

CODE OF CONDUCT



**KRANBAU
KÖTHEN**

The Code of Conduct for Kranbau Köthen
July 2019

www.kranbau.de/en

1. Preamble

Kranbau Köthen GmbH recognises the social responsibility that it bears as part of its business activities worldwide. Compliance with the law is a given. Violations of the law go against our values.

This „Code of conduct for social responsibility“ (hereinafter referred to as „CoC“) is a voluntary code. It describes the objectives that are to be met regarding working conditions and social and environmental sustainability, as well as transparency, trust-based cooperation and dialogue with respect to employees, business partners, society and the environment.

For Kranbau Köthen GmbH, this means that the company takes responsibility by considering the consequences of its business decisions and actions in an economic, technological, social and ecological context and ensuring that interests are balanced in an appropriate manner.

2. Applicability

- 2.1 All employees (and members of management) are bound by the provisions of this CoC.
- 2.2 This CoC applies to all branches and business units of Kranbau Köthen GmbH worldwide.
- 2.3 Kranbau Köthen GmbH undertakes to also encourage its suppliers to adhere to the provisions of this CoC to the extent that it is able to do so.

3. Code of conduct

Kranbau Köthen GmbH actively works to ensure that the values and principles defined below are consistently observed and maintained.

3.1 Compliance with the law

Kranbau Köthen GmbH complies with the laws and other statutory provisions that are applicable in the countries in which the company operates. In the case of countries that have a weak institutional framework, the company carefully considers what good business practices from its own home country should be implemented to support responsible company management.

3.2 Integrity in business

- 3.2.1 Kranbau Köthen GmbH acts in accordance with universal ethical values and principles, in particular integrity, honesty, respect of human dignity, openness, and not discriminating against religions, philosophies, gender or ethics.
- 3.2.2 Kranbau Köthen opposes corruption and bribery and ensures compliance with the applicable anti-corruption and bribery laws. When dealing with business partners (customers, suppliers) and state institutions, the interests of the company and the personal interests of employees on both sides are kept strictly separate. Gifts and other benefits are permitted if they fall within the scope of normal business practice with regard to hospitality, convention and courtesy.
- 3.2.3 Kranbau Köthen GmbH undertakes clean, recognised business practices and engages in fair competition. In competition, it focuses on professional conduct and high-quality work. The company fosters a relationship with supervisory authorities that is based on partnership and trust.
- 3.2.4 Kranbau Köthen GmbH adheres to any relevant trade controls and applicable regulations on import and export control, as well as embargoes.
- 3.2.5 Kranbau Köthen GmbH takes all measures necessary in order to prevent money laundering in its sphere of influence. Likewise, the company expects its employees to strictly to adhere to all anti-money laundering laws and regulations.
- 3.2.6 Where consumer interests are concerned, Kranbau Köthen GmbH complies with consumer protection regulations and undertakes appropriate sales, marketing and information practices. Particular attention is given to groups that are especially vulnerable (e.g. child protection).

3.3 Communication

Kranbau Köthen GmbH communicates with employees, customers, suppliers and other interested parties and stakeholders about the requirements and implementation of this CoC in an open and dialogue-oriented manner. All documents are created in accordance with obligations, are not dishonestly modified or destroyed, and are stored in the proper manner. Company secrets and business information of partners are handled sensitively and in confidence.

3.4 Human rights

Kranbau Köthen GmbH is committed to the promotion of human rights. It respects the human rights defined in the United Nations Universal Declaration of Human Rights, in particular the following:

- 3.4.1 Protection of privacy.
- 3.4.2 Ensuring health and safety at work, in particular ensuring a safe and healthy working environment in order to prevent accidents and injuries.
- 3.4.3 Protecting employees against corporal punishment and against physical, sexual, psychological and verbal harassment and abuse.
- 3.4.4 Protecting and ensuring the right to freedom of opinion and freedom of expression.

3.5 Working conditions

Kranbau Köthen GmbH adheres to the following core labour standards of the International Labour Organisation (ILO):

- 3.5.1 The ban on child labour, i.e. the employment of persons under the age of 15, insofar as local regulations do not define a higher age limit and insofar as no exceptions are permitted.
- 3.5.2 The ban on forced labour of any kind.
- 3.5.3 The labour standards concerning remuneration, in particular regarding the level of remuneration in accordance with the applicable laws and provisions.
- 3.5.4 Respecting employees' right to freedom of association and freedom of assembly, as well as their right to collective bargaining insofar as this is legally permissible and possible in the respective country.
- 3.5.5 Non-discriminatory treatment of all employees.
- 3.5.6 Kranbau Köthen GmbH adheres to the labour standards concerning the maximum permissible working hours.

3.6 Environmental protection

Kranbau Köthen GmbH meets the provisions and standards on environmental protection that concern its operations and acts in an environmentally conscious manner in all locations. The company also handles natural resources in a responsible manner.

3.7 Civic engagement

Kranbau Köthen GmbH contributes to the social and economic development of the country and region in which it operates and encourages its employees to undertake appropriate voluntary activities.

4. Requirements for employees

4.1 Conflicts of interest

Kranbau Köthen GmbH expects its employees to behave in an ethically sound manner when handling conflicts of interest. They are required to inform their superiors of relationships with individuals or companies with whom Kranbau Köthen GmbH does business and that could lead to a conflict of interest — this includes, for example, family relationships, partnerships and investments.

4.2 Handling company and trade secrets

Employees of Kranbau Köthen GmbH are committed to the safeguarding of company and trade secrets. Confidential information and documents may not be passed on to third parties or made accessible to third parties in any other way without authorisation.

4.3 Handling assets

All employees of Kranbau Köthen GmbH are responsible for handling the company's property carefully and in the proper manner. All employees have an obligation to protect the company's property against loss, damage, misuse, theft, misappropriation or destruction. All employees are obligated to inform their superiors immediately in the event of use of the company's assets contrary to the above.

4.4 Confidentiality and data protection

Kranbau Köthen observes the applicable laws and regulations when collecting, storing, processing and transferring personal data and information. When collecting, storing, processing and transferring the personal data (e.g. name, address, telephone number, date of birth, health information) of employees, customers or other third parties, we take the greatest care and ensure strict confidentiality, as well as compliance with the applicable laws and regulations. Employees who handle personal data receive advice and support from the responsible legal departments and company data protection officers.

5. Implementation and enforcement

Kranbau Köthen GmbH takes all appropriate and reasonable measures to ensure the consistent implementation and application of the principles and values described in this CoC. Contractual partners will be informed about the key measures on request and within the scope of reciprocal cooperation so that the manner in which compliance with these measures is fundamentally guaranteed can be understood. There is no entitlement to the disclosure of company and trade secrets, to competition-related information or any other information warranting protection.

5.1 Compliance with the code of conduct

Kranbau Köthen GmbH expects all its managing directors, managers and employees to act in compliance with the CoC. Violations of conduct requirements, legal provisions, internal guidelines and regulations can have serious consequences not only for the individual concerned, but also for Kranbau Köthen. Culpable, intentional misconduct is therefore not tolerated.

5.2 Implementation and monitoring

If employees have any concerns or complaints regarding the points listed in this code of conduct or have knowledge of a possible breach of the conduct guidelines contained herein, they should raise these issues with their manager immediately for clarification. They may also do this anonymously or confidentially. If employees are not happy with the clarification provided, they may raise their concern or complaint not only with their manager but also with the works council or the personnel department. Kranbau Köthen GmbH does not allow any reprisals as a result of complaints that were made in good faith in the context of this code of conduct.