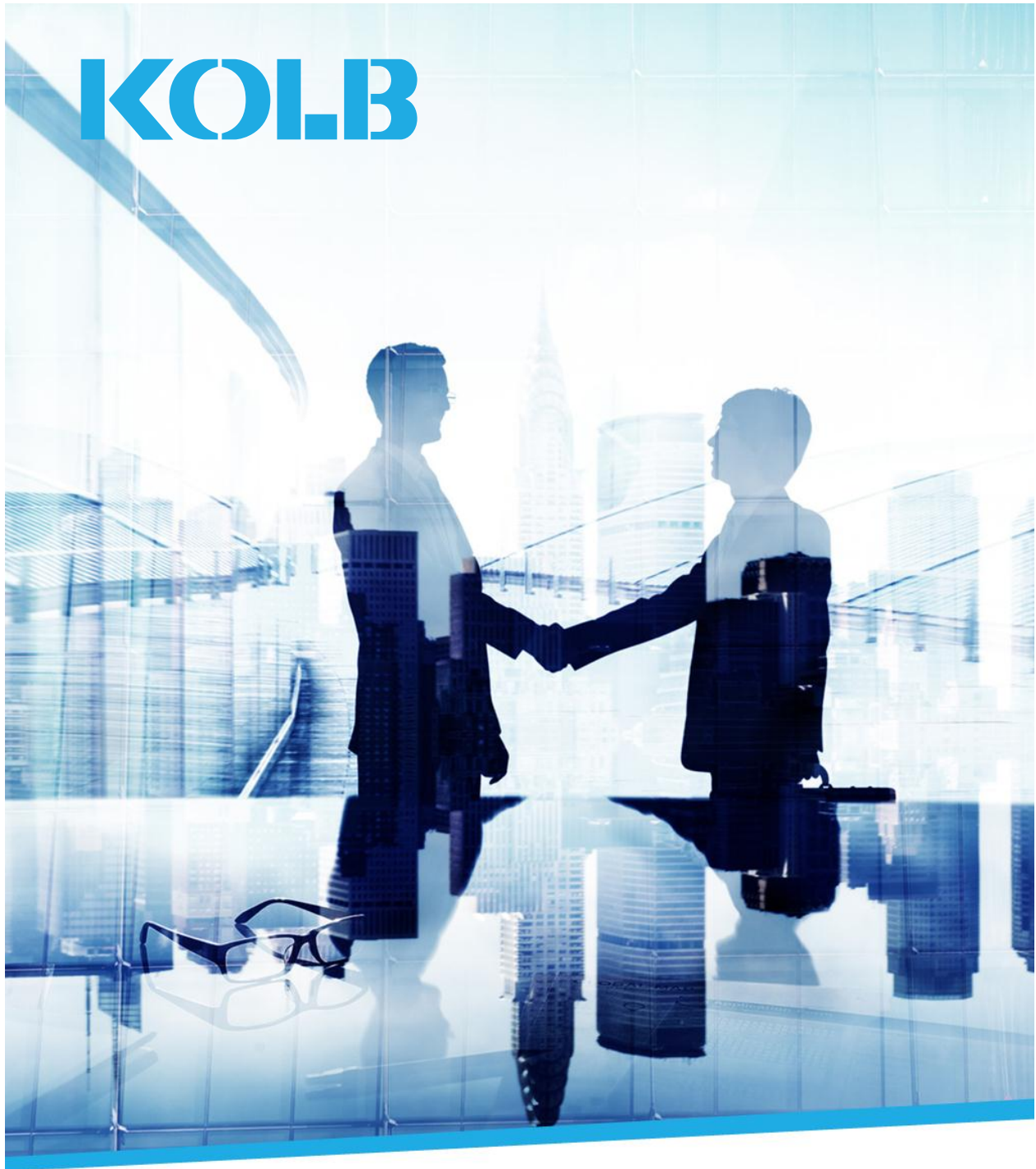


# KOLB



## Code of Conduct

**SAFETY.  
RELIABILITY.  
QUALITY.**

# KOLB Code of Conduct

## 1. Our principles and values.

*KOLB's guiding principle is the basis for actions and conduct. As an experienced and reliable specialist for fasteners and connecting elements, manufactured in massive forming processes, we are known to our customers throughout the world. They do not only value our outstanding product quality, but also our environmental competency for us and our surrounding.*

This is the basis upon which this Code of Conduct establishes behavioral guidelines for the correct conduct in our daily business. This conduct shall meet legal demands as well as highly ethical requirements. We recognize our responsibility as fair and correct partners towards our employees, customers, suppliers, business partners, and the public. We adhere to legal requirements as well as our internal regulations.

This Code of Conduct was adopted by the executive managements and follows the ten principles of the Global Compacts of the United Nations<sup>1</sup>. We all, as employees of KOLB GmbH, commit to accept rules of this Code of Conduct as the basis for our actions and our daily business. With this we guarantee for safety, quality, and sustainability in the interest of our customers and create the prerequisites for the integrity of our work environment and protect KOLB GmbH's good reputation.

