

## Code of Conduct

### Preamble

Our code of conduct is intended to be a guideline for the whole company Peter Kwasny GmbH and therefore applies equally to each and every one of us. Specifically, it is aimed at management, executives and all our employees and our suppliers. On the one hand, it represents the standard we set ourselves to live up to the values and principles listed within it, and at the same time it communicates to the outside world responsible behaviour towards our business partners, customers and employees.

### Management commitment

The company Peter Kwasny GmbH considers itself obliged to act in an economically, socially and environmentally conscious manner. The company Peter Kwasny GmbH strives to conduct its business competently and on an ethical and moral basis and to compete fairly in all markets in which it operates. This includes compliance with applicable laws and the acceptance of cartel prohibitions or restrictions on competition. We want to avoid gaining undue advantages over customers, suppliers or competitors.

### Mission statement of Peter Kwasny GmbH

In our world, everything is about the spray paint can. Our goal is to constantly improve and develop these with innovative ideas and to make them even more environmentally friendly.

Our focus is on our customers, who know and appreciate our products as professionals in trade and industry, artists or do-it-yourselfers.

By consistently aligning our portfolio with the wishes and requirements of our users, we want to conquer new target groups and inspire them with the possibilities of the spray paint can.

We shape the market in the long term as a technology leader with creativity, perseverance and courage. We implement solutions for the future.

We constantly question existing solutions and develop new ideas for the benefit of our customers. To this end, we promote constructive teamwork among our employees. Your interests and requirements for us are key to our work and further development. We are successful in our cooperation due to the diversity of our employees and their commitment to the business areas.

We are driven by the desire to consistently deliver outstanding customer value. We strive for long-term cooperation and are binding in adhering to mutual agreements.

We expect all our employees to always act according to the highest professional standards as well as guidelines of our company.

If employees violate existing guidelines, rules or regulations in the context of their work or through their behaviour, they will be subject to disciplinary measures.

### Standards of cooperation

#### Compliance with human rights

Peter Kwasny GmbH is expressly committed to upholding human rights within its sphere of influence. We see it as our duty not to participate in any form, directly or indirectly, in human rights violations. We also expect this from our business partners.

#### Protection from child and forced labour

We strictly reject child or forced labour without exception and expect the same from our business partners. Children of compulsory school age (younger than 15 years) may not be employed even if the legal requirements of the respective country of our supplier would allow this.

## Fair working conditions

We ensure fair working conditions for all employees and comply with the respective national regulations on working hours. Remuneration shall be appropriate and based at least on the statutory minimum wages or applicable collective wage agreements. All salaries, benefits and nationally prescribed social security contributions agreed in the employment contract are paid or deducted reliably. We also expect this from our business partners.

## Prohibition of discrimination

Any form of discrimination is prohibited as a matter of principle. No matter whether it is a question of nationality, ethnicity, age and gender, sexual orientation, marital status, pregnancy or disability, or religion or belief. Promotions and new appointments are always made free of discrimination. We expect that our business partners also prevent any discrimination.

## Open communication with staff

We value courageous, self-reliant action as an employer. We exchange ideas, are honest about our mistakes and look for solutions together.

The way we lead our employees is based on appreciation, clarity and trust. We pull together to achieve our goals. We work together to remove obstacles that interfere with our cooperation. We do not cover up misconduct. If employees report actual or suspected misconduct in good faith, we will not tolerate intimidation or retaliation against them. We understand "in good faith" to mean that the employee is convinced that his or her statement is true. This applies regardless of whether a subsequent investigation confirms the employee's version or not.

## Understanding of leadership

Every supervisor directs his or her leadership behaviour in such a way that a trusting, long-term and successful cooperation with our employees is possible.

Supervisors are responsible for ensuring that no violations of the law occur in their areas of responsibility that could have been prevented or made more difficult by supervision.

As a management team, all supervisors in their respective areas of responsibility therefore ensure that each employee knows which tasks he or she is responsible for with regard to the company's goals and which legal and internal requirements he or she must comply with. In doing so, supervisors carefully select employees for jobs based on personal and professional suitability. They help their employees to remove obstacles on the way to the goal. The cooperation is based on mutual respect and trust: They take care to speak respectfully with and about each other. Joint agreements are respected. Managers and employees are honest about mistakes and look for solutions together. Conflict situations with or between staff members are immediately followed up by supervisors and attempted to be resolved amicably. They empower your employees to take responsibility and support them in developing the necessary competences. Supervisors provide guidance to their employees through regular communication on their work results and behaviour. They take care of themselves and the safety and health of their employees.

The supervisors and the HR Department are also available to employees for professional and personal concerns.

