

Knaus Tabbert AG

Declaration of Principles on respect for human rights and associated environmental standards

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FOREWORD

Knaus Tabbert AG is a listed company with a strong foundation of values. Observing and complying with legal, contractual and other obligations is an integral component of the values of the Knaus Tabbert group of companies. Acting responsibly and lawfully throughout the entire supply chain is one of the basic prerequisites for our business success and forms the basis for the trust of our stakeholders.

For us, sustainability means creating lasting value and taking this into account in our corporate planning. We have consistently anchored this in our core business with a sustainable business strategy.

We are therefore expressly committed to observing and complying with the core principles of the "UN Global Compact", respect for human rights (UN Resolution 217 A (III)) and the relevant basic principles (core labour standards) of the International Labour Organization (ILO).

Furthermore, we expressly recognise as protected legal positions worthy of protection those arising from the following conventions for the protection of human rights:

- Minamata Convention of 10 October 2013 on Mercury (Minamata Convention)
- Stockholm Convention of 23 May 2001 on Persistent Organic Pollutants (POPs Convention)
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (Basel Convention)

We regard these international agreements and declarations as the basis of our commitment and the way we want to do business.

Jandelsbrunn, January 2023

The Management Board of Knaus Tabbert AG

Wolfgang Speck
(CEO)

Carolin Schürmann
(CFO)

Werner Vaterl
(COO)

Gerd Adamietzki
(CSO)

For the General Works Council of Knaus Tabbert AG

Anton Autengruber
(Chairman of the General Works Council)

SCOPE OF APPLICATION

This document sets out our commitment to the future. All Knaus Tabbert Management board divisions support this declaration of principles. We integrate the principles set out in it into our systems and processes and make them an integral part of them. Our definition of human rights also includes environmental aspects, which can ultimately have an impact on human rights. We therefore attach great importance to working with business partners who share these values and the commitment set out in this declaration.

The Knaus Tabbert Group recognises its social responsibility and is particularly aware of its corporate responsibility to respect human rights and related environmental rights. We respect human rights and the associated environmental rights (hereinafter referred to as "human rights") not only in our own business operations, but also work towards compliance with these fundamental rights in our upstream and downstream supply chains. To this end, we require new and existing suppliers and other business partners to ensure that our standards and basic principles are also appropriately observed, including by their suppliers and business partners.

We use internal regulations, instructions and codes of conduct as guidelines, with the help of which we fulfil the legal provisions regarding human rights and environmental due diligence obligations.

Sustainable management can only be effective if it encompasses the entire supply chain. We therefore not only place corresponding requirements on ourselves, but also expect such standards and basic principles from our suppliers and other business partners. We enter into dialogue with existing suppliers on the basis of our contracts and the Knaus Tabbert Supplier Code of Conduct and work together on improvements. New suppliers are directly integrated into the new supplier management requirements.

Our commitment to human rights and environmental issues

At Knaus Tabbert, we take responsibility - not only for our products, but also for our employees and for the consequences that our business activities can have. We protect people and their environment and endeavour to avoid any negative impact on human rights by continuously monitoring our business activities for human rights risks and implementing preventive measures in relation to identified risks at an early stage. If we identify a violation of human rights or environmental obligations, we will take immediate and appropriate action to prevent, stop or minimise the extent of the violation. With our principles listed below, we explain how we want to fulfil our commitment to human rights.

Knaus Tabbert does not accept human rights violations

We respect all applicable regulations for the protection of human rights as a fundamental and general requirement worldwide. We emphasise this in our Code of Conduct for Employees, in which human rights are also a key chapter and which underlines the importance of human rights for us. Our employees receive regular online and face-to-face training on the Code of Conduct. For us, it is a matter of course that respect for human rights applies not only to activities within our own business area, but also to the behaviour of suppliers and other business partners. In this respect, our cooperation is also based on our Code of Conduct for Suppliers and Business Partners (Supplier Code of Conduct), which in particular includes compliance with human rights and is and will be part of our communication with suppliers and other business partners.

Knaus Tabbert uses its influence to prevent and combat human rights risks

We view human rights violations as a dynamic and ongoing risk. We therefore adapt monitoring procedures in this regard to ongoing processes, for example the implementation of human rights and environmental aspects in the compliance risk assessment and compliance monitoring processes. At the same time, we have a responsibility to take remedial action if we have caused or contributed to a human rights violation.

Our risk analysis and classification (high, medium, low) is based on a compliance risk assessment carried out at Knaus Tabbert, which works with country and industry-specific indices, but also includes analyses and evaluations from self-assessments (selected questionnaires for suppliers). We have defined a package of measures to minimise human rights risks and support the integration of human rights into the compliance management system. This includes the management's commitment to human rights and the introduction of specific training and communication measures. Human rights are thus also part of the current compliance monitoring system, including reporting to relevant stakeholders such as the Knaus Tabbert Management Board and the continuous improvement of human rights measures.

