

# Knaus Tabbert Group

## Supplier Code

(as at January 2022)

**Integrity, Transparency, Respect and Sustainability**



**Publisher:**

Knaus Tabbert AG  
-Knaus Tabbert Compliance Komitee-  
94118 Jandelsbrunn  
Germany

Knaus Tabbert AG, January 2022

## Foreword

Dear Supplier,

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.

We therefore also expect our suppliers and business partners to act in accordance with these basic principles. Requirements in supplier management, however, no longer only have to satisfy a globally networked world. Modern and high-quality products and technologies require raw materials that often come from critical regions of the world. Impacts on supply chains also stem from climate change and increasing resource scarcity.

The Knaus Tabbert Group meets these challenges by considering sustainable aspects in procurement and supplier management. We see sustainable procurement as a core issue. This applies to the responsible use of critical materials as well as to human rights and basic ecological and social standards.

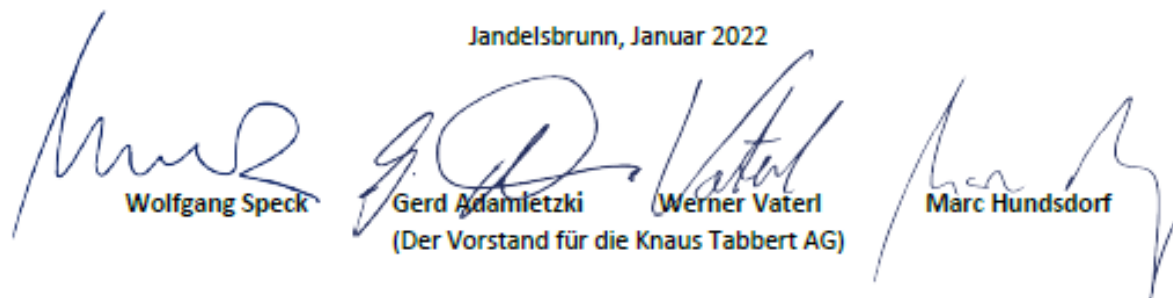
The value basis for our requirements in the supply chain is provided by internationally recognised standards and principles, which we have enshrined in this Knaus Tabbert Group Supplier Code.

These core principles largely correspond to national and international laws, basic principles and conventions, such as the principles of the "UN Global Compact", the Universal Declaration of Human Rights (UN Resolution 217 A (III)), the "UN Guiding Principles on Business and Human Rights", the UN Sustainable Development Goals and the relevant basic principles (core labour standards) of the International Labour Organisation (ILO).

To strengthen these values, we rely on active communication with and appropriate monitoring of you as our direct/immediate suppliers, coupled with the expectation that you will not only base your own actions on these basic principles, but also pass them on to your upstream suppliers in the supply chain in an appropriate manner.

Only together can we master the global challenges of the future.

Jandelsbrunn, Januar 2022



Wolfgang Speck      Gerd Adamietzki      Werner Vaterl      Marc Hundsdorf  
(Der Vorstand für die Knaus Tabbert AG)

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**A) Preamble:**

**WITHIN THE KNAUS TABBERT GROUP, INTEGRITY, TRANSPARENCY AND MUTUAL RESPECT ARE THE CORNERSTONES ON WHICH OUR BUSINESS IS BASED. KNAUS TABBERT TAKES ITS CORPORATE RESPONSIBILITY SERIOUSLY AND IN SO DOING CREATES THE PREREQUISITE FOR SUSTAINABLE BUSINESS SUCCESS.**

The Executive Board of Knaus Tabbert AG has therefore adopted this Supplier Code. The Code underlines the importance Knaus Tabbert attaches to responsible business relationships.

This Supplier Code describes the values and principles of conduct required of all Knaus Tabbert <sup>1</sup> suppliers, their employees and the supply chain.

These values and principles of conduct represent the binding foundation for Knaus Tabbert's global cooperation with suppliers.

Knaus Tabbert therefore requires that you as suppliers take responsibility for complying with this Supplier Code of Conduct and support each of your employees and your sub-suppliers in complying with it as well.

**Area of application**

This Code applies to all natural or legal persons who sell or provide products, processes or services to the Knaus Tabbert Group (Knaus Tabbert AG and all companies in which Knaus Tabbert AG directly or indirectly holds a majority interest) themselves or through third parties, e.g. affiliated companies, distributors, subcontractors, agents (hereinafter "Supplier").

<sup>1</sup> In the following, the term "Knaus Tabbert" always refers to the Knaus Tabbert Group, i.e. Knaus Tabbert AG and all group companies in which Knaus Tabbert AG directly or indirectly holds a majority interest.

