

A central image showing two hands of different skin tones clasped together in a supportive gesture. The background is a collage of geometric shapes in various shades of blue and white, with some shapes containing faint patterns like gears or grids.

Code of Conduct

**Creating value
with respect**

The behavioural guidelines
for employees of the GKD Group

FOR A HEALTHIER, CLEANER, SAFER WORLD



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Technical weavers for industry and architecture

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Chairman of the Supervisory Board: Bernhard Kunsmann | Registered office of the company: Düren | Düren Register Court HRB 2915
 Tax ID:DE 122282386



From left to right:
Ilonka von Bodman,
Lara Kufferath,
Dr. Daniel Holstein

Foreword by the Executive Board

As an expert in weaving technology and solution provider for mesh-based products, GKD - Gebr. Kufferath AG and its subsidiaries form one of the world's leading metal weaving companies. As a family-run company, GKD not only stands for innovative products of the highest quality, but also for reliability both as an employer and for its basis of stable customer and supplier relationships.

Compliance with the law is a matter of course for us. High ethical standards and a focus on sustainability shape our actions and contribute to our economic success. We are committed to our social responsibility towards our employees, business partners and the community. With our products and everything we do, we want to make the world healthier, cleaner and safer. Preserving the environment and conserving natural resources is therefore of particular importance to us. This Code of Conduct summarises the most important principles of our business activities. It provides our employees with a framework for dealing with each other and for their behaviour towards business partners and the public.

We ask all employees to familiarise themselves with our Code of Conduct, to implement it in their daily work and to use it together with us as a guideline for our daily actions.

The Executive Board

Lara Kufferath, Dr. Daniel Holstein, Ilonka von Bodman

Date: November 2025

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Who we are, what we strive for

Our value base

Sustainability is the basis of everything we do worldwide¹. It forms a common vision for our business activities. To make it clearer what we mean by this in concrete terms, we have created an **overarching values mission statement**² for GKD. It is based on clearly defined values and ideals.

- ◆ **Commitment** – Working together to find the best solution
All employees at GKD bring their own skills and ideas to the table. We want to encourage this and give commitment the space it needs to flourish. We ensure understanding so that our employees can always think and act with an integrated approach. We always remain curious and open and focus on sustainability and long-term growth in the most integrated and committed way possible.
- ◆ **Development** – Ready to break new ground
Our customers and partners see us as problem solvers. This is also reflected in our corporate culture. Constructive suggestions and concepts for solutions are received openly and with curiosity in the teams. We challenge and encourage our employees to constantly develop their skills and come up with new solutions.
- ◆ **Reliability** – the basis for trust
Our reliability is highly valued by our customers and partners worldwide. Because reliability creates trust and is an essential element of any collaboration. Whether in our relationships with customers, suppliers and partners, or with each other as a team – we at GKD are proud that you can rely on us. In terms of strategy, too, long-term and sustainable goals always take priority at GKD.
- ◆ **Respect** – diversity that enriches us
Respectful behaviour is essential to GKD's corporate culture. Whether internally or externally, constructive and respectful dialogue is always beneficial, especially when different opinions clash or a challenge is perceived from different perspectives. Flat hierarchies and an open and honest feedback culture help us to develop innovative solutions internally. This creates trust and an environment in which everyone can flourish.

We can significantly influence GKD's success if we align our actions and behaviour with such clearly defined values. This enables us to create a common culture.

¹ Further information on our understanding of sustainability can be found at <https://www.gkd-group.com/en/company/responsibility/sustainability/>
² cf. e.g. on the Internet „What we can rely on“ (<https://www.gkd-group.com/en/career/>)

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How to apply this Code of Conduct

The GKD Code of Conduct is intended to ensure that the aforementioned values are put into practice and to protect the company and its employees. This Code of Conduct applies to all employees of the GKD Group. Our business partners expect us to work with them in a spirit of trust. We can only be a reliable partner if we live according to our values and always remain true to our principles. This Code of Conduct sets out the principles and their significance for the GKD Group (hereinafter referred to as GKD) and its employees.

The Code of Conduct is a key component of a compliance management system and part of GKD's rules and regulations.

All GKD employees are called upon to make these behavioural guidelines and their principles the benchmark for the daily fulfilment of their tasks. To this end, it is necessary to actively and continuously inform oneself about the existing requirements and to take part in the compliance training courses on offer.

If employees have any questions or uncertainties regarding this Code of Conduct, other compliance-relevant topics or the correct behaviour in individual cases, they can confidentially contact people in their local working environment. The same applies in connection with existing GKD guidelines. These are in particular:

- ◆ superiors
- ◆ Compliance Manager
- ◆ the Board of Directors or the local management
- ◆ the HR department
- ◆ or – where available – the employee representatives.

