

	<b>Code of Conduct for KNAUER Partners</b>	<b>F142-008EN</b>
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# Code of Conduct for KNAUER Partners

## Allgemeine Information

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<b>Funktion</b>	Compliance Manager	Head of Quality	Managing Director
<b>Name</b>	Hongjing Shao	Dr. Kate Monks	Alexandra Knauer
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## Änderungsprotokoll

<b>Version</b>	<b>Änderungen</b>	<b>Änderungsgrund</b>
1.0	Erstellung des Dokuments	Bedarf nach Vorlage
2.0	Formatvorlage angepasst	Neue Formatvorlage im Rahmen der Einführung der ISO 13485

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## Contents

Foreword .....	2
Code of Conduct.....	3
1 Conduct in Business .....	3
1.1 Avoiding Conflicts of Interest .....	3
1.2 Fair Competition .....	3
1.3 Preventing Money Laundering .....	4
2 Conduct Towards Colleagues, Employees and KNAUER Partners.....	4
2.1 Equal Treatment and Non-Discrimination .....	4
2.2 Human and Labor Rights.....	4
2.3 Occupational Health and Safety .....	4
3 Behavior in the Society .....	5
3.1 Conduct within Sustainability and Protection of Environment and Climate.....	5
3.2 Donations .....	5
3.3 Behavior in Public and Communications.....	5
4 Conduct concerning handling of Information.....	5
4.1 Confidential Company Information / Inside Information.....	5
4.2 Data Protection and Information Security .....	5
5 Conduct with Regards to Protection of Company Property .....	6
6 Implementation and Contacts .....	6

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## Foreword

The KNAUER Code of Conduct describes the way we want to work at KNAUER and with our suppliers, distributors, sub-resellers, and other business partners (each a “**KNAUER Partner**”) – both now and in the future.

We endeavor to comply with these guidelines, to secure long-term business success. We can only achieve this goal together. Our values such as personal responsibility, openness, transparency as well as legal and ethical compliance play a vital role in this. Integrity, credibility, reliability, and consistency define everything we do. Compliance is a must. We are a responsible corporate citizen. This involves making an active commitment to sustainable development, which we support by subscribing to the ten principles of the United Nations Global Compact. We are also committed to the United Nations Universal Declaration of Human Rights.

The basic rules and principles governing our behavior now and, in the future, have been brought together in this Code of Conduct. It provides our basic rules and applies equally to everyone – each KNAUER employee and KNAUER Partner. It sets a standard for us and at the same time represents a promise that we will act responsibly both externally in our dealings with KNAUER Partners and the general public as well as internally in our interactions with colleagues. We bear joint responsibility for our company’s reputation. Misconduct by individuals can cause immense harm to all of us. So please read this code of conduct carefully and let us use it to guide our day-to-day conduct.

*Alexandra Knauer, Managing Director and Owner*  
*Carsten Losch, Managing Director*

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## **Code of Conduct**

The Code of Conduct describes the rules and regulations which are valid and binding for all KNAUER employees and KNAUER Partners. Any employee or KNAUER Partner who fails to comply with policies, directives, and agreements must expect corresponding consequences. Infringements are to be reported via the e-mail address [compliance@knauer.net](mailto:compliance@knauer.net). Based on the above, this Code of Conduct summarizes the main principles and rules governing our actions as well as the standards we set ourselves in our dealings with KNAUER Partners and stakeholders.

### **1 Conduct in Business**

Compliance with the law, rules and regulations is for us an essential basic principle of responsible business conduct. We always adhere to legal prohibitions and requirements, even if this involves short-term business disadvantages or difficulties for the company or individuals. We expect the same level of integrity from all KNAUER Partners. KNAUER and KNAUER Partners shall comply with all applicable import and export control regulations, such as the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.

#### **1.1 Avoiding Conflicts of Interest**

At and with KNAUER, business decisions are to be made exclusively in the best interests of the company. Any conflicts of interest with personal matters or other business or non-business activities, including those of relatives or other related parties should be avoided. Should such conflicts nevertheless occur, they must be resolved in accordance with the law. Conflicts must be dealt with openly and transparently.

#### **1.2 Fair Competition**

KNAUER and KNAUER Partners shall comply with national and supranational antitrust and competition laws. KNAUER Partners shall not enter directly or indirectly into any illegal agreements with their competitors nor exchange sensitive information, e.g., regarding markets, customers, strategies, prices, and the like. KNAUER Partners shall participate in public tenders and private sector bidding procedures by strictly following the applicable laws and regulations.

Our conduct on the market is based on our compliance commitment. KNAUER stands for technological competency, innovation, customer orientation and motivated, responsible employees and KNAUER Partners. Corruption and antitrust violations threaten these success factors and will not be tolerated (zero tolerance). For us, bribes are not a means of winning business. We would rather forgo a contract and fail to reach internal goals than act against the law. KNAUER Partners shall fulfil their legal obligations to ensure fair competition as well.

KNAUER has taken measures to ensure compliance with anti-corruption and antitrust regulations and the business policy is based thereon. The anti-corruption regulations include but not limited to the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. Violations will not be tolerated and will result in sanctions against the persons concerned. All managers, employees and KNAUER Partners must be aware of the risks which corruption and antitrust violations can signify for KNAUER and KNAUER Partners as well as for them personally. All employees and KNAUER Partners are requested to contribute actively to their areas of responsibility in implementing compliance.

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### **1.3 Preventing Money Laundering**

KNAUER and KNAUER Partners shall fulfill their legal obligations to prevent money laundering and do not participate in money laundering activities.

