

CODE OF CONDUCT (status 04 | 2025)

Our most important values

HUMANITY	We treat people with respect.
PROFESSIONALISM	While we are committed to tradition we also always try to break new ground.
SUSTAINABILITY MANAGEMENT	We define sustainable management as economic, ecological and social responsibility as a value-based goal and measure for our actions.
PARTNERSHIP	We strive to exceed customer expectations and adhere to agreements. We deliver excellent service always and everywhere.

1. Compliance

We respect the law in everything we do and comply with our internal guidelines and specifications.

We respect the freedom of association of our employees. We recognize and support the right of our employees to employee representation. Cooperation between employees and the company is based on trust.

2. Conflicts of interest

Business decisions are made exclusively in the interests of Klüh or the respective business unit. Personal, family or financial interests as well as personal idealistic or monetary considerations must not play a role in the decision-making process

If there is an actual or even potential conflict between business and private interests, employees must inform their superiors and seek a solution with them - if necessary involving senior management.

3. Integrity

Business secrets and confidential information may not be disclosed unless required by law. Personal data must not be obtained by unlawful means.

Employees must not obtain confidential company information or business secrets illegally or pass them on to third parties (including family members).

We are also committed to financial integrity in all business transactions.

4. Innovation

Open to new ideas, we strive for creative solutions with high efficiency. Smooth integration into the client's processes is a distinctive Klüh quality standard.

5. Effectiveness and sustainability

Saving time and efficiency in the interest of the customer as well as sustainable management with ecological and social responsibility for our actions are key benchmarks of our performance. We use resources entrusted to us responsibly.

6. Tolerance

Respectful cooperation and appropriate treatment of business partners and employees are an essential part of the Klüh culture. Any form of discrimination based on personal characteristics such as gender, age, origin or nationality, social background, political conviction or sexual orientation must be prevented.

The privacy of each individual and their personal rights are respected and protected.

7. Competition

It is one of Klüh's fundamental beliefs that free and fair competition within the company and in the markets in which Klüh operates leads to the best possible allocation of human, financial and economic resources. Therefore, we are committed to the principle of fair competition and the guiding principles of the OECD.

8. Quality

We always strive for the highest quality in the provision of our services. We operate professionally, thereby ensuring the satisfaction of our customers.

9. Data protection

We comply with applicable law when collecting, storing and processing data. IT security is a particularly high priority for us.

Disclaimer: This Code of Conduct cannot anticipate every conceivable legal or ethical situation, let alone provide answers.

For the Holding Management Board
Christian Frank

Further explanations:

Implementation of the Code of Conduct and communication

Klüh communicates the Code of Conduct, including any changes and its implementation, to employees and other stakeholders. This is done, for example, through announcements on our website, in tenders or other publications. The Code of Conduct and all guidelines alongside it are based on formally recognized national or international reporting standards or regulations. The implementation of these guidelines and maxims is recorded in annual reports and, where possible and appropriate, made measurable in key figures. Reporting is carried out in accordance with the German Commercial Code (HGB) for commercial reports and in the areas of sustainability and social affairs using the international GRI standard, our sustainability report and various internal reports (energy report, social report, management review among others).

Compliance

All actions must comply with applicable national, European and international law (e.g. the UN Convention on Human Rights, ILO, OECD Guidelines). We regard all legal provisions that affect our activities as minimum requirements. In this context, we expressly distance ourselves from all forms of child and forced labor.

In order to emphasize this intention, we have been a participant in the UN Global Compact since 2023 and have been reporting in accordance with its requirements (COP) since 2024. We focus on aligning Klüh's business activities with the Sustainable Development Goals (SDG)

Diversity and inclusion

Klüh employs people of different ethnic backgrounds, ages, disabilities, genders, religions, nationalities and sexual identities from 122 nations. Integration and diversity are part of our corporate culture.

Discrimination against employees is not tolerated. Discrimination and exclusion have no place at our company.

Klüh attaches great importance to equal rights and equal opportunities in all areas of the company. Different cultural, gender and age-related backgrounds and experiences allow us to successfully offer different services for many different industries worldwide.