We will continue to develop our risk assessment in this regard in the future in order to expand our understanding of the specific human rights risks in our business activities and their environment. This risk assessment will also serve to continuously adapt our processes and systems to recognise, prevent and mitigate human rights risks. Human rights risks are not only assessed in our own business area, but are now also given significantly greater importance in the selection, review and assessment of suppliers and business partners.

A key tool in this area is the sustainability assessment, which is used to evaluate the social and environmental performance of our direct suppliers as a mandatory part of the procurement process. In this way, Knaus Tabbert sets an example for suppliers that is intended to promote cooperation so that sustainability aspects permeate the supply chain. The primary aim is not to exclude suppliers from the supply chain, but to give those whose performance is not yet satisfactory the opportunity to achieve a positive sustainability rating. Any shortcomings that become apparent are to be remedied by the suppliers with precisely defined measures as part of an action plan with fixed deadlines.

Knaus Tabbert wants to systematically analyse, prioritise and reduce the human rights risks in our supply chain. For our first risk analysis, we are creating software-supported assessments based on our direct suppliers. Our well-known and proven service provider Tec4U is supporting us with its specialised software DataCross (well-known material compliance software with a new add-on module). This automatically calculates a statistical risk of the direct suppliers based on the suppliers' industries and country indices (risk analysis). High-risk countries with high human rights risks are identified. Requests for a self-assessment (questionnaire) are sent to suppliers (especially those with a high risk); this response is also automatically imported into DataCross, weighted and analysed. If a supplier then has a high risk, Knaus Tabbert is obliged to take (step-by-step) measures (so-called remedial measures); these are defined and determined on a case-by-case basis (not across the board).

Continuous documentation is also carried out via DataCross, as are analyses and reports.

Based on the existing risk assessment, we consider the risks listed below to be relevant to our own operating activities and business relationships as well as those of our direct suppliers and other business partners. These risks will be assessed and weighed up for the first time from the 2023 financial year. In future, Knaus Tabbert will prepare an annual report on the fulfilment of its human rights and environmental due diligence obligations within the meaning of the German Supply Chain Due Diligence Act (LkSG) for the previous financial year (for the first time from the 2023 financial year) and make it available on our website (www.knaustabbert.de) no later than 4 months after the end of the financial year.

Knaus Tabbert sets high standards for human rights in the workplace

Protecting employees during their work is an essential part of our commitment. We therefore see labour rights as a central element of human rights and aim to set high standards in this area. We adhere to the core principles of the UN Global Compact and the core labour standards of the International Labour Organization (ILO) and protect the following legal positions in particular with our internal rules and regulations:

- **Rejection of forced labour**

As described in the Code of Conduct for Employees, Suppliers and Business Partners (Supplier Code), Knaus Tabbert rejects all forms of forced or bonded labour, modern slavery and human trafficking. This includes work that is performed involuntarily by people due to intimidation, punishment, violence by security forces or the threat of discrimination. Employment relationships are based on voluntary co-operation and can be terminated by employees at any time of their own free will and within a reasonable period of notice. We endeavour to protect our staff and ensure a safe and healthy working environment for all.

- **Rejection of child labour and young workers**
Child labour is prohibited at all costs. The International Labour Organisation sets the minimum age for employment, which must be adhered to.
- **Equal treatment in employment**
We reject any form of discrimination, harassment and unjustified disadvantages. Discrimination on the basis of ethnic or social origin, skin colour, gender and gender identity, nationality, language, religion, ideology, physical or mental disability, sexual orientation, state of health, age, marital status, pregnancy/parenthood, trade union membership or political conviction, insofar as this is based on democratic principles, is not tolerated. Fair wages and punctual remuneration are fundamental rights of every employee. Equal opportunities, equal treatment and respectful behaviour are fundamental obligations for our work and cooperation with others. We promote and protect a culture of diversity, equity and inclusion.
- **Freedom of association and collective bargaining**
We respect the right of all employees to form and join trade unions and employee representative organisations. As a company, we reject any form of discrimination based on trade union activities. For us in the Knaus Tabbert Group, the perspective of employees and employee representatives is an important asset. We are convinced that good cooperation and a strong relationship with our employee representatives contribute to the success of the company.
- **Occupational safety**
Knaus Tabbert is committed to its responsibility for the health and safety of its employees and the continuous improvement of the working environment. Compliance with health and safety requirements is the responsibility of the health and safety systems. Knaus Tabbert offers its employees preventive health care and promotion measures and aims to increase job and performance satisfaction through development measures.

Knaus Tabbert addresses environmental risks that could affect human rights

Knaus Tabbert recognises that climate change and other environmental issues can also have a negative impact on human rights. We have processes in place to manage and ensure compliance with applicable environmental regulations. In addition, we constantly strive to improve our environmental performance, optimise the use of natural resources and mitigate and avoid risks that could impact human rights.

