

## Ethics policy (status 06 | 2024)

This ethics policy serves as a behavioural guide and decisions-making guideline of all employees and managers of the company. We are committed to conducting our business with **integrity**, **respect** and **transparency** while upholding the highest ethical standards. Our values are based on trust, fairness and social responsibility and must be upheld by all employees, business partners and customers.

### 1. Respect, inclusion and diversity

#### 1.1 Equal treatment

We treat all employees, customers and business partners fairly and respectfully, regardless of gender, age, ethnic origin, religion, sexual orientation, disability or other personal characteristics.

#### 1.2 Working environment

We promote a working environment that is free from discrimination, harassment and bullying. Every employee has the right to work in a safe and respectful environment.

#### 1.3 Inclusion and diversity

We value and promote inclusion and diversity at all levels of the diversity dimensions within our company. We are actively committed to creating a diverse workforce and ensuring that all employees have equal opportunities and access to resources and development opportunities. Diversity is seen as a strength and a contribution to the company's innovative strength and competitiveness.

By signing the Diversity Charter in 2021, Klüh committed itself to cultivating a corporate culture characterized by respect and appreciation, managing HR processes in accordance with the principles of the charter and introducing diversity management.

### 2. Integrity and honesty

#### 2.1 Honesty

We are committed to honesty and transparency in all our business practices and communications (prohibition of misleading advertising) with customers, business partners and colleagues.

#### 2.2 Conflicts of interest

Conflicts of interest must be avoided. Employees must disclose personal interests that could conflict with the interests of the company and handle such situations transparently and responsibly.

### 3. Responsibility and sustainability

#### 3.1 Environmental awareness

We are committed to protecting the environment and strive to integrate sustainable practices into all areas of our business. Resource conservation and environmental awareness are integral parts of our corporate philosophy.

#### 3.2 Social responsibility

Our company has a social responsibility. We support social projects and are involved in the communities in which we operate.

#### **4. Information security**

##### 4.1 Protection of information

We treat all business and personal information confidentially. The privacy and data protection of our employees, customers and business partners are our top priority.

##### 4.2 Security measures

We take appropriate measures to ensure the security and integrity of our IT systems and data. This includes protection against unauthorized access, data loss and cyber attacks.

#### **5. Compliance and adherence to the law**

##### 5.1 Compliance with laws

We comply with all applicable laws and regulations, both nationally and internationally. Unlawful, anti-competitive or unfair behavior (fraud) will not be tolerated.

##### 5.2 Anti-corruption

Corruption, money laundering and bribery are strictly prohibited. We reject any form of unethical behavior and are committed to transparent and fair business practices.

#### **6. Implementation of and compliance with the Code of Ethics**

##### 6.1 Responsibility of managers

Our managers are role models and are responsible for implementing this Code of Ethics. They should actively exemplify and promote the values and principles.

##### 6.2 Training and awareness-raising

We offer regular training and awareness-raising measures to ensure that all employees understand and apply the ethics policy.

##### 6.3 Whistleblower system

Employees are encouraged to report violations of the Code of Ethics. We guarantee that there will be no negative consequences for whistleblowers.

##### 6.4 Audits

As part of internal and external audits and supply chain audits, we ensure that our employees, business partners and customers comply with regulations relating to IT security and corruption as well as applicable law.

This Code of Ethics is reviewed regularly and updated as necessary to ensure that it meets current requirements and standards.

We are convinced that ethical behavior is the basis for sustainable success. By adhering to these guidelines, we help to gain and maintain the trust of our stakeholders.