



# KOKINETICS Group

- Code of Conduct: Business Ethics and Compliance -

[www.kokinetics.com](http://www.kokinetics.com)





## Preface



KOKINETICS has earned an excellent reputation over the course of decades. Innovation, technical performance, pioneering spirit, quality, customer focus, and reliability have made us a leading company in our markets.

We all bear responsibility for the reputation of KOKINETICS.

This [Code of Conduct: Business Ethics and Compliance](#) delineates the ethical-legal framework within which we act.

It defines the basic principles of our conduct within KOKINETICS and in our relations with our partners and the public. It presents the principles of our corporate actions and expresses our corporate values. Acting responsibly means acting lawfully, and it also means acting ethically. Only business transactions which meet this standard are KOKINETICS business transactions.

Compliance constitutes the bridge between law, conscience, and culture. Our code of conduct relieves no one from his or her personal responsibility. However, we call on all staff members to ask for advice and help whenever they must take a decision on ethical or legal issues or whenever they notice modes of conduct in their work environment which they consider questionable. Our code of conduct is neither a control system nor a denunciation tool but rather a guideline for conduct that is in line with KOKINETICS' corporate culture. It is based on integrity, safety, respect, and sustainability.

All staff members are called upon to fill the code of conduct at KOKINETICS with life. We are proud to be taking it as a guideline for our conduct.

[Dr. Andreas Stoltze \(CEO\)](#)



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*At KOKINETICS we commit ourselves to treat one another with respect*

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Our staff members are the foundation for the success of the KOKINETICS Group. To ensure that their strengths can fully develop, we create a work environment which expresses this appreciation and promotes integrity.

We tolerate neither discrimination nor harassment. What counts for us are performance and conduct in the spirit of partnership, irrespective of age, origin, gender, or ethnic group. We judge the result of an individual's work objectively, regardless of political commitment or involvement in a union, of religion, physical constitution, or sexual identity. For this reason we do not tolerate defamation, intimidation, threats, or assigning blame to others. Fairness, respect, team spirit, and open-mindedness mark our cooperation with superiors, colleagues, and other employees. These principles also apply to our conduct toward external partners.

We respect and promote employee rights and endeavor to deal with the labor representatives in a spirit of partnership and with the aim of finding solutions.

We specifically promote cooperation between different subsidiaries and countries. The decisive criteria for selecting and promoting our employees are the performance, ability to grow, and personal qualification of each individual. We are committed to a culture of learning where issue-related feedback is sought and appreciated by everyone concerned but personal attacks are rejected. Working at KOKINETICS means having confidence in one's own performance, treating others with esteem and respect, and being a model for others on account of the results of one's work.



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### *At KOKINETICS we are committed to sustainable entrepreneurship*

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KOKINETICS is committed to the idea of sustainability. These elementary principles mark our actions from ecological, social, and economic points of view. Our more than sixty-year history demonstrates that KOKINETICS does not build on short-term success.

**Environmental Management System:** Programmes for the improvement of the environment and safety are fully integrated into our management processes. We define concrete environmental targets every year and we launch projects to achieve these. We have an active improvement programme designed to continuously develop our environmental management systems.

**Environmentally-friendly technology:** Kokinetics spends a significant amount on research and development of lightweight products every year. The company combines the best of two worlds - steel and plastics. This is the reason why many products from Kokinetics are lighter than those of their competitors and are therefore 'Best in Class'.

**Employees:** Kokinetics emphasizes the social aspects of collaboration. We train our employees at our own Kokinetics Academy.

Natural resources are to be protected, material is to be saved, and waste is to be reduced. To limit the consumption of raw materials and energy as well as emissions, sensible options for optimizing processes are exhausted. Our production plants are solely built and operated in accordance with regulatory provisions.

In addition to economic aspects, ecological and social criteria are also considered in the selection of our business partners. We do not accept as business partners those who violate environmental regulations, exploit employees, permit child labor, or move in legal gray areas.

