

Code of Conduct

Inhaltsverzeichnis

PREAMBLE	1
SOCIAL RESPONSIBILITY AND COMPLIANCE WITH THE LAW	1
TREATMENT OF EMPLOYEES	1
FREEDOM OF ASSOCIATION	2
INTEGRITY	2
COMPETITION AND ANTITRUST LAW	2
CORRUPTION, GIFTS AND BENEFITS	2
INTERNATIONAL TRADE	3
ENVIRONMENT, CLIMATE AND RESOURCE PROTECTION	3
DATENSCHUTZ UND INFORMATIONSSICHERHEIT	3
RELATIONSSHIPS WITH BUSINESS PARTNERS	4
DISCLOSURE OF INFORMATION	4
CONFLICT OF INTEREST	4
COUNTERFEIT PARTS AND INTELLECTUAL PORPERTY	4
FINANCIAL RESPONSIBILITY	5
WHISTLEBLOWING SYSTEM AND PROTECTION AGAINST RETALIATION	6
FINAL PROVISIONS	ERROR! BOOKMARK NOT DEFINED.

Preamble

Through the following Code of Conduct, the KLEiN Group affirms its responsibility towards all employees, business partners, public authorities, as well as the environment and society.

These principles apply throughout the company and govern all activities, both in internal cooperation and in dealings with external partners. They form the foundation for legally compliant and ethically responsible conduct, as well as for the personal integrity of every individual. They are binding on all employees, while managers bear an additional responsibility to serve as role models in accordance with these principles. This Code of Conduct also defines the expectations we place on our suppliers and sub-suppliers regarding their responsibility towards people and the environment, compliance with competition and antitrust laws, and adherence to international trade regulations.

A key objective of the KLEiN Group is to promote sustainable efficiency across all areas of business activity. We are committed to giving equal consideration to environmental, social and economic aspects and to contributing, through practical and achievable measures, to sustainable long-term development. This includes the responsible use of natural resources, respect for human rights, and the promotion of fair and transparent business practices.

Through regular reviews of our compliance management system, we ensure that these principles reflect changing legal requirements and that this document is revised and updated whenever necessary.

Social Responsibility and Compliance with the Law

We are aware of our social responsibility. Our actions are guided by ethical principles and strict compliance with the law. We adhere to the principle of legality and respect the generally accepted customs of the countries in which we operate, provided that these do not conflict with applicable laws.

As a minimum standard, we follow the policies, guidelines and voluntary commitments established by the KLEiN Group.

We acknowledge our responsibility and act accordingly. In particular, we respect and support internationally recognized human rights and children's rights and reject all forms of forced labour and child labour.

Wir sind uns unserer Verantwortung bewusst und verhalten uns entsprechend. Dabei respektieren und unterstützen wir insbesondere die Einhaltung der international anerkannten Menschen- und Kinderrechte und lehnen jegliche Formen von Zwangs- und Kinderarbeit ab.

Treatment of Employees

Respect for all employees is the fundamental principle governing our interactions. We do not tolerate discrimination based on national origin, skin colour, gender, age, religion, disability or personal lifestyle.

Everyone is responsible for ensuring the health and safety of all employees. We comply worldwide with all applicable regulations regarding working hours and occupational health and safety.

Personnel decisions are made solely on the basis of qualifications, performance and suitability.

The KLEiN Group promotes the professional development of its employees through needs-based training and continuing education. At the same time, we encourage the exchange of knowledge and experience throughout the company in order to maintain expertise, foster innovation and ensure the long-term performance of our organization.

Wages and Social Benefits

The wages and benefits we provide comply with the fundamental principles regarding minimum wages, overtime compensation and statutory social benefits.

Working hours comply with applicable laws. Overtime is performed only on a voluntary basis, and employees are granted at least one day off after six consecutive working days.

Freedom of Association

Employees who exercise their legal right to freedom of association shall not be discriminated against, harassed, intimidated or subjected to retaliation.

Integrity

We expect all employees to actively contribute to the success of our company, to use available resources responsibly, to continuously seek improvements, and to pursue ongoing professional development. We think and act across departmental and national boundaries.

Accordingly, our leadership principles are based on the delegation of responsibility and a culture of trust. This includes ensuring that all employees of the KLEiN Group are adequately informed about matters relevant to their work and are encouraged to obtain the information they need on their own initiative.

Within the scope of their respective responsibilities, every employee contributes to ensuring legal compliance and preventing potential violations.

Competition and Antitrust Law

We support fair competition in accordance with applicable laws and regulations.

Anti-competitive practices such as market or customer allocation, agreements on prices, delivery terms or capacities, or the exchange of competitively sensitive information with competitors are prohibited and will not be tolerated.

Corruption, Gifts and Benefits

Employees are prohibited from accepting or granting improper advantages or preferential treatment, particularly in connection with solicitation, awarding, execution, delivery, or payment of contracts.

The acceptance and giving of gifts or other benefits is permitted only if their value is insignificant and they remain within the applicable legal limits.

Neither the giver nor the recipient may be placed in a position of dependency or undue influence.

International Trade

Compliance with international agreements and national laws and regulations governing international trade and financial transactions—including import and export control laws and regulations—is a matter of crucial importance for us.

