

CODE OF CONDUCT (Status 06 | 2024)

Our most important values

HUMANITY	We treat people with respect.
PROFESSIONALISM	We are committed to tradition and at the same time always try to break new ground.
SUSTAINABLE ECONOMY	We define sustainable management in terms of economic, ecological and responsibility as a value-based goal and measure for our actions.
PARTNERSHIP	We strive to exceed customer expectations and adhere to agreements made. We deliver excellent service always and everywhere.

1. Compliance

We respect the law in everything we do and also comply with our internal guidelines and specifications. We respect the freedom of association of our employees. We recognise and support our employees right to employee representation. Cooperation between employees and the company is based on trust.

2. Conflicts of interest

Business decisions are made exclusively in the interests of Klüh or the respective business unit. Personal, family or financial interests as well as personal idealistic or monetary considerations must not play a role in the decision-making process.

If there is an actual or possible conflict between business and private interests, employees must inform their superiors and seek a solution with them - if necessary involving senior management.

3. Integrity

Business secrets and confidential information may not be disclosed unless required by law. Personal data should not be obtained by unlawful means.

Employees should not obtain confidential company information or business secrets illegally or pass them on to third parties (including family members).

We are also committed to financial integrity and are committed to this in all business transactions.

4. Innovation

Open to new ideas, we strive for creative solutions with high efficiency. One of Klüh's quality standards is the smooth integration into the client's processes.

5. Effectiveness and sustainability

Saving time and efficiency in the interests of the customer as well as sustainable management including ecological and social responsibility are key benchmarks of our performance. We use the entrusted resources responsibly.

6. Tolerance

Respectful cooperation and appropriate treatment of business partners and employees are an essential part of Klüh's culture. Any form of discrimination on the basis of personal characteristics such as gender, age, origin or nationality, social background, political conviction or sexual orientation must be prohibited.

The privacy of each individual and their personal rights are respected and protected.

7. Competition

One of Klüh's fundamental beliefs is free and fair competition within the company and in the market in which Klüh operates, which leads to the best possible allocation of human, financial and economic resources.

Therefore, we are committed to the principle of fair competition and the guiding principles of the OECD.

8. Quality

We always strive for highest quality in the provision of our services. We operate professionally, thereby ensuring the satisfaction of our customers.

9. Data Protection

We comply with applicable law when collecting, storing and processing data. IT security is a particularly high priority for us.

Disclaimer: This Code of Conduct cannot anticipate every conceivable legal or ethical situation, let alone provide answers.

For the Holding Management Board
Christian Frank

Further explanations:

Implementation of the Code of Conduct and communication

Klüh communicates the Code of Conduct, including any changes and its implementation, to employees and other stakeholders. This is done, for example, through announcements on our website, in tenders or other publications. The Code of Conduct and all guidelines alongside it are based on formally recognized national or international reporting standards or regulations. The implementation of these guidelines is recorded in annual reports and, where possible and appropriate, made measurable in key figures. Reporting is carried out in accordance with the German Commercial Code (HGB) for commercial reports and for the areas of sustainability and social affairs on the basis of the international GRI standard, our sustainability report and various internal reports (energy report, social report, management review).

Compliance

All actions must comply with applicable national, European and international law (e.g. the UN Convention on Human Rights, ILO, OECD Guidelines). We regard all legal provisions that affect our activities as minimum requirements. In this context, we expressly distance ourselves from all forms of child and forced labor.

In order to emphasize this intention, we have been a participant in the UN Global Compact since 2023 and have been reporting in accordance with its requirements (COP) since 2024. We focus on aligning Klüh's business activities with the Sustainable Development Goals (SDG).

Diversity and inclusion

Klüh employs people of different ethnic backgrounds, ages, disabilities, genders, religions, nationalities and sexual identities from 122 nations. Integration and diversity are part of our corporate culture.

Discrimination against employees is not tolerated. Discrimination and exclusion have no place at Klüh.

Klüh attaches great importance to equal rights and equal opportunities in all areas of the company. Different cultural, gender and age-related backgrounds and experiences allow us to successfully offer different services for many different industries worldwide.