Personnel selection and development are carried out exclusively on the basis of qualification.

As a sign of our support for the aforementioned values, Klüh has signed the "Diversity Charter", an initiative of the German government.

Respect and fairness

Fairness and respect are core values when dealing with our employees. These values are taken into account in every contact with our employees, from application to termination of an employment relationship.

Remuneration and working hours comply with the respective legal requirements. Specific regional standards, agreements between social partners or collective bargaining provisions are recognized and implemented.

Overtime bonuses and allowances are also paid in accordance with the applicable collective agreements. Employees are informed regularly, in detail and comprehensibly about the composition of their salary. Professional development and equal pay for all employees are guaranteed.

For this reason, we practice the principle of "promotion before entry" at Klüh. In mandatory employee appraisals (mutual feedback culture), further training agreements and development opportunities are concluded between employees and their direct line manager.

In all specialist companies, there are personnel development programs that qualify our employees

for higher positions, which are supported by the Klüh Academy and the Klüh Safety School, among others.

Ethics and fair conduct

Personal dependency, unethical behavior or influencing employees through bribery and/or corruption is not tolerated. Fairness and honest dealings are fundamental components of Klüh's corporate culture. We have implemented a whistleblower system to ensure that this is transparent. The compliance officer conscientiously investigates every report and, if necessary, takes appropriate measures and reports on them annually.

Occupational health and safety

The working environment and work processes of Klüh employees must be designed in a safe (occupational health and safety) and healthy (health and safety) way. Hazardous activities must be prevented or - if impossible - secured in the best possible way. The standards derived from the accident prevention regulations and other legal bases must be complied with. Employees are regularly informed about applicable health and safety guidelines and safety measures (management review, HSE plan and occupational safety protocols).

Social and regional commitment

As a Düsseldorf based company steeped in tradition, local customs (e.g. carnival) and the Rhineland way of life are part of our corporate culture.

We are committed to preserving and promoting our region through our "Wir für Düsseldorf" foundation. This initiative was launched by Düsseldorf native Josef Klüh himself. The aim of the initiative is to support social associations in Düsseldorf.

Environmental protection and sustainability

We pursue environmental protection in our own initiative and responsibility. Our activities must not entail any risks for the environment. Our service processes are therefore designed in such a way that they have as little impact on the environment as possible. New products and new processes are assessed with regard to sustainability criteria before

they are used in order to prevent environmental damage or safety risks.

We use raw materials and energy sources responsibly and sparingly in order to contribute to the careful use of nature.

Together with our suppliers and other contractual partners, we ensure that appropriate environmental standards are applied and that the products and processes used are environmentally friendly.

Returning residual materials to the material cycle and the conscientious separation, recycling and disposal of waste are an essential matter to us.

We are continuously working to expand our knowledge of the economical and environmentally friendly use of resources and the environmental impact of our performance processes (environmental and energy policy, environmental targets, DIN EN ISO 14001 and 50001). Klüh has set itself the goal of becoming climate-neutral by 2040

We also involve our suppliers in our efforts to improve occupational health and safety and environmental protection. When selecting our suppliers, we therefore ensure that they are certified in accordance with DIN EN ISO 9001 and DIN EN ISO 14001. The same strict requirements apply to employees of subcontractors as to our own employees with regard to operationally necessary training (e.g. occupational health and safety). The purchasing guidelines were adapted to all new requirements (corruption and supply chains) in April 2024.

Particularly strict requirements for suppliers apply to the specialist area of security through certification in accordance with DIN 77200. The qualifications of our subcontractors' managers and the training certificates of the subcontractor's employees are checked and documented separately. Compliance with this code of conduct is checked regularly. Quality management, auditing and controlling work together with the compliance officer as part of the internal control system (ICS). Any deficiencies are investigated and remedied as quickly as possible.

Final explanation

The explanations of the Code of Conduct are regularly adapted in subordinate documents as required and as conditions change. The stakeholder groups relevant to our business activities are regularly identified by means of a stakeholder analysis. This is an established process that is

reassessed annually by the holding company management (opportunity and risk matrix in accordance with DIN EN ISO 9001).

For the Holding Management Board
Christian Frank