

A man with a beard and a woman with long hair are standing in a hallway. The man is on the left, wearing a grey hoodie, and the woman is on the right, wearing a yellow shirt and a patterned scarf. The hallway has a warm, orange glow from the lighting. The text "CODE OF CONDUCT" is overlaid in the center in large white letters.

# CODE OF CONDUCT

**KUNBUS**

## **Preamble**

We depend on the trust of our customers, employees, suppliers and the public in the performance and integrity of KUNBUS GmbH (KUNBUS). This trust depends to a large extent on how we all behave and how we use our expertise for the benefit of our customers.

The following rules of conduct apply to all areas of our activities within the company. They form a binding framework for the conduct of all employees towards colleagues, customers, suppliers and third parties.

This Code of Conduct reflects our common goal of strengthening ethical standards throughout the company and anchoring integrity, respect, and fair conduct in our working environment. Strict adherence to laws and principles, a socially responsible business policy and respectful interaction with one another serve the long-term interests of our company.

The rules of conduct described in this document are based on applicable German and European law as well as the requirements of our industry and the standards that are of particular importance to KUNBUS and our business partners.

The rules of conduct are binding for all employees (hereinafter referred to as “employees”). Managers have a special responsibility to exemplify and ensure compliance with these rules of conduct.

Your management

Laurent Corti

Günter Knorr

Dr. Martin Kunschert

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## **1. Compliance with laws and regulations**

It is a given for us to comply with all laws to which our business activities are subject. We observe the applicable law and the guidelines of KUNBUS. This applies both in relation to business partners in Germany and abroad and at an internal company level within KUNBUS.

In particular, this includes compliance with the German competition rules (GWB), the corruption provisions of the German Criminal Code (§§ 299, 331 StGB) and the data protection requirements of the GDPR. If there are any questions about these legal regulations, employees should clarify them with their manager.

## **2. Fair competition and antitrust law**

We are fully committed to fair competition. We reject any business activity that is aimed at gaining an economic advantage - be it in an unfair manner under competition law or through behavior that violates antitrust law. This includes the prohibition of price fixing and market agreements as well as the prohibition of unfairly hindering competitors through targeted measures.

## **3. Gifts and hospitality: Prohibition of corruption**

We condemn corruption and bribery and do not tolerate any transactions involving improper means. Our employees observe the legal regulations that prohibit offering or granting benefits to civil servants or employees in the public sector.

We expect our employees not to offer or grant any advantages in business dealings with the intention and expectation of being unfairly favored in competition. Furthermore, no employee of KUNBUS may demand or accept unfair advantages. This includes benefits and hospitality that are not customary in the business or do not take place within an appropriate framework. To this end, KUNBUS GmbH has drawn up rules of conduct for its employees.

### **Examples of inadmissible benefits:**

- A supplier offers an employee expensive gifts (e.g. a wellness weekend) in order to obtain preferential treatment when awarding contracts. Such gifts must be strictly rejected.
- A business partner regularly invites an employee to exclusive dinners in expensive restaurants that go beyond normal business practice. Such invitations must not be accepted.



- The acceptance of small gifts such as promotional gifts (e.g., pens or calendars) is generally unproblematic as long as they remain within the usual framework and do not lead to influence.

Suspected cases of corruption can be reported via our whistleblower system (more information can be found in section 13 “Whistleblower system”).

## **4. Dealing with confidential information**

KUNBUS expects its employees to respect the business secrets and intangible assets of KUNBUS and its business partners. Industrial property rights, trade secrets and other confidential company information must be protected from unauthorized disclosure. Employees who have received or become aware of confidential information or business secrets from KUNBUS or third parties may not pass this information on to third parties (including family members and acquaintances) and may not use it for purposes other than business purposes. Disclosure to colleagues is not permitted if the disclosure would be for purposes other than business purposes.

Employees undertake to comply with all data protection regulations in accordance with the GDPR and, if necessary, to sign appropriate non-disclosure agreements (NDAs) to ensure confidentiality.

## **5. IT security**

We are aware of the threat posed by malware and attacks of all kinds on computer systems. We protect our customers and our company from cyber attacks. We take security guidelines into account in our daily work and keep an eye on the threat situation. We rectify security vulnerabilities as soon as we become aware of them. We inform our customers transparently by immediately publishing information on acute threats to our products. We have set up a corresponding reporting system for this purpose.

## **6. Avoidance of conflicts of interest**

Our employees are required to avoid situations where their personal interests conflict with the interests of the company. In such cases, the interests of KUNBUS GmbH must not be compromised.

### **Examples of conflicts of interest:**

- An employee works part-time for a company that is in direct competition with KUNBUS. This represents a clear conflict of interest and must be reported to management.

- A family member of the employee works for a supplier that the employee evaluates as part of their duties. In this case, the employee must disclose the conflict of interest and recuse themselves from the decision.

