



# KURZ Code of Business Conduct

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## 1. The KURZ Mission Statement

A company's good reputation is based not only on the quality of its products and its economic success, it is also significantly influenced by the company's attitude towards its employees, business partners, and the public. For us, this means that all our values and corporate actions are based on prescribed legal and ethical standards.

Social responsibility and business conduct founded on high ethical standards have always been the guiding principle for all important decisions of the entire Company Group. It has always been particularly important for us to continually review our corporate business model, as this is the only way to ensure that it is adapted to the economic and competitive conditions of the market that are constantly changing. This corporate business model can be found in the KURZ mission statement.

This Code cannot reasonably take into account all the situations that we encounter in our day-to-day working life. However, it is supposed to offer guidance when it comes to making the 'right choice'. If in doubt, employees should seek advice from their superiors or from the individuals/ departments designated in this Code.

We would like to encourage all our employees to take the time to study the Code carefully, as it is the basis for our relationship with our customers, business partners, and the public in our daily work. It provides all KURZ employees with binding guidelines for correct and responsible conduct.

By adopting this Code and following its rules, you help KURZ maintain and promote the company's excellent reputation.

Thank you very much for your commitment and support.

January 2024



Dr. Andreas Hirschfelder and the entire Executive Management Board

## Partnership:

**Committed people for reliable results.**

We foster a sense of trust with our customers through our fullest commitment and dedication.

## Customization:

**Tailored solutions for each need.**

We support our customers with tailor-made solutions for individual requirements, in-depth know-how and a worldwide presence.

**committed**

We inspire with joy and passion. We show our full commitment, to always provide our customers with the best solution.

**ambitious**

We live by our standards of best quality and highest reliability. We make every effort to live up to this standard with ambition and perseverance.

**KURZ**   
**making every product unique**

**open minded**

We have an open heart and an open mind towards the world and its different cultures. We care about the individual needs of our customers and employees.

We are constantly developing our processes, techniques and procedures in order to produce innovative and trend-setting solutions for our customers.

**forward looking**

## Sustainability:

**Life Cycle Thinking (LCT) for environmental protection.**

By preserving resources and with a controlled recycling economy, we help to relieve the burden on the environment and ensure that our customers have a clear conscience.

## Inspiration:

**Fascinating innovations for enduring success.**

We inspire our customers with forward-looking new and further developments, as well as our systematic innovation processes.

## 2. Scope of Application

This KURZ Code of Business Conduct ('Code' <sup>(1)</sup>) applies to KURZ <sup>(2)</sup>. As part of its business activities, corporate integrity is the basis for KURZ's relationship with its social environment, customers, suppliers, and employees <sup>(3)</sup>. We make every effort to ensure safety in the workplace, maintain the respect and dignity of our employees, and to make all production processes environmentally friendly. Our activities are carried out in accordance with the laws, standards, and ordinances of the country in which we conduct our business. This Code goes one step further and also incorporates internationally recognized standards for promoting social and environmental responsibility.

<sup>(1)</sup> Please note that only the English-language version of this Code is authoritative. Translations into other languages are for information purposes only.

<sup>(2)</sup> Throughout the Code, the terms 'KURZ', 'Company', 'we', and 'us' refer to LEONHARD KURZ Stiftung & Co. KG and its global subsidiaries and affiliates.

<sup>(3)</sup> For the sake of clarity, all genders are always included unless otherwise stated in the context.

## 3. Ethical Principles

KURZ is committed to adhering to the highest standards of ethical conduct when dealing with employees, customers, suppliers, government bodies, and authorities.

### 3.1 KURZ Corporate Identity / Image

The public image of KURZ is significantly influenced by the conduct of each individual employee and the way they carry themselves. Inappropriate behavior on the part of a single employee can seriously damage the company's reputation. Our employees should therefore always bear in mind the importance of maintaining the good reputation of the company in all countries where KURZ is present. This good reputation and respect for the company must always be at the forefront of all employees' day-to-day work.

### 3.2 Compliance with Laws, Regulations, and Corporate Principles

We understand the importance of the relevant laws, regulations, principles, and standards, both internally and externally, and we are committed to complying with them. This Code is in accordance with the fundamental principles of our corporate policies and guidelines referred to herein. In the event of contradictions, this Code shall prevail. We ensure compliance with the Code and all relevant laws and regulations through regular self-assessments.

