

CODE OF CONDUCT



The Code of Conduct for
Kranbau Köthen
March 2026

www.kranbau.de/en

1. Preamble

Kranbau Köthen GmbH (“the Company”) recognises its social responsibility in doing business worldwide. Compliance with the law is mandatory. Violations of the law contradict our values. This „Code of Conduct“ (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 responsibility and sustainability, as well as transparency, trust-based cooperation and dialogue with respect to employees, business partners, society and the environment.

For the Company this means to take 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

All employees and members of management are bound by the provisions of this CoC. The Company also encourages its suppliers to adhere to the provisions of this CoC to the extent.

3. Code of conduct

The Company actively works to ensure that the values and principles defined below are consistently observed and maintained.

3.1 Compliance with law and regulations

The Company complies with the law and other statutory provisions that are applicable in the countries in which it operates. In countries with weak institutional framework good business practices will be implemented to support responsible company management.

3.2 Business Integrity, The Company

- 3.2.1 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 opposes corruption and bribery and ensures compliance with the applicable anti-corruption 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 undertakes clean, recognised business practices and engages in fair competition. It focuses on professional conduct and high- quality work and fosters a relationship with supervisory authorities that is based on partnership and trust.
- 3.2.4 adheres to any relevant trade controls and applicable regulations on import and export control, as well as embargoes.
- 3.2.5 takes all measures necessary in order to prevent money laundering in its sphere of influence
- 3.2.6 complies with consumer protection regulations and undertakes appropriate sales, marketing and information practices in particular towards vulnerable groups.

3.3 Communication

The Company 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. Confidential business information of partners are handled sensitively and confidence.

3.4 Human rights

The Company is committed to the promotion of human rights and respects the human rights defined in the United Nations Universal Declaration of Human Rights, in particular the following:

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

3.5 Working conditions

The Company adheres to the following core labour standards of the International Labour Organisation (ILO):

- 3.5.1 The ban on child labour.
- 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 Labour standards concerning the maximum permissible working hours.

3.6 Environmental protection

The Company 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

The Company contributes to the social and economic development of the region it operates in and encourages its employees to undertake appropriate voluntary activities.

4. Requirements for employees

4.1 Conflicts of interest

The Company requires its employees to behave in an ethically sound manner when handling conflicts of interest and inform their superiors of relationships that could lead to a conflict of interest für example, family relationships, partnerships and investments.

4.2 Handling company and trade secrets

Employees of the Company are committed to the safeguard 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 are responsible for handling the Companys property carefully and in a proper manner and to protect the companys property against loss, damage, misuse, theft, misappropriation or destruction. All employees are obligated to inform their superiors immediatly in the event of use off the Companys asset contrary to the above.

4.4 Confidentiality and data protection

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

4.5 Cybersecurity

The Company complies with current laws and guidelines regarding the cybersecurity of its information systems.

5. Implementation and enforcement

The Company takes all appropriate and reasonable measures to ensure the consistent implementation and application of the principles and values described in this CoC. Business partners will be informed about such measures on request and within the scope of reciprocal cooperation. 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 CoC

The Company expects all its managing directors, managers and employees to always act in compliance with the CoC. Violations of legal provisions, internal guidelines and regulations can have serious consequences not only for the individual concerned, but also for the Company and is therefore not tolerated.

5.2 Whistleblower Protection Act („Hinweisgeberschutzgesetz“)

The Company has implemented the requirements of the Whistleblower Protection Act and expects all employees to contact the designated office with the relevant information. If employees have any concerns or complaints regarding the points listed in this CoC or have knowledge of a possible breach of these guidelines, they should raise these issues with their manager immediately for clarification. They may also do this anonymously or confidentially.