We expect from our suppliers and business partners, and customers that they share KOLB GmbH's basic values and make sure that their actions are conform to the principles of this Code of Conduct.. We do not tolerate the violation of legal regulations, this Code of Conduct, or their rules. Violations will be sanctioned according to legal or contractual regulations and may result in the dissolution of a contractual relationship with the respective employee, customer, supplier, or business partners.

## 2. Our Conduct.

### 2.1 Interaction with people.

- **Protection of personality:** We treat one another decently, fair, and respectfully. We protect the personality of our employees and do not accept exclusion of any kind.
- **Discrimination and harassment:** We do not tolerate discrimination or harassment of sexual or personal nature or insults of employees, customers, suppliers, or business partners because of sex, race, religion, age, national origin, sexual orientation, disabilities, or political or union activities.

- **Health and labor laws:** We protect the health of our employees. We adhere to the relevant legal rules and regulations and offer proper working conditions.

### 2.2 Safety Concerns.

- **Protection and prevention:** In all of our activities we first and foremost protect the people. Beside the prioritized protection of employees, customers, suppliers, and business partners, we also our plants, equipment, buildings, and installations. We avoid damage through behavior constantly focused on risk and safety.
- **Safety relevant stipulations:** Safety is one of our central concerns. We comply with the relevant safety regulations and standards.

### 2.3 Handling of Information.

- **Confidentiality:** We do not release confidential information about KOLB GmbH, its customers, suppliers, or business partners to third parties.
- **Communication:** We maintain an open dialogue with all stakeholders and demonstrate responsibility for environment and society. We communicate transparent, honest, comprehensive as well as goal and objective oriented with our employees, customers, suppliers, business partners, and interested parties from the public and media.
- **Data protection:** We treat data obtained from employees, customers, suppliers, and business partners with due diligence and confidentiality. Processing of such data strictly follows legal and internal requirements.

### 2.4 Conduct in Competition.

- **Competition regulations:** We do not make arrangements with competitors or business partners which have the purpose of illegally restricting or affecting competition. We do not obstruct competition or exploit business. Our business approach is based on the principle of good faith.
- **Award of contracts:** We follow legal and internal guidelines when awarding contracts. We treat all suppliers and service providers equally and assure a fair and transparent process.
- **Conflict of interest:** We avoid all situations in which the personal interests conflict with the performance of duties on behalf of the company and do not compete with the company. If a conflict of interest should arise or if we are uncertain about a situation, we will contact a supervisor immediately and without being asked.

<sup>1</sup> Global Compact of the United Nations, [www.unglobalcompact.org](http://www.unglobalcompact.org).

# KOLB Code of Conduct

## 2.5 Dealing with assets.

- **Third party assets:** We respect assets of third parties. We especially respect the legal stipulations in regards to protection of intellectual property.
- **KOLB GmbH owned assets:** We exercise care of duty when using means of production and installations and all other KOLB GmbH owned assets. We use provided means of production, raw materials, and supplies exclusively for business- and other approved purposes and do not tolerate misuse or deliberate damage. We make sure that KOLB GmbH's intellectual property is suitably protected and respected by third parties.
- **Bribery and corruption:** We tolerate no bribery or other corruption. Public and private functionaries and decision makers must not be offered any gifts or other advantages, neither directly nor indirectly, which conflict with legal guidelines regarding bribery and corruption. We reject gifts or other advantages from third parties. Gifts are defined as anything with a direct or indirect monetary or other advantage. Exclusions from this with respect to offerings of insignificant value are defined in internal instructions.

## 2.6 Dealing with finances.

- **Money laundering:** We comply with the relevant legal requirements with respect to money laundering.
- **Taxes:** We comply with all current tax requirements. We do not offer support for tax evasion or tax fraud committed by our employees, customers, suppliers, business partners, or third parties.
- **Invoicing:** We assure correct invoicing based on accepted principles. We assure that the financial representation of the business is correct.

## 2.7 Dealing with the environment.

- **Dealing with resources:** We budget natural resources and work toward further reduction of our impact on the environment. We make sure to design our entire value add as environmentally sustainable as possible. We consider economic, social, and ecological factors in our decision making and align our actions with the long term success of KOLB GmbH.
- **Environmental laws:** We comply with current environmental laws and standards.

## 3. Confidential Compliance Reporting (Whistleblowing).

Employees report suspected or actual violation of this code of conduct or other internal regulations as well as illegal actions to their supervisors or directly to the human resource management of the top management.

The some reporting contacts are available for reports from customers, suppliers, and business partners.

Reported incidents will be investigated. All delivered information including the identity of the reporting person shall be kept confidential.

Employees reporting suspected or actual violations in good faith, shall be protected from retribution.

*Adopted January 2018 by the company management.*

Bernd Schweighöfer  
CEO Finances

Andreas Siewert  
CEO Technique