Employees can also contact the aforementioned persons to report violations of this Code of Conduct, laws or existing GKD guidelines. This allows appropriate measures to be initiated and violations responded to.

If employees do not wish to raise concerns locally or do not find adequate support there and wish to report serious violations, they can also use the GKD whistleblower system. The request is processed in this system under the requirement of confidentiality and in compliance with all applicable data protection regulations.

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1. Consequences of misconduct

- ◆ GKD employees undertake to comply with this Code of Conduct. Non-compliance with the Code is taken seriously by GKD and may result in disciplinary action. Violations of this Code of Conduct will not be tolerated by GKD.
- ◆ Employees who have a special responsibility for ensuring compliance due to their position or role in the company are obliged to immediately report specific indications or initial suspicions of a possible substantial compliance violation to their line manager, the Compliance department or the whistleblower system. All other employees are called upon to do the same.
- ◆ GKD does not tolerate violations of the law by its employees. Culpable violations of the law by employees may result in sanctions under labour law, up to and including termination of the employment relationship, based on the applicable labour law provisions. If legal violations result in damage, this can also result in personal liability on the part of employees. Furthermore, courts and authorities may also impose penalties or fines for violations.

2. Role model function and responsibility of managers

- ◆ All managers must ensure compliance with these guidelines in their area of responsibility. All managers are obliged to inform and sensitise employees in their own area about the content and importance of this Code of Conduct. They support their employees to the best of their ability to act in a lawful and value-orientated manner.
- ◆ Managers promote compliance with these guidelines on the basis of trust, transparency and appreciation. Managers at GKD act as role models when it comes to values, integrity and adherence to rules. In particular, they avoid personal conflicts of interest. They communicate to their employees that they take potential compliance risks seriously and that such information is of great value in protecting the company. In their dealings with their employees, managers are open to discussion and also to dissenting opinions.
- ◆ If there are indications of legal violations, these must be consistently followed up. If risks are identified, managers immediately initiate changes to eliminate the risk and proceed in a transparent and prudent manner.
- ◆ Any violations identified and measures taken to eliminate the risk must be documented.
- ◆ In addition, managers must inform themselves about the rules and regulations that apply in their own area of responsibility.
- ◆ Managers are obliged to report concrete indications or initial suspicions of a substantial breach of regulations without delay.

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Laws and regulations

As a company, we are committed to complying with the applicable laws and regulations

- ◆ All employees are committed to the idea of compliance. Compliance means that all GKD employees adhere to applicable laws, regulations and guidelines at all times and in all parts of the world. Any practice of circumventing laws or questioning their application will not be tolerated at GKD. The same applies to technical specifications.
- ◆ We provide employees with external legal advice in various areas of law to help them identify and interpret the applicable law. In individual cases, we also offer further opportunities to acquire the knowledge required to comply with the relevant laws and regulations.
- ◆ We comply with the respective **foreign trade legislation**. For GKD's business activities, compliance with trade regulations means observing all relevant regulations on the import, export and domestic trade of goods, technology, software and services as well as all international sanctions.
- ◆ We do not maintain business relationships with companies or individuals that violate national or international regulations on economic sanctions in the fight against **money laundering and terrorist financing**. By complying with specified sanctions lists, GKD employees ensure that all forms of corporate crime are prevented.



● **What we expect from our employees**

Every single employee of GKD is required to comply with the law and GKD's guidelines.

We provide our employees with tools and the necessary knowledge to do this.

- ◆ Employees take part in training courses on legal compliance and adherence to the GKD guidelines.
- ◆ The requirements of customs and export control law are **always** complied with.
- ◆ The identity of our customers and business partners must **always** be known.
- ◆ In their daily work, our employees **always** remain vigilant and watch out for signs of money laundering activities or unusual and possibly illegal business behaviour.
- ◆ Any suspicion of money laundering or unlawful business behaviour must be reported immediately by employees to their superiors.

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Anti-corruption

We conduct our business in a fair and legal manner

We unreservedly reject **corrupt behaviour** of any kind, including **the acceptance of advantages** and **bribery**. Employees, representatives and others acting in the name of or on behalf of GKD are prohibited from exerting any form of illegal influence. This also includes bribes paid or received by our business partners on our behalf.



● **What we expect from our employees**

- ◆ Corruption is generally avoided by ensuring that business relationships are transparent and reliable and that objective, comprehensible criteria are used for awarding contracts, such as quality, cost-effectiveness and reliability.³
- ◆ **Anything** that could give the mere appearance of undue influence is **prohibited**. GKD is resolutely committed to combating bribery, favouritism and corruption. Corrupt behaviour by employees is not tolerated.
- ◆ Gifts, invitations and gratuities may **only** be accepted within an appropriate framework and in accordance with internal regulations. Business decisions must not be influenced by this. If you are affected by an attempt at bribery by a third party, report this to your line manager immediately.
- ◆ Gifts, invitations or gratuities are **never** solicited and inappropriate gifts, invitations or gratuities must **always** be refused.⁴
- ◆ The acceptance of secondary employment and mandates must not lead to conflicts of interest and therefore **always** requires the prior authorisation of the manager.

