

KUKA



Code of Conduct

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Foreword by the Executive Board

Our world is changing – our everyday working lives, but also our society and our environment. KUKA is helping to shape this change with products and solutions related to robotics, automation and digitalization. For us, economic success, corporate responsibility and sustainability therefore go hand in hand.

For 125 years, KUKA has combined tradition with innovation and regional roots with an international outlook, and has thus continued to develop. We have become a successful global company. The most important factor in this success? Our employees. They not only shape our products and solutions, but also our corporate culture.

Every single KUKA employee around the world contributes to our image and how our KUKA evolves – and thus bears a great responsibility. The world is changing rapidly and we are operating in a dynamic environment full of competition. It is therefore important to always keep in focus what is important and what drives us, as KUKA, in our day-to-day work.

What corporate culture do we embody at KUKA, how do we work together? How do we behave in everyday life with regard to our business partners, capital providers, our environment and social surroundings? These questions are crucial to KUKA's success.

Our shared values support us in answering these questions and in behaving correctly and responsibly in everyday life. We have therefore summarized the most important KUKA guidelines in this Code. They are our guardrails on the way to a successful and sustainable future.

Although the following Code of Conduct summarizes KUKA's values and thus serves as an orientation guide for us, it cannot, of course, fully cover in detail all the situations that we encounter in our day-to-day business and will encounter in the future.

Therefore, each and every one of us individually must ensure that we always comply with our high ethical standards. We must make sure we can make the right decisions and do the right thing even under pressure. We must be open to others' concerns, even in difficult situations, and listen to our colleagues, customers and other stakeholders.



Alexander Tan
Chief Financial Officer

Peter Mohnen
Chief Executive Officer

We must act with integrity and reason, bringing this Code of Conduct to life in our daily lives for a responsible and sustainably successful KUKA.

Peter Mohnen
Peter Mohnen

Alexander Tan
Alexander Tan

December 2022

Our key areas of action

Sustainability stands for the consideration of economic, ecological, and social or societal aspects. In order to be able to reconcile this with a corporate strategy, KUKA has identified topics relevant to our industry and to us as a company. The topics of central importance are:

**CLIMATE PROTECTION AND
CLIMATE RISKS**

**EFFICIENT AND RESPONSIBLE
PRODUCTS AND SOLUTIONS**

RESPONSIBLE PROCUREMENT

**EMPLOYEE RESPONSIBILITY AND
DEVELOPMENT**

GOOD CORPORATE GOVERNANCE

KUKA's Organizational Culture

Our people are our greatest asset. We are driven to have a high performing, productive, collaborative, team-oriented environment that is safe, supportive, and encouraging for our employees. We are united by a common understanding of our fundamental values and principles. This starts with our leadership team demonstrating positive behaviors but is strengthened by our workforce generating positive results. Together we are committed to our Code of Conduct, Behavior Expectations and Corporate Compliance policies. Our goal is to actively shape our market environment, set new standards of innovation and exceed the expectations of our customers. This is achieved with an organizational culture that is driven by purpose, respect, and clear expectations.

Human rights and fair working conditions

Occupational health and safety and protection against health risks

Occupational safety as well as the protection and promotion of the health of our employees have the highest priority. We comply with applicable industrial safety laws, health and safety regulations worldwide and thus limit work incidents and adverse health effects¹. All activities in the company are subject to high safety standards. This includes appropriate workplace design and the provision of suitable personal protective equipment. We prevent incidents and work-related health hazards by implementing preventive controls, emergency measures, an incident reporting system and other measures, such as fire and disaster prevention, in order to improve continuously. Our employees are adequately trained and instructed accordingly. We involve employees and their union representatives in occupational health and safety issues.

Protection against discrimination

Equal treatment of all employees is one of our core values. We promote equal rights, equal opportunities and do not tolerate any kind of discrimination². All employees are valued and must never be discriminated against based on their ethnicity or history, social background, gender, religious beliefs or ideology, age, political opinions, physical or mental disability, or sexual orientation. Diversity is an important factor to success for an international company like KUKA. We treat our employees respectfully. We want our employees to work in a healthy, safe, and fair environment, one which is characterized by tolerance and acceptance and is free of deliberate and unconscious bias. Sexual harassment and any other form of bullying is not tolerated. The privacy and dignity of others must be respected at all times.

