

A central image showing two hands clasped together in a supportive grip, set against a background of geometric shapes in various shades of blue and white. The hands are positioned in the upper left quadrant of the cover.

Code of Conduct

Guideline

Working together
responsibly
at GKD

FOR A HEALTHIER, CLEANER, SAFER WORLD



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Technical weavers for industry and architecture

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

Preamble

As an expert in weaving technology and solution provider for mesh-based products, GKD - Gebr. Kufferath AG, together with its subsidiaries, is 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 as the basis for stable customer and supplier relationships.

Compliance with the law is a matter of course for us. High ethical standards characterize our actions and contribute to our economic success.

We are committed to our social responsibility towards our employees, business partners, and the community. Sustainability is particularly important to us. We always strive to protect the environment and conserve natural resources in everything we do.

This Code of Conduct summarizes the most important principles of our corporate activities.

We expect the same behavior from our business partners. For future cooperation, the contracting parties agree that the following provisions for a joint code of conduct shall apply.

The contracting parties undertake to comply with the principles and requirements of the Code of Conduct and to endeavor to contractually oblige their subcontractors to comply with the regulations and standards set out in this document.

A breach of these regulations may be reason and cause for GKD to terminate the business relationship, including all associated supply contracts.

The Management Board

Lara Kufferath, Dr. Daniel Holstein, Ilonka von Bodman

Updated: November 2025

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1. Objective

Interest and classification of this guideline

This guideline for our partners declares which rules and principles of conduct GKD expects and must be complied with when working with suppliers and other partners* ¹ By partners we mean companies, organizations, or institutions that directly provide goods or services for GKD, as well as institutes and institutions, particularly in the university environment, that work together with GKD. The same applies to third parties acting on behalf of GKD.

For our procurement organization, this policy is a general basis for contract decisions and the selection of business relationships. It serves GKD as a **reference for the selection and retention of all partners worldwide.** As a global group of companies, we are aware that there are **different legal, cultural, and ethical frameworks** in the countries and regions in which we and our business contacts operate. The implementation of this guideline may vary depending on local circumstances, but must not lead to the circumvention or abandonment of our principles. This guideline makes the criteria for this clear and comprehensible for all partners.

This guideline serves to promote and institutionalize due diligence in the operations of our business partners in order to achieve or exceed the applicable nationally and internationally recognized standards. We see this as a prerequisite for a business relationship.

GKD will **continuously adapt and develop** this guideline. To this end, we would also like to exchange ideas with our partners - so that we can all work together to achieve ever greater sustainability.

2. Compliance and integrity

Communicate framework, expectations for action, and requirements

This guideline reflects our commitment to conducting business with compliance and integrity.

- ◆ **Compliance** means that all companies in the GKD Group will 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 is not permitted at GKD and its business contacts.
- ◆ **Integrity** means that we at GKD assume responsibility beyond the legal requirements if we consider this to be ethically necessary. Therefore, this guideline also sets out the moral objectives that GKD follows and the fundamental values for which GKD takes responsibility.

¹ Since the term "partner" in this document does not primarily refer to persons, but rather to companies, facilities, organizations, institutions, etc., we have decided to use the masculine form for better readability.

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This guideline serves as a basis for holding our business partners accountable **for compliance with important guiding principles and international standards**. GKD aims to create a **consistently responsible and effective supply and value chain**. Accordingly, we look for partners who share and promote our commitment to human rights and our guiding principles in equal measure.

We have the following special expectations of our partners:

1. **All applicable local legislation is complied with by our partners in the respective countries**, including laws, regulations, and legal requirements in the following areas: Human rights, labor, environment, anti-corruption, trade, and customs. Should conflicts arise between local legislation and international norms and standards² as well as GKD-specific standards and certification requirements (e.g., ISO standards, etc.), GKD is expected to be informed. GKD refers to the following guidelines as international standards:
 - ◆ United Nations Guiding Principles on Business and Human Rights,
 - ◆ United Nations Convention against Corruption,
 - ◆ OECD Guidelines for Multinational Enterprises on Responsible Business Conduct,
 - ◆ ILO Declaration on Fundamental Principles and Rights at Work and
 - ◆ The Ten Principles of the United Nations Global Compact.
2. **Business is conducted in accordance with fair and intensive competition** and in compliance with applicable antitrust law. They comply with all applicable antitrust and competition laws and fair trade practice laws, both in letter and in spirit.
3. **All applicable import and export control laws**, regulations and sanctions of the country in which affiliates are located, the United States and any applicable country in which transactions are conducted (including import, export, re-export, transfer or disclosure) will be complied with. This includes all types of transactions of goods, software, technology or technical assistance that may be subject to trade restrictions, regardless of the nature of the transfer. We expect direct suppliers to the GKD Group to have an **EcoVadis certificate**³ or an equivalent supply chain certification. Suppliers must cooperate with GKD in determining applicable export control restrictions. In addition, we expect our suppliers to also monitor their respective suppliers⁴.
4. **All marketing and advertising materials and activities** meet high ethical and scientific standards. They comply with the locally applicable laws and regulations.

2 United Nations Guiding Principles on Business and Human Rights: <https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights>
 OECD Guidelines for Multinational Enterprises on Responsible Business Conduct: <https://doi.org/10.1787/81f92357-en>
 The Ten Principles of the United Nations Global Compact: <https://unglobalcompact.org/what-is-gc/mission/principles>
 ILO Declaration on Fundamental Principles and Rights at Work: <https://www.ilo.org/ilo-declaration-fundamental-principles-and-rights-work>
 United Nations Convention against Corruption: <https://www.unodc.org/unodc/en/treaties/CAC/index.html>

3 Find out more here: <https://www.gkd-group.com/de-de/agb/#1689160510079-c6724aa7-0568c263-f389>

4 GTC | GKD Group – [gkd-group.com](https://www.gkd-group.com)

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5. **Any form of bribery, corruption, extortion, money laundering, or embezzlement is prohibited.** Partners may not grant benefits, offer, pay, or accept money. This also applies to illegal inducements (e.g., bribes) and any unlawful influence in business or government relations. Furthermore, no intermediaries (e.g., subcontractors, wholesalers, agencies, consultants, or other third parties) may be used to handle or support such activities. Partners must take action against bribery, corruption, extortion, money laundering, and embezzlement in all forms, including through effective fraud prevention and reporting programs. You must report to GKD all incidents of fraud (confirmed or under investigation) in connection with transactions with GKD, regardless of their materiality.
6. **Gifts, gratuities, hospitality, meals, or entertainment** may not be offered to influence business relationships in their favor – neither to employees at GKD, nor to representatives of governments or regulatory authorities, nor to other persons who could be influenced in their decisions.
GKD employees may not directly or indirectly accept items of value because GKD is committed to ethical business practices. Conflicts of interest – in practice or in appearance – run counter to fair treatment and a good procurement policy.
7. **Any concerns, illegal or irresponsible activities within the meaning of these guidelines and in connection with transactions with the GKD Group must be reported.** No reprisals, intimidation, or harassment should be feared; investigations and corrective measures should be initiated if necessary.

We expect verifiable evidence of training courses, relevant certificates for general compliance training or comparable evidence (e.g., sustainability report or similar) on request to ensure compliance with this guideline. We expect our partners to work with us as equals, characterized by respectful interaction and clear, prompt communication. If our expectations are not met in accordance with this guideline, this will lead to a reassessment of the business relationship. If this reassessment leads to a permanently negative result, business relationships will be abandoned or not entered into.

3. Human rights and occupational health and safety

Living social and societal responsibility

Partners, especially suppliers in the supply chain, must support and respect the protection of internationally agreed human rights and ensure that they are not complicit in human rights abuses. This is based on the **United Nations Universal Declaration of Human Rights of 1948**. In addition, the general, international, and national occupational health and safety and social standards must be complied with.

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These include in particular:

- ◆ the ILO labor standards,
- ◆ the United Nations Guiding Principles on Business and Human Rights (UNGPs)
- ◆ and the Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD).

