

# Code of Conduct

Karl Knauer KG



<b>1 Foreword</b>	<b>3</b>
<b>2 Values</b>	<b>4</b>
<b>3 Ethical principles of social responsibility and respect for applicable laws</b>	<b>5</b>
<b>4 Environmental protection</b>	<b>6</b>
<b>5 Respect for human rights</b>	<b>7</b>
<b>6 Anti-corruption and conflicts of interest</b>	<b>8</b>
<b>7 Behaviour towards competitors</b>	<b>9</b>
<b>8 Suppliers</b>	<b>10</b>
<b>9 Implementation and enforcement</b>	<b>11</b>

*In the interest of readability, gender-neutral language is used. Our statements do however refer to persons of any gender.*

# 1

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## Foreword

**KARL KNAUER KG is committed to conducting all aspects of its business activities in an ethical and lawful manner.**

Karl Knauer KG's corporate policy obliges its employees to act in accordance with legal requirements, corporate values, and the Code of Conduct of Karl Knauer KG. Due consideration is given to the requirements of the Ethical Trading Initiative (ETI) Base Code.

We communicate the principles behind our thoughts and actions based on our lived value system to our employees during the recruitment process.

Where applicable, the provisions of the Code of Conduct also apply to those under direct management and to third-party services provided on the premises of Karl Knauer KG.

The Karl Knauer Code of Conduct is designed to reinforce the company's interest in fair, sustainable, and responsible ethical principles of action.

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## Values

Our forward-looking thoughts and actions are determined by the distinctive value system we live by: Openness, honesty, reliability, loyalty, tolerance, respect, planning capability, and a commitment to social issues are – and remain – essential pillars of this value system.

Those who work at Karl Knauer are looking for more than just a job. They are looking for well-being, humanity, recognition, and scope for corporate success, which we seek to ensure. Our employees are our company's most important success factor. They are appreciated and are entitled to clear, collaborative leadership based on defined and achievable goals.

We will continue to place great emphasis on our core values and the further development of our value system and the unwavering cultivation of relationships with all our partners.

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## Ethical principles of social responsibility and respect for applicable laws

Karl Knauer KG is committed to strict adherence to high standards of ethical conduct as per relevant national and international laws. These include rules relating to labour law, social security law, human rights, corporate environmental protection, prevention of unfair competition, governance rules, and protection of copyright and other forms of intellectual property.

Karl Knauer KG employees are obligated to respect and support the values of the company and to adhere to the principles of company values and individual responsibility.

Karl Knauer KG pays its employees a fair wage and guarantees occupational safety, protection of health and hygiene in the workplace within the scope of national regulations. Karl Knauer KG supports continuous development measures to improve working conditions.

Employees can expect the company to give due consideration to constructive suggestions and to concerns and complaints. Potential problems will be investigated and resolved impartially.

In line with company values, no employee of Karl Knauer KG may be discriminated against on the basis of their race, creed, skin colour, nationality, origin, age, religion, gender identity, sexual orientation and identity, disability, trade union membership or non-membership.

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## Environmental protection

Karl Knauer is conscious of the environmental impact of its business activities and seeks to use resources sparingly and conscientiously. Environmental responsibility is an integral part of our sustainability-focussed actions.

We are committed to protecting the environment and preventing pollution. We give this due consideration when we develop our products, solutions and within the entire manufacturing chain. Through our environmentally conscious actions, we strive to be a role model for our employees, business partners, and for our region.

We are committed to complying with environmentally relevant legal regulations and with other specific environmental requirements.

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## Respect for human rights

Karl Knauer's thoughts and actions are determined by the distinctive value system it lives by – a system based on respect for human rights, among other values.

The company's policy on the protection of human rights is based on generally applicable laws, standards and international norms, including the Labour Code, the Universal Declaration of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work. Karl Knauer KG is guided by the principles of ethics and respect for human, labour and employment laws and regulations. At the same time, it expects its employees to behave ethically. Karl Knauer KG recognises that it is a fundamental obligation to adopt a zero-tolerance approach to discrimination in its business activities and to take consistent action against misconduct and violations.

Karl Knauer KG does not profit from child or forced labour nor will it do so in the future.

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## Anti-corruption and conflicts of interest

Karl Knauer KG is firmly opposed to all corrupt practices. Company employees are obligated to avoid activities that give rise to conflicts of interest.

In line with corporate culture, Karl Knauer KG only maintains fair, trust-based, and ethically impeccable relationships. Dubious advantage-taking or benefit-offering as a means of influencing decisions is prohibited. The company confronts violations with clear, unambiguous anti-corruption measures.

When dealing with business partners (customers, suppliers) and state institutions, there is strict separation between company interests and the private interests of employees on both sides. Actions are taken and purchasing decisions are made free of extraneous considerations and personal interests.

Non-cash benefits, personal benefits in return for preferential treatment in business dealings, must not be offered, promised, granted or approved. Likewise, when dealing with business partners or public officials (such as civil servants or employees), personal benefits of value must not be demanded or accepted.

Karl Knauer KG's management and employees must not offer, promise, demand, grant or accept gifts, payments, invitations or services in business dealings if these are granted with the intention of improperly influencing a business relationship or if there is a risk of jeopardising the professional independence of the business partner. This is generally not the case with gifts and invitations that are within the scope of customary hospitality, tradition or courtesy.

Employees must avoid situations that are inappropriate from a professional ethics standpoint.



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## Behaviour towards competitors (competition law)

Karl Knauer KG respects fair competition and ethical behaviour in this respect. Karl Knauer KG undertakes to comply with applicable laws, in particular the relevant competition laws and other laws regulating competition.

In dealing with competitors, these regulations specifically prohibit agreements and other activities that influence prices or conditions, allocate sales territories or customers, or hinder free and open competition in an impermissible manner. These regulations also prohibit agreements between customers and suppliers that seek to restrict customers' freedom to determine their prices and other conditions autonomously when reselling (price and condition fixing).

As a specialist in the packaging industry, we generate competitive advantages by working in partnership with our customers with a view to always finding optimal solutions.

# 8

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## Suppliers

We believe it is important to have a partnership and trust-based collaboration with our business partners and suppliers, and to act ethically along the entire value chain. That is why we expect our business partners and suppliers to act in accordance with the principles of our Code of Conduct.

At the same time, all business partners are entitled to fair treatment and equal opportunities from Karl Knauer KG in establishing a partnership-focussed collaboration. Our corporate policy stipulates that all business partners be paid for their deliveries and services provided in a timely manner and in accordance with the terms of the contract.

Karl Knauer KG will communicate the principles of this Code of Conduct to its direct suppliers, promote compliance with the Code's contents among its suppliers to the best of its ability, and also ask these suppliers to comply with the Code.

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## Implementation and enforcement of the Code of Conduct

Karl Knauer KG's Code of Conduct was adopted and issued by the management.

The coordination of the Code of Conduct is the responsibility of the HR department, which advises company employees on the implementation and application of the Code of Conduct.

All employees will be made aware of the applicability of the Code of Conduct and employees should familiarise themselves with the Code's contents. Each employee is responsible for the application of the Code of Conduct in their area of activity.

**Contact**

Marco Manna  
Vice President Finance and Human Resources  
marco.manna@karlknauer.de

KARL **KNAUER** KG  
Zeller Str. 14  
77781 Biberach/Baden  
Germany

Tel: +49 7835 7820  
info@karlknauer.de  
www.karlknauer.com

**KARL KNAUER**   
Beeindruckend anders

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