

KnausTabbert

Wir bewegen



Knaus Tabbert Group Supplier Code

(as of March 2025)

Publisher
Knaus Tabbert AG
Knaus Tabbert Compliance Committee
94118 Jandelsbrunn
Germany

Version: 2.0

Knaus Tabbert AG, March 2025

preface

Dear suppliers,

Knaus Tabbert AG is a publicly traded company with a strong foundation of values. Compliance with and compliance with applicable legal, contractual and other obligations is part of the Knaus Tabbert values for our group of companies. Responsible and lawful action along the entire supply chain is one of the basic requirements for our corporate success and forms the basis for the trust of our stakeholders.

Our relationships with suppliers are based on the principles of fairness, integrity, and transparency. As a responsible company, we consistently fight against corruption in all forms and expect the same from our business partners. Corruption, whether in the form of bribery, unfair interference or taking advantage, is not only damaging to the reputation and integrity of our organization, but also to fair competition and society as a whole.

We therefore also expect our suppliers and business partners to act in accordance with these basic principles. However, supplier management requirements no longer just have to meet a globally connected world. Modern and high-quality products and technologies require raw materials that can often come from critical regions of the world. There are also effects on supply chains as a result of climate change and increasing scarcity of resources.

The Knaus Tabbert Group meets these challenges by taking sustainable aspects into account 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.

Our supply chain requirements are based on internationally recognized standards and principles, which we have enshrined in this Knaus Tabbert Group Supplier Code.

These core principles largely comply with 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 for Business and Human Rights”, the UN Sustainable Development Goals and the relevant basic principles (core labor standards) of the International Labor Organization (ILO).

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

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

Jandelsbrunn, March 2025

Willem Paulus de Pundert

Radim Sevcik

(The Management Board of Knaus Tabbert AG)

CONTENTS

<u>preface</u>	<u>02</u>
<u>A. preamble</u>	<u>05.</u>
<u>1 Fundamental principles and behavioral requirements</u>	<u>06</u>
1.1 Integrity	
1.2 Transparency, Trust, and Collaboration	
1.3 Dealing with risks	
1.4 Compliance with applicable laws	
1.5 Avoiding conflicts of interest	
1.6 Careful handling of business assets	
1.7 Proper accounting and financial reporting	
1.8 Appropriate public appearance	
<u>2 Conduct towards suppliers and third parties</u>	<u>08.</u>
2.1 Fair competition	
2.2 Combating corruption	
2.3 Preventing money laundering and terrorist financing	
2.4 Export control and sanction law	
2.5 Taxes and duties	
2.6 Product safety and compliance (product compliance)	
<u>3 Handling information</u>	<u>10</u>
3.1 Protecting business-relevant information and data	
3.2 Protection of personal data (data protection compliance)	
3.3 IT security	
3.4 Insider information	
<u>4 Respect for human rights and environmental requirements</u>	<u>10</u>
4.1 Prohibition of child labor	
4.2 Prohibition of slavery and forced labor	
4.3 Prohibition of discrimination; equal opportunities	
4.4 Negative environmental change	
4.5 Land rights	
4.6 Misuse of violence by private or public security forces	
<u>5 Safe and fair working conditions</u>	<u>11</u>
5.1 Contractual arrangements	
5.2 Working hours	
5.3 Occupational safety	
5.4 fair remuneration	
5.5 Freedom of association and expression	
<u>6 Compliance with environmental requirements</u>	<u>12</u>
6.1 Environmental and climate protection	
6.2 Waste, Emissions, and Resources	
6.3 Energy efficiency	
<u>7 Implementation</u>	<u>13</u>
7.1 Compliance with the principles of the Supplier Code	
7.2 Supply chain	
7.3 Verification	
7.4 Consequences of violations	
7.5 Amendment to the principles and supplier code	
<u>8 Notification, notes and contacts</u>	<u>14</u>
8.1 Reporting of misconduct of any kind (complaint procedure)	
8.2 Local contacts	
Whistleblower System	
<u>B. Contact</u>	<u>16</u>
<u>C. Approval of the Knaus Tabbert supplier code</u>	<u>17</u>

A) Preamble:

INTEGRITY, TRANSPARENCY AND MUTUAL RESPECT ARE THE KEY PILLARS WITHIN THE KNAUS TABBERT GROUP ON WHICH OUR ACTIONS ARE BASED. KNAUS TABBERT ASSUMES ITS CORPORATE RESPONSIBILITY AND THUS CREATES THE CONDITIONS FOR SUSTAINABLE CORPORATE SUCCESS.