### 3.3 Integrity / Payments to Public Officials

Payments to public officials, extortion, and embezzlement in any form are strictly prohibited and will be immediately punished by us.

### 3.4 Fairness, Advertising, and Competition

We adhere to the principle of fairness in advertising, sales, and competition. We therefore require our employees to adhere to the following principles:

- Act fairly in dealing with customers and suppliers, including competitors
- Respect the freedom of our customers to conduct their business at their own discretion and to set their selling prices as they see fit
- Refrain from exercising any form of coercion in product distribution, such as inducing a customer to purchase unnecessary products
- Waive the exploitation of market power or market information leading to a restriction of competition
- Refrain from unfair or fraudulent acts or business practices

### 3.5 Competitive Issues

In all business situations with an impact on competitive conditions, we act independently and in our own interest, and we avoid any actions that lead to restrictions of competition. For this reason, employees must not enter into agreements or tacit agreements with our competitors or discuss competitively relevant issues, such as:

- Prices and conditions under which KURZ or our competitors offer products
- Costs incurred or profits achieved in the manufacture of products for KURZ or for our competitors
- The production output or utilization rate at KURZ or a competitor
- The customers or regions to which KURZ or our competitors sell products
- The type or quantity of products manufactured or distributed by KURZ or our competitors

### 3.6 Confidentiality

Insofar as we are involved in joint ventures or industry associations in which competitors are also involved, our employees are obliged to limit communication and contacts to the minimum necessary for cooperation at this level.

### 3.7 Advantages

Advantages include presents, gifts, hospitality, or other benefits for which the recipient does not pay the standard market price ('Advantages'). These may include benefits in kind as well as intangible benefits, such as invitations to a meal or drink, entertainment, leisure activities, raffles, honorary fees, travel, discounts, and promotional gifts, or the use of the donor's time, materials, facilities, or equipment.

Any employee who offers or authorizes an Advantages must ensure that this does not violate any ethical or legal principles. The Advantage must be part of the normal course of business, it must not cause a conflict of interest or loyalty, and the impression must not be given that the Advantage is intended to influence a business decision. Advantages must not in any way harm the reputation of our company or that of the business partner in question.

Our employees are not permitted to request Advantages. In no circumstances may our employees accept Advantages if the donor has the actual or suspected expectation of receiving a corresponding service or benefit in return, such as obtaining an unjustified advantage or influencing an employee to take an action that violates a law. Advantages offered to and accepted by our employees are the property of KURZ. Employees must not assume that they can keep these Advantages and use them for private purposes.

The rules regarding Advantages are very complex and must be carefully examined in each individual case. When deciding whether a particular Advantage can be given or accepted, every employee should first rely on their own business judgement and seek guidance if in doubt. Our employees should refrain from giving or receiving an Advantage whenever they feel it would be uncomfortable to discuss this matter with their supervisor, a colleague, or a newspaper reporter. If an employee is unsure, they should ask their supervisor if they can give or accept a specific Advantage.

### **3.8 Conflicts of Interest, Competition, Secondary Employment**

A conflict of interest exists when personal and corporate interests are in conflict. The mere appearance of a conflict of interest can already damage KURZ's good reputation or interests. Therefore, our employees are not allowed to compete with our company. It must not appear that employees are guided by personal or family interests in their work for KURZ.

Employees who wish to take up secondary paid employment must inform their supervisor in writing beforehand. Permission to commence such secondary employment may be refused if this is likely to lead to reduced work performance, incomplete fulfilment of contractual obligations, or the occurrence of conflicts of interest. Exceptions to this rule are only sporadic activities, e.g., as author or lecturer, and comparable secondary activities carried out only occasionally.

Examples of conflicts of interest that need to be reported include:

- A family interest in a business with KURZ. Such family interest includes any stake held by the employee's spouse, parents, children, relatives, or partner
- A more than nominal stake held by the employee or their family member in a competitor, supplier, or customer of KURZ (e.g., an equity investment of more than 1% in a supplier)
- A significant stake held by the employee or their family member in an organization that does or wants to do business with KURZ
- Acquisition of a stake by the employee or their family member in assets (such as real estate, patent rights, shares, or other assets) or in companies in which the employee must assume that KURZ also holds or could hold stakes
- Pursuance of own business interests or goals that impair the performance of the employee concerned because the time and energy of the employee is deducted to a considerable extent from his responsibilities as a KURZ employee

### **3.9 Business Opportunities**

Employees may not use KURZ business opportunities arising in the course of their employment or due to their position at KURZ for their own purposes. Employees must not undertake any activities that primarily benefit the employee themselves and not the company. Income from business opportunities arising in the course of an employment relationship is only due to the company and not to employee. Our executives have a special responsibility to promote and utilize all resulting business opportunities in the interest of the company.