Donations and sponsoring

Practising social responsibility

It is important to us to give something back to society and to support the communities in which we operate. GKD supports initiatives at various locations that strengthen social development.

³ cf. also the guidelines for responsible collaboration in their currently valid version.

⁴ Detailed information and guidelines on this topic can be found in the internal rules and regulations.

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- ◆ Donations are made exclusively to charitable organisations, while our sponsorship is carried out for marketing reasons.
- ◆ Donations and sponsorships are never used to improperly influence decision-makers.



● **What we expect from our employees**

- ◆ Ensure that donations and sponsorships are made in accordance with the applicable guidelines and are authorised by the local management.

Conflicts of interest

We make our business decisions objectively and in the best interests of the company

We respect the privacy of our employees. However, a conflict of interest may arise if the personal, social or financial activities of employees impair or could potentially impair their objectivity and loyalty to GKD.



● **What we expect from our employees**

- ◆ Employees' personal relationships with customers, suppliers, applicants or authorisation-relevant decision-makers at GKD authorities that could influence decisions within the scope of their professional activities must **always** be reported in writing to their superiors.
- ◆ External business relationships such as administrative mandates, appointments or shareholdings in competing companies or business partners (customers, suppliers, service providers) of GKD must **always** be declared in writing to the superiors
- ◆ Superiors must **always** be informed in writing of any conflicts of interest in order to ensure proper documentation in such cases.

Fair competition

We conduct our business in a fair and legal manner

- ◆ We do not participate in price fixing, market sharing, production restrictions, bid rigging and other practices that contradict, restrict or distort fair competition. We comply with applicable **competition** and **antitrust law**.
- ◆ In situations where we are the market leader, we do not abuse our leadership position or violate legal requirements.

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● **What we expect from our employees**

- ◆ Information on pricing and other business matters is never passed on to third parties outside GKD. This applies in particular to industry meetings and events organised by trade associations at which competitors may be present.
- ◆ Agreements with competitors regarding pricing must be excluded.
- ◆ In the event of market leadership, GKD will not use this position to the detriment of customers and competitors.
- ◆ If third parties offer you information relevant to competition or if employees of a business partner or a third party attempt to enter into an illegal agreement with you, inform your line manager immediately.

Company values and confidential information

We handle company values carefully and responsibly and ensure that company assets and confidential information are protected

Company values and information are essential for achieving our business goals. All assets and data used or secured within the company are the property of GKD and must be protected against damage, misuse or loss.



● **What we expect from our employees**

- ◆ It must **always** be ensured that all items of company property (e.g. vehicles, tools, spare parts, office materials, documents, computers, data carriers, etc.) are only used for business purposes. Exceptions require a separate agreement.
- ◆ Information is one of GKD's most important assets. Information that provides unauthorised insights into GKD's business processes or is classified as business secrets must **not** be disclosed **under any circumstances**. Particular caution is also required when exchanging information in electronic networks.
- ◆ It must **always** be ensured that data and information that becomes known within the company is used exclusively within the authorised scope and that, when it is passed on within and outside the company, it is checked whether the recipients are authorised to receive the data and information.
- ◆ Information technologies require special security awareness. The protection regulations/IT security regulations issued by the IT departments must be observed and strictly adhered to. For example, attachments from e-mails, applications (apps) and downloads from the Internet or other files brought in must not be opened or installed without being checked.

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- ◆ Depending on the importance of the information, it must be ensured that additional **security measures such as confidentiality obligations or audits** are effectively agreed.
- ◆ GKD is in possession of **patents**. In addition, GKD possesses trade and business secrets as well as technical expertise. In order to secure our competitive edge, these innovations and skills must be protected from imitation in the best possible way. Every employee must act responsibly and carefully when using information relating to our patents and innovations and protecting trade and business secrets and technical expertise. The employees responsible for the business processes are required to organise business processes in such a way that misuse is prevented.
- ◆ **Confidential information from third parties and their expertise** must also be respected and protected. We only utilise third-party knowledge insofar as it is lawful or known to us from generally accessible sources. It must be ensured that third-party industrial property rights (patents, trademarks, etc.) are respected and only used with the authorisation of the respective property right holder.

Human rights

We respect and protect internationally agreed human rights

We respect and protect the globally applicable regulations for the protection of people and children's rights (hereinafter referred to as human rights).⁵ We ensure that GKD is neither directly nor indirectly complicit in human rights violations. GKD rejects any form of oppression and harassment. We take human rights due diligence seriously and also ensure compliance in our supply chain.⁶

5 This is based on the Universal Declaration of Human Rights of the United Nations and the European Convention as well as the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO).

