

**KNAPP**

**Code of Conduct**



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# Preamble

**making complexity simple** is our motto and the objective of all our activities within the KNAPP group.

To fulfil this mission, the company values **reliability, courage, openness, appreciation** and **creativity** form the basis of our positive corporate culture. Across all areas and phases of business development, KNAPP values social fairness, diversity reflected in a positive, respectful approach to the individual, a strong foundation of trust as well as a conscientious attitude. Fundamental to our open corporate culture are thorough communication, creative freedom and the active involvement of employees in making decisions and changes. As a business with a strong focus on sustainability, KNAPP is aware of its responsibility and conducts its entrepreneurial action while always considering economic and ecologic factors as well as social compatibility.

This Code of Conduct is a guideline dealing with self-imposed behaviours and applies to all employees and managers including our suppliers.

Along with the compliance of all relevant legislation, the KNAPP Code of Conduct forms the minimum standard for decisions and actions within the group of companies as well as with respect to business partners and the public.

By observing the KNAPP Code of Conduct, employees and suppliers are doing their part to ensure that the companies of the KNAPP group are and will remain reliable business partners and continuously improve.

As a modern, international group of companies, KNAPP places great importance on appreciation and openness also with respect to equal rights for all people. At the same time, we are serious about our motto making complexity simple. When it comes to communication, both internally and externally, KNAPP is trying their best use gender-neutral language. Should this not be the case in some documents, it is only for the sake of better readability and to avoid excessive wordiness. Where gender-neutral language is not possible, it is nevertheless meant to include all genders without discrimination.



**Gerald Hofer**  
Chief Executive Officer



**Christian Grabner**  
Chief Financial Officer



**Franz Mathi**  
Chief Operations Officer

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# 1 Laws and corporate social responsibility

KNAPP strives to evolve in a sustainable manner based on economic performance combined with corporate responsibility. In doing so, KNAPP responds to the interests of their employees and business partners with integrity, fairness and sincerity. In their business activities, KNAPP complies with all the relevant applicable laws and other legal requirements throughout all regions and countries. KNAPP is aware that laws and ethical norms may vary from country to country due to national specifics.

## 1.1 Human and labour rights

Within their area of influence, KNAPP is mindful of and respects the internationally recognized human rights, and acts according to the principles of the United Nations Global Compact.

Furthermore, KNAPP follows the Declaration on Fundamental Principles and Rights at Work (International Labour Organization, ILO, 1998) in line with the national legal requirements and practices.

KNAPP in particular advocates for fair working conditions and categorically rejects all forms of child and forced labour as well as any other type of involuntary work within the supply chain.

It goes without saying that KNAPP respects the right of all employees for employee representation, while complying with the relevant applicable legal requirements, and their right to appropriate remuneration. KNAPP ensures that all employees carry out their work in compliance with all the applicable laws and mandatory industry standards regarding regular working hours, overtime including breaks, rest periods, public holidays as well as maternity and paternity leave.

Not only are all members of the KNAPP group required to comply with human and labour rights as well as prohibitions of any type of child or forced labour within the supply chain, this is also required of their business partners. Furthermore, the requirements for the Social Accountability Standard 8000 (SA8000) of the Social Accountability International (SAI) must be met.

## 1.2 Equality and anti-discrimination

KNAPP is committed to equal opportunities and sees diversity as an asset and driving force for innovation. What's more, KNAPP promotes an inclusive work environment in order to achieve the highest level of productivity, creativity and efficiency. The main criteria when selecting and promoting employees within the KNAPP group are their skills, experience and qualification. KNAPP does not tolerate any form of discrimination, particularly based on gender, ethnic affiliation, religion, age, disability, sexual orientation, nationality, belief or other characteristics protected by law. Not only do all the companies of the KNAPP group commit to these values, a similar attitude is also expected to be demonstrated by any selected business partner.

## 1.3 Due diligence in the supply chain

KNAPP is aware of its necessary due diligence with respect to mankind and nature, especially considering its global activity and takes this responsibility seriously. In doing so, KNAPP orients itself on the United Nations' guiding principles regarding the economy and human rights as well as the Global Compact<sup>1</sup>.