To avoid conflicts of interest, the following behaviors must be observed:

**Behaviors to Avoid Conflicts of Interest:**

1. Business decisions must not be guided by private interests and relationships.
2. The selection of suppliers is based on objective criteria (including price, quality, reliability, technological standard, certification, presence of quality management).
3. Paid activities for other companies or organizations must be expressly approved in writing by KUNBUS. This also applies to significant direct or indirect shareholdings in KUNBUS competitors – with the exception of shareholdings in publicly traded companies, such as stock corporations.
4. Employees may not exploit company property, internal company information, or their position for private interests. Excluded is company property that employees may use privately based on separate regulations (employment contract, work regulations, etc.). This includes, for example, company cars and mobile phones.

## **7. Occupational safety, health and environmental protection**

The health and safety of all employees, neighbors, customers and other persons affected by KUNBUS GmbH's business activities, as well as environmental protection, are of high priority to us. We are committed to sustainable, future-oriented development and work continuously to align economic and ecological goals.

Our products comply with the requirements of the REACH Regulation and the RoHS Directive, which aim to avoid harmful materials and chemicals in the manufacture of new devices, ensure the safety of delivered products, and reduce their impact on the environment and health.

We observe the high German occupational health and safety standards and actively work to ensure that our work environment is safe and health-promoting at all times. This includes measures to prevent accidents, reduce work-related illnesses, and ensure safe working conditions for all employees.

Every employee is required to report unsafe conditions or violations of occupational safety regulations immediately. Occupational safety, health and environmental protection regulations must be strictly applied. Managers must fulfill their role model function.

## **8. Protection of human rights**

We advocate for dignified work worldwide. Should we receive information about inhumane work in our supply chain, we will take action against it or discontinue procurement from corresponding suppliers.

Our supply chain strategy is guided by the requirements of the REACH Regulation and the RoHS Directive (see Section 7). Additionally, we expect our suppliers and business partners to adhere to the same high ethical standards that we follow at KUNBUS.

## **9. Equal opportunities and respectful treatment**

KUNBUS is convinced that social responsibility is an important factor for business success. We commit to creating equal opportunities for all employees of KUNBUS GmbH.

We condemn any discrimination or harassment in the workplace, whether based on gender or gender identity, sexual orientation, age, ethnic affiliation or national origin, disability, religion and worldview, or social origin. We actively promote a culture of inclusion and diversity.

We expect our employees to contribute to a corporate culture characterized by respectful, fair, and cooperative collaboration.

## **10. Constructive error culture**

Errors are part of human action. What matters is how we deal with errors. Management commits to an open, constructive error culture and promotes this company-wide. At KUNBUS, we analyze error causes objectively to learn from them and reduce error sources. This way, we continuously improve our working methods and work results.

### **Guidelines for a constructive error culture:**

- We accept errors and address them openly – without fear of negative consequences.
- We analyze errors objectively and eliminate error sources.
- We communicate respectfully with each other.
- Managers exemplify this principle.

## **11. Product quality and safety**

Our high product quality is a central pillar of our business. Customer satisfaction, process-oriented management and continuous improvement, as well as comprehensive quality management are

essential. We do everything to implement customer requirements, especially regarding quality and reliability, at all times.

There must be no risks or dangers to health and safety from the use of our products. All KUNBUS employees are jointly responsible for excluding such risks to the best of their knowledge and belief. The applicable technical and legal standards and regulations must be identified and complied with at all times.

## **12. Social networks and media**

We expect our employees to always consider the interests of KUNBUS GmbH and its business partners when using social networks or other media. The rules on confidentiality and data protection must of course be observed.

When employees comment on topics that affect KUNBUS or our business partners in public discussions, they must make it clear that they are doing so as private individuals. This particularly applies to posts on social networks or statements to the press.

Statements in emails to external contacts or posts on social networks and other media may be spontaneous, but they will remain visible to recipients or the internet public for a long time. Therefore, we expect our employees to express themselves thoughtfully and objectively, especially in these contexts.

## **13. Whistleblower system**

KUNBUS operates a whistleblower channel in cooperation with an external service provider. Through this channel, employees can draw attention to grievances in the company that violate applicable European law. In accordance with the Whistleblower Protection Act, reports are treated with absolute confidentiality. We meet strict data protection requirements to protect whistleblowers. Every report is reviewed and processed. The whistleblower is kept informed about initiated measures.

## **14. Arrangements for compliance with the Code of Conduct**

Management ensures that all employees are familiar with this code of conduct. Only regular engagement with the rules of conduct ensures that all employees live by them. Therefore, KUNBUS regularly offers training and ensures that all employees are up to date with applicable laws and internal guidelines.

Furthermore, this code of conduct is regularly reviewed to make adjustments to changing legal frameworks and company-specific requirements.



## **15. Commitment to comply with the Code of Conduct**

Every employee is responsible for understanding the rules set out in the code of conduct and implementing them in daily work. Should uncertainties or questions arise, we encourage all employees to approach their supervisor early.

We expect all managers to fulfill their role model function and sensitize their employees accordingly.

Our code of conduct forms the foundation for our actions and contributes to our long-term success. Together, we ensure that we comply with legal requirements at all times and achieve our goals in accordance with our ethical principles.

### **Point of Contact for Questions**

Human Resources

[HR@kunbus.com](mailto:HR@kunbus.com)