



CODE OF CONDUCT AND SUSTAINABILITY

of KRAIBURG Holding SE & Co. KG

As at March 1, 2023

The KRAIBURG Group (“KRAIBURG”) conducts its global business in compliance with all applicable national and supranational laws and regulations as well as applicable international conventions, and it prevents violations of law. KRAIBURG undertakes to act upon the highest ethical standards and treat others with respect and integrity in accordance with the principles of this Code of Conduct and in line with the UN Universal Declaration of Human Rights, the principles of the UN Sustainable Development Goals (SDGs), the UN Global Compact, the principles of the International Labor Organization (ILO), the OECD Guidelines for Multinational Enterprises, the Supply Chain Due Diligence Act for the prevention of human rights violations in supply chains (Lieferkettensorgfaltspflichtengesetz – LkSG), DIN ISO 9001, DIN ISO 14001 and DIN ISO 50001.

This Code of Conduct applies to all suppliers, customers and other business partners of KRAIBURG (hereinafter referred to as “business partners”) as well as their management boards, employees and subcontractors. They are encouraged to also comply with this Code of Conduct and the related principles. All business partners are expected to carefully read this Code of Conduct and to sign it and to act within these rules. Business partners undertake to request their suppliers to comply with the principles and rules of this Code of Conduct.

The prerequisite for a business partnership with KRAIBURG is the confirmation of, compliance with and signing of this Code of Conduct or the presentation of a separate code of conduct based on the same fundamental principles. KRAIBURG reserves the right to update the Code of Conduct if necessary and expects its business partners to accept such amendments. The individual purchasing guidelines of the KRAIBURG subsidiaries are automatically part of this agreement. KRAIBURG does not tolerate violations of this Code of Conduct.

In particular:

Corruption and bribery

KRAIBURG and its business partners including managing boards, employees and subcontractors act in accordance with applicable laws in relation to criminal and administrative offenses. In particular, acts of corruption and bribery – both within the private sector and in dealing with the public sector – are punishable by law and/or subject to fines.

Management, employees or subcontractors must not demand, allow themselves to be promised or accept any benefits for themselves or for third parties in return for providing improper advantages or promising to provide such advantages in the future (receiving a bribe). Conversely, the offer, promise or granting of any such improper benefit (bribing) is not permitted either. The latter applies especially when dealing with public officials and persons entrusted with special public service functions in view of their official function but also when dealing with private persons, unless they have a legally effective permission from their relevant superior.

In the private sector, it is permitted to grant and accept benefits that are customary and socially appropriate with regard to the respective business relationship. Such benefits must usually not exceed a value of \$/€50.00. If benefits above this amount are to be granted or received, approval from the relevant compliance officer and/or management board must be obtained in advance. Approval can only be granted if the benefit is not related to giving preferential treatment.

Antitrust law

Competition and the free market economy are essential elements of a free society. Their protection is in the interests of KRAIBURG and its business partners. Management board, employees and subcontractors must also comply with the applicable European and international competition and antitrust laws. In particular, the following is not permitted:

- Fixing of prices, price increases and other pricing parameters (discounts, allowances, payment terms, etc.)
- Exchanging non-public sensitive market information, such as turnovers, prices, strategies, customer data or market shares between competitors
- Partitioning of markets, particularly allocating customers and sales territories to each other
- Non-solicitation and exclusivity obligations, unless they are exempted from antitrust regulations
- Price maintenance obligations that oblige the customer to resell at minimum or fixed prices
- Abuse of a dominant market position
- Bid rigging in public and private bidding procedures

Labor and human rights

KRAIBURG and its business partners comply with the UN Universal Declaration of Human Rights as well as the ILO Declaration on Fundamental Principles and Rights at Work (core labor standards) as well as the requirements of Section 2 Subsection 2 Nos. 1–12 of the Supply Chain Due Diligence Act. We expect our business partners to protect international human rights, not commit any human rights violations and not to be complicit in any human rights violations. Forced labor, including prison labor, compulsory labor and child labor are strictly prohibited. Unless the relevant national laws require a higher age limit, no children of school age or children younger than 15 years of age may be employed. This does not apply to Agreement no. 138 of the requirements of the ILO (International Labor Organization). Persons who have not reached the age of 18 years are not permitted to do dangerous work nor to work at night. Wages and other benefits may not fall below the statutory minimum salary. All other applicable national labor laws such as maximum working hours must be observed. Employees' rights to freedom of association and wage negotiations must be respected.