The relevant applicable laws to ensure due diligence by companies within supply chains are taken into account as well.

For this purpose, appropriate risk analyses are carried out to identify possible human rights violations or environmental risks early on. Implementing corresponding processes ensures that preventative measures and any corrective actions, if necessary, can be taken to rectify any such grievances.

KNAPP endeavours to keep the social and ecological consequences of their business activities to a minimum along the entire supply chain. Ecologically sound solutions are being used not only for the creation and procurement of resources and products, but also for the disposal of generated waste. All factors mentioned are fulfilled in accordance with the applicable law and the currently applicable international standards.

KNAPP places great emphasis on climate neutrality within the entire supply chain, which is why KNAPP is engaging in an ongoing dialogue with the relevant stakeholders.

When selecting suppliers, KNAPP therefore ensures that they adhere to human rights, fair working conditions and environmental standards within the supply chains and that they review and select their direct suppliers based on these criteria in order to meet the requirements of the relevant applicable laws. In addition, all companies of the KNAPP group and business partners are encouraged to independently work on improving the carbon footprint of the products they offer and to consider sustainability issues when developing new products.

KNAPP endeavours not to procure and process any goods and commodities that entail so-called conflict materials whose production could lead to human rights violations or to the financing of violent conflicts in the respective regions, and considers the due diligence procedures resulting from the relevant laws. In this regard, the compliance of the *(EU) 2017/821 regulation on conflict materials as well as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* is assessed in particular when selecting suppliers.

## 1.4 Whistleblower system

By launching the KNAPP whistleblower platform, the Union's requirements of the *Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law* has been implemented. This platform allows people – also anonymously – to report potential grievances within the group of companies. These reported issues are treated confidentially and do not entail any negative consequences for the informant as long as they have been reported in good faith. KNAPP demonstrates its reliability in this context particularly by implementing measures to resolve any alleged grievances and by letting the informant know about the measures taken within the legal deadlines. The platform can be found at [knapp.com/en/whistleblowing](https://knapp.com/en/whistleblowing); issues can also be reported directly by email to [whistleblowing@knapp.com](mailto:whistleblowing@knapp.com).

<sup>1</sup> [unglobalcompact.org/what-is-gc/mission/principles](https://unglobalcompact.org/what-is-gc/mission/principles)

# 2 Integrity and fair competition



When it comes to dealings with all stakeholders, reliability is a core value at KNAPP. Our business partners can trust that issues are dealt with integrity and in a way that conforms to legal requirements.

KNAPP stands for fair competition in all its business activities. The compliance of all competition and antitrust laws is a matter of course for KNAPP and is also expected from KNAPP's business partners. Any activities that limit fair competition are therefore not tolerated by KNAPP. In particular, no arrangements are made with competitors and no confidential information that could limit or distort fair competition is disclosed.

## 2.1 Bribery, acceptance of gifts and corruption

KNAPP is convinced that outstanding service is the key to the company's success. That is why KNAPP neither promises nor accepts any personal or other improper advantages for the purpose of making deals or continuing business. All business partners are treated in a transparent manner and in compliance with the international standards on fighting corruption as well as the relevant applicable national laws.

All companies of the KNAPP group have made clear their commitment to stop any possible distortions of competition at the onset and to maintain our reputation as an reputable business partner.

The acceptance of gifts and other benefits is only permitted as long as it is usual business practice, ethically acceptable and complies with the relevant applicable law. Employees are prohibited from requesting or accepting any gifts or personal benefits from business partners and domestic or foreign officials.

The offering and accepting of gifts and other benefits is prohibited, especially if they could influence any upcoming business decisions or if they constitute a violation of a law, regulation or directive.

KNAPP's business partners are expected to comply with the minimum standards to prevent corruption in various forms and to act within the parameters of the relevant applicable legal situation.

## 2.2 Preventing money laundering and combating terrorist financing

Integrity is also vitally important to KNAPP when it comes to handling the requirements on preventing money laundering, which is why KNAPP makes every effort to prevent such activities. Employees are made aware of this issue and are asked to immediately report any unusual or suspicious activities to the competent bodies.

