KRAH GROUP

Freude am Widerstand

Code of Conduct of the **KRAH** group of companies

KRAH
GROUP

Preamble

The KRAH Code of Conduct applies to all companies of the KRAH Group, their corporate management as well as their employees, and should serve as the basis for all business relationships.

The KRAH Code of Conduct is derived from the company‘s principles and objectives.

In accordance with the rules formulated here, all KRAH employees act fairly, responsibly, ethically and in a sustainable manner.

The following paragraphs I to XVI form minimum standards that ensure the integrity of the companies and their employees.

Drolshagen February 2019
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KRAH GROUP

Basics

I.

In our company, people of different cultures and with different perspectives and abilities work together successfully. The diversity of our employees as well as the intensive contact with customers, suppliers and various organizations worldwide are prerequisites for our economic strength. As a group of companies, we benefit from our shared understanding of integrity and responsible behavior.

Please do contribute in your professional life so that this will continue in the future. Only if we act ethically and with integrity at all times, will we remain successful in the long term.

Law and Order

II.

We undertake all business actions and decisions complying with applicable laws and other applicable regulations of the countries in which we operate.

We treat our business partners fairly. Contracts are complied with, taking into account changes in the framework conditions.

Corruption

When dealing with business partners (customers, suppliers ...) and state institutions, the interests of the company and the private interests of employees on both sides are strictly separated. Actions and (purchase) decisions are made free of extraneous considerations and personal interests.

Management and employees shall not offer, promise, demand, grant or accept in the course of business any gifts, payments, invitations or services granted with the intention of improperly influencing or threatening the business relationship or where there is a risk of endangering the business partners independence. This is not the case for gifts and invitations that are within the bounds of customary hospitality, custom and courtesy. We comply with the applicable corruption criminal law.

III.

Fair competition and antitrust law

We pay attention to fair competition. Therefore, we comply with applicable laws protecting and promoting competition, in particular the applicable antitrust laws and other competition laws.

In dealing with competitors, these regulations in particular prohibit agreements and other activities that affect prices or conditions, allocate sales territories or customers, or unduly hinder free and open competition. Furthermore, these regulations prohibit agreements between customers and suppliers with which customers should be restricted in their freedom to autonomously determine their prices and other conditions for resale.

IV.

Trade secrets

V.

We are committed to respecting internal and external (such as those of our customers and suppliers) trade and business secrets. Confidential information and confidential documents may not be disclosed to third parties or made accessible in any other way without express permission. Only publicly available information remains unaffected by this provision.

Human rights

VI.

We respect and support compliance with internationally recognized human rights. In particular, we respect the personal dignity, privacy and personal rights of each individual. Unacceptable treatment of colleagues or employees, such as psychological hardship, sexual and personal harassment or discrimination, will not be tolerated. This includes any behavior (including gestures, language and physical contacts) that is sexual, coercive, threatening, abusive or exploitative.

Forced labor and child labor

We reject any form of forced labor. We further commit to comply with the applicable national regulations on child labor.

VII.

Discrimination

We oppose any form of discrimination under applicable laws and regulations. This refers in particular to discrimination against employees based on sex, race, disability, ethnic or cultural origin, religion or belief, age or sexual orientation.

Health

IX.

We ensure occupational safety and health at work in accordance with national regulations. We support a continuous development to improve the working world

Freedom of association

X.

We respect the right to freedom of association of all employees within the scope of applicable laws and regulations.

Environmental Protection

We are sustainably committed to the goal of environmental protection for present and future generations. Laws enacted to protect the environment must be observed. We support environmentally conscious actions. Therefore, we design our products, services and processes to be environmentally friendly. We take environmental protection into account wherever we operate our facilities and use natural resources responsibly. We refrain as far as possible from using environmentally hazardous substances and undertake not to carry out any unlawful evictions. We will never unlawfully take land, forests and waters through acquisition, development or other use. We respect the rights of indigenous peoples in all our projects.

XI.

Working conditions

We commit to comply with local and international standards for wages and benefits. We also comply with local and international standards for working hours. We strive to accommodate our employees with flexible working hours. Recruitment of new employees is done in a fair and transparent manner and in line with international labour standards. Employee welfare is a high priority for the companies of the KRAH Group. This priority is also in line with the company‘s principles - and goals.

XII.

Women‘s rights

XIII.

The empowerment of women in terms of full participation in economic life, in all areas and at all levels of economic activity, is essential for, among other things, building a strong economy, establishing a more stable and just society and driving business activities and goals. Therefore, as a company, we specifically promote equal opportunities, non-discrimination and inclusion of women in economic processes through management decisions. We are committed to the principle of „equal pay for equal work“. When designing working conditions, we take into account different impacts on men and women. We recognise and promote the contributions as well as the leadership roles of women in our company. In collaborative consultation processes, we ensure that women are adequately represented.

We lead by example and publicly demonstrate our commitment to equal rights for women.

Financial responsibility

XIV.

Our books of account and financial records are maintained with the highest degree of accuracy, completeness and transparency. We comply with national and international accounting regulations and disclosure requirements and ensure that our records provide a reliable basis for the preparation of financial statements.

Company assets are used exclusively for operational purposes.

Export controls and economic sanctions

The company operates in compliance with the criteria for export controls and in compliance with existing economic sanctions to ensure safe trade.

The company rejects trade outside these regulations.

XV.

Intellectual property

We protect our intellectual property, proprietary know-how and developments. Access to this information is strictly protected from unauthorised access and only granted for defined and legitimate purposes. This practice is the basis of our economic success as well as that of our business partners and customers. Therefore, the use of plagiarised or counterfeit materials is prohibited. We will never use or publish intellectual property without authorisation. We respect patents, copyrights and protected trademarks.

XVI.

KRAH GROUP

Use of private or public security forces

XVII.

We undertake to refrain from hiring or using private and public security forces if, due to a lack of instruction or control on the part of the company, there is a risk of torture and or cruel, inhuman or degrading treatment, injury to life or limb, or interference with the freedom of association and union.

Whistleblowing and reporting a violation

If you are aware of a potential violation of this Code of Conduct, we encourage you to communicate it. You can contact your manager or the compliance officer (compliance@krah-gruppe.de). Your message will be kept confidential. Employees who report information about non-compliance with the Code of Conduct in good faith will not be penalized.

Procedures and changes

In the event of a breach of this Code of Conduct, the Company will become active and take appropriate action to ensure proper resolution. First and foremost, the company will explain the meaning of our Code of Conduct to relevant employees in order to change their behavior and resolve the matter.

However, it is also possible to carry out work or disciplinary measures in the context of existing regulations if there are violations of this Code of Conduct.

The management of KRAH group examines this Code of Conduct regularly to decide on any changes.

Information and Questions

To understand these guidelines, make difficult decisions, or assist the company in implementing our Code of Conduct, you may need help. You have different options:

- Talk to your manager.
- If you have questions about special guidelines, please contact the respective department.
- If you have any questions about the Code of Conduct, please contact the Compliance Representative (compliance@krah-gruppe.de).

In addition, if you have a conflict of interest or are unsure whether a conflict of interest exists or might arise, please contact the Compliance Officer.

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