



**Knauf Interfer SE**

**CODE OF CONDUCT  
for Business Partners**

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## **PREAMBLE**

The Knauf Interfer Group is one of the leading factory-independent service providers, processors and distributors for aluminium and steel solutions in Europe. We are aware of our economic, environmental, and social responsibility and operate accordingly.

During our business activities, we are materially dependent on the deliveries and services of our business partners. That's why we expect them to comply with the highest sustainability standards, both in their own business and within their local and global supply chains.

This Code of Conduct outlines our demands and expectations as concerns our business partners, their agents and subcontractors and defines the minimum standards for cooperation. These relate to the protection of human rights, especially improved working conditions, as well as environmental protection.

It is based on the legal provisions of national and international agreements (including the Supply Chain Sourcing Obligations Act, the 2015 Paris Agreement, the ten principles of the United Nations Global Compact, the core labour standards of the international Labour Organisation (ILO), the Business Social Compliance Initiative (BSCI), the Base Code of the Ethical Trade Initiative), protected legal positions as defined in Article 1-30 of the Universal Declaration of Human Rights, and our own sustainability claims.

## **SCOPE**

This Code of Conduct forms the basis for all business relationships of Knauf Interfer SE and its subsidiaries (hereinafter called "Knauf Interfer Group"). It is thus also binding for all suppliers, their agents and subcontractors, hereinafter referred to as the "Business Partners". Our Business Partners undertake to pass on the content of this Code of Conduct to their own business partners in turn by means of suitable contractual agreements. Moreover, they must regularly check that their own business partners comply with their obligations. If any of the rules in this Code of Conduct are violated, our Business Partners are obligated to report these violations to us and to eliminate them through appropriate remedial measures as well as to prevent them in the future with the help of preventive measures.

## **A) WHICH ENVIRONMENTAL STANDARDS MUST BE OBSERVED?**

### **1. Environmental permits**

Our Business Partners must ensure that all environmental permits and approvals required in their respective countries of operation are obtained, kept up to date and observed. This particularly includes compliance with the regulations resulting from the Minamata Convention, which regulates the handling of mercury-added products. Furthermore, it prohibits the production and use of persistent organic substances and any handling, collection, storage or disposal of associated wastes that is not environmentally sound. In addition, the provisions of the Basel Convention regarding the export of hazardous waste must be observed.

### **2. No environmental pollution**

Our Business Partners are obligated to strictly refrain from any environmental pollution that could endanger the natural livelihood of the people living on site. This prohibition comprises, in particular, causing harmful soil change, water pollution, air pollution or harmful noise emissions. It further includes excessive water consumption that significantly impairs the natural basis for food preservation and production, denies a person access to safe drinking water or impedes or destroys access to sanitation, and harms the health of persons.

### **3. Climate and resource protection**

As Knauf Interfer Group, we support the 2015 Paris Agreement and want to do our part for decarbonisation to limit global warming to well below 2°C, and preferably to 1.5°C, compared to pre-industrial levels. In accordance with the EU Climate Change Act and the Federal Climate Protection Act, the Knauf Interfer Group has set itself the goal of climate neutrality by 2045 at the latest and expects its Business Partners to do the same. Our aim must be to avoid or continuously reduce the environmental impact of resource and energy consumption, air pollutants, water consumption, spreading in soil and water, as well as the resulting waste, in order to preserve biodiversity as well as species diversity and to promote the circular economy.

### **4. Energy management**

Knauf Interfer Group's Business Partners must ensure that they implement, or plan to implement, systems and processes to increase energy efficiency and/or use renewable energy in the company with the long-term aim of reducing energy consumption and greenhouse gas emissions.

### **5. Safe handling of hazardous substances**

Our Business Partners must clearly label any hazardous substances, chemicals and materials and ensure their safe handling, movement, storage, recycling, reuse and disposal.

## 6. Environmentally friendly packaging

Our Business Partners are encouraged to use environmentally friendly packaging. The aim must be to avoid packaging wherever possible, or otherwise reduce it or improve its environmental impacts. Packaging is considered environmentally friendly if it is reusable, uses as little material as possible, is recyclable and/or consists of secondary raw materials or alternative materials.

## 7. Animal protection

We expect our business partners to treat animals with dignity, respect and care and that all actions concerning animals are in accordance with ethical principles and applicable laws. We reject animal testing or practices that cause unnecessary suffering to animals.

