

Code of Conduct

Group Member



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Foreword

Part of corporate responsibility is the reconciliation of necessary economic corporate goals with social and ecological aspects. This includes compliance with applicable laws, basic ethical values and sustainable action. The basic principles required for this are set out in this Code of Conduct as binding guidelines. We want and expect our business partners to commit to these basic principles when working with us and to demand the same from their business partners. The Code of Conduct applies to all associated companies of the Kuhse Energy Group, Kuhse Power Solutions GmbH, M&S Combustion Technologies GmbH and Kuhse Secure Systems GmbH.

Rosengarten, 01.09.2025

signed Thormod Ohm
Managing Partner

Kuhse Energy Group

Group Member
Kuhse Power Solutions GmbH
M&S Combustion Technologies GmbH
Kuhse Secure Systems GmbH

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21224 Rosengarten
Germany

1. Corporate responsibility

Sustainable economic activity

The Kuhse Energy Group fulfills its corporate responsibility in the narrower sense first and foremost through sustainable economic activity. Economic stability, profitable management and moderate growth protect the legitimate interests of investors, employees, customers, suppliers and all other business partners and creditors of the company.

Compliance with applicable law

Compliance with all applicable laws and regulations is a matter of course for us. This is the only way to ensure our business success. Any violation of applicable laws or regulations can have serious consequences for both the company and its employees, such as criminal prosecution, consequences under labor law, damages or damage to reputation.

Customer satisfaction

We depend on our customers. Meeting their needs with the highest quality, maximum reliability and technical and economic competitiveness is our central goal. In return, we expect their respect and compliance with their own obligations to us.

Duty of care towards our employees

Our employees are our most important and valuable assets in the realization of our corporate goals. They deserve our collective and individual care for their performance, especially towards our customers.

In addition, the overarching themes of corporate responsibility are binding for us and our business partners.

Human rights

The Kuhse Energy Group and its business partners are required to comply with all internationally proclaimed human rights and to avoid human rights violations. Particular attention is paid to respecting the human rights of particularly vulnerable rights holders. Slavery, servitude, forced and compulsory labor or human trafficking are neither used nor contributed to. No employees are hired who are not at least 15 years old. In countries that fall under the exception for developing countries, the minimum age may be reduced to 14 years. Furthermore, no employees are hired for risky activities unless they are at least 18 years old.

Equal opportunities, equal treatment and non-discrimination

No one is discriminated against regardless of origin, skin color, gender, religion, ideology, age, disability, sexual orientation, political views, insofar as these are based on democratic principles and tolerance towards those with different opinions, or other legally protected characteristics, insofar as this does not conflict with mandatory law. This includes gestures, language and physical contact that are sexual, coercive, threatening, abusive or exploitative. Inappropriate treatment of workers will not be tolerated.

Freedom of association

All employees are granted the fundamental right to form and join trade unions and employee representative bodies. Members of employee organizations or trade unions are neither favored nor disadvantaged. For rights restricted by law, alternative and legally compliant options shall be promoted in a similar manner.

Fair and healthy working environment

We ourselves and our business partners comply with the applicable legal requirements for safety in the workplace. We support the further development and improvement of working conditions. National legal requirements regarding working hours correspond at least to the minimum standards of the respective economic sectors. Appropriate remuneration is paid in compliance with all applicable remuneration and compensation regulations, in particular with regard to minimum wages. If there are no statutory or collectively agreed regulations, remuneration shall be based on industry-specific, local, collectively agreed remuneration and benefits that ensure an appropriate standard of living for employees and their families. In accordance with the applicable legal and international standards relating to health and safety in the workplace and safe working conditions, care must be taken. Furthermore, training and similar measures must be taken to ensure that all employees are adequately trained in health and safety at work. Furthermore, an appropriate health and safety management system must be established and applied.

Product safety

All applicable product safety regulations and specifications, as well as the legal requirements regarding safety, labeling and packaging of products and the use of hazardous substances and materials must be complied with.

Our aim is to offer our customers safe and high-quality products of impeccable quality. Products must not have any defects or dangerous properties that could impair health or damage property.

Dealing with conflict minerals and high-risk raw materials

Appropriate measures must be taken to avoid the use of raw materials in products that originate from conflict and risk areas and contribute to human rights violations, corruption, the financing of armed groups or similar negative effects. To this end, the due diligence obligation for a responsible supply chain for raw materials (e.g. tin, tantalum, tungsten, gold, cobalt) is fulfilled. The improvement of transparency within our own supply chain up to the extraction of raw materials and the introduction of suitable measures to reduce the risk of serious human rights violations is carried out continuously. We ourselves and our business partners avoid the use of raw materials that originate from smelters and refineries that do not meet the requirements of the OECD Due Diligence Guidance for the Supply Chain of Mineral Resources from Conflict-Affected and High-Risk Areas. At the request of the Kuhse Energy Group, information on the smelters and refineries used by the supplier or sub-supplier must be provided.

Environmental and climate protection

The Kuhse Energy Group and its business partners comply with all legal requirements for the protection of the environment and sustainability and take responsibility for environmental protection issues. Cooperative collaboration with the authorities is a matter of course for us.

Our aim is to sustainably reduce our energy consumption and improve energy efficiency. In doing so, we want to fulfill our responsibility to preserve our environment. We will therefore also make energy efficiency a key decision-making criterion when purchasing new products and services. Natural resources will be used sparingly and the environmental impact of production processes and products will be minimized.