Working hours

Adherence to working hours and breaks is essential for preventing work-related incidents and health hazards. We comply with the applicable national working hour regulations and international labor standards. We ensure that weekly working hours, including overtime, do not exceed the relevant maximum limit permitted by law. We promote the balance between work and family life through different working time models.

Fair compensation

Fair pay is a sign of appreciation and motivates employees. We ensure that our compensation system does not differentiate between the sexes, because the equal treatment of all employees means that compensation is based solely on performance and competence. Our employees receive fair wages and salaries. It goes without saying that we comply with the respective statutory minimum wage regulations and existing collective wage agreements³. If there are no statutory or collectively agreed regulations, we are guided by industry-specific as well as local compensation requirements in order to ensure an appropriate standard of living for our employees and their families. Our employees are informed clearly, in detail and regularly about how their pay is structured.

Prohibition of child labor

The safety and health of children must be protected. This is why we reject any form of child labor. We adhere to the minimum age requirement for employment⁴. In exceptional cases, the minimum age may be reduced to 14 years if these countries fall under the exception for developing countries according to ILO Convention No. 138. We do not hire employees for hazardous work who cannot demonstrate a minimum age of 18 years in accordance with ILO Convention No. 182.

Prohibition of all forms of slavery, forced labor and torture

Employment relationships are fundamentally based on their voluntary nature. We explicitly reject forced labor and all forms of slavery, slave-like practices, servitude or other forms of domination or oppression⁵. All work must be voluntary and employees must be able to terminate the same at any time at their own will and subject to reasonable notice.

Torture and cruel, inhuman or degrading treatment are prohibited. We respect the protection of physical integrity and ensure appropriate protection within the company framework through suitable measures as well as within the scope of our duty of care. In the event that we contract security services, these provisions shall apply to them to the same extent (see also Code of Conduct for Suppliers).

Protection of local communities and indigenous peoples

We respect the protection of property and the prohibition of unlawful deprivation of land, forests and waters. In our business activities and particularly when acquiring and building on land, we ensure that the rights of local communities and indigenous peoples are not violated and that there is no unlawful forced eviction.

Use of public and private security services

We expect our own security personnel to protect our operating sites and private security service providers contracted by us to ensure that internationally recognized human rights are observed at all times. We ensure this through appropriate specifications and measures.

Freedom of association and collective bargaining

We recognize the right to collective bargaining and wage negotiations as well as the fundamental right of all employees to form and join trade unions or labor organizations⁶. We respect the freedom of association of employees in trade unions, and we respect their representatives. We adhere to the results of collective bargaining in our companies covered by collective wage agreements. If these basic rights are restricted by local laws, alternative ways of establishing employee representation that comply with the law are to be promoted and constructive dialog created with employees.

Our automation solutions

Product quality, safety and low environmental impact

We place great importance on the quality and safety of our products, systems and solutions and also collaborate closely with our customers and suppliers in this regard. We set high standards for safety requirements and comply with applicable legal regulations and internal standards. This enables us to offer our customers innovative and high-quality automation solutions. As it concerns the handling of our products, we want to rule out potential risks and hazards to health as much as possible. This is why we continuously check and improve the safety of our machinery and systems throughout our manufacturing processes.

We are committed to preventing or keeping to a minimum any adverse affects of our products, systems and automation solutions on people and the environment throughout their entire life cycle. It is important to us to meet the high demands of our customers and to contribute to meeting future ecological challenges. Our energy-efficient solutions are an important lever

for reducing energy consumption in our customers' applications. Throughout the life cycle of our products, our employees help to ensure that legal and internal requirements as well as our customers' expectations are taken into account. One of our goals is to continuously improve the energy efficiency of our products and to reduce greenhouse gas emissions.

We place emphasis on the recyclability of the materials and products we use by supporting the use of sustainable and renewable natural resources as well as increasing our reuse and recycling, and avoiding waste.

In our products, we strive to use only raw materials whose extraction, production, transportation, trade, processing and export do not contribute directly or indirectly to human rights violations, health and safety problems, violations of environmental laws or compliance violations.

