally, internal confidential counsellors are established or appointed in sufficient numbers.

Process and plant-related workplace evaluations (risk and PPE evaluations) are carried out in order to assess the occupational health and safety criteria and implement appropriate safeguarding measures.

PPE (Personal Protective Equipment):

(with reference to "Ordinance on Personal Protective Equipment" in Federal Law Gazette II No. 77/2014).

- Primarily for KMB: eye protection, ear protection, hand protection, skin protection and protective clothing.
- The PPE situation of the respective process or plant is reassessed at regular intervals or in case of process changes

- Health and safety management system:

In order to review the health and safety policy in the company, internal and external experts (SVP, SFK, bodies of occupational medicine or the labour inspectorate)

Experts (SVP, SFK, organs of occupational medicine or the labour inspectorate) regularly and periodically. Audits and safety checks are carried out regularly and periodically and systematically documented with automated appointment management.

- Dangerous substances and chemicals management:

Systematic recording of "dangerous working materials" including current labelling and safety data sheets available at all times. The company is "environmentally certified"! (ISO 14001)

B. Corruption, money laundering, fair competition

- **Prohibition of corruption and discrimination:** Active and passive forms of corruption, **gift acceptance** or **money laundering** are prohibited, as is discrimination against employees in any form.
- **Competition:** We are committed to fair competition and support equitable, ethical and transparent business practices in all markets in which we operate. Unfair business practices are prohibited.

C. Sustainability

We are committed to promoting environmental protection and conserving natural resources, and we support international efforts to protect the climate.

- **Environmental responsibility:** Businesses must be careful about environmental issues and the risks they pose and encourage the development and diffusion of environmentally friendly technologies.
- **Environmentally friendly production:** Optimal environmental protection must be ensured in all phases of production. This includes a proactive approach to avoid or minimise the consequences of accidents that can have a negative impact on the environment. Particular importance is attached to the application and further development of energy- and water-saving technologies - complemented by the use of emission reduction, reuse and recycling strategies.
- **Environmentally friendly products:** All products manufactured along the supply chain must meet the environmental standards of their respective market segment. This includes all materials and substances materials and substances used in production. Chemicals and other substances that pose a risk to the environment must be accounted for. Safe handling, transport, storage, recycling and disposal shall be provided for.

D. Specific examples in the kmb

- **Certifications:** ISO 9001; IATF 16949; ISO 3834-2 and environmental certificate according to ISO 14001.
- **Environmental report and waste management concept** with the corresponding representations of environmental, waste and energy management measures.

e.g.: - Waste separation and disposal optimisation
- Recycling systems - Contract with suppliers (refillable printer cartridges etc.)
- Recycling of raw castings etc.
- Exchange systems

- **Supplier selection** taking into account the results of the supplier evaluation or audit.
- **Procurement and manufacturing processes** in compliance with and adherence to relevant specifications with regard to prohibited materials and substances,
e.g. - Switching to formaldehyde- and boron-free cooling lubricant (considered carcinogenic since 2016)
- Abandonment of chrome 6 (CR6) materials in production
- **Offer only** for products that do not contain any substances of concern or which consume such substances in the production or manufacturing process, e.g. storage lids.
- **Risk analysis** for all workplaces and production machines (workplace evaluation)

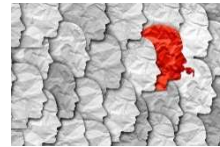
Further concrete examples: see annual environmental report

Implementation in the company: The responsible internal units for social and environmental sustainability are defined.

(see environmental report)

Communication of our sustainability policy:

- **internal training measures/upon joining the company - and for all employees:**
 - in periodically held "safety days",
 - on the staff flatscreen in the lounge,
 - by posting on the staff notice board, etc.
- **external measures:**
 - Customer and supplier letters with reference to the "General Terms and Conditions of Business" / "General Terms and Conditions of Purchase".
 - Customer and supplier meetings,
 - Supplier audits etc.