This supplier code was adopted by the Executive Board of Knaus Tabbert AG. The Code underlines the importance that Knaus Tabbert attaches to responsible business relationships.

This supplier code describes the values and principles of conduct required of all Knaus Tabbert ¹ suppliers, their employees and their supply chain (sub-suppliers and subcontractors).

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

Knaus Tabbert therefore requires that you, as a supplier, feel responsible for compliance with this Supplier Code and that you support and commit each of your employees and your sub-suppliers to comply with it as well.

Scope of application

This Code applies to all natural or legal persons who sell or provide products, processes or services to Knaus Tabbert themselves or through third parties, such as affiliated companies, distributors, subcontractors, agents (hereinafter “supplier”).

¹ 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 has a direct or indirect majority stake.

1. FUNDAMENTAL PRINCIPLES AND BEHAVIORAL REQUIREMENTS

1.1 integrity

Integrity means that Knaus Tabbert's business practices are always in line with the company's values and principles of conduct. Knaus Tabbert requires its suppliers to comply with applicable laws as well as to comply with the additional values and principles of conduct defined here.

Knaus Tabbert only has long-term business relationships with third parties whose business practices comply with the values and principles of conduct set out in this Code.

1.2 Transparency, Trust, and Collaboration

Knaus Tabbert is a fair and reliable partner. Knaus Tabbert therefore acts transparently with you as a supplier. Because transparency creates trust and trust is the basis for successful, long-term and sustainable cooperation within the supply network. We also expect this from you.

Responsible collaboration requires actions and decisions that are transparent and comprehensible. Only then will they achieve the necessary acceptance. For cooperation, transparency also means addressing topics openly and dealing honestly with one another.

1.3 Dealing with risks

Knaus Tabbert takes calculated business risks with care in order to implement the corporate strategy and realize the associated opportunities. Business success generally requires opportunities to be seized and associated risks identified, evaluated and managed at an early stage.

Due to the complex supply network, which you as a supplier belong to together with your sub-suppliers, the analysis and evaluation of supply chains plays a significant role.

To this end, we expect your active participation and support in identifying or classifying risk burdens. This applies in particular to the acceptance and implementation of the methods used, e.g. self-information or on-site inspections, possibly by commissioned third parties.

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

1.4 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 of this can result in significant damage and have serious consequences for the company as well as for employees, business partners and other stakeholders. Knaus Tabbert does not tolerate violations and equally requires its suppliers to comply with applicable laws, official regulations and rules.

1.5 Avoiding conflicts of interest

Knaus Tabbert requires integrity from all suppliers. We expect our suppliers to avoid any form of conflict of interest that could impair the objective performance of their duties and responsibilities. A conflict of interest occurs when private or personal interests influence business decisions and actions or give the impression that decisions are not made in the best interest of the company.

Our suppliers are required to avoid all situations that could lead to a conflict between personal interests and the interests of the company. If a potential conflict of interest exists or could arise, it must be disclosed immediately and transparently. Suppliers should ensure that all business relationships and decisions are made in accordance with the highest ethical standards and principles of fairness and transparency.

We expect our suppliers to train and sensitize their employees and representatives accordingly in order to identify and avoid conflicts of interest. Any form of favoritism, advantage, or undue influence that could result from a conflict of interest is strictly prohibited and will not be tolerated.

1.6 Careful handling of business assets

If property, such as equipment, equipment, or information technology, software, data or intellectual property, is transferred to you as a supplier, you are obliged to handle it carefully and responsibly and to protect it from unauthorised access.

1.7 Proper accounting and financial reporting

Knaus Tabbert requires its suppliers to always comply with the applicable principles of proper accounting and, if applicable, financial reporting.

1.8 Appropriate public appearance

Knaus Tabbert requires its suppliers not to make any Knaus Tabbert related statements or statements in public or via social media and not to use 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 stands for fair and undistorted competition.

