

## Kübler Code of Conduct (doc. QMS010\_000004\_03)

The Kübler Code of Conduct is provided to help us living and implementing in all companies of the Kübler Group our culture and the values we are committed to. It is also intended as information for customers and partners.

Our Code of Conduct abides by the ZVEI requirements and integrates company-specific, cultural and other values codes.

This Code of Conduct has been adopted by the extended Corporate Management and by the managerial staff of our Company in 2012; it is binding on all employees of the Kübler Group.

The basic values and rules of behaviour of the Kübler Group contained in it are compulsory for each and any employee of the Kübler Group. All employees in the Kübler Group will be handed over this Code of Conduct and undertake to comply with its contents. The respective local Manager or Site Responsible will be responsible for compliance.

### Preamble

Kübler is committed to its social responsibility within the framework of its business activity all over the world (generally called internationally "CSR"<sup>1</sup>). This "Kübler Code of Conduct for social responsibility" (called "CoC" hereafter) states the meaning of this, especially in terms of working conditions, social and environmental compatibility, as well as of transparency, confident cooperation and dialogue.

### 1. Basic understanding of a socially responsible corporate management

This CoC is based on a common basic understanding of a socially responsible corporate management. This means for us and our employees that we assume the responsibility by considering the consequences of our business decisions and actions from an economical, technological as well as from a social and environmental point of view and reach a proper balance between the interests at stake. Within the framework of our respective possibilities and fields of action, we contribute voluntarily to the benefit and the sustainable development of the society at the sites where we are active. To do so, we orient ourselves on universally accepted ethical values and principles, in particular integrity and righteousness, and on the respect of human dignity.

### 2. Scope

2.1 This CoC applies to all subsidiaries and business units of the Kübler Group worldwide.

2.2 We commit ourselves to request the respect of the contents of this CoC also from our suppliers and in the further value chain, within the framework of our respective possibilities and fields of action.

### 3. Cornerstones of a socially responsible corporate management

<sup>1</sup> CSR = Corporate Social Responsibility

We work actively towards the sustainable compliance with and the respect of the values and principles referred to below, now and in the future.

### 3.1 Compliance with the laws

We comply with the laws and other legislations in force in the countries where we are active. For countries that have a weak institutional framework, we carefully examine what good company practices from our home country should be applied to enable supportive, responsible company management.

If we notice irregularities, extraordinary risks or criminal activities, we inform our superior. We can also address higher-level superiors, up to the Corporate Management. Our information will be treated strictly confidentially.

### 3.2 Integrity and Organizational Governance

3.2.1 We orient our activity on universally accepted ethical values and principles, in particular integrity, righteousness, respect of human dignity, open-mindedness and non-discrimination with respect to religion, belief, gender and ethnicity.

3.2.2 We reject corruption and bribery within the meaning of the relevant UN Convention<sup>2</sup>. We promote in an appropriate manner transparency, acting with integrity and responsible management and control in the company.

When dealing with employees of customers, authorities or other business partners, we do not offer undue financial or other advantages or even bribes. Furthermore, we do not promise such advantages. We refuse to obtain unjustified business advantages by means of financial or other donations.

We ourselves refuse gifts and other donations from business partners, which exceed the normal level of an appropriate hospitality or low-value occasional gifts. There are special detailed regulations for this. (Annex 1)

### 3.2.3 Business practices

We pursue clean and recognized business practices and fair competition. We maintain a cooperative and confident behaviour with the supervisory authorities. We do not favour or disadvantage unfairly customers who are in competition with each other. We behave appropriately when dealing with suppliers or partners in projects. The selection of a supplier shall be oriented exclusively on the interests of Kübler and of our customers, and not of single employees.

Commission payments to representatives, distributors or consultants must show a comprehensible relationship with the provided services and stand up to the arm's length principle. They shall not be used to make unjustified payments to third parties.

### 3.2.4 Business transactions

We carry out all business transactions (quotations, order confirmations, invoices, credit and debit notes, bookings, etc.) in an appropriate manner and adhere to the legal regulations and applicable rules (e. g. accounting standards, credit limits, payment targets).

### 3.2.5 Conflicts of interest

We avoid conflicts of interest whenever possible. We actively take care of the settlement of recognised conflicts of interest. We always talk of conflicts of interest when personal interests - or interests of family

<sup>2</sup> United Nations Convention against Corruption of 2003, in force since 2005

members, parents or friends – get in potential conflict with the Company. Examples of conflicts of interest are:

- Other employment besides the employment at Kübler. This is forbidden as a matter of principle and must be authorised in exceptional cases in writing by a member of the extended Corporate Management or by the Human Resources Management, and always together with the superior of Kübler. The same applies in case of the creation of secondary companies by employees. The latter is forbidden as a matter of principle in case of subsidiaries outside of Germany.
- Awarding of orders or payment of commissions or similar to companies in which there are economic interests (ownership, family members are managers, are participating or belong to the managerial staff)

If we notice possible conflicts of interest, we are obliged to refer to our superiors or to the Management.