# **B) WHICH SOCIAL STANDARDS MUST BE OBSERVED?**

## 1. No child labour

The Knauf Interfer Group is against any form of child labour. In order to comply with these requirements, we expect our Business Partners to implement processes within their company that prevent child labour violations in their own business and within the supply chain.

## 2. No forced labour / slavery / human trafficking

We are against any form of forced and compulsory labour, including debt bondage, serfdom, slave labour or any other work performed by a person under the threat of punishment. Employees must be free to leave their employer in accordance with the statutory notice periods. We are committed to strictly preventing and combating all forms of human trafficking and expect the same from our business partners.

## 3. No discrimination

We do not tolerate discrimination of any kind (including harassment). In particular, any distinction, exclusion or preference based on national and ethnic origin, social origin, health status, physical or mental disability, sexual orientation, skin colour, gender, age, creed, political opinion, religion, belief, membership of an employee organisation, marital status or other personal characteristics is prohibited. In this context, all Business Partners undertake to comply with the General Equal Treatment Act or the corresponding national legislation. This applies to dealings with both internal and external stakeholders. Particularly in terms of the ethical recruitment of new employees, care must be taken to ensure that the recruitment process is fair, transparent and based on equality.

## 4. Appropriate wages and social benefits

Our Business Partners are obligated to, at a minimum, compensate their employees in accordance with the higher of either the national statutory minimum wage or the industry standard approved in

collective bargaining. They must respect the right of their employees to appropriate remuneration sufficient to enable them and their families to live in dignity and provide the national statutory social benefits. Remuneration must be paid on time, regularly and in full using a legally permitted means of payment. Where accommodation is provided, it must be clean, safe and meet the basic needs of staff.

## 5. Regulated working hours and employment relationships documented in writing

We expect our Business Partners to record and document the working hours of their employees. Employees must not work longer days than the legally permissible working hours and must observe legally regulated rest breaks. The Business Partners guarantee the written documentation of the work conditions (e.g. start and duration of the employment relationship, working hours, salary and bonuses) of their employees.

## 6. Freedom of association and right to collective bargaining

All employees have the right to freedom of expression. They have the right to join and form associations of their choice and to bargain collectively at any time, within the the framework of the applicable national laws and in accordance with our core labour standards of the International Labour Organisation (ILO) at all times to join and form associations of their choice and to conduct collective negotiations. Setting up, joining, or being affiliated with a trade union must not be used as a reason for unjustified discrimination or retaliation.

## 7. Prohibited disciplinary measures

Disciplinary measures against employees may only be taken in accordance with applicable national and international laws and regulations. Inappropriate disciplinary measures, such as unlawful withholding of pay, benefits or documents (e.g. identity cards) and any prohibition to leave the workplace are unacceptable.

## 8. Occupational health and safety

Our Business Partners must comply with the nationally applicable occupational health and safety laws. All employees must have access to a safe and healthy working environment at all times. This includes observance of safety standards in the maintenance of the workplace, work station and work equipment. Appropriate precautionary measures against occupational accidents and diseases must be implemented, and adequate personal protective equipment must be provided. This includes measures to prevent excessive physical and mental fatigue, in particular through appropriate work organisation in terms of working hours and rest breaks. All employees must receive regular training on health, safety and emergencies in the workplace. The training sessions must be documented.

## 9. Appropriate use of security personnel

We assume that the respective applicable national laws are complied with when commissioning or deploying security personnel. Any unreasonable use of internal security personnel or of commissioned external security personnel for the unlawful enforcement of own interests by force and/or the suppression of freedom of association and coalition are unacceptable.

## 10. Fair use of external personnel

We expect our Business Partners to implement the applicable national laws, the contents of this Code of Conduct and the protection of human and labour rights in their contractual and labour relations. This requirement includes the use of external personnel by the Business Partners, regardless of the type of contract – such as a contract for work and services or agency work.

## 11. Responsible sourcing of conflict minerals

We expect our Business Partners to procure materials responsibly, to be familiar with the applicable legal provisions relating to minerals from conflict zones and high risk areas, and to comply with these legal provisions. Minerals, especially tin, tantalum, tungsten, gold, their ores as well as metals alloyed with conflict raw materials must be acquired as conflict-free. If a product by one of our Business Partners contains one or more conflict minerals or other high-risk raw materials – such as cobalt – the Business Partner must be able to disclose the supply chain up to the smelter upon our request. Smelters and refineries without adequate audited due diligence processes should be avoided.