### **3.10 Protection of Resources**

Our ability to be there for our customers requires the effective and sensible use of resources. These include not only tangible assets such as plants, equipment, and inventories but also other assets such as securities and cash, office equipment, consumables, and computer systems. These resources also include intangible assets such as software, patents, trademarks, copyrights, and other proprietary knowledge and know-how, as well as time. Our resources may only be used for operational purposes.

### **3.11 Intellectual Property Rights / Protection of Information**

Our intellectual property rights and other confidential information<sup>4)</sup> are important assets of our company and must be carefully protected by every employee. Confidential information must be clearly marked as such and stored securely. Every employee must ensure that non-disclosure agreements (NDA) are concluded with persons outside the company before confidential information is disclosed to these persons.

Each individual employee is responsible for protecting our data from unauthorized access. This applies regardless of the technologies or transmission channels used. Today, the electronic distribution of information enables knowledge and ideas to be passed on quickly to both internal and external users. However, this information may contain, for example, copyrighted material, data subject to export control, or other sensitive data material that should not reach persons who do not necessarily need it. Controlling data access affects both internal and external system users.

Our employees must respect the intellectual property rights of third parties and must take their confidentiality obligations towards third parties (including suppliers and previous employers) as seriously as expected of them with regard to KURZ's confidential information.

<sup>4)</sup> All information that has not been disclosed or made public. This includes economic or technical data, acquisitions or sales plans, new products, inventions or marketing campaigns, personal data of employees, important contracts, expansion plans, financial transactions, major changes in management, other developments in the company, and trade secrets.



### 3.12 Plagiarism

We have developed, implemented, and sustainably maintained appropriate methods and processes for our products and services in order to eliminate the risk of counterfeit materials being introduced into our products and services. If counterfeit materials are detected, we will inform the original equipment manufacturer (OEM) immediately and notify the responsible authorities if necessary.

### 3.13 Documentation and Records

All business transactions must be recorded comprehensively, accurately, and truthfully. No false, misleading, or invented entries may be intentionally made in the company's books and receipts. Documents and receipts may not be signed without appropriate authorization. No funds or assets may be used for unlawful or improper purposes. All business transactions must be fully documented and recorded in the accounts. Labor, travel, material, and other costs must be booked truthfully. Deliberately removing evidence in connection with anticipated or ongoing investigations, audits, or legal proceedings is punishable. Insofar as practicable, all contracts in which KURZ acts as a contractual party must be drafted in writing. All contract texts must be formulated as unambiguously as possible. Side letters or comfort letters, to which no explicit reference is made in the main contract, should only be accepted or submitted after consultation with our legal department.

### 3.14 Social Commitment, Donations, Political Activities

We are committed to supporting society in social and economic development and to contributing to sustainability in our social environment. We do not make direct or indirect donations to political candidates, parties, and organizations. However, we would like to encourage our employees, as private individuals, to participate in political life by voting in elections or by making individual contributions in terms of time or money. However, political activities must not be organized on behalf of KURZ or carried out in our permanent establishments, and no KURZ resources may be used for this purpose.

### 3.15 Subcontractors / Suppliers

KURZ does everything in its power to ensure that business is only concluded with subcontractors or suppliers who have made a commitment to international human rights and pollution control. We pledge to monitor the conduct of our suppliers from an ethical point of view and to take immediate and decisive steps if we become aware of questionable ethical conduct on the part of subcontractors or suppliers.

We carefully select subcontractors or suppliers fairly and impartially according to objective criteria. Impermissibly favoring or impeding subcontractors or suppliers is strictly prohibited.

### 3.16 Sales Partners

We devote special attention to our relationship with sales partners, sales agents, distributors, representatives, and similar persons ('Sales Partners'). Commissions and charges paid to Sales Partners should be proportionate to the services rendered. Contracts with Sales Partners must not be misused to make payments to third parties who are not involved in the business.

### 3.17 Money Laundering

We strongly commit to complying with all laws to prevent, detect, and report money laundering activities<sup>9)</sup>. We carefully check the identity of customers, business partners, and other third parties with whom we wish to do business. It is our declared goal to only maintain business relationships with reputable partners whose business activities are in accordance with statutory regulations and whose resources are of legitimate origin.