Employees responsible for these areas are familiar with all applicable laws, regulations, guidelines and procedures and are required to comply with them. Where necessary, external professional advisors are consulted.

Environment, Climate and Resource Protection

The KLEiN Group considers the responsible use of natural resources and the protection of the environment to be an integral part of its corporate culture.

We promote environmentally conscious thinking and action by actively involving all employees and fostering a shared understanding of sustainable business practices.

Our environmental initiatives encompass our entire product portfolio and all production processes. Our objective is to systematically prevent and continuously reduce environmental impacts. We maintain high standards for the effectiveness of our environmental measures and have them regularly verified by independent external auditors.

The KLEiN Group is certified in accordance with ISO 14001 and is committed to complying with internationally recognized environmental standards.

Furthermore, the KLEiN Group is committed to contributing to decarbonization wherever reasonable and feasible in order to help limit global warming.

As part of our sustainability strategy, we are committed to continuously minimizing the environmental impact of our business activities, particularly with regard to energy and resource consumption, air pollutant emissions, water consumption, discharges into soil and water, and waste generation.

The preservation of biodiversity and the promotion of a functioning circular economy are fundamental elements of our environmental commitment.

Data Protection and Information Security

When handling confidential information, we safeguard personal privacy and protect business data, customer and supplier information, as well as trade and business secrets. In doing so, we comply with the requirements of the General Data Protection Regulation (GDPR).

All employees are required to maintain the confidentiality of such information and must not disclose it to unauthorized third parties in any form. We also comply with all other applicable legal and contractual requirements. Compliance is verified through an annual audit conducted by our external Data Protection Officer.

We protect our information and IT systems against unauthorized access, data loss and other security risks. Information security is an integral part of our business processes and is continuously improved.

Relations with Business Partners

We ensure that all agreements with our business partners are complete, transparent and unambiguous.

Suppliers and service providers are selected solely on the basis of fair competition. All business decisions are made exclusively in the interests of the KLEiN Group and are never influenced by personal relationships or private interests.

We comply with our internal procedures, such as the four-eyes principle. We regard our values and Code of Conduct as essential criteria for establishing and maintaining long-term, successful business relationships.

Disclosure of Information

We disclose information in accordance with applicable legal requirements and established industry practices.

This includes, among other things, financial and non-financial information, as well as information relating to our employees, occupational health and safety measures, environmental practices, business activities and the financial position of the KLEiN Group.

Conflicts of Interest

Conflicts of interest arise when an individual (or a company) is able to use their professional position in any way for personal or business gain. For this reason,

business and private interests must be kept strictly separate. Our decisions are based solely on objective judgement and must not be influenced by personal relationships, opinions or other forms of preferential treatment.

Employees must not use their position within the KLEiN Group to obtain personal benefits. Likewise, business partners must not receive preferential treatment based on private interests.

Whenever there is any doubt, employees are required to disclose close personal relationships to their supervisor before entering into a business transaction. This requirement applies in particular to secondary employment with competitors, customers or suppliers, as well as to financial interests in such companies.

Activities that compete with an employee's primary duties within the KLEiN Group are prohibited.

Counterfeit Parts and Intellectual Property

The use of counterfeit products, plagiarized materials or falsified components is strictly prohibited.

By sourcing our raw materials exclusively from authorized and certified suppliers, we minimize the risk of counterfeit materials or plagiarized products entering our supply chain. Should counterfeit materials or plagiarized products nevertheless be identified during our regular quality assurance processes, they will be immediately isolated, and the original equipment manufacturer (OEM) and, where appropriate, the competent law enforcement authorities will be notified.

We also respect intellectual property rights, including inventions, literary and artistic works, designs, as well as trademarks, trade names and commercial imagery. Such intellectual property must not be used or published without proper authorization.

This applies in particular to intellectual property protected by patents, copyrights or trademarks.

Financial Responsibility

We document all significant business transactions accurately, transparently and in a timely manner.

Internal and external reports—including financial records, quality reports, time records, expense reports and other submissions—must be accurate, complete and capable of providing the recipient with a true and fair representation of the relevant facts.

We are committed to factual reporting and objective language. Premature conclusions and unsupported assumptions must be avoided.

Documents required for ongoing or anticipated internal investigations or official proceedings must not be destroyed, removed or altered.

Financial records are prepared in accordance with applicable laws and generally accepted accounting principles. We also comply, where required, with all applicable commercial, tax and industry-specific document retention requirements, whether for original or electronic records, and maintain such documentation in an orderly and traceable manner.

Whistleblowing System and Protection Against Retaliation

Confidential internal reporting channels are available for reporting suspected violations. All reports are treated confidentially and investigated appropriately. Reports may be submitted to:

- the Management Board and managers of the KLEiN Group,
- the KLEiN Group Compliance Officer
(e-mail: compliance@klein-ut.de),
- or via a confidential whistleblower mailbox.

Retaliation or any form of disadvantage against individuals who report concerns in good faith will not be tolerated.

Final Provisions

This Code of Conduct applies to all employees of the Company and enters into force upon its publication.

The Management regularly reviews this Code of Conduct and updates it as necessary to reflect changes in legal requirements or operational circumstances.