



Knauf Interfer SE

CODE OF CONDUCT

Matthias Kessel-Knauf
CEO

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Corporate philosophy

As an independent company, we are able to operate in a free and unbureaucratic manner, and, most importantly, in the interests of our customers at all times.

Our actions revolve around the needs of our customers in the industrial and automotive sectors, thereby facilitating growth in our core areas and safeguarding the futures of the employees¹ at our locations. This philosophy is also reflected in our corporate structure - the Holding, the Business Unit Steel, and the Business Unit Aluminium - business segments that are tailored to the needs of our customers and operate across locations.

Our corporate success plays a crucial role in future investments, for example, in customer interfaces, process optimization, machine technology, training, and logistics, thus creating a long-term basis for profitability and customer satisfaction.

Our value-oriented corporate culture, which combines entrepreneurial freedom with open, goal-oriented, and, most importantly, appreciative leadership, makes us a competent partner. We attach great importance to consistently high quality standards, the greatest possible occupational safety, the advancement of our employees, as well as the responsible handling of the environment and energy. Each of these goals is of equal importance to us.

Scope of application

This Code of Conduct shall apply to all Knauf Interfer Group companies.

We guarantee the highest quality

We are only satisfied when our customers are satisfied. Therefore, ensuring that our products and services are of a consistently high quality is of the utmost priority. We understand the expectations that our customers have of us. We fulfil these expectations in compliance with all current standards and under continuous inspection, resulting in finished, customized solutions of the highest quality. Every employee contributes to the quality of our products and services through his or her personal performance. This is a point of pride for us.

¹

Note

While the male form is predominantly used throughout these pages, the female and diverse forms are, naturally, always implied in all professional, educational, or other designations. In this respect, we have opted in favour of readability.

Quality policy

As a company, we are maximally focused on our customers and their satisfaction. We want to achieve this with constantly increasing product and service quality. The customer sets the standard for quality.

- We see high quality as the basis for our sustainable success. The Executive Board and the Managing Directors take responsibility for quality, define the quality policy and the strategic quality objectives. We conduct regular assessments of the effectiveness of the Integrated Management System.
- We understand the expectations formulated by our customers, implement them and pursue a zero-defect strategy. Likewise, we develop products and services that exceed our customers' expectations or have not yet been formulated in this way.
- We consistently apply, monitor and continuously improve the quality management system in cooperation with all interested parties. We comply with legal and official requirements, regulations, and other applicable directives.
- We comply with legal and official requirements, rules and other applicable regulations; they represent minimum standards for us. We are also committed to the environment, human rights and social expectations.
- The foundation for our success as a company is formed by qualified employees who, thanks to their corresponding awareness, identify with the company policy. Every employee is personally committed to the quality standards and also bears decision-making responsibility for this.
- We strive for the highest possible error prevention and reduction of waste in all company processes. Zero-defect quality is our goal and management task.
- As part of the sustainability assessment, the value-adding activities in the organisation are increased. The use of the best available technology, with due regard to economic efficiency, ensures capable, safe and environmentally sound processes.

General behavioural requirements

The Knauf Interfer Group is committed to the United Nations Global Compact.

In addition, we expect our business partners to observe equivalent social standards in all of the following areas: human rights, compliance with the law, protection of children and young people, treatment of employees, equal opportunity, as well as health and safety.

Respect for human dignity

We respect internationally recognized human rights and support their observance. Every employee is obliged to ensure that these universally applicable fundamental rights are complied with.

Equal opportunity and non-discrimination

We guarantee equal opportunity and equal treatment irrespective of ethnic origin, skin colour, gender, disability, ideology, religion, nationality, sexual orientation, social origin, or political opinion, to the extent that it is based on democratic principles and tolerance of dissenters.

We are committed to ensuring that every employee is treated with dignity and respect and is able to work in a work environment free of physical impairment and sexual, psychological, or verbal harassment. Any indication of infringement shall be investigated, while safeguarding the interests of victims and witnesses.

Our employees are selected, hired, and promoted on the basis of their qualifications and skills.

The right to freedom of opinion and expression is protected, and privacy is guaranteed.

Non-acceptance of child labour and forced labour

Child labour is strictly forbidden. In accordance with state obligations, the minimum age for employment eligibility is observed.

We prohibit the use of forced and compulsory labour. No employee shall be compelled to work, directly or indirectly, through the use of force and/or intimidation. Employees shall only be employed if they have willingly made themselves available for employment.

