



Kindswater AG corporate ethics guidelines (Code of Conduct)

Kindswater AG is a commercial enterprise with expertise in firefighting technology. Compliance with the applicable legal regulations, integrity and sustainability are an essential part of our corporate culture. Our code of conduct sets out our ongoing commitment to act in accordance with the law, promote justice, respect cultural differences, assume social responsibility and to protect the environment and the wellbeing of the people who work with us along the supply chain.

In particular, the introduction of the Supply Chain Due Diligence Act specifies minimum legal standards that do not apply directly to us as a medium-sized company, but we also acknowledge that we ourselves are under a similar obligation.

We expect all our business partners and suppliers to act with the same compliance with the law, integrity, fairness, responsibility, honesty and commitment to sustainability.

The principles detailed in this code of conduct for all Kindswater AG suppliers ("Code of Conduct") form an important part of the supplier selection and evaluation process. Our Code of Conduct is valid worldwide and applies to both producing suppliers and service providers and to any other business partners ("Suppliers"). It also forms a mandatory part of all Kindswater AG procurement contracts. We expect our Suppliers to comply with all the principles and obligations described below and to impose such obligations on their subcontractors and vicarious agents.

Compliance with the respective laws, rules and standards

Kindswater AG Suppliers must observe all the applicable laws, rules and legal provisions in the countries in which they are active, and will comply with any internationally recognised environmental, social and corporate governance standards (ESG standards) to continuously improve their performance in terms of sustainability.

Corruption, bribery, breach of trust and fraud

We prohibit any form of corruption, bribery of officials or bribery in commercial transactions, embezzlement of company funds or any theft of company property or the property of third parties. Our Suppliers must observe all the applicable anti-corruption laws, including those that govern acts of bribery outside Germany. This includes, in particular, the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act. We shall neither request or accept from, nor grant or guarantee any bribery payments, kick-back payments or other advantages and benefits to our Suppliers either to gain business opportunities or in connection with our commercial activities. This excludes any appropriate goodwill with a limited value; however, under no circumstances may the parties request or offer a gift of money.

Conflicts of interest

We make our business decisions based exclusively on factual criteria and shall not be influenced by personal interests and relationships. We will immediately disclose any actual or potential conflict of interest in connection with our commercial activities.

**Fair and free competition**

We observe the concept of fair and free competition and observe the respective laws on competition, in particular antitrust laws. We neither engage in anti-competitive practices with competitors, suppliers and customers nor do we exchange information relevant to the competition and will refrain from any activity or contact that violates antitrust law. Furthermore, we do not abuse any market dominance we may enjoy.

Money laundering and financing of terrorism / financial records

We ensure compliance with the applicable regulations to prevent money laundering and the financing of terrorism. We maintain the appropriate financial records, compile reports in accordance with applicable laws and have implemented a risk management system.

Export controls and customs

We ensure compliance with all the regulations for the import and export of goods, services and information. We comply with the obligations with respect to customs and foreign trade laws in all the countries in which we conduct commercial activities. We observe the current sanctions and embargoes lists.

Data protection

We comply with the applicable laws for the protection of personal data of employees, customers, business partners and other data subjects in accordance with the requirements of the GDPR.

Business secrets and intellectual property

The security and protection of information, business secrets and intellectual property is important to us. We ensure that expertise, patents, intellectual property and confidential information are adequately protected. In particular, we ensure the appropriate protection of our trade and business secrets and third parties and maintain the safety of such.

We shall treat as confidential all technical and commercial information that is not publicly known and of which we become aware within the scope of our business relationship, and shall neither publish nor disclose such information to third parties without prior authorisation or make it available in another form.

Human rights / fair and safe working conditions

We respect internationally recognised human rights, in particular the guidelines on children's rights and corporate activity, the United Nations guiding principles on business and human rights and the labour standards of the International Labor Organization (ILO) as the basis for all our commercial relationships. We are committed to observing the rights of our employees arising from such guidelines, and shall treat our employees in accordance with such.



Prohibition of child labour

We prohibit the use of child labour. We comply with the minimum age for admission to employment in accordance with the applicable legal regulations. Convention 138 of the ILO shall apply accordingly in the absence of any legal stipulations. Convention 138 states that the direct or indirect employment of children under the age of 15 is generally prohibited. Employees under the age of 18 shall only perform work duties pursuant to the legal requirements of their respective country of employment (in particular regarding working hours and conditions) and in compliance with the requirements in terms of education and training. No concerns should arise with respect to their occupational health and safety.

Prohibition of slavery and forced labour

We do not tolerate slavery, servitude or forced labour in any form in the supply chain. This also applies to debt bondage, indentured slavery and involuntary prison labour. Any work duties should therefore be carried out on a voluntary basis at all times. We retain no personal property, passports, salary, training certificates, work or other documents of our employees without a factual or legal basis for such retention.

Freedom of association

We respect the right of our employees to freely choose to join or to form (or not) a trade union/employee representative body of their choice in accordance with the local laws, and to suffer no discrimination, threats, intimidation or other reprisals for so doing. We recognise and respect the free activity of trade unions in accordance with the law of the place of employment, in particular the right to strike and the right to collective bargaining.

Equal opportunities and the prohibition of discrimination

In our own sector we do not tolerate discrimination or unequal treatment based on national or social origin, ethnic and cultural affiliation, religion or belief, political opinion, sexual orientation, trade union activities or discrimination or unequal treatment due to age, gender or abilities.

