



# CODE OF CONDUCT AND ETHICS



# OUR CODE OF CONDUCT AND ETHICS

Dear employees and business partners,

We at KOLAR set high standards for ourselves. This not only applies to the quality of our products, but also to the daily work of each and every one of us. We want to ensure that our actions are faultless and exemplary at all times.

The basis for the success and quality of our products are, of course, our employees, alongside high-quality raw materials and the latest technology. Each and every individual contributes through personality, performance, specialist knowledge and behaviour.

This Code of Conduct and Ethics is valid for all employees in the company - for the management and all employees in all areas and positions of the company.

The code of conduct and ethics describes the principles of our open, valued and legally compliant corporate culture, to which we feel obliged and which we give new life to every day.

We always endeavour to offer our customers the best possible quality and dealing fairly with our partners determines how we act. We want to be perceived as a trustworthy partner - among our customers, business partners and employees.



A handwritten signature in blue ink, appearing to read 'Dagmar &amp; Christoph Poindl'.

**DAGMAR & CHRISTOPH POINDL**  
Managing Directors Kolar GmbH

# What is the Code of Conduct and Ethics?

This code therefore contains guidance and rules for ethical and legally proper action and decision-making by all employees of the company.

Our code of conduct and ethics is mandatory for all managing directors and employees.

We want to achieve our goals and always behave correctly, legally, sincerely, and honest.

Our code is based on international agreements as well as ethical standards

and reflects our commitment to core labour standards and business practices.

At KOLAR, we are committed to complying with the applicable legal regulations as well as the applicable internal guidelines and codes of behaviour in all activities and decisions.

We also expect our business partners to behave in accordance with the principles set out by this code.

We at KOLAR are committed to complying with the applicable legal provisions and the applicable internal guidelines.





# Doing business with integrity. Future-oriented actions with responsibility.

## 1. Customer care

We are there for our customers and treat them as we would like to be treated ourselves - friendly, courteous and competent. We also answer "banal" questions for ourselves with patience.

Quality and customer orientation are important to us. We use our strengths for the benefit of our customers. We give our customers a clear performance promise and always try to adhere to it.

We take criticism from our customers seriously and see it as an incentive to improve.

## 2. Efficiency

We work in a results-oriented way and secure our market position. We act economically, making our personal contribution towards the success of the company. We think long-term and prepare for economically difficult situations.

We secure our market position through targeted ideas and innovations. We use new technologies to create added value, in order to at least keep the value chain stable, but ideally to deepen or lengthen it.

## 3. Purchase

Economic efficiency, sustainability and integrity are essential criteria for our purchases.

We therefore expect our suppliers to adhere to the principles set out in our code.

## 4. Sustainability

Acting sustainably as a company is important to us, not only when using our raw material wood. In addition to economic factors, ecological and social factors also play a major role in corporate management. When implementing our goals and activities, we are guided by principles relating to human rights, labour rights, environmental protection and anti-corruption.

Forest conservation is important to us. We are tested and certified according to PEFC and FSC® standards.

We are constantly working on improvements to protect our environment and the climate. We have invested in in-house photovoltaic systems, full LED lighting, heating the production site using our own energy, and switching to e-mobility. Regionality is an important issue for us, both in purchasing, sales, production and in marketing.

**5. Business and trade secrets** We are committed to protecting confidential information, such as internal company information, financial data, production processes, technical drawings, etc. - both those in the possession of the KOLAR company and those of our customers, suppliers and business partners. Unless it is for the purpose of fulfilling a business or a legal requirement.

## 6. Data protection

We respect the privacy of our employees, customers and business partners. We collect, use and pass on personal data only for legitimate business purposes or to meet legal requirements.

## 7. Corruption

We do not tolerate any form of corruption.

We strictly avoid any appearance of inappropriateness or dishonesty. We make business decisions solely on the basis of factual considerations in the interests of the KOLAR company, private interests do not play a role.

We do not accept any unfair advantages and notably do not allow ourselves to be influenced in our business decisions. Claiming such benefits is also prohibited without exception. It is strictly forbidden to offer, promise or grant unfair advantages directly or indirectly.

## 8. Gifts & hospitality

When accepting or offering gifts or hospitality, we must ensure that they are reasonable, infrequent and of nominal value. We neither want to influence decisions or give them the appearance of it.

## 9. Fair competition in compliance with the law

We meet the challenges of increasing competition with optimizations in our processes, new product innovations and continuous increases in efficiency. We are committed to complying with the rules of competition and monopolies law. We reject anti-competitive behaviour such as price fixing or abuse of market position as well as unfair business practices.

Our business is characterised by economic efficiency, fair competition and sustainability.



## Integrity in the Workplace. Fair cooperation.

### 1. Appreciation and respect

We treat each other openly and respectfully. We give each other feedback, criticize the matter at hand and not individuals. We provide orientation and want to achieve our goals as a team with the right people in the right place. We are open to concerns and feedback from our employees.

### 2. Respect for human rights

The respect of the human rights of our employees is a matter of course for our company. We offer fair working conditions in accordance with all applicable laws and regulations. We do not tolerate child or forced labour in our supply chain. That is why we also expect all suppliers or other business partners to act ethically and in accordance with the law.

### 3. Equal opportunities

Diversity and integration are an asset to our company. We respect all people and offer the same career opportunities, regardless of

their age, gender, origin, religion, any disabilities, or sexual orientation. We respect your right to privacy. We do not tolerate discrimination.

### 4. Health & safety

The health and safety of our employees is very important to us. We therefore attach great importance to compliance with statutory and internal employee safety regulations.

We support health promotion and take preventive measures to maintain the long-term health and the ability to work of our employees.

### 5. Working conditions

We do not tolerate any working conditions that contradict international laws and regulations.

All employees are entitled to fair and performance-related pay. As an employer, we guarantee safe working conditions.



## How does the code and conduct and ethics influence us?

In everyday business situations, situations may occur in which you cannot determine with certainty which behaviour is correct and appropriate. In such cases, you should ask yourself the following questions:

- Is my activity / decision permitted by law?
- Does my activity / decision correspond to our values, the principles contained in the code of conduct and ethics as well as our internal guidelines and codes of behaviour?
- Is my activity / decision free from personal interests and is the wellbeing of the company the main focus?
- Do I have the “feeling” that my activity / decision is correct?
- Does my activity / decision protect KOLAR's reputation as a company with high ethical standards?

If you can answer “yes” to all of these questions, your activity or decision is most likely correct and complies with the principles. If in doubt, contact your manager.

At KOLAR we are all - both the management and every single employee - jointly responsible for the success of the company.

# Verhaltens- und Ethikkodex



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**KOLAR**  
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