KOKINETICS complies with the laws on safety at work and, together with its employees, endeavors to create a healthy and safe work environment. The health of our employees is of equal concern to each individual and the company. Experts in occupational health and safety support the management in preventing sickness and accidents. Adherence to the provisions regarding safety at work is mandatory. In this regard each employee shares the responsibility for safety in his or her area and the safety of his or her colleagues.



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*At KOKINETICS we protect our lead in knowledge and respect the intellectual property rights of third parties*

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The material and intellectual property of KOKINETICS must be protected against loss, theft, and misuse. The value of our company is based on the ideas and the inventiveness of the people who actively try to enhance the success of KOKINETICS and have tried to do so in the past. Successful knowledge management has continued to create and passed on this value added from generation to generation. Inventions, patents, and other know-how are extraordinarily valuable in this respect, as are our trademarks. We protect these nonmaterial assets, as they are of considerable economic significance for the future of our company.

KOKINETICS' company secrets and knowledge about future developments must not be revealed to third parties, let alone be published, without the approval of the Management Board. All employees are called upon to protect data against unauthorized access by third parties and to avoid opportunities for them to access business documents. IT safety, data security, and privacy are top priorities for us. We have created special areas of authority for these matters.

We pledge to respect the material and intellectual properties of third parties and reject illegal ways of acquiring information. Company secrets include all information which is not publicly accessible but constitutes a great value for our company or its competitors, as well as any information which only the company possesses. Taking credit for others' achievements is not in agreement with the KOKINETICS culture.

We do not work with knowledge which has already been fully explored and do not use any ideas which have not been developed on the basis of our own accomplishments and our own know-how. Observing the competition is necessary and desirable.

We do not, however, collect confidential information from competitors or ask customers about it. Those who come into the possession of company secrets of other businesses in an illegal way have the obligation toward these companies to protect this information and not use so that it may profit us.





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*At KOKINETICS we are committed to integrity and transparency*

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Our employees avoid any collision between their private interests and those of the company. We are not guided by private concerns or personal relationships in our decisions. Business relationships are based on price, quality, or an already existing, fair cooperation which has developed over the course of past collaborations. Relationships from which purely personal material or nonmaterial benefits are gained may have no impact on the signing of a contract or the continuation or termination of a business relationship. We reject any instance in which KOKINETICS employees or their relatives establish a business relationship between KOKINETICS and a supplier or service provider, whether directly or through third parties.

As a matter of principle, every employee must obtain the approval of his superior to begin additional employment – including on a freelance basis – or start his own entrepreneurial activities. This applies particularly to assuming positions in companies which have a business relationship with or which are competitors of KOKINETICS.

KOKINETICS welcomes any volunteer commitment of its employees which is compatible with their obligations toward KOKINETICS according to their employment contract.

When expressing their private opinion in public, employees must not create the impression that they are voicing the opinion of the company.

If an employee has an actual or potential conflict of interests, he must promptly advise his superior of this so the conflict can be jointly removed.



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*At KOKINETICS we are committed to objectivity and impartiality*

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We make our decisions freely and independently, and without creating any dependencies. We will not accept preferred treatment by suppliers, service providers, or customers. When dealing with business partners, material or moral dependencies must not be a factor.

We reject any “you scratch my back and I’ll scratch yours” business policy. We accept invitations to events or business dinners by business partners only if they have a demonstrable business purpose and if the business partner or his representative is present. The invitation must be appropriate to this

business partner and may not go beyond common hospitality. The employee’s superior must be notified about invitations from business partners.

Presents from business partners must be within the legal limits and appropriate in terms of type and extent. Invitations from business partners to their events of a largely private character are permitted as approved exceptions if the major expenses of the event are born by KOKINETICS or the employee himself or herself.