Employees and employee representatives

We strive to foster an environment that offers both personal and professional opportunities for our employees while enhancing their employability. We invest in the qualifications and competencies of our employees in an appropriate manner.

At the same time, we expect our employees to place high demands on themselves, their performance, and their health and to actively participate in their further development.

The Knauf Interfer Group is committed to working in an open and trusting manner with employee representatives, to conducting a targeted and cooperative exchange of views, and to striving for a fair balance of interests. We regard a professional approach to employee representation, which allows neither preferential treatment nor discrimination, as an integral part of our corporate culture.

The right to peaceful assembly and freedom of association at all levels is a matter of course for us.

The determination of wages and fringe benefits results from negotiations between employers and employee associations that relate to an employee's employment relationship.

Behaviour of employees towards each other

We attach great importance to ensuring that all employees treat each other in a trusting, open, and respectful manner. The behaviour of employees towards each other should be based, among other things, on jointly established guidelines, such as team rules and meeting rules.

Any tension or problems that arise should be resolved via open discussion in a respectful and appreciative manner; supervisors or the Human Resources Department can provide assistance in this regard.

Working conditions

We safeguard our workplaces and protect our employees

Providing a secure future for our employees and our company is one of the primary goals of our activity. We are passionately committed to this goal, as a team that comprises all of our employees. Our employees, after all, constitute the foundation of our success. Their competence, their experience, and, most importantly, their high level of motivation make us strong. As a result, the highest possible level of occupational safety and comprehensive health care is ensured. Targeted training and continuing education are just as important as technical and organisational measures for optimum working conditions and maximized safety at work.

Working hours

Provided that the respective national regulations do not stipulate a lower maximum working time, the regular standard working time shall not exceed 48 hours per week. Employees are entitled to at least the equivalent of one day off in each 7-day period. This can be granted for a period of up to 14 days, provided the relevant national regulations so provide.

The allowances and benefits paid or provided for the normal working week shall be at least equal to the minimum national statutory standards or the minimum standards of the national economic sectors concerned.

Occupational health and safety policy

- We ensure compliance with all applicable occupational health and safety requirements, and, whenever appropriate and possible, we exceed such standard levels.
- Our employees are of the utmost importance to us. We use technical, organizational, and personal means to ensure the highest possible level of workplace protection.
- All managers are directly responsible for the occupational safety and health of the employees and third parties in their respective areas. They are to serve as role models for their employees and motivate them to achieve maximum occupational safety.
- We expect all employees to assume responsibility for safety, both for their own safety as well as for the safety of the people and organizations that we work with.
- We thoroughly analyse circumstances that have led to or could have led to accidents in the workplace and take corrective action. After all: Accidents are never random and contradict our corporate philosophy.
- We are committed to eliminating hazards and minimising safety, health and occupational health risks wherever possible. In doing so, legal obligations and other requirements represent a minimum for us.
- We support consultation and participation of employees.

Avoidance of conflicts of interest

Potential conflicts of interest are addressed in the Compliance Guideline.

Conduct vis-à-vis business partners and third parties is covered by the Compliance Guideline.

Fair competition

Fair competition is addressed in the Compliance Guideline.

Business relationships with suppliers

Business relationships with suppliers are addressed in the Compliance Guideline.

Handling information

Data protection

In accordance with the applicable legal requirements, we guarantee the protection of privacy when using personal data as well as the security of all business data in all business processes. We maintain an appropriate standard of technical protection against unauthorized access, which corresponds with the latest technological developments. We comply with the EU General Data Protection Regulation (EU-GDPR).

Confidentiality

All confidential information concerning the Knauf Interfer Group shall be kept secret. This obligation shall continue to apply after termination of the employment relationship.

Handling of internal information

With the exception of special cases involving overriding interests (e.g., confidentiality), information is correctly and completely disseminated to other areas. We undertake to ensure that information is exchanged quickly and smoothly throughout the company locations. We do not unlawfully withhold, forfeit, or selectively disclose knowledge relevant to our activities.

Sustainability and environmental protection

As one of the leading independent companies in the manufacture, distribution, and processing of steel and aluminium products, we attach great importance to sustainability and the responsible use of natural resources. Our environmental policy is designed to help us remain aware of our responsibility to protect and conserve natural resources in our daily activities.