# C) WHICH COMPLIANCE STANDARDS MUST BE OBSERVED?

## 1. Prohibition of bribery and corruption

Knauf Interfer Group does not tolerate any type of bribery or corruption. All Business Partners and their employees must behave in such a way that they do not create any personal dependencies, obligations or influence. They are expected to behave professionally, in a way that is based on fairness and compliance with the applicable national and international standards. In addition to compliance with the provisions of antitrust and competition law, this also includes, in particular, observance of the regulations on responsible corporate management ("Corporate Governance") and the regulations on the prevention of bribery, illegal money transfers ("Money Laundering") and corruption.

Invitations, gifts and hospitality for employees of the Knauf Interfer Group are only permitted if the occasion and scope are appropriate. This is the case if they are of low value and can be considered as an expression of locally accepted business practice. In turn, our employees are also instructed not to extend inappropriate invitations to our Business Partners and not to provide gifts, hospitality or other inappropriate benefits. If, in specific countries, gifts form part of customs and politeness, it should be ensured that these do not create any binding dependencies and that the applicable national standards are observed.

## 2. Avoidance of conflicts of interest

Conflicts of interest based on private matters or other economic or miscellaneous activities of our Business Partners' employees, their relatives or otherwise related persons or organisations must be prevented from the outset.

### 3. Trade secrets, confidential information and data protection

We expect our Business Partners to treat trade secrets, confidential information, intellectual property and personal data responsibly. Trade secrets, confidential information, any type of data worthy of protection as well as the intellectual property rights of the Knauf Interfer Group must be properly secured in accordance with the applicable legal provisions and it must be ensured that these are not used improperly and/or disclosed to third parties.

### 4. Foreign trade law

We expect our Business Partners to strictly comply with the relevant national and international regulations of foreign trade law. Compliance with export control and embargo regulations is mandatory. In addition, our Business Partners must not engage in any illegal business activities with sanctioned persons, companies or organisations.

### 5. Respect for the rights of local communities

Our Business Partners must respect applicable local, national, international and traditional land, forest, water and resource rights, especially those of indigenous communities.

In the case of the acquisition, construction or other use of land, forests and waters, the use of which secures the livelihood of one or more persons, our Business Partners are prohibited from both unlawful eviction and unlawful taking of land, forests and waters.

### 6. Financial Responsibility

Financial responsibility and compliance with the legal requirements of proper accounting and disclosure requirements must be a matter of course for our business partners. Our business partners are required to accept their financial responsibility and maintain documents in accordance with applicable law and generally recognised accounting principles. We also expect our suppliers to disclose financial and non-financial information in accordance with applicable laws.



## **SANCTIONS AND REMEDIAL MEASURES IN THE EVENT OF INFRINGEMENTS**

If we suspect (e.g. due to negative media coverage, complaints or other indications) that our requirements are not being met, we expect our business partners to provide us with information on our enquiries in this context without delay. In the event of non-compliance with our requirements, we expect remedial action to be taken immediately.

The Knauf Interfer Group may monitor the requirements set out in this Code of Conduct in relation to its direct Business Partners. This can be done, for example, by means of supplier questionnaires or, by arrangement, through audits. The Knauf Interfer Group may commission third parties (e.g. auditors) with said monitoring.

In case of violations, we may issue warnings to our Business Partners. In case of a failure to implement remedial action within a reasonable period and/or if the provisions of this Code of Conduct continue to be violated, the Knauf Interfer Group may terminate the contract with the Business Partners through extraordinary termination without a notice period.

## **NOTIFICATIONS OF INFRINGEMENTS - COMPLAINTS PROCEDURE**

If our Business Partners become aware of human rights violations, environmental risks or similar in the supply chain, they must inform the Knauf Interfer Group immediately. Information on violations of this Code of Conduct can be reported at any time - also in anonymised form - to [complaints@knauf-interfer.com](mailto:complaints@knauf-interfer.com). Employees must be informed accordingly. To the extent required by law, the Knauf Interfer Group expects its Business Partners to establish an appropriate grievance procedure themselves. Disciplinary measures against reporting persons are unacceptable.