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*At KOKINETICS we are committed to honesty in our business and social activities*

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We conclude business deals only on account of the quality and performance of our products or services. Sales shall not be promoted by way of presents, donations, bribery, or corruption. The principles of honesty and integrity must be observed in all business and social activities.

Relationship management is part of business success. It is conducted neither in legal gray areas nor with inadmissible means. Employees of KOKINETICS do not accept, either directly or indirectly, bribery nor do they make any such offers themselves. Bribery is a criminal offense in business transactions as well as to office holders. When dealing with government offices or authorities, no payments or benefits are promised or granted in order to influence decisions by public servants or other office holders in favor of KOKINETICS.

We do not make any presents for the purpose of inappropriately influencing our position in the market. We do not accept any presents which are meant to stimulate the award of contracts. Presents or benefits which may influence business decisions are impermissible and must neither be offered, granted, requested, nor accepted. This also applies if they may merely create the appearance of impropriety, and in particular to the initiation of contracts and the conclusion of business deals.

Only the Management Board of the KOKINETICS Group decide on donations and sponsorships which go beyond locally limited and temporary activities, as well as on minor donations. The same applies to politically motivated donations, contributions to political parties, and memberships in special-interest groups and associations.



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*At KOKINETICS we are committed to transparent financial reporting*

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Our partners rely on our always informing them truthfully about our business development, results, and outlook for our company. They include customers, business partners, banks, rating agencies, employees, financial authorities, as well as our shareholder. Correctness in our accounting, notes, and financial reporting is the yardstick of our credibility. False or incomplete reporting may create the appearance of financial irregularities, of deception, or of fraud.

Internal control systems document crucial business transactions appropriately and ensure that information about business developments which are important for accounting are recorded completely and correctly.

Keeping records and documents so that they are complete, clear, and comprehensible is therefore a matter of course for us. Notes and files must be kept in such a way that auditors and financial authorities can comprehend their system and contents at any time. Our processes are so transparent and structured that other employees can always continue them. Legal or internal obligations to preserve records must be met. Documents which relate to procedures of authorities or courts of law must not be destroyed.

Any documentation must be formally correct and its content consistent so that it may also be shown to third parties when required.





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*At KOKINETICS we are committed to reliable communication*

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Transparent, prompt, and reliable internal as well as external communication is an important part of our corporate culture. The misinformation of employees and colleagues, the public, the market, and our customers is not acceptable to us.

Customers should receive appropriate access to the information that is necessary for a sensible business decision. This may be achieved, for instance, by way of general written product information or through company representatives. KOKINETICS takes customer complaints very seriously and processes them promptly and fairly.

All information that is provided to the public is truthful. Flawless quality is our standard. Improper, ambiguous, incomplete, or ill-considered statements may be misinterpreted, misused, or taken out of context, thus causing us considerable damage.

For this reason communication via e-mail or the Internet must also be conducted correctly.

As a matter of principle, information may be provided to the public only by staff members who are authorized to do so. Those who appear in public as representatives of KOKINETICS without prior authorization must state clearly that they are acting as private individuals. When investigative authorities make inquiries, the Management Board must be consulted immediately.

The principle of truthful communication must also be adhered to toward employees and colleagues. We inform our staff comprehensively, regularly, and promptly about objectives, plans, and corporate data, and we make decisions transparent.



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*At KOKINETICS we are committed to fair competition*

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KOKINETICS openly declares its belief in the market economy and promotes fair and free competition. Wherever KOKINETICS is active, the company adheres to antitrust and trade laws, and to laws on pricing, competition, and consumer protection.

We do not tolerate illegal agreements with competitors or any other breaches of competition laws. Even the appearance of improper agreements with other market participants must be avoided.

In cases of doubt about matters concerning competition law, the Management Board must be consulted.

KOKINETICS wins over customers by presenting its own strengths rather than improving its position by degrading competitors.

Information about customers and competitors is exclusively gained through generally accessible sources. We respect the innovative strength of our competitors



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## *How to find us*

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