

Code of Conduct Friedrich Kusch and Suppliers.

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Introduction

As a sole proprietorship, we pride ourselves on building our business operations on foundations of integrity, ethics, and fairness. This Code of Conduct serves as a guide for our daily actions and as a commitment to our employees, business partners and the community in which we operate.

The purpose of this Code of Conduct is to set clear expectations and standards that must be adhered to by all stakeholders in our company. It includes fundamental principles that guide our business activities and ensure that we always operate in accordance with applicable laws and regulations.

Our Code of Conduct applies to all employees as well as to our business partners and suppliers. He emphasizes that we treat each other with respect, respect the rights and privacy of others, and foster a work environment based on trust, openness, and collaboration.

We recognize that compliance and ethics are fundamental to the long-term success and reputation of our company. Therefore, we are committed to respecting and complying with the standards set out in this Code of Conduct, as well as continuously striving to improve and adapt them.

We invite all employees, business partners and suppliers to familiarize themselves with this Code of Conduct and to actively contribute to its compliance. If you have any questions or concerns, we are always available to offer support and advice.

By jointly adhering to these principles and values, we contribute to creating a responsible and sustainable business environment based on integrity, ethics and respect.

1.1 Purpose of the Code of Conduct

The purpose of this Code of Conduct is to establish the fundamental values, principles and standards of conduct that must be adhered to by all employees, business partners and suppliers of our company. This Code is intended to serve as a guide to ensure that all actions and decisions are made in accordance with the highest ethical standards and applicable laws and regulations.

By setting clear expectations and standards of conduct, this Code of Conduct strives to create a work environment that is characterized by trust, respect and integrity. It is intended to help strengthen the trust of our customers, business partners and the public in our company and to build long-term relationships based on ethical principles.

In addition, this Code of Conduct serves as a tool to mitigate risks and promote a positive corporate image. By committing to respect and adhere to the standards contained therein, we help to maintain the integrity of our business and minimise potential legal, financial and reputational risks.

Overall, this Code of Conduct is intended to help create a corporate climate based on responsibility, fairness and ethics that supports the long-term growth and success of our company.

1.2 Scope and application

This Code of Conduct applies to all employees of our company as well as to all business partners, suppliers and subcontractors who act on behalf of our company or are associated with our company. Any person or organization that interacts with our company is required to observe and comply with the provisions of this Code of Conduct.

This Code of Conduct applies to all business activities and interactions related to our company, whether they take place inside or outside the company's premises. These include, among others:

All workplace situations, including offices, production facilities, sales outlets and external locations.

Business trips, customer visits and external events on behalf of our company.

The use of company resources, including computer equipment, communication systems, vehicles, and other assets.

In addition, all employees of our company are required to take into account the provisions of this Code of Conduct in their daily work and to ensure that they behave in accordance with these principles. Business partners, suppliers and subcontractors are encouraged to adopt and adhere to similar standards to ensure partnership and ethically responsible cooperation.

Failure to comply with the provisions of this Code of Conduct may result in disciplinary action, including termination of employment or business relationship, depending on the severity of the breach and applicable law.

1.3 Target group

This Code of Conduct is addressed to all persons who act for or are associated with our company in the course of their work. The target audience of this Code of Conduct includes:

Employees: This includes all permanent, temporary and part-time employees who work directly or indirectly for our company, regardless of their position or function.

Management and Executives: This refers to all individuals who serve in a managerial capacity for our company and are responsible for developing and implementing company policies and procedures.

Business partners and suppliers: This includes any external person, company or organization that enters into business relationships with our company, such as suppliers, service providers, consultants and contractors.

Customers and End Users: Although customers and end users are not directly affected by the Code of Conduct, it sets the framework for our company's interactions with customers and end users, thus indirectly contributing to their experience with our company.

The public: This refers to any person or group outside of our company who has an interest in our company's activities, products or services, such as local residents, local communities, government agencies and non-governmental organisations.

Each of these target groups has an important role to play in adhering to and implementing the standards and principles set out in the Code of Conduct. Through the collaboration and commitment of all stakeholders, we can ensure that our company delivers on its commitments and reflects its values in all aspects of what it does.

Company Values and Policies

2.1 Integrity and ethics



Our company places the highest value on integrity and ethics in all aspects of its operations. We are committed to acting honestly, sincerely and transparently and adhering to the highest ethical standards.

- **Honesty and sincerity:** All employees of our company are encouraged to act honestly and sincerely in all business interactions. This includes communication with colleagues, customers, suppliers and other stakeholders. We strive to avoid misrepresentations or misleading statements and to always tell the truth.
- **Transparency:** We are committed to transparency in our business and make it important to disclose and make available relevant information, both internally and externally. This includes disclosure of business practices, financial information, conflicts of interest, and other relevant issues.
- **Avoiding conflicts of interest:** We recognize the importance of identifying and avoiding conflicts of interest that could compromise the integrity of our business decisions. All employees are required to disclose potential conflicts of interest and take appropriate measures to resolve or minimize them.
- **Compliance with laws and regulations:** We are committed to complying with all applicable laws, regulations and guidelines that affect our operations. This includes, in particular, laws and regulations in the areas of competition law, data protection, the environment, occupational safety and consumer protection.