KMB Code of Ethics:

2. Conflict of Interest, Intellectual Property and Whistleblowing (and Protection from Retaliation) (CSR = Corporate Social Responsibility)

Guidelines on conflicts of interest, intellectual property and whistleblowing as well as protection against retaliation are significant criteria for the success of kmb Metalltechnik GmbH, while observing **human, social and ethnic standards (CSR = Corporate Social Responsibility with regard to social aspects and sustainable development)**:

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These success criteria are defined in detail in the document "KMB Code of Ethics: Compliance & Anticorruption and Sustainability". In addition, the following paragraphs contain further standards on the topics of "Conflicts of Interest, Intellectual Property and Whistleblowing as well as Protection against Retaliation":

A. Conflicts of interest

• General

In the context of the business activities of kmb Metalltechnik GmbH (KMB), conflicts of interest generally exist when employees can make or influence business decisions on behalf of KMB where their personal interests or those of related parties differ from the interests of KMB.

Related parties" means persons to whom employees are related or with whom employees have a personal relationship that could influence, or at least appear to influence, their business judgement.

• Prevention and disclosure

Situations in which a conflict of interest with KMB could arise or the impression of such a conflict could arise should be avoided.

If a conflict of interest with KMB exists or it is considered very likely that a conflict of interest could arise, this conflict must be disclosed as early as possible and written approval must be obtained for further action. The written approval must be signed by the management of KMB.

Conflicts of interest usually occur in personal relationships at the workplace, in relationships with business partners known e.g. from one's private environment, and similar circumstances.

There is also a conflict of interest when a contract or business relationship with a third party is approved or promoted in exchange for or in the expectation of a personal benefit. The CEO, human resources management, department heads and/or the QMR/EMR are available as a point of contact for any conflicts of interest or their avoidance and disclosure.

→ **Privacy:** see **data processing directory according to Art. 30 para. 1 EU General Data Protection Regulation (DSGVO)**

B. Intellectual Property and plagiarism

For KMB it is of great importance to protect the intellectual property of the company kmb Metalltechnik GmbH and its employees.

To make this possible, KMB has the following internal guidelines such as:

- **Data processing directory according to Art. 30 (1) EU General Data Protection Regulation (DSGVO)**
- **PB 7.5.1 Documented information (EDP & Accounting - Data protection)**
- **Work instruction for PB 7.5.1 Software & data backup (data protection)**

Among other things, KMB's intellectual property is also protected by a ban on photography and video recording during visits by external persons. (see **KMB Visitor Guidelines**)

It is also stated in the respective employment contracts and in the KMB recruitment folder that information on the employer's operational and business matters may not be disclosed or published to third parties.

Plagiarism can harm KMB and the KMB business environment. Plagiarism will be legally pursued by all means as soon as it is detected. The same applies if we notice plagiarism of products from other manufacturers. These are to be informed immediately. Plagiarism of any kind is harmful to free and fair competition.

C. Whistleblowing

The term "whistleblowing" essentially stands for "giving a hint" and refers to the reporting of grievances within a company or to an external body (e.g.: authority, institute, etc.).

These reports usually contain a violation of compliance guidelines or legal framework conditions.

The generally applicable data protection guidelines of KMB are also valid in the context of whistleblowing and protection against retaliation. All necessary criteria for the consideration of anonymity and feedback to the whistleblower are observed.

- **Whistleblower**

A multi-level escalation system is designed to ensure that reports are first made internally and only then dealt with externally. Only as the last escalation level does the disclosure of violations to the public serve. In the case of threats to the public interest or possible emergency situations, external reports can also be made at an early stage.

- **Reporting channel**

As a central reporting channel or central reporting point, an anonymous and at the same time locked letterbox is used, which is emptied once a week and the contents are sifted through by an impartial person/department. The information or reports should be made anonymously and ideally in PC form.

- **Contact person for whistleblowers**

In the first instance, the department heads serve as contact persons for whistleblowers. In the second instance, the personnel management, plant management and/or the QMR/EMR are available as contact persons. In the third instance, the CEO is the contact person for whistleblowers.

- **Actions in the company after receiving a report (complaint management)**

After reports or tips are received, they are evaluated weekly and any immediate measures or further steps are initiated accordingly. On the one hand, this can mean that first of all a discussion is sought with the respective department heads or the informants, but on the other hand it can also mean that external authorities are informed immediately. Feedback to the whistleblower is posted anonymously and further reports from the whistleblower can then be submitted via the mailbox (reporting channel) or direct contact can be established.