## **1 BASIC PRINCIPLES AND STANDARDS OF CONDUCT**

### **1.1 Integrity**

Integrity is about ensuring that Knaus Tabbert's business practices are always in line with the company's values and standards of conduct. Knaus Tabbert requires its Suppliers to comply with applicable law as well as with the values and standards of conduct additionally defined in this Supplier Code.

Knaus Tabbert maintains long-term business relationships only with third parties whose business practices comply with the values and standards of conduct of this Code.

### **1.2 Transparency, trust and cooperation**

Knaus Tabbert is a fair and reliable partner. Knaus Tabbert therefore deals transparently with you as a Supplier. After all, transparency creates trust, and trust is the basis for successful, long-term and sustainable cooperation in the Supplier network. We also expect the same from you.

Responsible cooperation requires actions and decisions that are transparent and comprehensible. Only then will they find the necessary acceptance. In terms of cooperation, transparency also means addressing issues openly and dealing with each other honestly.

### **1.3 Dealing with risks**

Knaus Tabbert takes calculated business risks prudently in order to implement the corporate strategy and realise the associated opportunities. Business success generally involves exploiting opportunities and identifying, assessing and managing associated risks at an early stage.

Given the complex supply network to which you as a Supplier belong, along with your sub-suppliers, the analysis and evaluation of supply chains is an essential part of the process.

In this respect, we expect your active cooperation and support in determining or classifying the risk burdens. This applies in particular for the approval and implementation of the methods used, e.g. self-declarations or on-site inspections, if necessary by commissioned third parties.

The implementation of precautionary measures must be ensured through appropriate monitoring or a management system.

### **1.4 Respect for human rights**

Respect for human rights is an integral part of Knaus Tabbert's corporate responsibility. Knaus Tabbert requires you as a Supplier to respect the dignity and personal rights of individuals and all stakeholders you interact with through activities, business relationships or products. Knaus Tabbert requires you to actively prevent the infringement of human rights and to remedy such infringements within the framework of the human rights due diligence process.

### **1.5 Compliance with applicable laws**

Knaus Tabbert respects and complies with all applicable local, national and international laws and regulations. Compliance with these laws and regulations is the basis for Knaus Tabbert's long-term economic success. Violations can lead to considerable damage and have serious consequences both for the company as well as for employees, business partners and other stakeholders. Knaus Tabbert does not tolerate violations and likewise requires its Suppliers to comply with the applicable laws, official regulations and rules.

### **1.6 Avoidance of conflicts of interest**

Knaus Tabbert demands integrity from all Suppliers.

### **1.7 Care in dealing with company property**

If you, as a Supplier of Knaus Tabbert, are provided with property, e.g. equipment, operating resources or computer technology, software, data or intellectual property, you are obliged to handle this carefully and responsibly and to protect it from unauthorised access.

### **1.8 Proper accounting and financial reporting**

Knaus Tabbert requires its Suppliers to comply at all times with the applicable principles of proper accounting and, where applicable, financial reporting.

### **1.9 Appropriate public appearance**

Knaus Tabbert requires its Suppliers not to make any statements or comments relating to Knaus Tabbert in public or via social media and not to use any Knaus Tabbert logos for their own purposes without approval from the Knaus Tabbert communications department.

## **2. CONDUCT TOWARDS SUPPLIERS AND THIRD PARTIES**

### **2.1 Fair competition**

Knaus Tabbert is committed to fair and undistorted competition.

In almost all countries there are laws and regulations that prohibit agreements, arrangements and coordinated practices between competitors, suppliers, customers and dealers that have the purpose or effect of distorting competition. The same applies to the abuse of market power by unilateral conduct.

Knaus Tabbert requires its Suppliers to refrain from engaging in conduct that violates competition and antitrust law and to ensure this same expectation in the supply chain.

## **2.2 Anti-corruption**

Knaus Tabbert does not tolerate any form of corruption. Any conduct by Suppliers that could give the impression of improperly influencing business decisions is prohibited.

### Gifts, invitations and other benefits:

Benefits from Suppliers, such as gifts, invitations or other perks, are only permitted if they are appropriate and transparent. Knaus Tabbert therefore requires you as a Supplier to comply strictly with the applicable anti-corruption laws in the countries where business cooperation takes place.

### Donations and sponsoring:

Sponsoring activities with or referencing the business relationship with Knaus Tabbert must be approved by the Knaus Tabbert Executive Board.

## **2.3 Prevention of money laundering and terrorist financing**

Knaus Tabbert requires its Suppliers to comply with the legal obligations to combat money laundering and terrorist financing and to neither participate in nor enable activities related to money laundering and terrorist financing.