By adhering to these principles of integrity and ethics, we strive to earn and maintain the trust of our customers, employees, business partners and the public, as well as to cultivate long-term relationships based on trust and respect.

2.2 Confidentiality and data protection

Our company recognizes the importance of confidentiality and protection of sensitive information and is committed to maintaining the confidentiality of all data collected, processed or transmitted in the course of our business activities.

- **Confidential Information:** All employees of our company are required to protect confidential information and use it only for business purposes. This includes personal data, financial data, intellectual property, trade secrets, internal communications and other sensitive information.
- **Privacy and Compliance:** We are committed to complying with all applicable data protection laws and regulations and ensuring that personal data is collected, processed and protected in accordance with applicable data protection legislation. This includes complying with the European Union's General Data Protection Regulation (GDPR) and other local data protection laws, regardless of the location of the company or data subjects.
- **Secure handling of data:** All employees are required to take appropriate security measures to ensure the confidentiality and integrity of data. This includes using strong passwords, using encrypted communication channels, restricting access to sensitive information, and preventing data loss or theft.
- **Disclosure and Sharing of Information:** Employees may disclose or share confidential information only when required for business or legal reasons and in compliance with

applicable procedures and permits. This includes disclosing information to government agencies, regulators, or as required by law.

By adhering to these principles of data protection and confidentiality, we strive to earn and maintain the trust of our customers, employees and business partners, as well as to ensure the security and integrity of all information collected and processed in the course of our business activities.

2.3 Fair treatment and cooperation

Our company attaches great importance to fair dealings and cooperative cooperation with all business partners, suppliers and other external stakeholders. These principles form the basis of our business relationships and are an integral part of our corporate culture.

2.4 Zero tolerance for corruption and bribery

Our company condemns all forms of corruption and bribery and actively promotes compliance with anti-corruption laws and policies. We expect all employees, business partners and suppliers to adhere to the highest ethical standards and to reject any form of unethical behaviour.

2.5 Rejection of exploitation and discrimination

We, the Friedrich Kusch company, are committed to strictly rejecting and counteracting any form of exploitation and discrimination. We strongly believe that every person has the right to fair and equitable treatment, regardless of gender, age, ethnic origin, religion, sexual orientation, disability or other personal characteristics. In this context, we are actively committed to creating an inclusive work environment where diversity is valued and encouraged. We do not tolerate practices that lead to labour exploitation, such as child labour, forced labour or indecent working conditions. Through regular training and clear guidelines, we ensure that all employees are aware of these obligations and take them into account in their daily actions. Our measures to prevent discrimination and exploitation are continuously monitored and improved to ensure that we meet the highest ethical standards.

Monitoring and enforcement

3.1 Accountability and monitoring of standards of conduct

Our company attaches great importance to accountability and monitoring of standards of conduct. All managers and employees are obliged to comply with the defined guidelines of conduct and to actively promote them. Compliance with these standards is ensured by regular internal reviews. To this end, we have each supplier issue the respective declarations of conformity and reports of conflict minerals. Our products have also been transferred to the SCIP database. In addition, we have a direct point of contact who is responsible for monitoring and evaluating the implementation of our standards of conduct to ensure that ethical behavior is embedded at all levels of the company.

3.2 Actions to be taken in the event of violations of the Code of Conduct

Violations of our Code of Conduct are taken seriously and consistently prosecuted. If there is a suspicion of violations of the rules, a thorough investigation is immediately initiated. Depending on the severity of the violation, the measures can range from internal disciplinary measures to termination of employment and legal action. Our employees are encouraged to report any violations or concerns to the operations manager. All reports will be kept confidential and carefully reviewed to ensure that appropriate action is taken.

3.3 Continuous improvement and adaptation

We strive to continuously improve our standards of conduct and adapt them to changing legal and social requirements. This includes regular reviews and updates of our Code of Conduct as well as training for our employees. Through feedback and suggestions from our employees and suppliers, we identify areas where improvements are needed and proactively implement them. Our commitment to continuous improvement ensures that we always meet the highest ethical and professional standards.



Final provisions

4.1 Mandatory Consent and Compliance

All employees of our company are obliged to read, understand and comply with the Code of Conduct. Acceptance of the Code of Conduct is a condition of employment and is regularly renewed through training and confirmations. Adherence to these guidelines is critical to maintaining our ethical corporate culture and ensuring that our business is conducted in line with our values and principles.

4.2 Updates and Changes to the Code of Conduct

Our Code of Conduct is regularly reviewed and updated as necessary to ensure that it is always in line with current legal requirements and best practices. Changes and updates will be communicated to all employees in a timely manner. It is the responsibility of each individual to be aware of these changes and to take them into account in their daily work.

4.3 Contact details for questions and support

For any questions or assistance regarding the Code of Conduct, our team is always available at info@friedrich-kusch.de. Employees can contact the operations manager directly if they have any uncertainties or concerns. We encourage all employees to seek support when needed to ensure that the guidelines of the Code of Conduct are understood and followed.

Dortmund, 10.07.2024

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