<sup>9)</sup> Money laundering is when money or other assets originating directly or indirectly from criminal offences are brought into the legal economic cycle and their origin is thus concealed.

### 3.18 Artificial Intelligence (AI)

AI includes different methods to try to automate intelligent skills. AI is already part of our products and processes and is set to have an even greater impact on our products, way of working, and employees in the future. In order to use the possibilities of AI for the company long term, we follow our ambitious AI principles. These include ethical principles for the development and use of Artificial Intelligence. We rely on responsible use of AI, explainability, protection of privacy, security, and reliability.

## 4. Management Systems

Our management systems are designed to ensure compliance with this Code and all applicable laws and regulations. Operational risks can thus be recognized and eliminated in good time, and a continuous improvement process can be maintained. KURZ management systems consist of the following elements:

### 4.1 Management Responsibility

Managers are appointed who are responsible for the implementation and regular monitoring of the respective management systems.

### 4.2 Legal and Customer Requirements / Export, Import

We look at, monitor, and understand the laws and regulations affecting us and the additional requirements imposed on us by this Code. We comply with the laws and regulations for export and import control, which apply to the import and export of goods and technical data, including items carried in luggage as samples or goods samples. We conduct a selection process for new customers, subcontractors, and suppliers to ensure that they do not conduct business with unauthorized units.

### 4.3 Antitrust Law

We comply with all national and international antitrust and competition laws in the countries in which we operate. These laws serve to protect the free economy and promote tough but fair competition. They also prohibit, among other things, all formal or informal agreements, arrangements, plans, or systems between competing companies with regard to prices, sales territories, market shares, or customers, and any activities or agreements that unfairly restrict free competition. Mergers, acquisitions, strategic alliances, joint ventures, and other forms of special corporate mergers must be examined in advance for possible antitrust concerns regarding a potentially prevailing dominant position or inadmissible agreements between market participants.

### 4.4 Risk Management

A risk management system has been established in order to identify in good time the environmental, health, safety, information security, and occupational safety risks associated with our business operations, to assess the particular significance of each individual risk, and to ensure compliance with occupational safety and other safety regulations with the help of appropriate organizational measures and technical aids. The investigation of potential safety risks extends to warehouses and other storage facilities, production facilities, and operating facilities, as well as laboratories and test facilities.

### 4.5 Performance Control

Written standards, performance targets, objectives, and implementation plans must be established. In addition, there is a regular target/actual comparison of the planned data and the services actually provided.

### 4.6 Training

We respect and promote our employees working independently. To this end, we offer our employees appropriate training programs.

### 4.7 Information and Messages

We provide our employees, customers, subcontractors, and suppliers with clear and unambiguous information about our performance, processes, and expectations. A clear system for handling complaints is in place.

### 4.8 Remedial Process

If deficiencies are found during internal or external audits, assessments, tests, investigations, or controls, a corresponding regulated process flow is provided for the prompt implementation of remedial measures.

## 5. Employee Rights and Human Rights

We respect the human rights of our employees and treat our employees with dignity and respect in accordance with the standards of the international community.

### 5.1 Discrimination

We do not discriminate against any of our employees for their race, skin color, age, gender, sexual orientation, ethnicity, disability, religion, political views, membership of an employee organization, or marital status. This applies to both recruitment and employment processes, such as promotions, incentives, access to training, assignment of duties, salary, fringe benefits, disciplinary measures, termination, and retirement. All applicable laws and regulations must be observed. We do not require pregnancy tests unless they are required by law.

### 5.2 Harassment and Bullying

We are committed to a working environment without harassment and bullying. Our employees do not need to worry about being treated roughly or inhumanly at their workplace. Sexual harassment or assaults, physical harassment, mental or physical coercion, and hurtful statements are prohibited.

### 5.3 Forced Labor

We reject any form of forced, slave, compulsory, and prison labor. Any work performed is performed voluntarily, and our employees can leave the company at any time subject to the applicable notice period.

### 5.4 Child Labor

Child labor is not used at any stage of the manufacturing process. Our employees must have reached the minimum age for employment in the country in question or an age at which they are no longer subject to compulsory schooling, whichever is higher. Under no circumstances may our employees be younger than 15 years of age (with the exception permitted under ILO Convention 138 on the Minimum Age for Employment (ILO Minimum Age Convention No. 138)). Employees under the age of 18 may not be involved in work that, according to ILO Minimum Age Convention No. 138, would endanger the health, safety, or moral principles of young adults. This Code does not prohibit participation in regulated apprenticeship programs which comply with the requirements of Article 6 of ILO Minimum Age Convention No. 138.