In almost all countries, there are laws and regulations that prohibit agreements, agreements and concerted practices between competitors, suppliers, buyers and retailers that have the purpose or effect of interfering with competition. The same applies to the misuse of market power through unilateral conduct. All competition decisions must be based on objective and transparent criteria that promote fair market access and equal opportunities for all market participants. Suppliers must not use anti-competitive practices such as price fixing, market division or undue interference with tendering processes.

Knaus Tabbert requires its suppliers not to participate in conduct contrary to competition and antitrust laws and also to ensure these expectations in the supply chain.

In addition, suppliers are required to actively combat anti-competitive conduct by immediately reporting violations of competition rules and, in close cooperation with us, to support a culture of fair competition.

2.2 Combating corruption

Knaus Tabbert does not tolerate any form of corruption. Any conduct by suppliers that could give the impression of an undue influence on business decisions is prohibited.

Gifts, invitations and other benefits:

Suppliers may not, directly or indirectly, offer, promise, or grant gifts, invitations, payments, or other benefits to influence business decisions or gain an unfair advantage. They must also not tolerate or support corruption in any way. Knaus Tabbert therefore requires you as a supplier to strictly comply with the applicable anti-corruption laws in the countries where business cooperation takes place. In the event of suspicion or specific cases of corruption, the supplier is obliged to report this to us immediately and in full.

Donations and sponsorships:

Donations or sponsorship activities involving or relating to the business relationship with Knaus Tabbert must be approved by the Knaus Tabbert Executive Board.

In addition, suppliers commit themselves to regularly training their employees and business partners on the importance of preventing corruption and compliance with all applicable laws and regulations. Violations of these obligations will not be tolerated and may result in serious legal and business consequences.

We expect our suppliers to implement an active anti-corruption compliance management system that includes preventive measures and clear procedures for identifying and reporting incidents of corruption.

2.3 Preventing money laundering and terrorist financing

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

2.4 Export control and sanction law

National and international laws and regulations regulate import, export, trade, brokerage or financing transactions, the provision of services and the transfer of goods (goods, software and technology). Knaus Tabbert obliges and requires its suppliers to ensure through appropriate processes that transactions and activities both with third parties and with the Knaus Tabbert Group do not violate export control and sanction laws and that any necessary evidence and information is provided immediately.

2.5 Taxes and duties

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

2.6 Product safety and compliance (product compliance)

We expect our suppliers to ensure that all delivered products meet the highest safety standards and are in compliance with applicable legal, regulatory and technical regulations. Product safety and compliance are critical to ensure the health and safety of end users and to build trust in our brand. Suppliers are required to comply with all relevant legal regulations, standards and industry requirements that apply to the manufacture, distribution and sale of their products. This includes safety requirements, quality standards and environmental regulations. Products that do not meet these requirements may not be delivered.

In addition, our suppliers must ensure that they have appropriate procedures and controls in place to continuously monitor and improve the quality and safety of their products. Any deficiencies or safety concerns identified during the production process or after delivery must be reported and addressed immediately.

We expect our suppliers to be fully transparent and work together to meet all product compliance requirements to ensure that all products we sell meet the highest quality and safety requirements.

3. HANDLING INFORMATION

3.1 Protecting business-relevant information and data

Knaus Tabbert requires its suppliers to protect company-relevant 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. Appropriate measures must be taken to ensure compliance with the applicable and valid requirements and laws, in particular when handling personal data (data protection compliance).

3.3 IT security

Data processed in IT systems must be protected in the best possible way, but at least in accordance with the law.

3.4 Insider information

Insider information, i.e. specific information which, if made public, would be likely to significantly influence the price of listed securities, must be kept strictly confidential. Suppliers who have such insider information regarding Knaus Tabbert AG may not use it to trade in securities or other financial instruments. They also do not share insider information with third parties and do not use it for recommendations on the purchase or sale of Knaus Tabbert AG securities or other financial instruments.

4. RESPECT FOR HUMAN RIGHTS AND ENVIRONMENTAL REQUIREMENTS

The Knaus Tabbert supplier ensures compliance with internationally recognized human rights.

4.1. Prohibition of child labor

Knaus Tabbert categorically rejects any form of child labor. Knaus Tabbert also strongly demands this from its suppliers. The supplier complies with the applicable regulations on the minimum age for admission to employment.