GKD will never knowingly engage suppliers or select partners who, directly or indirectly through a third party, violate these fundamental principles. We expect partners to be firmly committed to the application of these fundamental rights and safeguards and not to tolerate non-compliance either in their own operations or in those of third parties with whom they do business.

We have the following **special expectations** of our partners:

1. The use of child labor is not tolerated. We define "child labor" as work or service by persons under the age of sixteen (16), the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher. GKD recommends participation in lawful on-the-job training programs as long as they comply with all applicable laws and are consistent with Articles 6 and 7 of the ILO Minimum Age Convention No. 138 on Vocational or Technical Education and Training and Light Work.
2. **Employment relationships with under-18s** may only involve non-hazardous work (as defined in ILO Convention No. 138 and 182). These are only permitted if the young employees have reached the statutory minimum age for employment or are no longer of compulsory school age. Suppliers are expected to comply with all legal requirements for the work of authorized young employees (under the age of 18), in particular work that may endanger the health or safety of these young employees. Particular attention is expected to be paid to requirements relating to working hours, wages, working conditions, and the handling of certain materials.
3. All **forms of forced, slave, convict, or bonded labor** are not tolerated. Following Article 2 of ILO Convention No. 29 on Forced Labor, GKD defines "forced labor" as any work or service which is not performed voluntarily and which is exacted from any person under the menace of any penalty and/or under conditions which are unreasonably burdensome. These may include, but are not limited to, the confiscation of official identification, a passport, or work permit, or other restrictions that limit the free will of employees in relation to work. GKD defines "convict labor" as any work performed by a convicted person on or outside the prison grounds. The definitions of slavery and debt bondage, as adopted by GKD, can be found in the ILO's Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery⁵ in Articles 1 and 7.
4. Decisive action against all forms of slavery is a prerequisite. We are aware that so-called "**modern slavery**" can take place in any country, mostly – but not only – in the context of contractors and their subcontractors. Any form of slavery is incompatible with our ethical principles.

⁵ See here: https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---normes/documents/normativeinstrument/wcms_c182_de.htm

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5. Providing a **work environment that is free from cruel and inhuman treatment or the threat thereof**, including sexual harassment, sexual abuse, corporal punishment, verbal abuse, and other psychological or physical coercion.
6. Employees must be paid on time and in accordance with the applicable wage laws (including compliance with minimum wages, overtime regulations, and other prescribed employee benefits).
7. Discrimination in any form will not be tolerated or accepted, in particular with regard to gender, descent, origin, and nationality, as well as religion and ideology, political, social, or trade union activity, gender identity and orientation, physical and mental limitations, or age. All companies in our value chain are required to **pursue and support this goal of diversity**. They should provide a working environment that is free from harassment and discrimination.
8. **Open communication and direct discussions with employees** and, where appropriate, with trade union representatives to resolve problems relating to the workplace or pay should be encouraged. The labor laws laid down in local laws, e.g., with regard to freedom of assembly, joining or not joining trade unions, being represented and joining works councils, must be respected. Employees must be able to speak openly with management about working conditions without fear of reprisals, intimidation, or harassment.
9. It must be ensured that the products supplied to GKD **do not contain any metals from minerals or their derivatives that originate from conflict areas** in which armed groups commit serious human rights violations or which are directly or indirectly financed or favored by such groups.
10. A **safe, clean, and healthy working environment must** be provided. This also includes any accommodation provided by a company. In particular,
 - ◆ employees of all genders and ages must be protected from overexposure to chemical, biological, and physical hazards and physically demanding tasks in the workplace and in company accommodation;
 - ◆ appropriate controls, safe working procedures, preventive maintenance, and necessary technical precautions must be set up to reduce health and safety risks;
 - ◆ employees must be provided with suitable personal protective equipment if hazards cannot be adequately controlled as a preventive measure; steps to prevent accidents in accordance with the continuous improvement program must be determined, evaluated, and initiated;
 - ◆ employees must be provided with appropriate training in the areas of health, safety, product stewardship, and the environment.
11. Programs for prevention and reduction in the event of an **unintentional release of chemical or biological substances in operational procedures and processes** must be demonstrably presented to the GKD Group by the supplier (e.g., in the form of a process description). The programs must be risk-appropriate in relation to the facilities.
12. Risks of potential **emergency situations in the workplace and in company accommodation** must be identified and assessed, and their effects minimized through prevention, emergency plans, and response procedures.
13. Safety information relating to hazardous substances, including active pharmaceutical ingredients and intermediates, must be available to **instruct, train, and protect employees from hazards**.

