



# **KNILL GRUPPE CODE OF CONDUCT**



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## FOREWORD

At Knill Group, we believe in conducting business in a responsible, ethical and sustainable manner. We strive to create a work environment that is respectful, fair and inclusive for all our employees, partners and stakeholders.

Our commitment to social and environmental responsibility is an essential part of our company's values and principles. To ensure that we uphold these standards, we have created this code of conduct.

**Christian Knill**  
Owner

**Georg Knill**  
Owner



## SCOPE OF THE **CODE OF CONDUCT**

The present Code of Conduct is a commitment to ethically impeccable behaviour. It describes the rules and values that form the basis for our decisions and actions and applies to everyone who acts on behalf of Knill Group. The Code of Conduct is intended to help employees, managers and Executive Board members alike to understand our principles and to act in accordance with them and to preserve them for the future.

Each individual employee is responsible for complying with and implementing this Code of Conduct.

We expect our directors and managers to fully support our compliance program in words and deeds, and to act as a role model for compliance for their teams. We only work with suppliers that share our commitment to integrity, sustainability and human rights and have agreed to meet the requirements set out in our Supplier Code of Conduct.

We are committed to a transparent and competitive sourcing process and to dealing fairly and responsibly with our suppliers.



We communicate in a respectful, honest, transparent and professional manner. Communication channels must be used responsibly. All press releases and other information relevant to Knill Group that is intended for the public shall be issued exclusively by the Management board members or the marketing department.

Our communications must reflect our reputation and brand. Timely and responsive business communication is vital. If answering is not possible promptly, we inform those involved and tell them when we will respond.



## COMMUNICATIONS



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# ENVIRONMENTAL RESPONSIBILITY



Sustainable action and continuous improvement are among the principles of the Knill Group and influence our corporate actions.

We comply with all relevant environmental laws and regulations to ensure the protection of our planet's resources. In addition, we develop and implement plans and targets to reduce our carbon footprint across all of our production network, supply chain, products, components and services.

The use of hazardous materials can have a detrimental impact on the environment, so we minimize their use, where possible, and handle these materials safely and responsibly. We take all precautions to ensure the safe and compliant handling, storage, transportation, disposal, recycling, reuse and management of waste, air emissions and wastewater discharges.

We make every effort to minimize risks to people and the environment and to improve environmental protection within our own sphere of influence on an ongoing basis.

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As a family-owned business, Knill Group strives to create a good working environment. We provide fair and equitable compensation to our employees and comply with all relevant labour laws and regulations, including minimum wage, overtime, and working hours, to ensure fair treatment of workers.

We treat others with respect, dignity and fairness. This means that we respect human rights and avoid any form of discrimination, harassment or abuse of employees. We reject all forms of forced and child labour and employ only workers who meet the applicable minimum legal age requirement for their location.

Our employees have the right to express their opinion freely.

Any form of discrimination on the grounds of race, colour, sex, religion, political opinion, nationality, social origin, age, disability, health status, trade union membership and sexual orientation will not be tolerated.

# SOCIAL RESPONSIBILITY





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## HEALTH AND SAFETY



We provide a safe and healthy workplace environment and take effective steps to prevent potential health and safety incidents. Working places shall be ergonomic and safe to prevent injuries and ensure the well-being of workers.

All employees at Knill Group are trained well and must promote health and safety at the workplace and observe safety standards as well as guidelines and regulations regarding occupational health and safety.

Knill Group stands for premium quality and aims to offer its customers excellent and innovative products and services. Our products are designed to be safe and comply with all applicable regulations and standards.



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We stand by the rules of fair competition and antitrust laws to ensure a level playing field. Any discussion, agreement or understanding (direct or indirect) with a competitor on fixing prices, allocating markets, customers or bids, or restricting production or collective boycotts is illegal.

As a rule, we should not (directly or indirectly) solicit, obtain or exchange commercially sensitive information that could influence a decision of Knill Group or a competitor concerning cost, margins, pricing data, future strategies, product plans, employee salaries, etc.

Illegal or unethical activities, such as corruption and bribery as well as direct or indirect money laundering and terrorism financing are strictly prohibited. We do not accept bribes, nor do we offer or promise bribes to our business partners to obtain or retain business or improper business advantages.



## **FAIR COMPETITION, ANTI-CORRUPTION AND FRAUD**



# INTERNATIONAL TRADE CONTROLS

We comply with trade regulations, export control laws and trade sanctions to ensure the protection of our stakeholders. We also respect in particular embargoes relating to countries, assets or individuals. If necessary, we will obtain export permits required.



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Intellectual property such as patents, trademarks and know-how are among the most important resources of the Knill Group. We take reasonable technical measures to avoid unintentional disclosure of intellectual property or trade secrets. All employees are required to protect intellectual property and prevent competitors or other unauthorised third parties from gaining access to such knowledge.

We recognize that the use of IT, including software (e.g. email, messaging services and cloud applications), hardware (e.g., mobile phones and laptops), and networks or the internet might expose us to cyberattacks and other internal and external threats. We use our IT responsibly and only for legitimate business purposes that are consistent with interests and rights of the Knill Group and in accordance with our rules and guidelines.

When business partners require access to confidential information, we require confidentiality agreements. The obligation to maintain confidentiality in order to protect intellectual property continues without restriction even after termination of the employment relationship.

We take responsibility to manage our company's assets with care and to protect them against loss, theft, damage or misuse. We will not tolerate fraud, theft, embezzlement, improper diversion, or other improper use of company assets. We keep our books and records complete, accurate and truthful.



## PROTECTION OF INTELLECTUAL PROPERTY AND COMPANY ASSETS







## PRIVACY AND PERSONAL DATA

We acknowledge the importance of personal data protection and believe that the principles behind data protection strengthen individual rights.

The Knill Group collects, uses, stores, handles, transfers and discloses personal data in accordance with applicable laws and expects suppliers and business partners to do the same.



Our employees are expected to act in the best interest of Knill Group. Private interests and personal consideration shall not affect any business decision.

Our employees shall not be influenced by business partners with gifts, gratuities or personal benefits that are beyond a modest and/or reasonable dimension and which cannot clearly be considered a culturally acceptable display of business manners or hospitality.



## CONFLICTS OF INTEREST

We adhere to all relevant laws and regulations, including those related to labour, health, safety, the environment, and intellectual property.

We comply with all applicable data protection laws in collecting, processing, storing or handling personal data of any individuals, including, without limitation, our own employees and employees of our customers, suppliers and business partners.

All employees are encouraged to report violations of this Code of Conduct to existing communication channels within the company (e. g. supervisor, executives, HR ...) or our whistleblowing channel.

## COMPLIANCE WITH LAWS



## **YOUR RESPONSIBILITIES UNDER THIS CODE OF CONDUCT**

Every employee at Knill Group is expected to read and understand this Code of Conduct, knows how to report violations, cooperates with investigations of violations and does not retaliate against employees who report violations.

Every leader at Knill Group is expected to establish a culture built on integrity and lead with this in mind. Leaders should ensure that employees understand why it is important and beneficial to report integrity concerns promptly and that they feel comfortable doing so without fear of retaliation.

Leaders should be a visible, accountable and consistent role model for integrity so that employees know that leaders will support their ethical business conduct when it matters. Leaders should hire and promote only those employees who demonstrate high levels of integrity and ethical behaviour.



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