



# CODE OF CONDUCT

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## 1 Preamble

As Kitotec GmbH, we are committed to creating an environment based on integrity, respect and professionalism. This Code of Conduct serves as a guide for our behavior and interactions, both within the company and with our customers, partners and the public.

Our goal is to promote a culture characterized by mutual respect, fairness and cooperation. We are committed to creating a work environment that is free from discrimination, harassment, unethical behavior or abuse of any kind.

We respect diversity and value the different perspectives of our team members. We foster an open and inclusive environment where everyone has the opportunity to develop their full potential.

By recognizing this Code of Conduct, we commit ourselves to align our daily activities and decisions with the highest ethical standards and to uphold the reputation and values of Kitotec GmbH.

## 2 Responsibilities

### 2.1 Leadership and management :

The executives and management of Kitotec GmbH are responsible for promoting a culture that implements the principles of this Code of Conduct. They serve as role models for ethical behavior and are responsible for ensuring that all team members understand and follow the guidelines.

### 2.2 Team members:

Every member of Kitotec GmbH is responsible for respecting the Code of Conduct and embodying it in their behavior. This includes respect for colleagues, customers, partners and company resources.

### 2.3 Reporting and handling of violations:

It is the responsibility of each individual to report potential violations of the Code of Conduct. The company ensures that such reports are treated confidentially and investigated appropriately. There are clear procedures for dealing with violations, including appropriate sanctions.

### 2.4 Integration into the corporate culture:

It is the responsibility of all team members to actively integrate the Code of Conduct into the corporate culture and to ensure that it is regularly reviewed, updated and communicated.

## **3 Compliance with laws and regulations**

### **3.1 Compliance with the law:**

Kitotec GmbH and its team members are committed to strictly complying with all applicable laws, regulations and standards in all regions and countries in which the company operates.

### **3.2 Ethics and integrity:**

We are committed not only to complying with the law, but also to promoting ethical behavior and the highest levels of integrity in all our business activities. This means that we not only adhere to what is required by law, but also to ethical standards that go beyond these requirements.

### **3.3 Training and awareness:**

Kitotec GmbH will ensure that all team members are regularly informed about applicable laws, regulations and internal policies to ensure that they are able to understand and comply with these regulations.

### **3.4 Guidelines in case of ambiguities:**

Should uncertainties or questions arise regarding the interpretation of laws or regulations, Kitotec GmbH is committed to providing appropriate resources to provide clarity and ensure compliance.

## **4 Equal opportunities and equal treatment**

### **4.1 Non-discrimination:**

Kitotec GmbH is committed to creating a working environment in which all employees are treated equally regardless of gender, ethnicity, sexual orientation, religion, age, national origin, disability or other protected characteristics. Discrimination in any form will not be tolerated.

### **4.2 Inclusion and diversity:**

We strive to promote a diverse and inclusive work culture that values and encourages different perspectives, backgrounds and abilities. Kitotec GmbH is committed to actively supporting equal opportunities and diversity and breaking down barriers.

### **4.3 Promoting a respectful environment:**

Every employee of Kitotec GmbH has a responsibility to contribute to a respectful working environment. This includes respectful communication, collegial cooperation and refraining from any form of harassment or discrimination.

### **4.4 Equal opportunities in career development:**

Kitotec GmbH is committed to creating a fair and transparent basis for career development and promotions that is based on competence, performance and ability and does not allow discrimination on the basis of personal characteristics.

## 5 Combating corruption

### 5.1 Zero tolerance policy:

Kitotec GmbH has a strict zero-tolerance policy towards any form of corruption, including bribery, embezzlement and other unethical or illegal activities.

### 5.2 Legal compliance and guidelines:

All Kitotec GmbH employees are obliged to fully comply with all laws and regulations prohibiting corruption and bribery, regardless of their location or position in the company.

### 5.3 Internal controls and transparency:

The company has implemented internal control mechanisms and guidelines to identify, prevent and minimize corruption risks. This includes clear guidelines for the acceptance of gifts, donations or benefits from external parties.

### 5.4 Ongoing training and education:

Kitotec GmbH provides ongoing training and awareness programs to ensure that all employees understand the risks of corruption and are empowered to recognize and report suspicious behavior.

### 5.5 Reporting system for violations:

There is a confidential reporting system that employees can use to report possible violations or suspected corrupt acts. These reports are carefully examined and dealt with accordingly.

## 6 Prevention of money laundering

### 6.1 Compliance with laws and guidelines:

Kitotec GmbH is committed to strict compliance with all applicable laws and regulations for the prevention of money laundering in the regions in which the company operates.

