

KALDEWEI



Code of Conduct

FRANZ KALDEWEI GMBH & CO. KG

KALDEWEI is a German family business that has been creating and manufacturing bathroom solutions for over 100 years and is now in its fourth generation. KALDEWEI combines modern luxury with sustainable thinking, business and action. We have created our own term for this global strategy: Luxstainability®. This describes the corporate philosophy as well as the sophisticated material that makes KALDEWEI products so precious: KALDEWEI steel enamel. Bathtubs, shower solutions and washbasins are made from it and give every bathroom a unique character. Steel enamel impresses with its high-quality surfaces, lifelong durability and 100 percent circularity. With professionalism, passion and respect, we work every day to provide demanding, future-oriented people with luxurious and sustainable sanitary solutions. These high standards within the company illustrate how we think: not in quarters, rather in generations.

Franz Kaldewei GmbH & Co. KG (KALDEWEI) undertakes to comply with this Code of Conduct.



CODE OF CONDUCT

1. LAWFUL, LEGAL AND ETHICAL BEHAVIOUR

Every employee should work in the interests of our good reputation. Therefore, as part of their entire business activities for KALDEWEI, every employee is obliged to comply with the following requirements, the laws applicable at home and abroad and other relevant regulations, basic ethical values and to comply with the other contents of this Code of Conduct.

As within our company, we always behave respectfully and professionally towards our customers, suppliers and other business partners. The same applies to authorities and officials.

Conversely, we also expect all of our business partners, in particular customers, suppliers, financing partners and consultants, as well as other potentially affected groups and relevant interest groups, to behave lawfully and ethically.

2. HUMAN RIGHTS PROTECTION INCLUDING WORKERS' RIGHTS

We are committed to the principles of the United Nations Global Compact, the International Charter of Human Rights of the United Nations, the international conventions on civil and political rights as well as on economic, social and cultural rights and the core labour standards of the International Labour Organisation (ILO). In particular, we take appropriate measures to ensure the prohibition of any types of child labour in accordance with the ILO core labour standards, the ban on the employment of persons in forced or compulsory labour, any form of slavery, slavery-like practices, servitude or other forms

of domination or oppression in the workplace. KALDEWEI takes appropriate measures to comply with the ban on compulsory expropriation. If national law and these international human rights standards differ, KALDEWEI must follow the higher standard; in the event of conflicting standards, KALDEWEI will endeavour to respect internationally recognised human rights as much as possible.

Diversity is important to us. We guarantee all employees a working environment without any form of discrimination. Employees are not selected on the basis of national or ethnic origin, social background or health status, disability, sexual orientation, age, gender, political opinion, religion or ideology, unless this is justified by the requirements of the employment. This also includes equal pay and the avoidance or elimination of harassment and insults.

KALDEWEI guarantees the legally required occupational safety including the compliance with legally stipulated working hours. For us, occupational health and safety means identifying, assessing and reducing actual and potential accident and health risks, the recording and investigation of incidents, the training and instruction of employees in a form they can understand, the provision of suitable work equipment and protective equipment, ensuring appropriate structural, electrical and fire safety, as well as appropriate measures for emergency preparedness and response. In addition, KALDEWEI ensures access to water, adequate sanitary facilities and hygiene products.

KALDEWEI guarantees appropriate remuneration and in particular the compliance with national legislation on remuneration, for example minimum wage, social benefits and the use of external personnel, regardless of the contractual structure (e.g. work contract or temporary work).

KALDEWEI employees are free to set up and join an employee representative body or to take part in meetings. This also includes guaranteeing the right to strike.

3. SUSTAINABLE ENVIRONMENTAL AND CLIMATE PROTECTION

Sustainable environmental and climate protection as well as resource efficiency are important corporate objectives for us. In particular, we adhere to applicable laws, regulations and other environmental protection rules. When developing new products and services as well as when operating production facilities, we ensure that all resulting impacts on the environment and climate are kept as low as possible and that our products make a positive contribution to environmental and climate protection. This also applies to the handling of water, whereby pollutant-intensive production processes are controlled. By pre-treating the wastewater internally, we ensure that the specified limit values in the regulations are adhered to.