### 3.3 Consumer interests

Insofar consumer interests are concerned, we abide by consumer-protection regulations and appropriate sales, marketing and information practices. Particular attention will be paid to particularly vulnerable groups (e. g. protection of minors).

### 3.4 Communication

We will communicate openly and extensively about the requirements of this CoC and about its implementation with respect to all employees of the Kübler Group, customers, suppliers and other. Every document and all information will be duly produced. They will not be unfairly changed or destroyed and they will be properly stored.

Company secrets and partner's business information will be handled sensitively and will be kept in confidence.

### 3.5 Human Rights

We are committed to promote human rights. We respect human rights in compliance with the Charter of the United Nations<sup>3</sup>, especially those named hereafter:

#### 3.5.1 Privacy

Protection of privacy.

#### 3.5.2 Health and Safety

Ensuring health and work safety, in particular guaranteeing a safe and health-promoting work environment in order to avoid accidents and injuries. We promote health by means of healthy diet and exercise, e.g. by the Kübler Fit Program in the Headquarter. In case of health problems, every employee can address with trust his superior at an early stage.

#### 3.5.3 Contacts with one another

Within the company, we respect and help each other. We deal with each other politely, we inform us in an honest, responsible and regular manner.

#### 3.5.4 Harassment

We want all employees to feel well at Kübler. We tolerate no humiliation or harassment of employees during personal discussions, on the phone, in social media or in written communication.

#### 3.5.5 Freedom of opinion

<sup>3</sup> Universal Declaration of Human Rights, UN Resolution 217 A (III) of 1948

Protection and guarantee of the right to freedom of opinion and freedom of expression.

### 3.6 Working Conditions

We abide by the following core work standards of the ILO<sup>4</sup>:

#### 3.6.1 Child Labour

The prohibition of child labour, i.e. the employment of persons younger than 15 years, unless the local legal regulations specify higher age limits and unless exceptions are permitted.<sup>5</sup>

This applies also to our suppliers. We do not use products manufactured using child or forced labour.

#### 3.6.2 Forced labour

The prohibition of forced labour of any kind.<sup>6</sup>

#### 3.6.3 Remuneration

The work standards concerning remuneration, especially regarding the level of remuneration in compliance with the laws and requirements in force.<sup>7</sup>

#### 3.6.4 Employee Rights

The respect of the rights of the employee to freedom of association, freedom of assembly and to collective bargaining, insofar this is legally permitted and possible in the concerned country.<sup>8</sup>

#### 3.6.5 Non-discrimination

Discrimination-free treatment of all employees.<sup>9</sup> Employees originating from many countries are working together in the Kübler Group. We respect them all, independently of gender, religion, ethnicity, social origin, nationality, age or disability considerations. In the company, we collaborate with customers and other business partners regardless of differences or similarities of the involved persons. Their skills are the decisive factor for the appointment and promotion of employees. Nobody in the company shall discriminate employees.

### 3.7 Working hours

We abide by the work standards concerning the longest permitted working time.

### 3.8 Environmental Protection

We fulfil the requirements and the standards for environmental protection that relate to the respective sites and we act in an environmentally conscious way at all locations. We also use the natural resources in a responsible way, in compliance with the principles of the Rio Declaration.<sup>10</sup>

### 3.9 Civil involvement

We contribute to the social and economic development of the countries and regions in which we are acting, and we promote appropriate volunteer activities of our employees.

## 4. We treat the Company property with care.

<sup>4</sup> ILO = International Labour Organization

<sup>5</sup> ILO Convention No. 138 of 1973 and ILO Convention No. 182 of 1999

<sup>6</sup> ILO Convention No. 29 of 1930 and ILO Convention No. 105 of 1957

<sup>7</sup> ILO Convention No. 100 of 1951

<sup>8</sup> ILO Convention No. 87 of 1948 and ILO Convention No. 98 of 1949

<sup>9</sup> ILO Convention No. 111 of 1958

<sup>10</sup> The 27 principles of the "Rio Declaration on Environment and Development" from 1992 as the result of the UN Conference on Environment and Development in Rio de Janeiro

## 5. Implementation and Application

We will make every appropriate and reasonable effort to implement and apply the principles and values described in this CoC both now and in the future. Contract partners will be informed about the basic measures upon request and within the scope of a reciprocal cooperation, so as to allow monitoring their basic compliance. No right to communication of operational or business secrets, of information relating to competition or in need of protection can be derived from this.

Gebhard Kübler  
CEO and Owner

Lothar Kübler  
CEO and Owner

[Annex: Dealing with benefits and gifts](#)