### 6.2 Risk assessment and management:

The company carries out regular risk assessments to identify potential money laundering risks and develop measures to minimize or prevent these risks.

### 6.3 Monitoring and reporting suspected cases:

All employees are required to immediately report suspicious transactions or activities that could indicate money laundering. Kitotec GmbH has implemented clear processes for monitoring and reporting such suspicious cases.

### 6.4 Training and awareness-raising:

The company offers regular training and awareness-raising activities to inform employees about the signs of money laundering and to provide them with the tools to identify and report such activities.

#### 6.5 Cooperation with authorities:

Kitotec GmbH cooperates fully with the competent authorities and supports them in the investigation of suspected cases of money laundering.

#### 6.6 Compliance with ISO 37001 standards:

Kitotec GmbH is committed to strict compliance with the requirements of ISO 37001 certification for anti-corruption management systems.

The principles and best practices of ISO 37001 are an integral part of our Code of Conduct. All employees are required to consider and implement these standards in their daily activities.

#### 6.7 Continuous improvement and compliance:

The company is committed to continuously improving its anti-corruption management system to ensure compliance with ISO 37001 standards and to identify and eliminate potential weaknesses.

#### 6.8 Training and awareness:

Employees are regularly trained on the requirements and procedures in accordance with ISO 37001 to ensure that they are familiar with the best practices for preventing corruption and can apply them in their areas of work.

#### 6.9 Inspection and certification:

The company undergoes regular audits and certifications in accordance with ISO 37001 to ensure ongoing compliance with these standards and to guarantee the credibility of the anti-corruption management system.

## 7 Avoidance of conflict materials

#### 7.1 Obligation to comply:

Kitotec GmbH is committed to avoiding conflict materials in accordance with internationally recognized standards and laws. The company will ensure that none of its products contain materials that could contribute to the financing of armed conflicts.

#### 7.2 Supplier commitment:

Kitotec GmbH expects its suppliers not to supply any materials that originate from conflict regions or that could contribute to the financing of conflicts. Clear requirements are placed on suppliers to ensure that their materials are conflict-free.

#### 7.3 Performance of tests:

The company carries out regular checks and inspections along the supply chain to ensure that no conflict materials enter the production processes.

#### 7.4 Transparency and reporting:

Kitotec GmbH is committed to reporting transparently on its efforts to avoid conflict materials. Clear reporting mechanisms are established to provide customers, investors and other stakeholders with insight into compliance with these standards.

## **8 Export, import and compliance with embargoes**

### **8.1 Compliance with export and import laws:**

Kitotec GmbH undertakes to strictly comply with all applicable export and import laws in the countries in which the company operates. This includes compliance with all embargo regulations.

### **8.2 Responsible trade:**

The company acts responsibly and ethically in its export and import activities and respects the applicable regulations on goods inspection and safety.

### **8.3 Careful review of business partners:**

Kitotec GmbH carries out careful checks on business partners and suppliers to ensure that they do not carry out any illegal activities in connection with exports or imports that violate national or international laws.

### **8.4 Ensuring product conformity:**

The company ensures that all products and services comply with applicable export control regulations and restrictions and do not contain any prohibited or restricted materials.

### **8.5 Training and awareness:**

Employees are regularly trained on the requirements and guidelines relating to exports, imports and embargoes to ensure that they are familiar with the laws and regulations and comply with them.

## **9 Prevention of child labor and forced labor**

### **9.1 Zero tolerance policy:**

Kitotec GmbH is committed to zero tolerance of child labor and forced labor in all areas of its operations and throughout its supply chain.

### **9.2 Supplier standards:**

The company expects all suppliers and business partners not to permit child labor or forced labor in their operations and to comply with relevant guidelines and standards.

### **9.3 Testing and monitoring:**

Kitotec GmbH conducts regular audits and monitoring along the entire supply chain to ensure that no form of child labor or forced labor is involved in the production processes.

### **9.4 Training and awareness-raising:**

Employees are regularly informed about the problem of child labor and forced labor in order to raise their awareness of the importance of this issue and to enable them to recognize and report signs of such violations.



#### 9.5 Transparency and cooperation:

Kitotec GmbH is committed to transparency and works actively with organizations and authorities to combat child labor and forced labor and to ensure that human rights are protected throughout the supply chain.

Kitotec GmbH is committed to strict compliance with the requirements of SA 8000 certification for social responsibility, particularly with regard to the prevention of child labor.

The principles and best practices of SA 8000 certification are an integral part of our Code of Conduct. All employees are required to consider and implement these standards in their daily activities.

#### 9.6 Control along the supply chain:

The company carries out continuous checks and audits along the entire supply chain to ensure that no form of child labor is involved in the production processes.