4.2 Prohibition of slavery and forced labor

Knaus Tabbert does not tolerate any form of slavery, servitude, forced labor and human trafficking in the supply chain. Knaus Tabbert also does not accept debt or contract servitude or involuntary prison work. Work must always be done voluntarily. Knaus Tabbert expects that a supplier will not withhold any personal property, passports, wages, training certificates, work or other documents from its

employees without factual reason. Knaus Tabbert does not accept goods manufactured using slavery or forced labor and will refuse to accept such goods.

4.3 Prohibition of discrimination; equal opportunities

Knaus Tabbert expects that a supplier will not tolerate discrimination or unequal treatment in its area of business, in particular due to national or ethnic origin, social origin, race, religion or belief, political opinion, sexual orientation, trade union activities or as a result of age, health, sex or any disability.

4.4. Negative environmental changes

The supplier shall refrain from causing harmful soil changes, pollution of water and air, emission of noxious noise and excessive water consumption if this significantly impairs the natural basis for obtaining and producing food, denies a person access to safe drinking water or makes sanitation difficult or destroys or damages a person's health.

4.5. land rights

When purchasing, developing or otherwise using land, the supplier complies with the prohibition of the unlawful withdrawal of land, forests and bodies of water, the use of which ensures a person's livelihood. The supplier does not carry out any illegal eviction.

4.6 Misuse of violence by private or public security forces

When commissioning or using private or public security forces to protect the entrepreneurial project, the supplier ensures through instructions and controls that the security forces refrain from any form of torture and cruel, inhuman or degrading treatment, do not unlawfully injure life or limb and respect freedom of association and association.

5. SAFE AND FAIR WORKING CONDITIONS

5.1. Contractual arrangements

The supplier provides its employees with written contracts in a form and language that they understand.

5.2. working hours

The supplier complies with applicable laws and collective agreements with regard to working, breaks and vacation periods. The guarantee of working and break times also applies to employees who do not have a permanent job due to their job (e.g. truck drivers or fitters).

5.3. occupational safety

The supplier complies with applicable health and occupational safety-related laws and other regulations and ensures safe and hygienic working conditions for its employees. It takes the necessary precautionary measures against work-related accidents and health problems and to prevent excessive physical or mental fatigue.

5.4. Fair pay

The supplier ensures that its employees are adequately remunerated, which at least meets the statutory minimum wage requirements of the place of employment. If there are no appropriate regulations, remuneration is based on industry-specific, local remuneration and benefits. Compensation must be paid on time and in full.

5.5. Freedom of association and expression

The supplier respects the freedom of association of its employees within the framework of applicable laws. This includes the right to set up, join, collective bargaining and strike organizations of their choice. Members of workers' organizations or trade unions as well as employee representatives are not discriminated against.

Employees of the supplier may express themselves freely in accordance with applicable law. This includes reporting internal corporate legal violations.

6. COMPLIANCE WITH ENVIRONMENTAL REQUIREMENTS

6.1. Environmental and climate protection

The supplier complies with all relevant environmental laws and regulations. He takes appropriate measures to keep the negative effects of his business activities on the environment and people as low as possible and to reduce the climate-relevant effects of his business activities.

6.2. Waste, emissions, and resources

Sustainability is firmly anchored in Knaus Tabbert's core values. The supplier contributes to reducing emissions and energy and water consumption. It ensures compliance with legal requirements for waste disposal and storage of and handling of hazardous substances (such as: mercury and persistent organic pollutants) and prohibited and declarable substances and proves this through appropriate documentation. This applies in particular with regard to the international agreements of Minamata,

Stockholm and Basel, the requirements based on the End-of-Life Vehicles Directive (“ELV”) and the Directive on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (“RoHS”) and the regulations of the REACH Regulation. Knaus Tabbert also expects the supplier to comply with the special legal due diligence requirements for handling so-called conflict minerals and other critical minerals and materials.

6.3 energy efficiency

Increasing energy efficiency is a strategic goal at Knaus Tabbert. The supplier is informed that Knaus Tabbert AG is introducing an energy management system in accordance with DIN EN ISO 50001 and that aspects of energy efficiency and energy consumption are a decision criterion when evaluating offers.