Environmental and climate protection

KRAIBURG sets ambitious goals for reducing CO₂e emissions at all its sites worldwide. To achieve these goals, appropriate climate programs with reduction measures are being developed. Based on the principles of the Global Compact, the objectives of the Paris Climate Agreement and the provisions of Section 2 Subsection 3 Nos. 1–8 of the Supply Chain Due Diligence Act, KRAIBURG and its business partners assume social and ecological responsibility towards long-term environmental and climate protection.

KRAIBURG and its business partners seek to conduct their business activities in an ecologically sustainable manner and comply with all applicable laws and regulations for the protection of the environment. When selecting new business partners and raw materials, developing new products, operating production facilities, in packaging, transport and logistics as well as throughout the product life cycle (cradle-to-grave), attention is paid to keep any resulting impact on society, environment and climate as low as possible. All employees are therefore obliged to protect soil, water, air, biological diversity and cultural assets. Environmental damage must be avoided by using appropriate environmental protection measures consistent with the applicable laws. Resources must not be wasted. An environmental management system in line with ISO 14001 or a comparable system shall be put into force and a climate strategy shall be developed.

Compliance with health and safety regulations

KRAIBURG's staff members and business partners are obliged to always ensure a safe and healthy workplace. They must always strictly comply with occupational safety and health regulations. Appropriate strategies, preventive measures and checks must be in place for the occupational health and safety of employees. We also expect these regulations to be complied with within the supply chain.

Equal opportunity, anti-discrimination and respectful conduct

All KRAIBURG employees and business partners treat other people, especially those with different origins and experience, with respect and integrity. Discrimination based on ethnic origin, gender, religion, world view, age, sexual or political orientation as well on any kind of disability will not be tolerated. KRAIBURG and its business partners stand for an open-minded, upright and tolerant company culture and are committed to the protection of human rights. Employees must not be subjected to physical, mental, sexual or verbal harassment or assault.

Implementation and verification

Business partners must have an appropriate process in place to ensure and verify compliance with this Code. The business partners also ensure that the content of this Code is communicated to employees, officers and subcontractors. In relation to the Supply Chain Due Diligence Act, we expect our business partners to identify risks within their supply chains and to take appropriate measures.

Suppliers are encouraged to participate in audits and provide KRAIBURG with information and data (including self-assessments) to show that they comply with this Code. The execution of such audits is supported by allowing KRAIBURG or its officers access to the sites of the suppliers and their subcontractors.

Any violation of this Code shall be reported to KRAIBURG. Reports can be made directly to the responsible contact person at KRAIBURG: Violations of this Code can also be reported via our company-internal reporting channel for whistleblowers (see KRAIBURG Holding website or business unit specific websites). Our business partners shall also provide a contact person to report violations. KRAIBURG reserves the right to terminate business relations with suppliers which directly or indirectly commit material violations of this Code.

Waldkraiburg, March 2023

Code of Conduct – Consent of business partners

We hereby confirm as follows:

- 1) We have received the Code of Conduct.
- 2) In addition to our contractual obligations towards KRAIBURG, we confirm that we and all of our domestic and foreign subsidiaries will respect and comply with this Code of Conduct.
- 3) Upon request by KRAIBURG, we will provide a written self-assessment in an agreed form within a reasonable period of time.
- 4) We are committed to communicating the contents of this Code of Conduct to our suppliers and subcontractors and encouraging them to act in accordance with it at all times.
- 5) This agreement will be part of all contractual documentation with KRAIBURG.

Company: -----

City, date: -----

Name, title: -----

Signature: -----

(Please return a signed copy)