Ecological responsibility

We are committed to protecting the environment through the responsible use of natural resources and energy. We strive to optimize the use of resources and avoid any adverse effects on people and the environment or to keep these to a minimum. The relevant resources and information are made available to the extent necessary to achieve the objective.

Our goal is to minimize the consumption of energy, water and raw materials as well as keep waste generation and greenhouse gas emissions to a minimum in order to continuously reduce the global environmental pollution and energy consumption.

We take care to not cause or be involved in harmful soil changes or air and water pollution in violation of applicable law. We avoid hazardous substances or reduce them as much as possible. We replace hazardous substances with less dangerous substances whenever possible. If the use of hazardous substances is unavoidable, we handle these substances responsibly. Applicable laws, regulations and international conventions such as the Minamata⁷, Basel⁸ and Stockholm⁹ Conventions are observed at all times.

We pay attention to the protection, conservation and restoration of biodiversity and to the sustainable use of the constituent parts of the same. This is part of our environmental management system and is promoted both in our own corporate environment as well as among our partners and suppliers.

Responsible procurement

We fulfill our due diligence obligations in the supply chain with regard to human rights and the environment by reducing (potential) risks as much as possible. Before we decide on products and services, we evaluate them for their energy efficiency and low environmental impact. Globally oriented supply chain management based on the principles of sustainability is a significant success factor for us. We are always talking to our suppliers about ways to minimize potential risks.

We require our suppliers to comply with the KUKA Code of Conduct for Business Partners or to apply an equivalent code of conduct. We work to ensure that not only our business partners (for example, our suppliers) but also their sub-suppliers follow these principles.

Compliance with the law

The core elements of our business activities also include complying with applicable laws at all times and in all places and always respecting basic ethical values. Our [Corporate Compliance Manual](#) contains all essential information on our [corporate compliance program](#), relevant legal standards and ethical legal conduct.

The Corporate Compliance Manual contains policies. These regulate how employees should behave in certain situations and in relation to certain laws and issues. For example, there are Group policies on fair competition, prohibition of cartel arrangements, corruption and bribery, information/IT security and data protection. The Group policies are understood to be an integral part of the KUKA Corporate Compliance Program and apply worldwide throughout the KUKA Aktiengesellschaft Group.

Implementation and enforcement of this Code of Conduct

Our employees are made aware of the contents of this Code of Conduct and receive training as required. To implement and comply with the principles and international standards described, we use, among other things, our [integrated management system](#), which is subject to continuous improvement, based on internationally recognized standards (ISO9001, ISO14001, ISO50001, ISO45001, VDA6.4, IATF16949, EN9100, ISO13485, ISO3834-2, EN15085-2 and VDA-ISA) and is certified.

Violations of this Code of Conduct can have far-reaching consequences for KUKA as well as for its employees and authorized representatives. Any violation will be strictly prosecuted and may result in civil, criminal and labor law consequences.

Scope

These corporate principles are binding for executives, managers and all employees of KUKA Group as well as for monitored companies within the Group and for our customers' construction sites. KUKA strives to promote the principles in participating companies that are not part of the Group. These principles are to be applied when working with our business partners. Our Code of Conduct for Business Partners applies to our suppliers.

These principles are implemented under consideration of and in compliance with the applicable laws in the various countries and locations. Where national requirements fall short of our principles, KUKA advocates promoting our principles.

The principles are guided by ethical values and principles as well as the respect for human dignity as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the core labor standards of the International Labor Organization (ILO), and the United Nations Guiding Principles on Business and Human Rights.

¹ ILO Convention No. 155 and 187

² ILO Convention No. 111

³ ILO Convention No. 100

⁴ ILO Convention No. 138 and 182

⁵ ILO Convention No. 29 and 105

⁶ ILO Convention No. 87 and 98

⁷ Minamata Convention on Mercury of 10 October 2013: Risks from involvement in the manufacture and disposal of products containing mercury.

⁸ Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal of 22 March 1989: Risks from the import and export of waste

⁹ Stockholm Convention of 23 May 2001 on Persistent Organic Pollutants: Chemicals – risks from the production or use of certain persistent organic pollutants