All employees are asked to inform their superiors or the Internal Controlling System department if they suspect or know about a violation. The confidentiality of such a report is guaranteed and KNAPP ensures that every person who fulfils their obligation to inform will not suffer a disadvantage from it. However, knowingly providing incorrect or misleading information may lead to disciplinary action. Alternatively, tips can be given via the KNAPP whistleblower platform <sup>2</sup>.

The management will in principle follow up on all relevant indications, verify them and if necessary, take the appropriate internal or external actions.

All business partners of the KNAPP group are also expected to make clear their commitment to preventing money laundering and combating terrorist financing, and to comply with the relevant laws and similar mechanisms.

## 2.3 Trade rules

As a globally acting group of companies, KNAPP observes a multitude of national and international customs and trade laws which govern and limit the free movement of goods. KNAPP is obligated to adhere to the applicable economic sanctions and export control regimes and also expects proper compliance from the business partners of the applicable foreign trade regulations. Internal procedures ensure that the relevant regulations, sanctions or embargos are respected.

<sup>2</sup> [knapp.com/en/whistleblowing](https://www.knapp.com/en/whistleblowing)



### 3.1 Handling personal data

The KNAPP group is committed to comprehensive data protection.

Reliability in fulfilling data protection regulations and sensitivity in handling personal data are of particular importance to KNAPP. As more and more data must be collected as a result of digitalization, whether it is data on customers, suppliers, other business partners as well as existing or future employees, KNAPP pays special attention to processing the data only for the required purposes. The data is only saved for as long as it is necessary to fulfil its purpose or is archived as long it is legally required.

The processing of personal data by KNAPP always takes place based on the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation as well as integrity and confidentiality.

Employees are obliged to maintain confidentiality regarding the data that becomes known to them in the course of their professional activity for the KNAPP group, and are regularly trained in how to handle confidential information and made aware of issues relating to data protection. This obligation remains in effect even after they have left the companies of the KNAPP group.

The above-mentioned principles apply even if business partners of the KNAPP group have direct access to information and data for which KNAPP is classified as the

