

Introduction

This CSR Code of Conduct is an independent commitment on the part of Kappus GmbH and its employees. It is based on principles set forth by the UN, the ILO and the OECD.

This Code of Conduct forms the basis for the continuous improvement of our services and partnerships wherever we operate, directly or indirectly.

1. Management's commitment

Kappus GmbH is committed to acting in an economically, socially and environmentally responsible manner. The company strives to conduct its business in a competent manner on a solid moral and ethical foundation, and to compete fairly in all markets in which it operates. We view compliance with prevailing laws and the acceptance of cartel bans, limits on competition, export controls and economic sanctions as a matter of course. In this way, we avoid gaining undue advantages over customers, suppliers or competitors.

2. Scope

As a medium-sized company with approximately 200 employees, we are aware of our responsibility to society, the environment, and our employees and customers. This Code of Conduct therefore applies to all Kappus GmbH sites and business units. The company sets great store by the careful and responsible use of the products it produces, the materials and equipment it uses, and its intellectual property. At the same time, Kappus GmbH requires its suppliers to comply with the principles set forth in this Code of Conduct.

3. Rights and laws

In all countries in which it operates, Kappus GmbH respects and complies with the prevailing rights and laws, and it expects its suppliers and business partners to do the same.

4. Communication

Every company that has a business relationship with Kappus GmbH and signs this Code of Conduct is responsible for informing its employees and suppliers about the Code's requirements.

5. Transparency and dialogue

Kappus GmbH is committed to open and transparent communication on all channels. As a business, we treat all personal information confidentially and with the utmost care and sensitivity. More specific provisions are set forth in our confidentiality agreements, non-disclosure agreements and privacy policies.

6. Forced labour

Kappus GmbH rejects all forms of forced labour, including forced prison labour and debt bondage. This applies to our own employees and in equal measure to the employees of suppliers or other business partners.

Kappus GmbH rejects excessive restrictions on workers' freedom of movement. Furthermore, we reject demanding that workers surrender personal documents or assets such as identity papers, work permits or money, effectively binding them to a workplace.

7. Integrity and anti-corruption

We do not condone corruption of any kind, regardless of whether assets belonging to the company or to third parties are affected. Kappus GmbH aligns its conduct with generally accepted ethical values and principles, in particular integrity, rectitude, respect for human dignity, and openness towards and non-discrimination on the basis of religion, ideology, gender and ethnicity.

In an appropriate fashion, we promote transparency, integrity and responsible management and internal controls. Our employees are forbidden to accept or grant favours of any kind (cash, travel, gifts, etc.) that are linked to undue benefits (placement of orders, project contracts, etc.). We will immediately terminate our business relationships with any business partners who violate our anti-corruption policy, and we reserve the right to initiate legal proceedings and impose contractual penalties.

8. Child labour

We do not use child labour. Unless local laws specify a different age limit, we will not employ school-aged children or persons under the age of 18 (subject to the exceptions set forth in ILO Convention No. 138).

Employees under 18 years of age may not be assigned to hazardous activities and are exempt from night work in consideration of their educational needs.

9. Harassment

Kappus GmbH will not tolerate any form of corporal punishment or other physical, sexual, psychological or verbal abuse or harassment by employees or business partners.

10. Anti-discrimination

In all employment-related decisions, including but not limited to hiring, promotion, compensation, fringe benefits, training and dismissals, employees are treated strictly according to their abilities and qualifications.

No discrimination of any kind is permitted.

Kappus GmbH operates in accordance with Germany's General Act on Equal Treatment (*Allgemeines Gleichbehandlungsgesetz, AGG*), in particular with respect to: • Nationality or ethnic origin • Gender • Marital status • Religion and belief • Disabilities • Age • Sexual identity or orientation.

Neither workers nor applicants are subject to discriminatory practices.

Kappus GmbH guarantees its workers freedom of association and collective bargaining autonomy and does not interfere with their legally guaranteed rights to form or join workers' organisations.

Kappus GmbH rejects discrimination against members of workers' organisations such as trade unions.

11. Occupational health and safety

To prevent accidents and injuries, Kappus GmbH provides for safe and healthy working conditions that satisfy the minimum legal requirements with regard to:

- Occupational health and safety
- First aid
- Fire safety
- Evacuation of buildings
- Personal protective equipment
- Machine guards
- Hazardous chemicals or substances
- Hygiene
- Ventilation, temperature, humidity, noise
- Tidiness and cleanliness

12. Environment

At all sites where Kappus GmbH operates, we use environmentally friendly processes, which we improve continually. We comply with the environmental protection standards and regulations that apply at our sites, and we use natural resources in a sparing and responsible manner.

13. Working hours

Kappus GmbH ensures fair working conditions for all employees. We comply with national regulations on working time and respect the right to appropriate remuneration, which is based on statutory minimum wages or applicable collective wage agreements. Furthermore, we pay out all contractually agreed salaries and benefits and deduct contributions for nationally stipulated social benefits.

14. Data protection and privacy

KAPPUS GmbH ensures that the applicable data protection and privacy rules and regulations are complied with during any processing of personal and personally identifiable information. Furthermore, we ensure that information security requirements are complied with when we process information from our customers, suppliers and employees, and we inform them accordingly.

For Kappus GmbH

Heitersheim, October 18th 2021



Rainer Gsell, CEO



Michael Steppuhn, CFO