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4. Environment and species protection

Our partners work in an environmentally conscious and efficient manner and minimize the negative environmental impact of their business activities, as is standard practice for the companies in the GKD Group. For us and our business contacts, sustainable business means conserving natural resources, contributing to the longevity of our products, as well as reusing and recycling. Hazardous substances should be avoided where possible. **Appropriate management systems for environmental and safety programs and for product stewardship** are used to avoid risks in this regard. We also expect our partners to train their employees in the areas of the environment, sustainability, and product responsibility. To combat global warming, we are working with our **partners to set ambitious targets for avoiding CO₂** in order to support the respective national and international climate neutrality goals.

We have the following **special expectations** of our partners:

1. To ensure and guarantee the **objectives of the United Nations Convention on Biological Diversity (UN CBD) and the Nagoya Protocol** as well as to address the aspects of biodiversity that are relevant to activities in business and supply chains. This includes all materials of plant, animal, or microbial origin or traditional knowledge that are supplied to GKD and are subject to the applicable laws. This concerns the laws on access to genetic resources and the sharing of the resulting profits in accordance with the UN CBD and the definitions in the country of origin of the material in question. It also applies to access measures to genetic resources in accordance with the Nagoya Protocol and the fair and equitable sharing of the benefits arising from utilization.
2. When **manufacturing, using, and disposing of the products or providing services**, our partners must ensure that the promised properties are fulfilled and function as agreed.
3. Verification that all materials used in the manufacture of GKD products or the sale of products to GKD have been sourced in accordance with all **applicable local environmental laws, regulations, and requirements in the respective partner country**, as well as the international standards mentioned above (see footnote 2).
4. **Substances that pose a hazard if released into the environment** must be identified, handled with care, and comply with applicable labeling laws and regulations for recycling and disposal to ensure safe handling, transfer, storage, recycling, reuse, and disposal.
5. Where **specific applicable environmental regulations** must be met, the necessary environmental permits, licenses, information approvals, or restrictions must be proactively submitted with the order and other necessary operational and reporting requirements must be followed.
6. Use of systems to ensure the handling, disposal, storage, transportation, reuse, or control of waste, air emissions, and wastewater discharges.
7. The release of active pharmaceutical products into the environment (PIE) poses a particular risk and should be minimized to scientifically sound standards. Waste, waste water, or emissions with a potentially negative effect on human health or the environment must be disposed of appropriately, controlled, and treated before being released into the environment.

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8. Use of **systems to prevent and minimize accidental leaks and discharges into the environment** in order to prevent negative consequences for the local population.
9. Taking continuous **measures to increase efficiency and reduce the consumption of natural resources**. A system for recording and minimizing CO₂ emissions in accordance with the Greenhouse Gas Protocol must be set up. The origin of critical raw materials must also be carefully examined in order to promote legal and sustainable procurement in accordance with European law.

5. Handling information and data protection

Partners are obliged to respect and apply the **laws on the protection of personal data and data privacy** that apply to them. They use personal data (e.g., of patients, employees, or customers) in accordance with the data protection regulations that apply to them (e.g., the GDPR in Europe).

Partners must protect **confidential information**, including personal data, received from or processed on behalf of GKD and actively prevent any loss, misuse, theft, fraud, unauthorized access, disclosure, or alteration. This also includes unauthorized communication and/or publication of information obtained or procured by or for GKD.

All partners must ensure and demonstrate that they have implemented the necessary security measures to protect personal data and other confidential information. Unauthorized use, disclosure, and any loss of confidential data in connection with GKD must be reported to compliance@gkd-group.com

6. Acknowledgment and approval

Partners confirm bindingly that they have read and understood this Code of Conduct. They undertake to comply with all provisions of this Code when providing products or services to GKD Group companies.

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