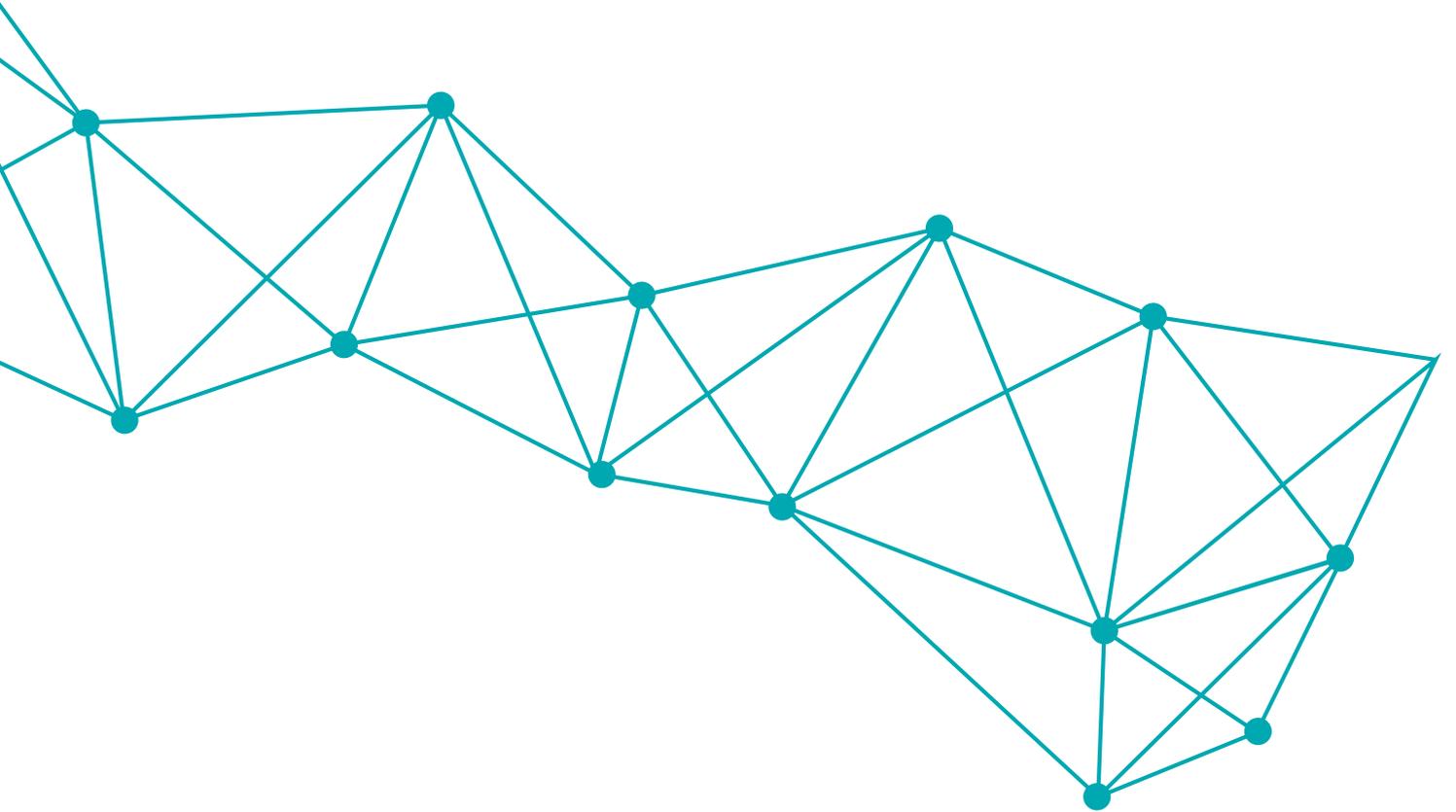
controller or has been commissioned to process. These business partners are either obliged to comply with the KNAPP Corporate Data Protection Policy or they must demonstrate a minimum degree of conformity defined by KNAPP in reference to this policy.

### 3.2 Confidentiality and data security

KNAPP implements appropriate, state-of-the-art technical and organizational measures not only for handling personal data, but also for other sensitive data concerning our business partners, stakeholders or the KNAPP group itself. Such information is generally treated confidentially, made inaccessible to unauthorized third parties, and its processing is protected by technical measures, internal guidelines and requirements as well as appropriate training of employees.

### 3.3 Procedure for data breaches

Despite the most careful implementation of security regulations and measures, the inadvertent or unlawful destruction, change, disclosure, loss of or access to personal data or sensitive information can never be ruled out. For this reason, internal processes and measures have been created so that a breach can be immediately reported to the competent bodies for it to be resolved as soon as possible. This averts or minimizes any potential damage, while complying with the legally required reporting obligations. Any suspected data breach or similar event must also be immediately reported to the KNAPP data protection team<sup>3</sup>.



## 4 IT security

Information as a business asset that belongs to the company is of great value to the KNAPP group and is appropriately protected. Information security protects and secures information from possible threats and contributes to both safeguarding business operations as well as avoiding or reducing economic damage (among others, financial damage, damage to reputation).

Information technology is an important factor at KNAPP and is an indispensable part of our everyday work and business processes. Sensitive information concerning KNAPP or their business partners must generally be treated confidentially. Information is always treated in accordance with company-internal requirements and guidelines as well as contractual or legal regulations. For this reason, all business information and data (business secrets) are protected by appropriate technical and organizational measures.

KNAPP's own information as well as that of our business partners is protected by KNAPP's confidentiality obligations and from unauthorized disclosure and misuse.

KNAPP also expects the business partners to comply with and take these requirements into account. When our business partners access KNAPP resources, the relevant systems must be protected using state-of-the-art technologies and security measures. KNAPP requires their business partners to follow the currently applicable laws and to orient themselves and act based on security standards and best practice processes. KNAPP expects all their employees to do their part in ensuring that information is secure and to observe the security requirements and guidelines of the KNAPP group. All employees are trained in electronic communication and sensitized to potential dangers.