## **2.4 Export control and sanctions law**

National and international laws and regulations govern import, export, trading, brokering or financing transactions, the provision of services and the transfer of goods (goods, software and technology). Knaus Tabbert requires its Suppliers to ensure through suitable processes that business transactions and activities with third parties as well as with the Knaus Tabbert Group do not violate export control and sanctions law and that any required evidence and information is provided without delay.

## **2.5 Taxes and customs**

Knaus Tabbert requires its Suppliers to comply with the applicable tax laws and customs regulations.

## **2.6 Product safety and conformity (product compliance)**

The primary objective of product safety at Knaus Tabbert is not to endanger the health and safety of persons. In compliance with the legal and regulatory requirements applicable at the time of placing on the market (e.g. type approval regulations), in particular the legal provisions of product safety on development, production, use and properties, we strive for conformity in all processes, products and services. All relevant product and material-specific specifications as well as legal and statutory regulations must be strictly observed (`material compliance`). In this context, Knaus Tabbert gives due consideration to the state of knowledge and technology as well as the justified safety expectations of the end customers throughout the entire life cycle. Knaus Tabbert also demands this from its Suppliers!

### **3. HANDLING OF INFORMATION**

#### **3.1 Protection of company-related information and data**

Knaus Tabbert requires its Suppliers to protect company-related information and data from misuse, loss, destruction and manipulation.

#### **3.2 Protection of personal data (data protection compliance)**

Knaus Tabbert requires its Suppliers to protect and respect personal rights. Suitable measures must be taken to ensure compliance with the applicable and valid regulations and laws, in particular concerning the handling of personal data (data protection compliance).

#### **3.3 IT Security**

Data processed in IT systems must be protected in the best possible way, but as a minimum in accordance with the law.

#### **3.4 Insider information**

Insider information, i.e. concrete information that would be likely to significantly influence the price of listed securities if it became publicly known, must be treated as strictly confidential. Suppliers who are in the possession of such insider information may not use this for trading in securities or other financial instruments. Neither may they pass on insider information to third parties or use it to recommend the purchase or sale of securities or other financial instruments.

### **4. DEALING WITH EMPLOYEES AND COLLEAGUES**

#### **4.1 Fair working conditions and employee development**

Knaus Tabbert requires its Suppliers (in particular temporary employment agencies that provide employees for work) to comply with the legally guaranteed minimum wages in the respective labour markets as well as the relevant applicable labour regulations/laws, in particular with regard to working hours.

When recruiting employees, it is prohibited to use misleading or fraudulent practices. Making false statements about working conditions, including wages and fringe benefits, place of work, living conditions, dangerousness of work, accommodation and/or related costs, if any, is not permitted.

Employment contract documents must be in writing and must contain a detailed description in a comprehensible form and/or the language of the future employee and must be available in good time prior to activities relating to the commencement of work.

Employees' identity documents must not be retained, tampered with or destroyed. Any accommodation provided must be at least of the standard of the country concerned.



## **4.2 Rejection of forced labour and child labour**

Knaus Tabbert strictly rejects any form of child labour, forced or compulsory labour, modern slavery, involuntary or exploitative prison labour, human trafficking or other forms of exploitation in its own business activities. Knaus Tabbert strongly requires this also from its Suppliers and their supply chain. Strictly prohibited in particular are severe forms of human trafficking that relate to the recruitment, transportation, transfer, harbouring or receipt of persons through the use of force, coercion, abduction, fraud, deception, abuse of power or weakness, or the giving of payments or benefits to a person having control over the victim.

Knaus Tabbert strictly prohibits all Suppliers from using forced labour or engaging in serious forms of human trafficking as defined above, including facilitating commercial sexual acts.

Knaus Tabbert expects its Suppliers to take effective measures to prevent human trafficking.

## **5. SUSTAINABILITY, ENVIRONMENT, SAFETY AND HEALTH**

### **5.1 Sustainable action**

Sustainability is firmly anchored in the core values of Knaus Tabbert. Sustainable value creation is based on the triad of economic, ecological and social responsibility, both in terms of the products and in terms of production and the associated processes, services and supply chain. Knaus Tabbert sees sustainable action as a comprehensive topic that can only be considered as a whole.

Knaus Tabbert requires its Suppliers to comply with the applicable local/regional and international guidelines on human rights, occupational health and safety as well as environmental protection laws for all products, processes and services.

It places a special focus on, among other things, the handling of so-called conflict minerals and critical minerals and materials in general, where the entire supply chain is the key to greater responsibility and care, placing further requirements therefore on transparency and cooperation.