Occupational health and safety

We ensure occupational health and safety in the workplace within the framework of the applicable laws as a minimum standard. We are committed to implementing the appropriate measures to prevent accidents at work, risks to health and work-related illnesses among our employees.

Violence and harassment in the workplace

We do not tolerate violence in the workplace. This includes direct or indirect threats, threatening behaviour, intimidation, physical attacks and any form of harassment.

**Fair remuneration and working hours**

We ensure that our employees receive reasonable remuneration, which is at least commensurate with the statutory regulations on the minimum wage. In the absence of the corresponding regulations, remuneration will be based on the industry-specific, local remuneration and benefits. Working hours shall not exceed the upper limits stipulated in the applicable laws and are based on the industry standards of the respective national economic sectors. We record and monitor working hours to avoid any unlawful and excessive working.

Ecological responsibility and environmental protection

We take responsibility for making our commercial activities as environmentally friendly as possible. We ensure compliance with the respective national and international environmental laws, regulations and standards, and apply the principle of sustainability to use resources sparingly and to minimise the environmental impact of our production processes, products and/or services. In particular, we ensure compliance with the legal requirements for waste disposal and the storage and handling of hazardous substances.

Product conformity and safety

We produce and commercialise firefighting technology that is frequently used under arduous conditions and high loads; our equipment must therefore meet the highest standards of quality. This demonstrates our claim to ensure our products comply with the applicable legal and official regulations and internal standards. It therefore also requires our Suppliers to develop, manufacture and supply products that conform to the respective standards of the latest, acknowledged state of the art in terms of product integrity, conformity and safety. We observe the product safety, regulatory and technical regulations and requirements applicable in the country of manufacture and at the place of the contractual performance, notably the applicable laws regarding the safety, labelling and packaging of products and the use of hazardous substances and toxic minerals.

Policy regarding conflict minerals

We implement processes pursuant to the guidelines of the Organisation for Economic Cooperation and Development (OECD) to fulfil due diligence to promote responsible supply chains for minerals from conflict and high-risk areas for the conflict minerals tin, tungsten, tantalum and gold and other raw materials such as cobalt. Smelters and refineries without the appropriate, audited due diligence processes should not be used.

Due diligence obligations regarding the supply chain

We implement the appropriate and effective risk management processes to identify and minimise human rights and risks to the environment in our supply chains and to prevent, stop or limit the extent of violations of human rights or environmental obligations, and require our Suppliers to also observe these obligations. This includes implementing the appropriate complaint mechanisms and reporting in accordance with the applicable laws and guidelines.



Commitment of our Suppliers

Kindswater AG Suppliers confirm that they have implemented or are introducing appropriate and effective processes and organisational structures that will ensure compliance with the stipulations of this Code of Conduct. They will also ensure that their employees are aware of and comply with the principles of conduct specified therein and will help them to act in accordance with the law and with integrity. Compliance with the requirements of this Code of Conduct should also be a decisive factor in the selection of subcontractors and vicarious agents. This applies, in particular, to the requirements regarding human rights and environmental issues set out in this Code of Conduct.

Control measures

The Suppliers shall support Kindswater AG in their implementation of the processes required by law and other due diligence processes by actively participating in related initiatives, e.g. self-assessment questionnaires. This also includes the implementation of training on the current status of the respective laws and standards.

Kindswater AG reserves the right, in specific cases, to check compliance with the laws and the requirements specified in this Code of Conduct after prior notice either with the Suppliers themselves or by external experts and in the presence of representatives of the Supplier in accordance with the applicable local legal regulations.

Actions in the event of a breach

We consider compliance with the principles contained in this Code of Conduct to be essential for us and the respective contractual relationship. We will be entitled to require disclosure of all the relevant information if our Suppliers violate the principles contained in this Code of Conduct. In addition, without prejudice to any additional contractual legal remedies, we may terminate the business relationship with the respective Supplier in whole or in part by extraordinary termination, unless the Supplier immediately drafts and implements a concept to halt or limit the breach and to avoid future violations. We reserve the right to temporarily suspend the business relationship while the concept is being implemented. Should our Suppliers become aware of violations of the principles in this Code of Conduct by one of their upstream suppliers, the Suppliers will use their best endeavours to ensure their conduct complies with the obligations under this Code of Conduct.

Complaint mechanisms, options and protections for whistleblowers

We urge any person who discovers any violations of the provisions of this Code of Conduct to report them to the Kindswater AG Board of Directors. Whistleblowers can contact the Board at: stefan.kindswater@kindswater.com.

Whistleblowers can also report human rights and environmental risks and violations of human rights or environmental obligations under the Supply Chain Due Diligence Act that have arisen or could arise from economic activity in their own commercial sector or at, or through, a direct or indirect Supplier.

We have implemented a whistleblower reporting system for employees and third parties. Reports can then be submitted anonymously or digitally via two channels. There will be no repercussions for reporting a violation. The identity of the person submitting the report will remain confidential as far as possible. Kindswater AG employees who report a violation of the Code will not be subject to disciplinary action provided they themselves have not participated in the violation of such. We will comply with all the obligations under the Whistleblower Protection Act.



Mutual acknowledgement of the parties

Kindswater AG and its contractual partners are committed to the implementation of their own Code of Conduct. Contractual partners consider their Code as equally valid, and it shall not be subject to the other party's Code of Conduct under the contract. The parties shall immediately notify the other party of any substantial amendments to the Code of Conduct.