

# Code of Conduct

## Heinrich Kopp GmbH



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Kopp einschalten.

**Kopp**

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## INTRODUCTION

Kopp conducts its business fairly and competitively and aims to succeed in the market with the help of its employees<sup>1</sup>, its innovative strength, the quality of its products as well as the reliability and correctness of its production processes and supply chain, while taking responsibility for the environment and society.

Kopp therefore respects applicable law everywhere and expects the same from its employees and business partners. Unlawful conduct can cause great economic damage. The mere semblance of a breach of law can damage the company's market position. The consequences of one's own actions must therefore also be measured against the impact they have on the reputation of the company and the integrity of its employees and management.

Another cornerstone of the company's success is a committed and motivated corporate culture, supported by the responsible and ethical actions of every employee. A committed, motivated and responsible corporate culture also includes the commitment to preserve integrity in one's own business dealings.

Every action must therefore be based on a clear understanding of the statutory and legal regulations, the company's internal guidelines and shared values.

These rules of conduct describe the framework within which the company's objectives are to be implemented in its daily work. And it's not just the results that matter here, but also the way in which these goals are achieved. The rules of conduct thus facilitate compliance with the legal provisions and internal regulations. They cannot, however, constitute a complete collection of the obligations of all legal systems within which the company operates. All the same, as with this Code of Conduct, they must be observed and complied with by all employees. Your supervisors as well as specialist departments such as Human Resources will be happy to answer any questions you have.

## PRINCIPLES

### 1) EMPLOYEES<sup>1</sup>

#### *a) Conduct towards employees and between employees*

The company's conduct towards its (also future potential) employees is marked by respect and fairness. The company respects the personality of its employees and rejects any form of harassment, discrimination or preferential treatment.

No one shall be disadvantaged or favoured, harassed or excluded because of their nationality, ethnic or social background, skin colour, age or appearance, gender, disability, sexual identity, religion or belief, trade union or party affiliation, or pregnancy.

#### *b) Data protection and use of electronic media*

The Company undertakes to treat personal data confidentially and to collect, process and store it exclusively in accordance with applicable data protection regulations. The company has appointed a data protection officer to whom any employee may address questions and comments.

Insofar as the company provides access to and use of electronic media for business purposes, such electronic media may not be used for purposes contrary to laws, regulations, directives, guidelines or other provisions of the company.

#### *c) Conduct within the company*

Tolerance, respect, objectivity and fairness must be applied in all dealings with one another as well as with third parties. This also applies to dealings with and in the "social media".

Employees must at all times separate their private interests from those of the company.

The consumption of drugs, alcoholic beverages and intoxicating substances before and during working hours is prohibited.

*d) Protection against harassment*

All employees, customers and suppliers have the right to be treated fairly, respectfully, with dignity, courtesy and without discrimination. The company is committed to this principle and intends to safeguard this right in our company.

Kopp observes the principles of equal opportunities in the workplace. Personnel decisions (e.g. with regard to recruitment, selection, training, promotion and remuneration) are based on qualifications, experience and other work-related criteria. The company does not discriminate on the basis of gender, race, ethnic background, religion or belief, disability, age or sexual orientation.

It is the company's self-assigned task to uphold the right of employees to a working environment free from sexual harassment or any other illicit discrimination. Any form of sexual harassment or other illicit discrimination on the basis of gender, race or ethnic background, religion or belief, disability, age or sexual orientation will not be tolerated and must cease.

Sexual harassment is any unsolicited sexually explicit conduct, also including any unsolicited sexual acts and requests for such acts, sexually explicit physical contact, remarks of a sexual nature, as well as the unsolicited display and visible posting of pornographic images, which has the purpose or effect of violating the dignity of the person concerned, in particular by creating an intimidating, hostile, degrading, humiliating or offensive environment. Sexual harassment is illegal. Examples of sexual harassment are:

1. Soliciting sexual acts or offering them for benefits in the workplace;
2. Cornering, patting, pinching, touching or any other unwanted physical contact of a sexual nature;
3. Publicly speculating about or repeatedly asking about a person's sex life;
4. Jokes, remarks or innuendos of a sexual nature about a person or men and women in general; or
5. Visibly exhibiting pornographic images in the workplace.

Examples of other illicit discrimination prohibited due to reference to gender, age, race or ethnic background, religion or belief, disability or sexual orientation are:

1. Violating the dignity of a worker by making offensive or degrading remarks or through such behaviour (e.g. on account of someone's foreign background);
2. Threatening or insinuating that someone's continued employment is conditional upon tolerating certain behaviour;
3. Forcing a worker to engage in degrading or humiliating acts, e.g. harassment because of someone's sexual orientation.

If employees have been harassed or subjected to illicit discrimination of any other kind, they should report this to the responsible human resources department.

#### *e) Confidential information*

The Company entrusts its employees with a great deal of information every day in the course of their work and duties. Information that is marked or identifiable as confidential information must be protected and kept secret. Information disclosed to the company by business partners under an obligation to maintain secrecy is subject to the same obligation to maintain secrecy.

In order to protect the confidential information, the following must be observed in particular:

- Confidential information must not be shared with anyone else inside or outside the company (this includes colleagues or family members) either during or after termination of the employment relationship, unless it is necessary to carry out your work for the company.
- Confidential information must not be discussed (in person or on a mobile phone) in public places (entrances, hallways, public transport, public squares, WCs, etc.) where a conversation can be overheard.
- Documents containing confidential information must be stored in such a way that they cannot be viewed by unauthorised persons.