The Supplier undertakes to comply with the regulations on prohibited and declarable substances, e.g. ELV, RoHS and REACH, and to provide evidence of this.

## **5.2 Occupational health and safety**

When it comes to human rights violations, Knaus Tabbert demands a "zero tolerance" attitude from its suppliers!

This also includes providing a suitable working environment for direct employees as well as employees in the supply chain through appropriate care and compliance with the legal requirements, regulations and recommendations and/or requiring this in the supply chain. Suppliers are required to observe any necessary regional laws and requirements appropriately and to counterbalance these with internal risk assessment in order to ensure an appropriate working environment.

## **6. REPORTING, INFORMATION AND CONTACT PERSONS**

### **6.1 Reporting misconduct of any kind (complaints procedure)**

Knaus Tabbert has set up an appropriate internal complaints procedure in order to identify possible legal violations, breaches of regulations and misconduct of any kind along the entire supply chain. For this purpose, Knaus Tabbert has appointed a compliance contact as an independent point of contact for its own employees, but also for customers, Suppliers and other external persons or third parties regarding any compliance-related incidents or allegations. The same applies if any weak points or other circumstances are identified that could lead to violations of the law.

If requested, these reports and tips can also be communicated anonymously. The Knaus Tabbert Group assures whistleblowers that it will not take any steps to identify the whistleblower in the event of an anonymous report. An exception to this is any improper use of the Knaus Tabbert compliance contact.

Both Knaus Tabbert employees and external stakeholders (third parties) are always encouraged to speak out freely and without fear of reprisals. Reprisals against reporting persons who in good faith express concerns about possible misconduct in the company are prohibited. This also applies to external actors (third parties) who contact Knaus Tabbert in this respect.

The following channels are available to both employees and all third parties for possible reports/tips:

### **6.2 Contact person on site**

You can contact the Compliance department at Knaus Tabbert Germany directly:

Knaus Tabbert AG

-Legal & Compliance-

Helmut-Knaus-Strasse 1

(D)-94118 Jandelsbrunn

E-mail: [compliance@knaustabbert.de](mailto:compliance@knaustabbert.de)

Internet: [www.knaustabbert.de](http://www.knaustabbert.de)

### 6.3 Whistleblowing system

Information on violations of the Knaus Tabbert Supplier Code, in particular illegal business practices or potential violations of human rights-related or environmental obligations, can also be communicated at any time via the Knaus Tabbert Group's whistleblowing system. The system is available in several languages and enables anonymous, confidential and specially encrypted secure communication with the investigation team of the Compliance Department at Knaus Tabbert.

The whistleblower system can be accessed in the following way:

#### Post

Knaus Tabbert AG

-Legal & Compliance-

Helmut-Knaus-Strasse 1

(D)-94118 Jandelsbrunn

#### E-mail

compliance@knaustabbert.de

#### Online reporting channel:

[https://sicher-melden.de/whistle/#/mainpage/KTcase/knaus\\_tabbert\\_ag](https://sicher-melden.de/whistle/#/mainpage/KTcase/knaus_tabbert_ag)

Knaus Tabbert consistently follows up every tip-off about misconduct, with due regard given to the principle of proportionality. Every single tip is checked. Depending on the result, a transparent decision will be taken on what consequences are appropriate, necessary and reasonable. The persons entrusted with the implementation of the complaints procedure at Knaus Tabbert offer a guarantee of impartial and independent action. They are subject to appropriate confidentiality and are not bound by instructions in this respect.

### **B) Contact**

For questions regarding the content of this Supplier Code, please contact the Legal & Compliance department:

Knaus Tabbert AG

-Legal & Compliance-

Helmut-Knaus-Strasse 1

(D)-94118 Jandelsbrunn

E-mail: compliance@knaustabbert.de

Internet: www.knaustabbert.de

**C) Agreement to the Knaus Tabbert Supplier Code**

As a Supplier of Knaus Tabbert, we shall act according to the ethical and legal principles laid down in this Supplier Code. We shall also pass on these requirements to our supply chain.

We hereby acknowledge the Knaus Tabbert Supplier Code and/or confirm that we shall comply with the above principles and requirements of the Knaus Tabbert Supplier Code through the application of our own, equivalent company code/code of conduct.

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Date and signature and stamp Supplier or  
Date and digital signature/Acknowledgement

**Knaus Tabbert AG**

Helmut-Knaus-Strasse 1

(D)-94118 Jandelsbrunn

E-mail: [compliance@knaustabbert.de](mailto:compliance@knaustabbert.de)

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All information has been carefully compiled and checked. However, we cannot accept any liability for possible errors or incompleteness. We reserve the right to make technical changes.

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