Raw materials, which we procure globally via an international network, are characterised by a high recycling rate. For many decades, steel and aluminium have been among the most important and environmentally friendly materials in a large number of industries and fields of application. Steel and aluminium products have become an indispensable part of our everyday lives. Therefore, we are obliged to produce and process our products in a responsible manner.

Environmental policy

- We determine, in advance if possible, the environmental effects of our processes, and we regularly monitor and evaluate them. We continuously work on reducing resource and energy consumption and minimizing emissions and waste in order to contribute to protecting the environment.
- When procuring raw materials and auxiliary materials, as well as when making investments – taking economic requirements into account – we give preference to the more environmentally friendly alternatives. We involve all of our company's suppliers and contractors in our efforts to improve environmental protection.
- We promote the environmental awareness and environmental responsibility of all employees as well as of all individuals commissioned and engaged by us, and we ensure that education, training, and further education are offered in the environmentally relevant areas.
- In addition to the implicit compliance with all environmentally relevant legal requirements and environmental standards within the framework of continuous improvement, we strive not only to comply with the prescribed limit values, but also to fall below them.
- We conduct open and constructive dialogues, both within the company and with interested parties, on the challenges of environmentally compatible production, and we provide information at regular intervals on the status of environmental protection and new objectives within the company.

Energy policy

As part of our energy management system, we continuously work toward saving resources, such as energy and raw materials, and reducing emissions and waste. We see the protection of our natural resources as a joint task, in which we involve our suppliers and partners as well as each individual employee.

Through the use of state-of-the-art machinery, innovative processes for finishing and surface treatment, as well as dynamic logistics concepts, we not only contribute to an energy-efficient production and distribution process, resulting in the lowest possible impact on nature and the environment, but also to the competitiveness of our company and our customers.

- The guidelines and objectives of our energy policy are applied in compliance with legal obligations.
- To that end, we provide the necessary financial and structural conditions.
- We strive to keep the use of natural resources – in particular, energy – as low as possible, taking the general economic conditions into account, and derive strategic and operational goals from this approach.
- Our manufacturing processes are designed to be energy-efficient in order to prevent environmental pollution to the greatest extent possible and to keep unavoidable pollution to a minimum.
- We take the latest technological developments into account when making new investments as well as when upgrading existing equipment, using energy-efficient machines and processes to the extent that this is economically justifiable.
- We check our plants and activities for potential energy savings and take appropriate measures to avoid disruptions or minimize their effects.

- We promote a sense of responsibility for energy use among our employees at all levels. We involve all employees in the implementation and execution of the energy management system, and we define responsibilities.
- We take precautions to ensure that our contractual partners comply with the requirements of the energy management systems used at our sites.
- We ensure compliance with applicable requirements regarding energy use, energy consumption and energy efficiency.
- We are committed to the continuous improvement of energy-related performance and the energy management system.

Conflict materials

We expect all of our partners to make the greatest possible efforts to achieve their goals without the use of raw materials that directly or indirectly finance armed groups that violate human rights. Our partners are prohibited from supplying us with goods containing columbitol tantalite (coltan), cassiterite (tinstone), wolframite, tin, tungsten, tantalum, or gold ("conflict minerals") from sources used to finance or support armed groups in the Democratic Republic of Congo (DRC) or its neighbouring countries ("covered countries"), pursuant to Article 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

All of our partners are required to notify us in writing at the time of the conclusion of any orders for the sale of goods if such goods contain conflict minerals. Notification shall specify the conflicting raw material and shall include the country of origin as well as the name of the processing smelter. If the conflict mineral comes from a "covered country", the supplier must confirm that its purchase was neither directly nor indirectly used to finance or support armed groups in such countries and must provide the source of its confirmation.

We reserve the right to withdraw from orders in which conflict minerals are used.

Application of the Code of Conduct

We undertake all appropriate and reasonable efforts to continuously implement and apply the principles and values described in this Code of Conduct and to remedy any existing deficiencies as quickly as possible.

The Code of Conduct and its enforcement are communicated to employees, business partners, and other interested parties, e.g., via publication on our website and our intranet as well as through training courses conducted at Knauf Interfer Group sites.

Compliance

We expect our partners to ensure compliance with this Code and to provide adequate documentation to demonstrate compliance.

Should any concerns arise, partners may contact their respective representatives or the Knauf Interfer Group Compliance Officer.

Such concerns will be immediately and objectively investigated and dealt with by the relevant department within the company.