The supplier is encouraged to regularly review more energy-efficient (“more economical”) alternatives to the services and/or products it has offered so far and, if there are, to offer them pro actively as variants or independent, optional extensions of the previous delivery offer. Any negligent waste of energy must be avoided.

7. IMPLEMENTATION

7.1. Compliance with the principles of the supplier code

The supplier undertakes to comply with the principles set out in this Supplier Code and ensures that its employees are aware of its content and comply with its requirements. Knaus Tabbert respects that compliance with and implementation of the principles defined in this supplier code is a continuous process.

7.2. supply chain

The supplier undertakes to communicate the principles and expectations set out in this Supplier Code also to its immediate suppliers and to endeavour to implement them appropriately, insofar as these business partners are relevant to products and services that are the subject of business or contractual relationships with Knaus Tabbert. This applies in particular to the human rights and environmental expectations expressed in this supplier code.

7.3. validation

Knaus Tabbert reserves the right, in individual cases, to check compliance with this Supplier Code upon prior notice by the supplier itself or by external experts in accordance with the applicable legal regulations on site. During every inspection, Knaus Tabbert will take into account the supplier's legitimate confidentiality interests and will not interfere with business processes as far as possible.

7.4. Consequences of violations

A significant violation of the principles and obligations set out in this Supplier Code is considered a significant impairment of the business or contractual relationship. Knaus Tabbert assesses each infringement individually and reserves the right to take appropriate sanctions or measures in such cases. These may consist of a temporary suspension or termination of the business relationship in accordance with the contractual and legal regulations applicable to the contractual relationship. Alternatively, Knaus Tabbert can ask the business partner to immediately create and implement a concept to end or minimize the infringement and prevent future violations.

7.5. Amendment to the principles and supplier code

Knaus Tabbert may adjust the principles, rights and obligations set out in this Supplier Code if this is necessary as a result of the results of a risk analysis or as a result of a change in the legal situation. In such a case, Knaus Tabbert will immediately notify the supplier of an amended version of the Supplier Code and give him a reasonable period of time to implement the amended requirements.

8. MESSAGE, NOTES AND CONTACTS

8.1 Reporting of misconduct of any kind (complaint procedure)

In order to be able to uncover possible legal violations, irregularities and misconduct of any kind along the entire supply chain, Knaus Tabbert has set up an appropriate internal complaints procedure. For this reason, Knaus Tabbert provides 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 weaknesses or other circumstances are discovered that could lead to legal violations.

On request, these reports and information can also be shared 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. Misuse of the Knaus Tabbert Compliance Contact is excluded from this.

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

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

8.2 Local contacts

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

Knaus Tabbert AG

-Law & Compliance-

Helmut-Knaus-Strasse 1

D-94118 Jandelsbrunn

- Email compliance@knaustabbert.de

Internet: www.knaustabbert.de

8.3 Whistleblower System

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

The whistleblower system can be reached in the following way:

poste

Knaus Tabbert AG

-Law & Compliance-

Helmut-Knaus-Strasse 1

D-94118 Jandelsbrunn

Email

compliance@knaustabbert.de

Online reporting channel:

<https://www.knaustabbert.de/de/unternehmen/compliance/hinweisgebersystem-konzern/>

Knaus Tabbert consistently investigates every suggestion of misconduct, taking into account the principle of proportionality. Every single notice is checked. Based on the result, a comprehensible decision is made as to which consequences are appropriate, necessary and appropriate. The persons entrusted with handling the complaint procedure at Knaus Tabbert guarantee that action will be impartial and independent. They are subject to appropriate secrecy and are therefore not bound by instructions.

B) Contact

If you have any questions regarding content, please contact the Law & Compliance department:

Knaus Tabbert AG

-Law & Compliance-

Helmut-Knaus-Strasse 1

D-94118 Jandelsbrunn

- Email compliance@knaustabbert.de

Internet: www.knaustabbert.de

C) Approval of the Knaus Tabbert Supplier Code

As a supplier to Knaus Tabbert, you act in accordance with the ethical and legal principles set out in this Supplier Code of Conduct. Please also pass these requirements on to your supply chain (sub-suppliers and subcontractors).

As a supplier, you must comply with the current version of the Knaus Tabbert Group Supplier Code of Conduct when providing services to Knaus Tabbert.

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

ISSUE DATE 24.07.2024 03/ 2025.