Environmental and energy goals are based on the purpose, type and extent of environmental impacts. The necessary financial, personnel and structural requirements to achieve these goals are ensured. Environmental and energy data are

regularly determined and checked. Our goals take into account the context of the corporate group with external and internal issues, the expectations and requirements of interested parties as well as the resulting opportunities and risks. KALDEWEI particularly aims to reduce Scope 1 and Scope 2 emissions and the associated contribution to climate change.

4. RESOURCE CONSERVATION AND CIRCULAR ECONOMY

All employees have the responsibility to treat natural resources with care and to contribute to protecting the environment and climate through their individual behaviour. KALDEWEI takes measures to avoid soil, water and/or air contamination, harmful noise emissions or excessive water consumption that is likely to significantly impair the natural basis for the preservation and production of food, deny a person access to safe water, impede or destroy a person's access to sanitary facilities or harm a person's health.

Conservation of resources and reuse of materials form an essential component of our environmental protection strategy. As far as economically possible and technically feasible, our products are designed with circular economy and reuse in mind. When using materials, we observe health and environmental protection requirements. Wherever possible, products are made from recycled or reusable materials. Waste is avoided as much as possible.

5. ANTITRUST AND COMPETITION LAW, CORRUPTION AND MONEY LAUNDERING BAN, DATA PROTECTION

The business decisions of KALDEWEI comply with applicable antitrust and competition law. This includes the prohibition of abuse of a dominant market position and participation in other anti-competitive business practices.

Any form of corruption must be avoided. Employees may not participate directly or indirectly in acts of bribery, whether by accepting or granting advantages in order to influence a decision in business practice or the exercise of office, neither in relation to business partners nor to public officials.

We take appropriate measures to comply with legal obligations to prevent money laundering and the financing of terrorism. Money laundering means that the origin of illegally obtained money, e.g. from terrorism, drug trafficking, organised crime or other crimes, is concealed by smuggling it into the legal economic cycle, thereby creating the appearance of legitimacy.

KALDEWEI takes appropriate measures to protect data and ensure the information security of personal data.

6. PREVENTION OF CONFLICTS OF INTEREST

We expect loyalty to KALDEWEI from our employees. Every employee must avoid situations in which their private interests, including the interests of people close to them, come into conflict with company interests. Business decisions must not be influenced by private interests.

7. EXPORT CONTROL, INTERNATIONAL BUSINESS RELATIONS

KALDEWEI complies with all applicable export control and sanctions regulations. In particular, no deliveries of goods or services will be made to countries or to persons or organisations to the extent that this is prohibited by applicable law. Every employee who is involved in the export of goods or technical support must check the legality of the activity with the greatest care.

8. DEALING WITH PROPERTY AND ASSETS

We always expect our employees to handle property and assets properly and carefully – including the intellectual property of KALDEWEI. Every employee must protect our property and assets from loss, damage, misuse, theft, embezzlement and destruction.

9. CONTACT PERSON FOR COMPLIANCE

If you have any questions or suggestions about compliance at KALDEWEI, you can contact us at any time. KALDEWEI can be notified of violations or impending violations of this Code of Conduct at any time via the whistleblower system set up at

<https://customer-portal.smartintegrityplatform.com/de/kaldewei-122/third-party>

The whistleblowers will be informed about the processing and the result.

When submitting information, the legitimate interests of business partners and the rights of employees, in particular with regard to the protection of data and business secrets, must be protected; the same applies to violations or impending violations by subcontractors of the business partners.

The business partners must inform those potentially affected about the rights arising from this Code of Conduct and point out the possibility of reporting violations to KALDEWEI. Email of the whistleblower system:

<https://customer-portal.smartintegrityplatform.com/de/kaldewei-122/third-party>

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