### 5.5 Remuneration

Our employees' payments in the form of salary, fringe benefits, and overtime shall be made in compliance with all applicable statutory provisions, including statutory provisions with regard to

minimum wages, overtime, working hours, and statutory social benefits. All employees will be informed comprehensively and in good time about the basis of their remuneration.

### 5.6 Protection of Privacy

We respect our employees' privacy and only store personal and medical data of employees that is absolutely necessary for operational, legal, or contractual purposes. The corresponding documents and the information contained therein are only accessible to a group of persons who require access to this data for legitimate operational purposes. Employees are entitled to view their own personnel file at any time. We ensure compliance with all statutory provisions on the protection of employee data.

### 5.7 Freedom of Association and Collective Bargaining

We respect the right of our employees to freedom of association and collective bargaining. Employees may not suffer any personal or professional disadvantages from the exercise of these rights. Our employees are regularly informed and consulted by the management and the board, e.g., at works meetings, department meetings, internal newsletters, and the company suggestion system.

### 5.8 International Conventions and Recommendations

In addition to the laws and regulations of the individual countries, the conventions and recommendations of international organizations such as the UN, the OECD, and others are primarily addressed to their member states and not directly to companies. Nevertheless, we also regard these agreements and recommendations as important guidelines for KURZ and for our employees, and we expect the same from our business partners and suppliers.

The most important of these agreements are listed below:

- Universal Declaration of Human Rights, UN
- European Convention for the Protection of Human Rights and Fundamental Freedoms
- ILO (International Labor Organization) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy and ILO Declaration on Fundamental Principles and Rights at Work
- OECD (Organization for Economic Cooperation and Development) Guidelines for Multinational Enterprises
- 'Agenda 21' on sustainable development
- United Nations Global Compact

## 6. Health and Safety

We are convinced that having health and safety integrated in all operational matters is an important prerequisite for a permanently high level of motivation of the workforce and an innovative product range. We are committed to providing all our employees with a safe and healthy working environment.

### 6.1 Protective Measures / Safety in the Workplace

We provide suitable control measures, work safety instructions, and preventive maintenance measures, and we put in place protective measures (such as locking and shut-off devices and contact protection) to minimize the health and safety risks in the workplace. If hazards cannot be adequately controlled with the help of these measures, we provide our employees with extensive personal protective equipment. Employees have the right, without fearing reprisal, to refuse work under unsatisfactory safety conditions until management has taken due account of their concerns.

### 6.2 Hygiene

The exposure of our employees to hazardous chemical, biological, or physical agents is subject to permanent monitoring, evaluation, and control. If it is not possible to minimize the risk from such substances with the help of technical or organizational measures, we provide our employees with adequate protective equipment. We provide our employees with clean toilet facilities, access to drinking water, and hygienically safe areas for preparing and storing food.

### 6.3 Emergency Prevention, On-Call Duty, and Measures

We try to identify potential emergency situations and damaging events in good time and classify or evaluate them accordingly. Emergency plans and corresponding behavioral instructions are developed to limit the consequences of accidents as much as possible. This includes procedures for reporting accidents, and for notifying employees and evacuating buildings. Regular emergency drills are also held with the employees, and corresponding training is provided. All operating facilities are equipped with first-aid kits, sufficient fire alarms, and firefighting equipment, as well as marked escape and rescue routes.

### 6.4 Occupational Accidents and Illnesses

In the event of an accident at work or an employee's work-related illness, suitable procedures and systems are in place to clarify the circumstances and, if necessary, initiate medical treatment. Furthermore, the causes of accidents at work and work-related illnesses are investigated,

classified, and statistically processed in order to rule out recurrence as far as possible and to enable the employees concerned to return to their workplaces.

### 6.5 Physically Strenuous Work

We record, evaluate, and monitor any physically strenuous operations that must be performed by our employees. These tasks include manual handling of materials, heavy lifting, standing for long periods of time, frequently repetitive movement sequences, or assembly activities requiring a great deal of force.

### 6.6 Communication

To promote a safe working environment, we ensure that our employees are adequately informed and trained on health and safety issues. For this purpose, all employees are provided with written documents and warnings in their main national language.