In cases of doubt, all employees and KNAUER Partners are required to report unusual financial transactions, especially those involving cash, which could give grounds to suspect money laundering, to the responsible finance, legal or compliance department for review.

## **2 Conduct Towards Colleagues, Employees and KNAUER Partners**

### **2.1 Equal Treatment and Non-Discrimination**

A culture of equal opportunities and mutual trust and respect is of great importance to us. We promote equal opportunities and prevent discrimination in the recruitment, promotion, training, and development of employees as well as all dealing with KNAUER Partners. We treat all employees and KNAUER Partners equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religion, or worldview. We expect the same level of commitment from all KNAUER Partners.

### **2.2 Human and Labor Rights**

We respect internationally recognized human rights and support their observance. We reject all forms of forced and child labor. We expect KNAUER Partners to fulfill their obligations to protect human and labor rights as well. We recognize the right of all employees to form unions and employee representative bodies on a democratic basis within the framework of national legislation. The right to appropriate compensation is recognized for all employees. Pay and other benefits shall at least comply with the respective national or local legal standards or the standards in the national economic sectors/ industries and regions. We expect the same level of commitment from all KNAUER Partners.

### **2.3 Occupational Health and Safety**

The safety and health of our employees are a corporate objective of equal standing with the quality of our products and our commercial success. Occupational safety and health protection are an integral part of all business processes and are included from the outset – starting in the planning phase – in all technical, economic, and social considerations. We expect the same level of commitment from all KNAUER Partners.

All employees and KNAUER Partners shall promote safety and health in their work environment and comply with the health and safety regulations. All managers are obligated to instruct and support their employees in meeting this responsibility.

The same safety standards as for KNAUER employees and KNAUER Partners shall apply to employees of subcontractors. This is to be considered when selecting and working with subcontractors.

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### **3 Behavior in the Society**

#### **3.1 Conduct within Sustainability and Protection of Environment and Climate**

For us, sustainability, environmental and climate protection, and resource efficiency are key corporate objectives. When developing new products and services and when operating production equipment, we ensure that all environmental and climate impacts are kept to a minimum.

Every employee and KNAUER Partner bears responsibility for conserving natural resources and helping protect the environment and climate through their individual behavior. We expect sustainability to be considered in all decision-making.

#### **3.2 Donations**

We make no financial contributions, in particular donations or sponsorships, to political parties in our home country or abroad, organizations related or similar to parties, individual office incumbents, or candidates for political offices. We expect the same level of commitment from all KNAUER Partners, to avoid any business payment which may encourage corruption.

#### **3.3 Behavior in Public and Communications**

We respect the right to free speech and the protection of personal rights and privacy. All employees and KNAUER Partners should be aware that in their private lives they can also be seen as part and representative or partner of KNAUER and are therefore called upon to safeguard KNAUER's standing and reputation in the way they act and conduct themselves in public, above all towards the media. When expressing an opinion, we all take care not to allow our personal opinion to be linked to our work at or with KNAUER. We fully support accurate and favorable communications.

### **4 Conduct concerning handling of Information**

We see great importance in being open and truthful in all our reporting and communications towards employees, customers, business partners, the general public, and government institutions. Every employee and KNAUER Partner shall ensure that both internal and external reports, records, and other documents of KNAUER comply with the applicable legal rules and standards and are always correct.

#### **4.1 Confidential Company Information / Inside Information**

We take the necessary steps to suitably protect confidential information and business documents from access and inspection by unauthorized colleagues and other third parties. The KNAUER Partner may only provide access to KNAUER confidential information to persons within its organization having a need to know the information. As appropriate, KNAUER Partners may be requested to enter into separate non-disclosure agreements with KNAUER.

#### **4.2 Data Protection and Information Security**

The protection of personal data of employees and KNAUER Partners, is of particular importance to KNAUER. There are guidelines and procedures in place to ensure this protection.

Personal data may be collected or processed only where permitted by law or with the consent of the person concerned.

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## **5 Conduct with Regards to Protection of Company Property**

We use the company's property and resources correctly and carefully and protect them from loss, theft, and misuse. Our company's intellectual property represents a competitive advantage and is therefore a valuable asset which we protect against all unauthorized access by third parties. KNAUER Partners are expected to protect KNAUER property and report misconduct, loss, theft, or transfer.

We use the company's tangible and intangible assets exclusively for business purposes and not for personal reasons except where expressly permitted. Our employees and KNAUER Partners bear joint responsibility with their respective managers for ensuring that business trips and invitations are always appropriate in nature and scale to the purpose of the trip and are efficiently planned and carried out taking time and cost aspects into account.

## **6 Implementation and Contacts**

KNAUER shall actively promote communication of this Code of Conduct and procedures. In their special capacity as role models, our managers have a particular responsibility to ensure that their actions measure up to the Code of Conduct. They are the first point of contact for questions on understanding the rules and must ensure that the Code of Conduct is known and understood. As part of their management duties, they shall prevent unacceptable conduct and take suitable measures to avoid infringements of rules in their area of responsibility. Good and trusting relations between employees, managers and KNAUER Partners are reflected in honest and open communication and mutual support.

For further questions relating to the Code of Conduct, all KNAUER employees and KNAUER Partners can also contact our central e-mail address [quality@knauer.net](mailto:quality@knauer.net). Information about possible infringements of the law or policies regarding corruption or anti-competitive behavior and relating to personnel shall also be reported to [compliance@knauer.net](mailto:compliance@knauer.net). All information will be treated in strict confidence.











# F142-008EN Code of Conduct for KNAUER Partners

Final Audit Report


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