Employees and business partners must protect the business secret including all information submitted and provided to them from use by unauthorized third parties. Any suspicious activities or incidents must be reported to the KNAPP CSIRT (Cyber Security Incident Response team)<sup>4</sup> as soon as possible.

<sup>4</sup> CSIRT@knapp.com



## 5 Product safety

As a manufacturing company, product safety is one of the cornerstones of successful projects and satisfied customers. KNAPP's safety concepts always take into account the current state-of-the-art technology in the country where a project is implemented as well as customer-specific aspects and requirements within projects and innovative solutions.

In the event that unexpected problems arise with a KNAPP product, KNAPP always takes a proactive approach and takes care of the issue in a timely manner, providing goal-oriented solutions to all their customers to ensure the products are safe to use for their entire life span.

Furthermore, KNAPP is always in touch with their business partners so as to respond to grievances and to ensure a safe working environment for the operating personnel of their installations.

# 6 Quality management

Quality management not only shapes the cultural identity of a company but also plays a huge role in its success. In order to achieve the KNAPP quality standard we have set for ourselves, it is crucial to establish a working environment in which employees can act freely based on the KNAPP company values and that employees and quality managers acting on a local as well as global level collaborate on all hierarchical levels of the company by generating company-wide synergies throughout the various KNAPP locations. For this purpose, the KNAPP group of companies orients itself on internationally recognized ISO standards and is certified by external accredited institutions at regular intervals to demonstrate their quality standard.

## 6.1 Error handling

As an innovative technology corporation, KNAPP strives to ensure efficient error management as well as a modern, contemporary and, above all, future-oriented error culture. That is why KNAPP aspires not to put their employees under even greater pressure by expecting them not to make

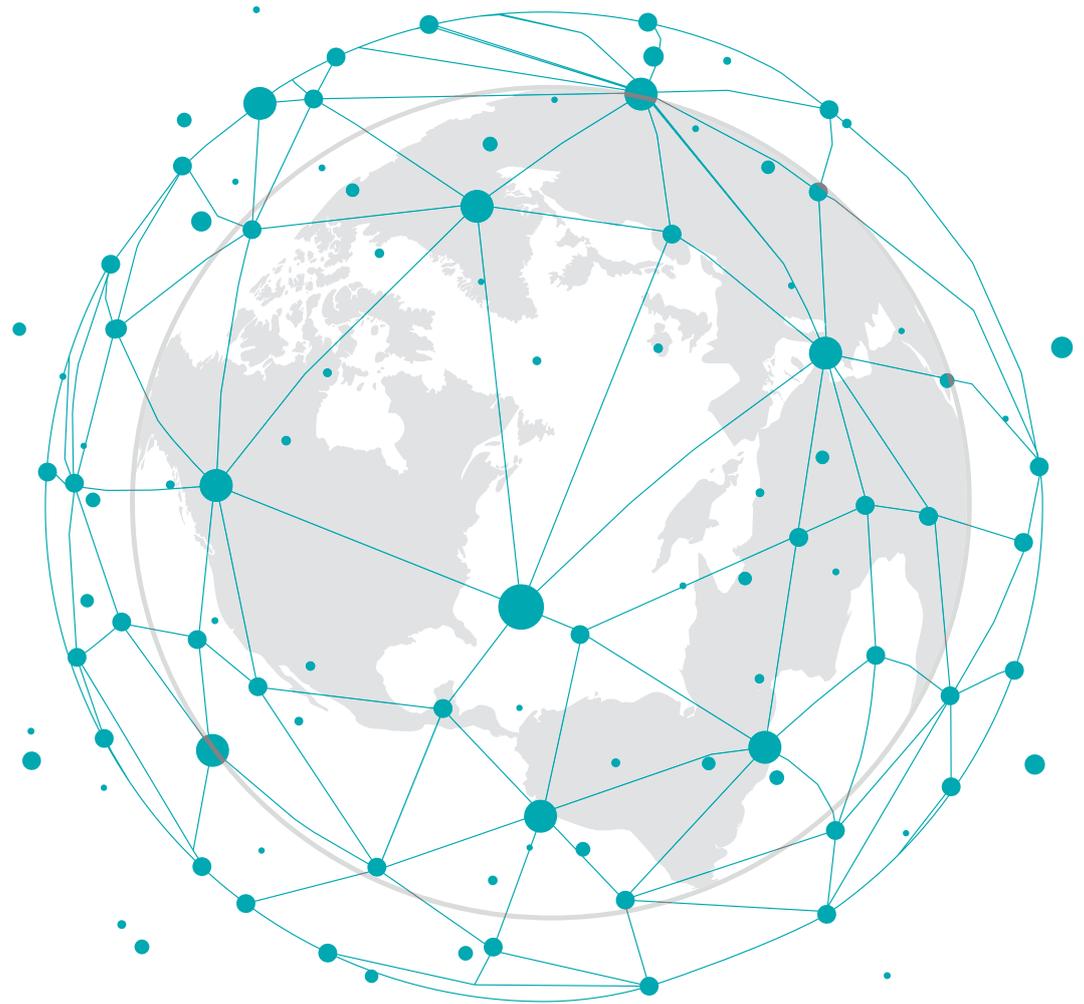
any errors at all, instead, employees on all levels of the company are encouraged to act according to the KNAPP company values and to handle errors and their consequences through open and constructive dialogue.