- Visitors, in particular, must not be given access to company documents. Visitors are therefore fundamentally not permitted in an unaccompanied capacity anywhere inside the company's business and office premises.

*f) Occupational health & safety*

Kopp complies with the legal regulations to ensure health and safety in the workplace and has taken the necessary measures to prevent accidents at work and to protect the health of its employees.

The company complies with the legal regulations on occupational safety, health and safety in the workplace and building security with the aim of minimising the risk of accidents and occupational illnesses.

Every employee shares responsibility for occupational health & safety; occupational safety, health and environmental protection regulations must be strictly observed. When handling hazardous substances, operating instructions and safety data sheets created in accordance with the legal provisions must be observed.

**2) PRODUCTS: RESEARCH, DEVELOPMENT, MANUFACTURING AND LIABILITY**

*a) Fair competition*

Kopp conducts its business exclusively in a fair and competitive manner and without any illegal arrangements and undertakes in particular to comply with antitrust law.

*b) Handling of trade secrets and intellectual property rights*

We protect our trade secrets and defend our intellectual property rights and respect the legally valid intellectual property rights of third parties.

*c) Cooperating with authorities*

Regulatory obligations towards the competent authorities must be observed.

*d) Environmental and health protection, sustainability*

Kopp is committed to protecting the environment and human health. This includes the health and safety of our employees and all persons working at our locations. For this, we operate an environmental management system in accordance with ISO14001:2015.

Sustainability is of the utmost importance to the company and is taken into consideration when making business decisions.

We are transparent in a clear and accountable manner about how our products are to be used and what risks may be associated with their use.

*e) Product safety*

As a company operating in the electrical engineering sector, Kopp is focussed on the manufacture and supply of safe and high quality products, so it in turn requires its employees to be committed to the quality of its products. This means, in particular, that all employees who become aware of any complaints about products are immediately to report them to their supervisor.

*f) Supply chain responsibility*

Even though we are not directly subject to the provisions of the Supply Chain Act, we are committed to its values and objectives. We respect human rights and are committed to the protection of life and health and the protection of the environment and nature. We also respect the freedom to form trade unions and the representation of workers.

We fully endorse the prohibition of slavery, forced labour and human trafficking, the prohibition of child labour and the protection of children, the prohibition of torture and the prohibition of discrimination and unequal treatment.



We are in favour of the obligation to uphold occupational health and safety provisions and compliance with locally applicable minimum wage laws.

We respect the right to freedom of association and collective bargaining.

Accordingly, we support our contractual partners as much as we can in providing them, to the best of our knowledge, with the information they need to fulfil their supply chain responsibilities and to comply with their legal obligations under the Supply Chain Act.

### **3) TRADE AND DISTRIBUTION**

#### *a) Bribery and corruption*

Bribery and corruption are prohibited and will not be tolerated by Kopp. The reputation, acceptance and business activities of the company as a trustworthy operator on the market must not be put in jeopardy by such crimes.

#### *b) Accepting and granting benefits*

No employee may demand, accept, offer or grant personal benefits in connection with their professional activities. No employee may accept or receive gifts from business partners or other third parties if this constitutes or may be perceived as inappropriately influencing business decisions.

#### *c) Money laundering*

The smuggling of assets from criminal offences into the legal financial and economic cycle while concealing their true origin and other money laundering activities at home and abroad are prohibited.

#### *d) Export*

All national and international customs, export and foreign trade regulations must be observed.

### **4) REPORTING AND DOCUMENTATION**

#### *a) Financial reporting and documentation obligations*

All business transactions must be appropriately and truthfully documented. Complete and correct recording of information relevant to accounting and tax law must be ensured. Legal and official storage regulations must be observed.

*b) Dealing with the media and government agencies*

Enquiries from the press or any media may only be answered by employees who have been given the express special authorisation to do so.

**5) COMPLIANCE BY BUSINESS PARTNERS AND SUPPLIERS**

Kopp's business partners and suppliers are obliged to conduct themselves at all times in such a way that they do not contradict the aforementioned Code of Conduct, in particular to accept the values and regulations mentioned therein for themselves and to implement them within their own companies and business structures in an appropriate manner and to provide evidence of this at Kopp's request.

**6) LEGAL CONSEQUENCES OF NON-COMPLIANCE**

- a) Violations of these rules of conduct will not be tolerated.
- b) Violations by employees may result in disciplinary measures under labor law up to and including dismissal and, depending on the type of violation, civil liability claims and criminal prosecution.
- c) Violations by business partners and suppliers may result in termination of the business, business relationship and, depending on the nature of the violation, civil liability actions and criminal prosecution.
- d) The company assures that no employee, but also no third party (in particular business partners and suppliers and third parties (in particular business partners and suppliers and / or their employees) of any irregularities or suspicions will suffer any damage or other disadvantage as a result.

Kahl, 17.05.2023

Heinrich Kopp GmbH

<sup>1</sup> All references to employees that do not strictly address both genders are to be understood as gender neutral and, regardless of the language used in this Code of Conduct, include both male and female persons, as well as intersex and transsexual persons or persons of diverse genders