6 More detailed information on this can be found in the guidelines for responsible collaboration in their currently valid version. At the time of publication of this Code of Conduct, GKD does not fall under the scope of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG)

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Health and safety

Understanding needs and providing security

We pay attention to safety! Our aim is to ensure that every single employee works in a safe and healthy environment, regardless of where we are in the world.



● **What we expect from our employees**

- ◆ Care must **always** be taken to ensure a safe and healthy working environment for all employees. Binding and specified safety standards are followed for this purpose. Managers have a special function here as role models.
- ◆ The specified personal protective equipment must be used and participation in GKD's health prevention measures must be ensured.
- ◆ We endeavour to continuously improve safety in the workplace. Report any suggestions that may contribute to this to your line manager or the relevant occupational safety office.

Diversity and inclusion

Creating a work culture in which everyone feels equally heard and included

- ◆ The diversity and uniqueness of our employees are the driving force behind GKD's performance and innovative strength. GKD is characterised by its committed and competent employees. Every person is respected as an individual. Our dealings with one another are shaped by appreciation, mutual understanding, openness and fairness. We therefore promote diversity and combat all forms of discrimination.
- ◆ We consistently reject any form of discrimination, in particular with regard to gender, ethnicity, origin and nationality, as well as religion and ideology, political, social or trade union activity, sexual identity and orientation, physical and mental limitations or age.
- ◆ We do not tolerate any form of harassment in the workplace, especially sexual harassment. It does not matter whether a perpetrator considers their own behaviour to be acceptable or whether the person affected has the opportunity to escape the harassment. Every single person has a right to be protected from this. Every manager is a role model in their own behaviour and must ensure a working environment free of discrimination and harassment.

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● **What we expect from our employees**

- ◆ A respectful approach to cultural differences.
- ◆ Decisions within the scope of the respective activities at GKD are **always** on the basis of individual performance in order to avoid discrimination.

Environment

GKD wants to make the world healthier, cleaner and safer. Environmental protection and sustainability are therefore particularly important to us.

- ◆ We always ensure compliance with environmental protection laws and standards.
- ◆ Our aim is to develop products that are particularly environmentally friendly, climate-friendly and energy-efficient in their respective market segment. We design our products to be environmentally friendly and energy-efficient, taking the entire product life cycle into account.
- ◆ We bear ecological responsibility and use the resources provided in a sustainable manner. We avoid and reduce waste and emissions as far as possible. We respect and comply with the regulations for the preservation of biodiversity and species diversity.
- ◆ Our aim is to achieve an exemplary environmental and energy balance and to reduce climate-damaging CO₂ emissions.



● **What we expect from our employees**

- ◆ Sustainable use of the resources provided, including a reduction in waste and minimisation of energy consumption.
- ◆ Submitting suggestions for improvement if you notice something that could help to conserve resources, avoid waste and reduce energy consumption.

Personal rights and data protection

We respect data protection as a personal right

- ◆ Anyone who entrusts us with data can rest assured that it is safe with us. When handling personal data, we comply with the applicable laws and regulations, such as the EU's GDPR. This includes the handling of non-personal data. We ensure that all data is secure with us and thus protected against unauthorised access by third parties.

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- ◆ We are committed to the principles of economical storage of personal data and transparency in data processing. With this claim, we ensure a standardised and appropriate level of data protection throughout the Group and respect the right to informational self-determination.



● **What we expect from our employees**

- ◆ Careful and responsible handling of personal data and confidential data to which employees have access.
- ◆ To only pass on personal and other confidential data if this is required by the receiving organisation for its work.
- ◆ Personal and other confidential data must always be protected against unauthorised access.

Compliance and whistleblowing

Making suspicious activity reports transparent

All GKD employees are required to observe and implement these behavioural guidelines and their principles and to make them the benchmark for the daily fulfilment of their tasks. We encourage our employees and business partners to report suspected cases of potentially unethical or illegal behaviour. In the event of suspected cases, supervisors should be contacted or information sent to the e-mail address compliance@gkd-group.com.

Employees can also use the GKD whistleblower portal to report serious violations in particular. When a report is made via the whistleblower portal, a particularly high degree of confidentiality is guaranteed regarding the reporter's identity.

We recommend reporting suspected cases in the following serious circumstances in particular:

- ◆ Fraud
- ◆ Corruption and bribery
- ◆ Gross violations of regulations for the protection of health, safety and the environment
- ◆ Unethical behaviour at management level
- ◆ Discriminatory behaviour at management level
- ◆ Violation of competition or antitrust law.

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