

Code of Conduct of the Künemund Group

The following companies are part of the Künemund Group

Künemund Wälzlager Holding AG, Stuttgart

Künemund GmbH & Co. KG, Stuttgart

Künemund GmbH, Kehl

Künemund Wälzlager Halle GmbH, Halle

Künemund Wälzlager Nürnberg GmbH, Nürnberg

Künemund Düsseldorf GmbH, Düsseldorf

Künemund Dichtungstechnik, Tönisvorst

Künemund Lineartechnik, Appenweier

Compound GmbH, Kehl

Zwicker Kugellager GmbH, Schöllnach

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** In the following, the masculine designations are used exclusively for the sake of better reading flow.*

Introduction

In an increasingly complex economic and business world, the trust of our business partners, owners, employees and the public depends significantly on the behaviour of each individual.

The benchmark for our actions is constant respect for the law and all our internal company rules.

Our Code of Conduct* summarises the most important mandatory standards that apply to all employees and thus continues the values of honesty and respect that we have always lived by.

Our Code of Conduct thus sets a generally valid framework and obliges all employees to behave in a legally compliant and responsible manner and supports our employees in their own responsible actions. It is intended to help them make the right decision at all times.

Each individual employee is responsible for ensuring that his or her actions comply with the rules and values of our Code of Conduct. Our managers have a special role model function - they not only communicate and live the rules and values, but also actively demand them.

The Code of Conduct applies to all employees. However, we also expect all other employees in our company (e.g. consultants, temporary workers) to comply with the rules and values laid down here.

Violations of the law, the Code of Conduct and internal company guidelines can not only result in negative consequences for each individual, but also have serious consequences for the entire company.

Therefore, we all take responsibility to behave in accordance with the rules and thus contribute significantly to the company's success.

* Code of Conduct

Employees

Our employees, their commitment, their experience and their knowledge are the essential basis of our corporate success. As an attractive employer, we can thus offer a performance-promoting, but also a personally appreciative working environment.

Health and safety

The health and safety of our employees is a top priority. Occupational health and safety is a natural part of all our operational processes and decisions. Our aim is to continuously develop occupational health and safety at all locations and to prevent accidents completely and sustainably. We expect our employees to behave in a safety-conscious manner and to point out safety violations - regardless of hierarchy and position in the company. Our goal is to be the industry's model company in the area of occupational safety and health protection.

Equal treatment and respectful treatment

We respect the fundamental rights of people worldwide. In our dealings with colleagues, customers and business partners, we respect the personal dignity, privacy and personal rights of each individual. We do not tolerate any unlawful unequal treatment, insults and (sexual) harassment. Misconduct will be punished accordingly. Equal opportunities and tolerance are essential elements of successful cooperation.

Fair working conditions

We offer our employees appropriate remuneration and fair working conditions that at least meet the legal requirements, for example on working hours. The legally guaranteed minimum wages in the respective labour markets are regularly exceeded.

Continuous improvement

We secure and strengthen our position on the world market through a continuous improvement process in which all employees are involved. In doing so, we take a holistic view of all procedures and processes. In order to adapt to the increasing global requirements, a high will to perform and a continuous improvement of work and plant productivity are fundamental. Within the framework of a culture of trust, every employee is encouraged to accompany and help shape change processes with a high level of motivation.

Business partner

Trust in competence, performance and reliability are the basis of every business relationship.

Customers

We are always a reliable partner for our customers and always offer excellent quality and outstanding service. We enable our customers' success with our products and services. The customer's needs are our focus. Only when the customer is satisfied are we satisfied. We strive for a long-term relationship based on partnership. We work passionately with our customers on innovative, sustainable solutions and product developments.

Suppliers and service providers

We select our suppliers and service providers fairly and impartially and expect the highest quality and best service at competitive conditions. We require our suppliers to respect and comply with the values of our Code of Conduct and to work within their means to ensure that the values of our Code of Conduct are also respected and complied with throughout the supply chain by their suppliers and service providers. A violation may lead to the termination of the business relationship.

Corporate responsibility

We are committed to free and fair competition. Unlawful restrictions of this competition are prohibited for our employees and will be sanctioned. We expect our customers and suppliers to adhere to this principle as well.

Cartels, collusion and competitive behaviour

All employees are obliged to comply with applicable anti-trust and competition law, observing all laws against restraints of competition. We do not take unlawful advantage of our market position. The goods and services we offer are free of anti-competitive agreements, such as price agreements with competitors.