## Freedom of association and right to collective bargaining

Peter Kwasny GmbH respects the right of employees to freedom of association and collective bargaining. Employees are free to establish or become members of an employee representative body. Employees must not suffer any disadvantages as a result of being a member of a trade union. Similarly, workers or their respective organisations can negotiate and conclude company agreements or collective agreements at the appropriate level

## Secondary occupations

Employees undertake to notify the company in good time, without being asked to do so, of any remunerated secondary employment they have or intend to have. In principle, it requires company approval, unless it is an honorary activity that does not significantly affect the interests of the company. The company is entitled to prohibit the secondary activity if and to the extent that, as result of it:

- a competitive situation arises vis-à-vis the company;
- regulations of the Working Hours Act are violated;
- the proper fulfilment of the duties arising from the employment relationship is jeopardised or
- other legitimate interests of the company may be significantly affected.

### Use of company facilities

The equipment and facilities in offices and workshops (e.g. telephone, photocopier, PC including software and internet/intranet, machines, tools) may only be used for official business. Exceptions and payment, if applicable, are regulated locally.

### Acceptance of gifts, donations

#### a) Gifts to our employees

Our employees do not demand or accept personal benefits from customers or suppliers that could influence or affect their own behaviour with regard to their own work for the company.

If gifts are offered by third parties, they may only be accepted if they are common practice and can be recognised as a courtesy or kindness (promotional gifts with the logo of the company giving the gift, such as calendars or pens).

Gifts exceeding the tax-allowable amount must be reported to the Compliance Officer or the Executive Board. If this is not possible, these gifts are to be refused in principle.

#### b) Gifts by our employees

Gifts on our part may also only be offered within the scope customary for the business relationship and to an extent that is materially appropriate. The recipient must not be able to associate with it any obligation that would influence his or her business decisions.

#### c) Donations

Peter Kwasny GmbH does not make donations to political parties, individuals or organisations whose aims contradict our corporate philosophy or damage our reputation. Donations are always made in a transparent manner.

### Corruption and bribery

We do not tolerate any form of corruption and bribery, regardless of whether this damages our company assets or the assets of third parties. Through control mechanisms, we ensure that bribery, theft, embezzlement, fraud, tax evasion or money laundering are prevented.

Our employees are prohibited from accepting or giving favours of any kind (cash, travel, gifts, etc.) that are linked to an undue advantage (contract award, project award, etc.).

Our business partners are also required to avoid conflicts of interest that pose a risk of corruption.

### Protection of the environment and occupational safety

For us as a manufacturer of chemical-technical products, environmental protection is not a marketing tool, but a matter of course. Peter Kwasny GmbH is certified according to ISO 14001 environmental management system and ISO 9001 quality management system. We are proactively working to further develop sustainable products and resource-saving production processes, with future generations in mind. We ensure consistent compliance with health, safety and environmental protection guidelines. We consider the impact on customers, the company, colleagues and the environment when making decisions.

We expect our employees to act responsibly in the production and distribution of our products and services. They should treat all natural resources used in our company (e.g. energy, water, land) with care. We also pay attention to the avoidance of waste and the responsible use of chemicals.

We comply with all laws and rules concerning health and safety at work to protect our employees. To this end, our managers in particular take measures to create a healthy and hazard-free working environment for our employees.

Smoking and alcohol are prohibited throughout the company's operations. For safety reasons, it is forbidden to switch on the mobile phone on the entire factory premises with the exception of the administration.

We also expect our suppliers to comply with the applicable national legislation on environmental protection, health and safety at work.

## **Compliance with applicable law**

We require our managers to familiarise themselves with the laws, regulations and rules relevant to their area of responsibility and to comply with them without exception. Our managers in particular bear a great responsibility in respecting the Code of Conduct.

The business practices of our business partners and their suppliers must also comply with applicable laws. This applies in particular to working conditions, import, export, and domestic trade in goods, technologies or services, but also to the movement of payments and capital.

A violation of economic embargoes as well as trade, import and export control regulations must also be ruled out by our business partners, as must the financing of terrorism.

## **Fair competition**

We are committed to fair competition and abide by these laws and rules. We refrain from agreements on prices, conditions and strategies with competitors, suppliers, other companies and traders that hinder fair competition. We do not participate in any anti-competitive boycott.

## **Dealing with business information**

As an owner-managed, medium-sized company, we value long-term, trustful cooperation with our business partners, customers and employees. As a matter of principle, all business information of our partners and their trade secrets are treated sensitively and confidentially. Required documents are prepared and stored appropriately or, if necessary, destroyed after the end of the cooperation.

## **Dealing with internal company information**

We attach importance to the careful and responsible handling of the products manufactured, the working materials used and the company's intellectual property.

## **Data protection**

We treat all personal data of our customers, business partners and employees with the utmost care. This includes names, addresses, telephone numbers as well as date of birth or information about the current state of health. Our employees are obliged to take all measures to secure the data, which are suitable to protect our IT system against internal as well as external data theft. In particular, this applies to passwords misused in the company as well as unauthorised downloading of files, especially of inappropriate material from the Internet.

## **Implementation and enforcement**

Peter Kwasny GmbH undertakes to make the necessary efforts to live up to the principles and values described in this Code of Conduct.

signed

Board of Management Peter Kwasny GmbH

Gundelsheim, August 2021