## 6.2 Risk management / business continuity management

For the KNAPP group, evaluating risks and opportunities are essential elements of their business processes and decisions. This also means that dealing with risks in a cognitive and structural way is inseparably linked to future-oriented entrepreneurial activities.

KNAPP has therefore implemented an efficient risk management which allows specific risks to be identified, assessed, communicated and appropriate control measures to be derived.

Matters relating to business continuity management are handled in the same way. KNAPP is pushing for more resilience as a company, thereby promoting reliability, one of our company values, in order to strengthen the continuity of business processes both inside and outside the company.



## 7 Sustainability

Protecting the environment and sustainability mean more to KNAPP than just fulfilling legal requirements. Therefore, a separate management system that follows a strategy in line with the 3P principle (*People, Planet, Profit*) has been introduced.

The goal of the KNAPP group is to make a substantial contribution to the achievement of the goals of the *European Green Deals*.

To set an example, KNAPP AG in Hart bei Graz has been certified according to *ISO 14001*. All companies of the KNAPP group take these standards into account and integrate them in their day-to-day work.

The KNAPP group plays a proactive role in implementing the United Nations *Sustainable Development Goals (SDG)*.

Not only does KNAPP engage in this social dialogue within the parameters of the company, but also with the stakeholders. This demonstrates a level of openness that is characteristic of a modern company.

For all internal initiatives as well as projects with external partners, the 3R principle (*reduce, reuse, recycle*) is applied.

KNAPP's employees implement all the necessary and possible environmental measures as long as they are not in conflict with their work and try to achieve the best possible environmental benefit. They ensure that all activities are in line with environmental laws, company policies and objectives.

KNAPP also expects their business partners to make a deliberate and coordinated effort to keep the environmental impact to a minimum.