Knaus Tabbert recognises the right to defend human rights and to speak out against human rights violations

For us, human rights are non-negotiable. We do not tolerate harassment of human rights defenders. At Knaus Tabbert, employees, business partners, direct and indirect suppliers, customers and other third parties can report possible violations of rules, including human rights violations, at any time and in several languages, anonymously if desired, via various channels, for example via our whistleblower portal on our website (www.knaustabbert.de) under the Compliance section, which anyone can access daily and around the clock.

The Knaus Tabbert Compliance Office is responsible for the processing of reports concerning the Knaus Tabbert Group and monitors/coordinates investigations together with an investigation centre established if necessary. The Knaus Tabbert Compliance Office acknowledges receipt of the tip and coordinates with the whistleblower on additional relevant information wherever possible and necessary. If the Knaus Tabbert Compliance Office is informed of a possible risk that does not involve Knaus Tabbert employees, for example possible violations by suppliers, the Knaus Tabbert Compliance Office will forward this information to an appropriate office or department of the Knaus Tabbert Group, for example the responsible procurement department. All reports are investigated in accordance with the principles laid down in the Knaus Tabbert Group, such as the protection of whistleblowers, procedural fairness, confidentiality and the principle of legality. The results of an investigation are communicated to the Management Board and the responsible committees, which decide on further measures.

Knaus Tabbert deals appropriately with human rights violations

All our human rights policies and guidelines are structured in such a way that they protect all rights holders in the best possible way. However, violations can never be completely prevented. It is therefore an essential part of our compliance management system to react and respond to possible violations. When we are informed of cases of suspected misconduct, we investigate them immediately and find solutions to end actual violations and limit and mitigate the negative effects. If we have substantiated knowledge of a violation in our supply chain, we seek dialogue with our supplier or other business partner and first try to find a joint solution that ensures future compliance with human rights. If necessary, we use contractually agreed audit rights to obtain further information on possible violations and risks and to identify and implement remedial measures. If suppliers or other business partners do not take sufficient measures to prevent, end or minimise the extent of human rights violations, this may result in the termination of our cooperation with the supplier or business partner as a last resort.

Handling high-risk raw materials

In principle, we pursue a risk-based approach in order to avoid negative human rights or environmental impacts through the handling of raw materials. In our risk analyses, we take into account that some of the raw materials used in the manufacture of our products can be hazardous to people and the environment during procurement and processing and require special measures. We therefore act in accordance with the Minamata Convention on Mercury of 10 October 2013, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 and the Stockholm Convention on Persistent Organic Pollutants of 23 May 2001 (POPs Convention).

Knaus Tabbert has set itself the goal of having a positive influence where we are active in our society

We see respect for human rights as our duty to society and the environment. This means that we not only respect people, but also their living environment by reducing pollution of water, air and soil. We are convinced that the success of our company must be based on responsible and sustainable behaviour. We take responsibility for the environmental compatibility and sustainability of our products, sites and services. We endeavour to carefully manage natural resources and continuously reduce negative environmental impacts in order to comply with environmental laws and regulations. The Knaus Tabbert Management Board sets the strategic direction and defines sustainability priorities.

Reporting and responsibility for human rights

Human rights are a central issue and affect the entire company. Within Knaus Tabbert, human rights are embedded in the compliance management system and are therefore managed by the Knaus Tabbert Compliance Office, which also works closely with all internal stakeholders, in particular Procurement, Sustainability, HR, HSE (occupational health and safety) and Legal. The Compliance department reports to the Management Board of Knaus Tabbert AG on risks, activities and developments in the area of human rights, for example in the annual report and on an ad hoc basis as required.

To support and monitor these due diligence requirements and processes, the Management Board of Knaus Tabbert AG appointed the Chief Compliance Officer as Human Rights Officer in January 2023.

External reporting on human rights issues is also ensured, for example as part of the non-financial Group statement of the Knaus Tabbert Group.

About this Declaration of principles / Contact

This declaration of principles statement was developed in dialogue with the responsible business and specialist departments, the General Works Council of Knaus Tabbert AG and external experts. As the challenges for companies to respect human rights and the associated environmental rights are constantly changing, we will continuously review our human rights position and its implementation to ensure that it is up to date and effective.

This declaration of principles comes into force on 1 January 2023. No rights of individuals or third parties can be derived from it.

We review this declaration of principles annually and on an ad hoc basis and will update it as necessary if we identify changed or expanded risks.

If you have any questions or comments about this declaration of principles statement or other human rights-related topics, please email compliance@knaustabbert.de.

Complaints or reports of non-compliance with this declaration of principles can be submitted either directly to compliance@knaustabbert.de or to the whistleblower portal on our website (www.knaustabbert.de) under the Compliance section.