We strive to continuously improve our environmental performance and act in accordance with the applicable legal norms and international standards relating to the environment. Appropriate environmental guidelines have been introduced to minimize pollution and continuously improve environmental protection.

We make an important contribution to climate protection by increasingly offering our customers burners that can be operated with renewable energy in the form of hydrogen and by constantly modifying and optimizing the burners, both in terms of technology and fuel consumption as well as potential material savings. The energy management system constantly optimizes the operation of the microgrids with energy generation systems such as PV, wind and battery systems and ensures maximum utilization of renewables, high efficiency and economic sustainability as well as an improvement in the ecological footprint of conventional energy generation systems in terms of CO₂ emissions and fuel consumption.

The health and safety of our employees and the neighborhood are a priority for us. We will, of course, take all necessary measures immediately if any dangers become apparent.

Since January 2025, we have been sourcing our electricity exclusively from renewable energy plants with the environmental standards required by law.

2. Transparent business relationships and market behavior

Fair and free competition, antitrust law and intellectual property

Applicable antitrust laws are complied with. Anti-competitive agreements with competitors, suppliers or customers and the abuse of any dominant market position must be avoided. Participation in price fixing, market or customer allocation, market or supply agreements is avoided. Intellectual property is always respected. Business data and reports on business activities are provided truthfully. This must be done in accordance with the applicable laws.

Export control

We ourselves and our business partners ensure compliance with all applicable laws for the import and export of goods, services and information. The applicable export control and customs regulations must be complied with.

Prohibition of corruption and dealing with authorities

Any form of corruption and bribery will not be tolerated. It must be ensured that employees, subcontractors or representatives do not give, directly or indirectly offer or accept bribes, kickbacks, improper donations or other improper payments or benefits to or from customers, public officials or other third parties. This also includes so-called "facilitation payments" (e.g. unlawful payments to expedite routine administrative matters). You must refrain from influencing official actions or achieving unfair competition, as well as taking acceleration measures. We ourselves and our business partners comply with the strict legal requirements when dealing with governments, authorities and public institutions and observe the respective legal requirements when participating in public tenders.

Conflicts of interest and money laundering

All conflicts of interest that could influence business relationships are avoided and/or disclosed both internally and to the Kuhse Energy Group. Even the appearance of such conflicts of interest must be avoided. Business relationships are only maintained with business partners whose integrity is assured. Care must be taken to ensure that the applicable legal provisions against money laundering or terrorist financing are not violated either directly or indirectly.

Consultants and agents as well as gifts, hospitality and invitations

Consultants or intermediaries are only engaged in accordance with applicable laws. Particular care must be taken to ensure that the remuneration paid to consultants or agents is only paid for consulting and intermediary services actually rendered and that the remuneration is commensurate with the service rendered. Benefits in the form of gifts, hospitality or invitations to exert undue influence are neither directly nor indirectly offered or accepted. Nor do business partners request any such inappropriate benefits from us.

The only exceptions to this are small amounts of hospitality required for joint activities or business trips.

3. Protection of data, business secrets and company assets

Data protection

Comply with all applicable laws regarding the protection of personal data of employees, customers, suppliers and other data subjects. Personal data shall be processed confidentially and responsibly, the privacy of all shall be respected and it shall be ensured that personal data is effectively protected and only used for legitimate purposes.

Dealing with company property

We use the property and resources of the Kuhse Energy Group appropriately and carefully and protect them from loss, theft or misuse. Our company's intellectual property in the form of patents and other property rights, e.g. brands and designs, is one of our most important corporate resources. We defend this valuable asset against any unauthorized access by third parties. We also avoid the unauthorized use of third-party intellectual property.

Security of the international supply chain

The business partners of the Kuhse Energy Group are required to ensure that the operating sites and transshipment locations where the goods intended for the Kuhse Energy Group are produced, stored, processed, loaded and transported are protected against unauthorized access by third parties as part of a secure supply chain. The personnel employed must also be selected on the basis of reliability. Reasonable efforts must be made to ensure that subcontractors and other business partners comply with the basic principles of this Code of Conduct.

4. Reporting possible misconduct

Serious information helps to counteract violations at an early stage. This can prevent damage to the Kuhse Energy Group, our employees and business partners. All Kuhse Energy Group employees can submit information or complaints on all topics mentioned in the Code of Conduct and beyond. The same applies to customers and suppliers. Several channels are available for this purpose - anonymously of course, if desired.

An open communication culture is an essential component of our cooperation and our corporate culture. Employees must be able to address errors openly and, above all, at an early stage. The primary point of contact should therefore always be their line manager. Ms. Rieckmann is available as a central reporting office. The Kuhse Energy Group protects the interests of whistleblowers not only by setting up a secure reporting system, but also by promising to treat incoming reports confidentially and to protect whistleblowers acting in good faith from any disadvantages resulting from a report by any means necessary.

As a third party, please contact us directly by e-mail or via the contact form on our website.

Legal consequences of violations of the Kuhse Energy Group Code of Conduct

If a business partner of the Kuhse Energy Group does not comply with the basic principles laid down in this Code of Conduct, the Kuhse Energy Group reserves the right to terminate the business relationship with this business partner by extraordinary notice.

In order to avoid such consequences and to take alternative measures instead, business partners are requested to provide credible assurances that countermeasures will be taken immediately to prevent future violations. At the request of the Kuhse Energy Group, these measures must be demonstrated and the Kuhse Energy Group reserves the right to check compliance with the requirements on site in individual cases.

This Code of Conduct therefore becomes an integral part of all supply contracts.