#### 9.7 Transparency and reporting:

Kitotec GmbH attaches great importance to transparency and reporting on compliance with SA 8000 standards in order to provide customers, investors and other interest groups with an insight into the measures taken to prevent child labor.

#### 9.8 Training and awareness-raising:

Employees receive regular training and information on the requirements of SA 8000 certification to ensure that they are familiar with the best practices for the prevention of child labor and can apply them in their work areas.

## 10 Compliance

Avoiding conflicts of interest is of great importance and integrating these measures into the Code of Conduct together with ISO 19600 certification underlines the company's commitment to compliance and ethics. Here is a suggestion of how this could be incorporated:

Kitotec GmbH is committed to strict compliance with the requirements of ISO 19600 certification for compliance management systems, particularly in the area of avoiding conflicts of interest.

The principles and guidelines of ISO 19600 certification are an integral part of our Code of Conduct. All employees are required to consider and implement these standards in their daily activities.

#### 10.1 Identification and disclosure of conflicts of interest:

Employees are encouraged to identify potential conflicts of interest and disclose them in accordance with established procedures. Clear guidelines are provided for the disclosure of conflicts of interest.

### 10.2 Training and awareness-raising:

The company provides regular training and information on the requirements of ISO 19600 certification to ensure that employees understand the risks of conflicts of interest and can deal with them appropriately.

### 10.3 Monitoring and testing:

Regular reviews and audits are carried out to ensure that the guidelines for avoiding conflicts of interest are implemented effectively and that appropriate measures are taken to manage potential conflicts.

## 11 Environmental protection obligation

### 11.1 Sustainability and environmental awareness:

Kitotec GmbH is committed to protecting the environment and the sustainable use of resources. The company strives to minimize negative environmental impacts and find long-term solutions to ecological challenges.

### 11.2 Compliance with environmental laws and regulations:

Kitotec GmbH is committed to strict compliance with all applicable environmental laws and regulations at all locations where the company operates.

### 11.3 Energy efficiency and resource conservation:

The company is actively committed to energy efficiency, reducing the consumption of resources and avoiding waste. Programs are implemented for the efficient use of energy and resources.

### 11.4 Environmentally friendly practices along the supply chain:

Kitotec GmbH expects its suppliers and partners to implement environmentally friendly practices and to be committed to environmental protection.

### 11.5 Continuous improvement and innovation:

The company continuously strives to innovate and improve in order to develop more environmentally friendly technologies and processes that reduce its ecological footprint.

Incorporating ISO 14001 certification into the Code of Conduct underlines the company's commitment to environmental protection and the implementation of best environmental practices. Here is one possible approach to how this could be reflected in the Code of Conduct:

### 11.6 Compliance with ISO 14001 standards:

Kitotec GmbH is committed to complying with the requirements of ISO 14001 certification for environmental management systems.

### 11.7 Anchoring environmental standards in the Code of Conduct:

The principles and guidelines of ISO 14001 certification are an integral part of our Code of Conduct. All employees are required to consider and implement these standards in their daily activities.

### 11.8 Monitoring and environmental management system:

The company carries out regular monitoring and internal audits to ensure that the environmental management system is effectively implemented and improved in accordance with ISO 14001 standards.

### 11.9 Training and awareness-raising:

Employees are regularly trained and informed about the requirements of ISO 14001 certification to ensure that they are familiar with the best practices for environmental management and can apply them in their work.

### 11.10 Transparency and reporting:

Kitotec GmbH attaches great importance to transparency and reporting on the implementation and performance of the environmental management system in accordance with ISO 14001 in order to provide customers, investors and other interest groups with an insight into the company's efforts to protect the environment.

## 12 Responsibility in the supply chain

### 12.1 Supplier standards:

Kitotec GmbH expects its suppliers and business partners to adhere to the same high standards of ethics, environmental protection, working conditions and quality as the company itself.

### 12.2 Transparency and due diligence:

The company is committed to promoting and enforcing a transparent supply chain. This includes conducting thorough due diligence on new suppliers and reviewing existing suppliers on a regular basis.

### 12.3 Working conditions and human rights:

Kitotec GmbH is committed to fair working conditions and respect for human rights throughout the supply chain and expects suppliers to comply with these principles.

### 12.4 Environmentally friendly practices:

The company requires suppliers to adopt environmentally friendly production and operating practices and to use sustainable resources in the manufacture of products or services.

### 12.5 Continuous improvement:

Continuous efforts are made to improve the supply chain by building partnerships and implementing best practices for a sustainable and ethical supply chain.

Meckenheim, November 29, 2023 – Peter Müller (Managing Director)

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