In particular, it is prohibited to enter into formal or informal agreements with competitors - including potential competitors - which have as their object or actual effect an unlawful restraint of competition. This applies both to tacit and to unconsciously concerted practices. In particular, agreements between competitors on the division of territories or customers as well as the exchange of information on prices, supply relationships, conditions, capacities, market shares, margins, costs, special customer information and the contents of offers are prohibited.

Corruption and bribery, conflicts of interest

We strictly reject any form of corruption, whether active or passive, and take appropriate precautions in our area of responsibility to ensure that the applicable anti-corruption laws are strictly observed. We do not accept bribes (e.g. when deciding on suppliers) and do not bribe ourselves (e.g. to obtain orders or other advantages). This prohibition applies not only to everyone, but also in particular to employees (and persons close to these groups) of business partners and competitors, both at home and abroad.

Remuneration paid in the form of commissions or in any other way to third parties (e.g. intermediaries such as commercial agents, brokers or consultants) must be appropriate and comprehensible.

Gifts and invitations are only acceptable if their nature and extent are not such as to unduly influence the recipient's actions and decisions or to create an obligatory dependency.

Personal interests must not unduly influence our professional judgement. We disclose actual and potential conflicts of interest in accordance with our internal guidelines and thereby conduct a neutral evaluation.

Data protection and information security

Compliance with national and international regulations on the protection of personal data is a matter of course in our company. We take suitable precautions to professionally protect the privacy of our customers, employees, suppliers and other data subjects in accordance with the statutory provisions. We create trust in our data processing through transparency, risk-oriented protective measures and employee training.

Unauthorised disclosure or dissemination of confidential information is prohibited, both internally and externally, in accordance with applicable laws. By confidential information we mean all non-public, strategic, financial, technical and business information, together with business and trade secrets, both of us and of our business partners

Patents and other industrial property rights

Our own inventions and technologies make an important contribution to the success of our company. The protection of these values through industrial property rights is essential for our competitiveness. No employee may pass on inventions, new findings and trade secrets to third parties without authorisation.

We equally respect effective property rights of third parties; no employee may obtain or use their trade secrets without authorisation.

International trade and anti-money laundering

Cross-border trade is a matter of course for us. In doing so, we observe the applicable legal requirements, e.g. on import and export, intra-Community supply, applicable sanctions and sanctions lists.

We take appropriate measures to comply with the respective requirements for the prevention of money laundering. To minimise the risk of money laundering, cash payments are generally neither made nor accepted.

Human rights, forced labour and child labour

We respect the internationally defined human rights of all individuals within our sphere of influence. We respect the fundamental principles laid down in the "Universal Declaration of Human Rights" and corresponding UN documents.

Furthermore, we reject and are fundamentally opposed to all forms of forced and child labour. We respect collective rights guaranteed by law at all times.

We also expect this understanding and strict compliance from our business partners.

Keeping accurate records and disclosures.

We keep our records accurate, complete, timely, adequate and understandable in accordance with the respective legal and regulatory requirements. Where legal provisions require disclosure of records, we comply with this obligation.

Sustainability

In addition to the protection of our employees and our commitment to society, environmental, species and climate protection are central aspects of corporate decision-making. We promote the efficient use of energy and other valuable resources. We make an important contribution by reusing and recycling wherever this is sensible and appropriate. We consistently invest in state-of-the-art, environmentally friendly and energy-efficient technologies. We continuously improve our processes with the help of management systems.

Implementation of the Code of Conduct

A Code of Conduct is only part of the corporate culture when its values are actively lived. Leading by example, in conjunction with an active, sustainable compliance organisation that involves the employees, ensures that it is permanently anchored in the consciousness of each individual.

Management

The Executive Board and all our managers act with full responsibility for the employees and, in their decisions, also take into account the circumstances and effects on the respective economic area in which our companies are located. Cultural differences are treated with recognition and respect, provided they do not violate company regulations and internal guidelines.

Compliance organisation

Our employees receive regular, risk-oriented training on the contents of this Code of Conduct. We are convinced that we are making an important contribution to avoiding legal violations and preventing them in the long term.

Management shall assist all employees in fulfilling their duties of care, supervision, organisation, selection, instruction and control, if any, and shall monitor compliance with this Code of Conduct.

The respective supervisor or also the management are available for questions regarding compliance.

Whistleblowing system

Every employee has the right and the possibility to report violations of this Code of Conduct or suspicious cases in this regard.

However, the report can be made to the supervisor or directly to the management.

No employee who, on the basis of concrete indications, believes in good faith that a violation of this Code of Conduct has occurred or could occur, must fear disadvantages, in whatever form, as a result of his or her report. As far as legally permissible and actually possible, the report will be treated confidentially, as will the identity of the reporter or the identity of other employees who cooperate in a possible clarification.

We expressly welcome corresponding tips!