### 6.7 Employee Committees for Occupational Health and Safety

Employee health and safety committees are involved in ongoing health and safety training. We encourage all employees to participate actively in this area.

## 7. Environment

Environmental protection is an integral part of our business activities. We are committed to minimizing the environmental impact of our products and manufacturing processes, and to reducing our pollutant emissions.

### 7.1 Product Components / Hazardous Substance Management

We comply with all relevant laws and regulations that prohibit or restrict the use of certain substances. Occupational safety when handling, transporting, storing, recycling, reclaiming, and disposing of substances that could pose a hazard if released into the environment is ensured by labeling and monitoring these substances accordingly. We comply with all regulations for the labeling, reuse, and disposal of such substances. Upon request, we can provide safety data sheets for all hazardous or toxic substances used in the workplace and offer appropriate training to all employees who handle such substances in their workplaces.

### 7.2 Waste Water and Residual Waste

Waste water and residual waste, insofar as they are generated during the operation of our plants, during the production process, and in our sanitary facilities, are monitored, checked, and treated in compliance with all statutory regulations before they are removed or disposed of.

### 7.3 Emissions to Ambient Air

Emissions of volatile organic chemicals, aerosols, corrosives, particulate matter, chemicals attacking the ozone layer, and operational combustion residues are monitored, checked, and treated in compliance with all statutory regulations before they are released into the atmosphere.

### 7.4 Environmental Permits and Notifications

We apply for and have the necessary environmental permits (e.g., emission control) and registrations, and we comply with the operational and reporting requirements of these permits.

### 7.5 Avoiding Pollution, Soil Alteration and Reducing Resource Consumption

We try to avoid all forms of pollution, soil alteration and waste, including water and energy, by conserving resources and minimizing resource consumption by recycling, reusing, or replacing materials at all of our facilities and in all our maintenance and production processes.

### 7.6 Land Rights, Forest and Water Rights and Forced Evictions

We try to avoid forced evictions and the seizure of land, forests and water bodies as far as possible when acquiring, developing or otherwise using land, forests and water bodies. All relevant national and international, legal and regulatory requirements are complied with and implemented in this regard.

## 8. Principles of Implementation, Language

### 8.1 Communication

The company's management staff is responsible for ensuring that they communicate the values and principles expressed in this Code to employees in a sufficient manner and that they monitor their compliance. They should encourage employees to contact their superiors and other designated persons for these purposes if they are in doubt about the best way to proceed in a given situation.

### 8.2 Working Language

Our working language is English. This applies in particular to communication with our subsidiaries and affiliated companies. Within those subsidiaries and affiliated companies, communication takes place in the respective national language. Occupational health and safety documents and warnings are also available in the local languages of our employees.

### 8.3 Code Violations

Violations of the provisions of this Code will be investigated and addressed. Any potential consequences under labor law can only arise from the statutory provisions, the employment contracts, the relevant ordinances, or the company agreements and other agreements.

### 8.4 Continuous Improvement Process

It is our duty to subject this Code to an ongoing improvement process and to take into account feedback and suggestions regarding the processes and procedures of this Code. The Code does not constitute a legal obligation of the Company and does not confer any enforceable rights on employees or other persons. Nevertheless, we are revising the Code at regular intervals, taking into account past experience with its application, always assuming that the principles and values set out herein are implemented in the best possible way.

### 8.5 Reporting of Violations

In order to justify the trust placed in KURZ by employees, customers or suppliers, the integrity and transparency of our business processes is a top priority. Therefore, it is essential that KURZ becomes aware of Code violations. Reliable reporting channels for employees, customers, suppliers and other stakeholders are essential for effective compliance, as they help ensure that potential violations are reported, investigated and remedied.

Reporting channels via KURZ's whistleblowing system include, on the one hand, the option of submitting a report via the digital software solution 'KURZ Incident Reporting'. On the other hand, reports can be submitted by telephone, e-mail and mail.

The 'KURZ Incident Reporting' compliance hotline is a secure way to report potential compliance violations. Reports can be submitted securely, confidentially and, if desired, anonymously online at any time of day or night, anywhere in the world. The website is operated by an external provider specializing in the secure and confidential handling of sensitive content. Incoming reports are not tracked and are treated confidentially. Reporting parties are not registered.

'KURZ Incident Reporting' is accessible via a secure external Internet server:  
<https://www.bkms-system.com/kurz>

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