

## Code of Conduct

Karl Kruse GmbH & Co KG endeavor to practice a unitary corporate culture. This includes compliance with corporate values including: RELIABILITY and INTEGRITY, FRANKNESS AND TRANSPARENCY. In this connection the Code of Conduct intends to provide aid for the conduct of members of Karl Kruse in relations with customers, partners, the society, Karl Kruse GmbH & Co KG, and with one another.

### RELIABILITY and INTEGRITY

#### 1. Scope of Application of Code of Conduct

This code of business conduct is valid throughout the world and defines the basic principles and demands which Karl Kruse GmbH & Co KG places on business partners and their employees, in particular with regard to the responsibility of suppliers of goods and services towards human beings and the environment. The prescribed principles accord with, amongst other such guidelines, the Conventions of the International Labour Organisation {referred to hereafter as "ILO"}, the Universal Declaration of Human Rights of the United Nations as well as UN Conventions on the Rights of the Child and on the elimination of all forms of discrimination against women.

#### 2. Compliance with legislation

National and international laws and stipulations, minimal industrial standards, ILO and UN Conventions as well as all other relevant regulations {hereafter referred to as „standards"} are to be adhered to, whereby those standards with the highest demands are the ones to be applied. Adherence to the code of business conduct as well as the standards specified above is not to be circumvented through contractual agreements or similar measures.

### 3. Health and safety of employees

In the interest of its employees, Karl Kruse ensures a safe and healthy work environment so that potential accidents relating to the procedures at work can be avoided. Every employee is there called on be vigilant and to use safety equipment where necessary. In case of irregularities, every employee shall inform the responsible safety office or his/her superior. In addition, employees are to be regularly informed and trained with regard to currently valid standards concerning health protection and safety standards as well as safety measures.

### 4. Respect for human dignity

Karl Kruse GmbH & CO KG is dedicated to the observance and protection of human rights and respects human dignity. Every employee is under an obligation to ensure that these generally valid fundamental rights are observed.

### 5. Prohibition of child labor and the employment of juveniles

Child labor and any form of exploitation of children and juveniles will not be tolerated by Karl Kruse GmbH & Co KG. Domestic standards are to be adhered to regarding child protection and the employment of juveniles. Exceptions specified by the ILO are allowed. The minimum recruitment age for employment must not be below the age at which compulsory education ends and in no cases will be below 15 years of age.

Measures are to be taken to ensure that the prohibition of child labour and limitations applying to the employment of juveniles are upheld. In particular, juveniles are not to be exposed to situations which are dangerous, unsafe or are likely to damage their health.

### 6. Ban on forced labor

Karl Kruse GmbH & CO KG will not tolerated any form of compulsory or forced .No employee may be forced to work, either directly or indirectly, through the use of force and/or through intimidation. Employees are only to be recruited if they have made themselves available for work on a voluntary basis.

## 7. Environmental protection measures

Protection of nature and of the environment is an integral component of Karl Kruse's business practice. The respective legal environmental standards currently in force and international standards are to be observed and adhered to. Integrated environmental management systems require on-going work with regard to avoiding and reducing environmental pollution. Procedures and standards currently in force regarding waste management, the treatment of chemicals and other hazardous substances as well as their disposal, together with emissions and the treatment of effluents, are to be enforced.

## 8. Prohibition of bribery and corruption

Corruption harms competition and prevents innovation. No forms of bribery or corruption will be tolerated by Karl Kruse GmbH & CO KG. No employee, employee of an affiliate or representative of Karl Kruse GmbH & Co KG may exert an unlawful influence on decision-makers in enterprises, public authorities or governmental institutions by promising, offering or granting benefits to them where such persons are not entitled to a legal claim in a corresponding amount. Likewise, it is not permitted to demand, procure the promise of or accept such benefits from third parties in business dealings. Such benefits can arise in different forms.

- a. **gifts, hospitality, invitations:** Birthday presents, guest gifts, food and drink invitations or cultural and sports events can go beyond the boundaries of what is permissible if they are abused in order to influence business partners.
- b. **advisors, service providers:** Where service providers or external advisors are involved, the impression of corruption can easily arise owing to the remuneration paid. This has to be prevented by Karl Kruse's employees. Therefore, where such persons are involved the framework conditions established by Karl Kruse have to be observed insofar as they are applicable. Only performance actually provided is eligible for remuneration. The remuneration has to be proportionate to the services or advice provided. The integrity of potential advisors and service providers has to be vetted in advance.
- c. **Relations with public authorities:** Strictest requirements apply as a rule to relations with public authorities throughout the world. Consequently, any and all payments have to be scrutinized, in particular, no payments shall be made that could be considered to exercise an unlawful influence.