## 8 Health and safety management

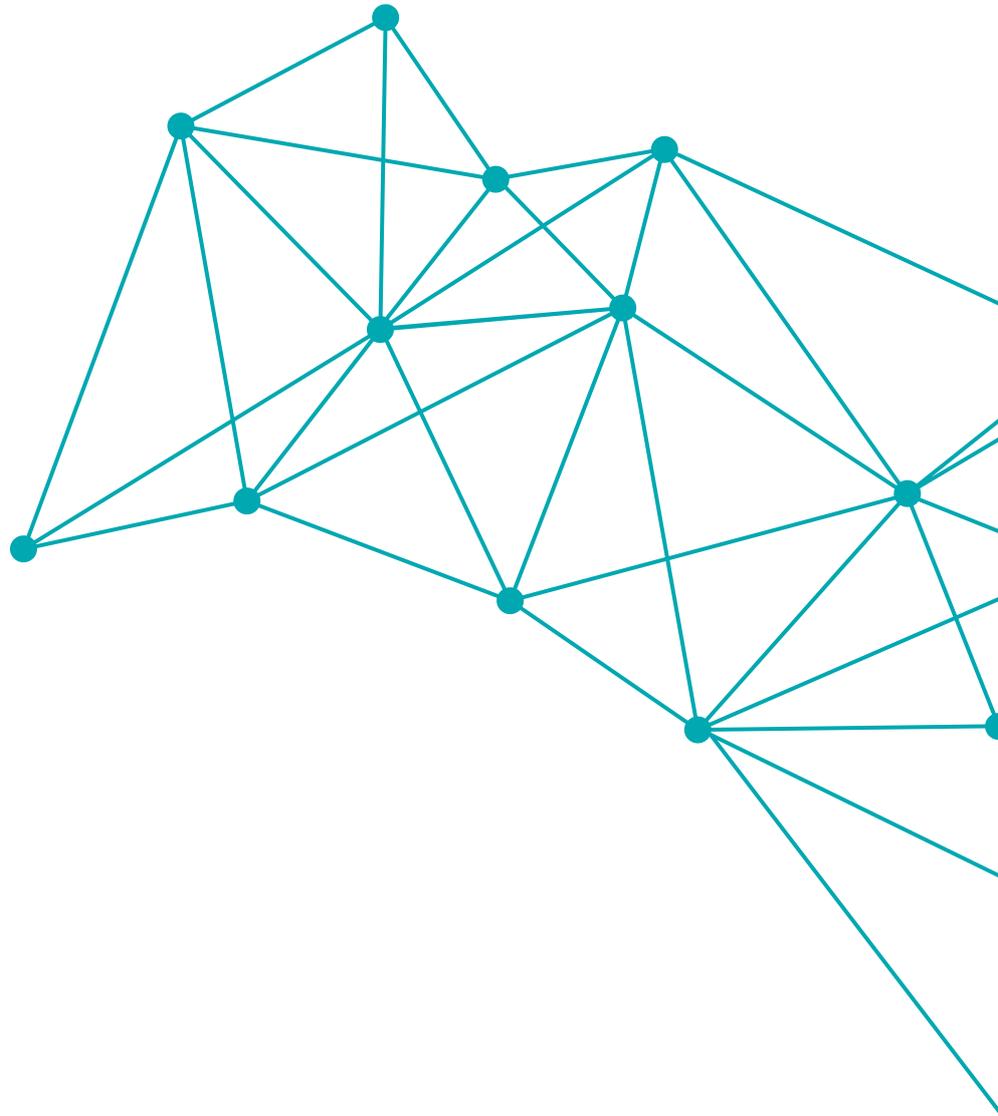
Work safety and health protection are integral parts of all operating processes of the KNAPP group and form part of the customers' technical, economic and social considerations as early as in the planning phase, throughout the entire project management and in the after-sales phase. KNAPP wants to raise awareness for safety and health, provide safe and healthy working conditions and further develop our culture along this line to prevent work-related accidents and illnesses.

With the participation of our employees and business partners, we are continually monitoring, analysing, evaluating and improving our processes and their results. Compliance with existing regulations is the foundation for achieving a high standard in the area of safety and health protection. The protection of high-risk or vulnerable groups of persons is a matter of course.

KNAPP's safety-conscious behaviour strengthens the confidence of employees, business partners and the public in our entrepreneurial activities. The relevant needs and expectations of all our stakeholders and other interested parties are determined, analysed and taken into account.

The health and safety management system at KNAPP AG is certified according to ISO 45001 and is monitored and continually improved through regular internal audits, inspections as well as external certification audits. All the companies of the KNAPP group are also doing their best in ensuring health and safety in the workplace beyond legal requirements.

KNAPP not only expects their business partners to comply with the relevant applicable laws, but also to implement appropriate safety measures to prevent accidents at the workplace and to provide appropriate training to ensure the health and safety of employees.



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