Personnel selection and development are carried out exclusively on the basis of qualifications and aptitude.

In support of our aforementioned values, Klüh has signed the "Diversity Charter", an initiative of the German government.

Respect and fairness

Fairness and respect are core values when dealing with our employees. These values are part of every contact with our employees, from the application to the termination of an employment relationship.

Remuneration and working hours comply with the respective legal requirements. Specific regional standards, agreements between social partners or collective bargaining provisions are recognized and implemented.

Overtime bonuses and allowances are also paid in accordance with the applicable collective agreements. Employees are informed regularly, in detail and transparently about the composition of their salary. Professional development and equal pay for all employees are guaranteed.

For this reason, we practice the principle of "advancement before entry" at Klüh. In mandatory appraisal interviews (mutual feedback culture), further training agreements are concluded and development opportunities are agreed between employees and their direct line manager.

In all specialist companies, there are personnel development programs that qualify our employees

for higher positions, which are supported by the Klüh Academy and the Klüh Safety School, among others.

Ethics and fair conduct

Personal dependency, unethical behavior or influencing employees through bribery and/or corruption is not tolerated. Fairness and honesty are fundamental components of Klüh's corporate culture. We have implemented a whistleblower system to ensure these values. The compliance officer conscientiously investigates every report and, if necessary, takes appropriate measures and reports on them annually.

Occupational health and safety

The working environment and work must be designed in a safe (occupational health and safety) and healthy way to ensure an adequate working environment and health protection is ensured.

Hazardous activities must be prevented or - if this is impossible - made as safe as possible. The standards derived from the accident prevention regulations and other legal requirements must be complied with. Employees are regularly informed about applicable health and safety guidelines and safety measures (management review, safety, health and environment planning and occupational safety protocols).

Social and regional commitment

As a Düsseldorf company steeped in tradition, local customs (e.g. carnival) and the Rhineland way of life are part of our corporate culture.

We are committed to preserving and promoting our region through our "Wir für Düsseldorf" foundation. This initiative was launched by Düsseldorf native Josef Klüh himself. The aim of the initiative is to support social associations in Düsseldorf.

Environmental protection and sustainability

We pursue environmental protection on our own initiative and responsibility. Our activities must not

entail any risks for the environment. Our service processes are therefore designed so they have as little impact on the environment as possible. New products and new processes are assessed with regard to sustainability criteria before they are used in order to prevent environmental damage or safety risks.

We use raw materials and energy sources responsibly in order to contribute to environmental protection. Together with our suppliers and other contractual partners, we ensure that appropriate environmental standards are applied and that the products and processes used are environmentally friendly.

Returning residual materials to the material cycles and the conscientious separation, recycling and disposal of waste are an essential matter to us.

We are continuously working to expand our knowledge of the economical and environmentally friendly use of resources and the environmental impact of our performance processes (environmental and energy policy, environmental targets, DIN EN ISO 14001 and 50001). Klüh has set itself the goal of becoming climate-neutral by 2040.

We also involve our suppliers in our efforts to improve occupational health and safety and environmental protection. When selecting our suppliers, we therefore ensure that they are certified in accordance with DIN EN ISO 9001 and DIN EN ISO 14001. The same strict requirements apply to employees of subcontractors as to our own employees when it comes to training necessary for operations (e.g. occupational health and safety). The procurement guidelines were adapted to all new requirements (corruption and supply chains) in April 2024.

Particularly strict requirements for suppliers apply to the specialist area of security through certification in accordance with DIN 77200. The qualifications of our

subcontractors' managers and the training certificates of the subcontractor's employees are checked and documented separately. Compliance with this code of conduct is checked regularly.

Quality Management, Revision and Controlling work together with the Compliance Officer as part of the internal control system (ICS). Any deficiencies are investigated and remedied as quickly as possible.

Final explanation

The explanations of the Code of Conduct are regularly updated in subordinate documents as required and, as conditions change, adapted. The stakeholder groups that are relevant to our business activities are regularly analysed. This is an established process that is reassessed annually by the holding company's management (opportunity and risk matrix in accordance with DIN EN ISO 9001).

**For the Holding Management Board
Christian Frank**