- d. **Donations and sponsoring:** Karl Kruse does not make any direct or indirect donations to political organizations or political parties political organizations or political parties, or to individual politicians. Exceptions to this shall always be discussed with the compliance office and the management. Sponsoring and donations to other non-political recipients have to be in conformance with the provisions of this Code of Conduct

## 9. Confidentiality

Karl Kruse's business and trade secrets shall be treated confidentially. This also applies to other information in the secrecy of which Karl Kruse, its contracting partners and customers have an interest. Such information may therefore not be communicated to unauthorized persons by any person without consent. This obligation shall survive termination of the employment relationship.

## 10. Data privacy protection

Karl Kruse protects information about the personal or property situation of a certain person {personal data}. Therefore, every employee shall comply with the provisions of the laws on data privacy protection in order to safeguard the interests of employees, customers and contracting partners. The necessary diligence shall be applied in order to protect personal data within the context of assigned responsibilities. Irregularities ascertained shall be notified to the superior or the responsible data protection officer without

## 11. Working Hours

Karl Kruse's working hours must meet applicable with the law in force, industrial standards or the relevant ILO Conventions to correspond, whichever has the stricter regulations. The maximum permissible weekly hours of work are to accord with national legislation. The employee is entitled to take at least one day off after having worked for six days in a row. Any overtime worked is to be remunerated separately in accordance with the appropriate domestic standards. Overtime is only to be worked on a voluntary basis. Care must be taken to ensure that fair remuneration is paid and that any legally prescribed minimum wage is guaranteed.

## 12. Disciplinary measures

All employees are to be treated with dignity and respect. In addition, the private domain and personal rights of each individual are to be respected. Sanctions, fines, other punishments or disciplinary measures are only to be imposed in so far as they are in accordance with the national and international standards in force as well as internationally recognised human rights. No employee may be subjected to verbal, psychological, physical, sexual and/or bodily violence, duress or harassment.

## 13. Export and foreign trade controls

Karl Kruse has to comply with foreign trade regulations, in particular with the law on foreign trade and international embargo provisions. Employees are therefore under an obligation to check potential export regulations prior to making decisions on the import or export of goods, services or information .

## FRANKNESS and TRANSPARENCY

### 1. Right of association and right to collective bargaining

Employees are to be protected against every form of differentiated treatment arising from their employment and which is contrary to the freedom of association. Respect is to be afforded for their right to found associations or organizations of their own choice for the purpose of promoting and protecting the interests of employees, as well as their right to join or leave such bodies as well as to be active on their behalf. No restrictions may be placed on any employee's ability to carry out their employment in this regard. Members of employees' organizations or trades unions are to be neither favored nor disadvantaged.

## 2. Discrimination/Respect for employees' basic rights

Any form of discrimination in recruitment and employment is prohibited. Equality of opportunity and the equal treatment of employees are to be promoted. In particular, any differentiation, exclusion or preferment is prohibited if it is undertaken on the basis of race, caste, skin color, gender, age, religion, political beliefs, physical or mental disability, ethnic, national and social origin, nationality, sexual orientation or other personal attributes.

Treating employees in an unacceptable manner, for example through physical hardship, sexual or personal harassment or discrimination will not be tolerated. Likewise no behavior {including gestures, speech and physical contacts} will be tolerated which is sexual, coercive, threatening, abusive or exploitative.

## 3. Treatment of knowledge

Insofar as relevant and expedient for the relevant responsibility, all employees shall ensure the rapid and smooth exchange of information within the enterprise. Accurate, relevant and comprehensive information has to be forwarded to decision-makers at an early point in time where possible and permitted. Knowledge relevant to responsibilities may not be unlawfully withheld, adulterated or selectively forwarded. Information has to be forwarded to other areas accurately and in full unless interests taking precedence are involved, in particular confidentiality interests.

## 4. Documentation

Every employee and member of Karl Kruse should document his/her work so that it is understandable and can be set forth by anyone in case of an emergency. Business activity often give rise to business documents that are of considerable value to Karl Kruse.. As a proof of Karl Kruse's integrity comprehensive and permanent documentation is essential. Statutory requirements concerning archiving obligations also apply. Karl Kruse expects its employees to implement the relevant documentation requirements diligently.

## 5. Promotion of the code of business conduct

Karl Kruse is responsible for ensuring that the basic principles of the code of business conduct are implemented and for promoting them to the greatest possible extent amongst their suppliers. In addition, the basic principles of non-discrimination in choosing suppliers and in dealings with suppliers are to be respected.