

KUKA



Code of Conduct
for Business Partners

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Our business partners assure us that they will comply with the human rights and environmental expectations set out in this Code of Conduct and address them appropriately within their value chain. To this end, they will align their corporate actions with the internationally recognized United Nations Guiding Principles on Business and Human Rights and base their due diligence processes for human rights on the following international standards:

- » United Nations Universal Declaration of Human Rights
- » Core labor standards of the International Labor Organization (ILO) with their five basic principles on freedom of association and the right to collective bargaining, the elimination of forced and child labor, the prohibition of discrimination in respect of employment and occupation, and occupational health and safety
- » OECD Guidelines for Multinational Enterprises

We expect our business partners to establish effective processes to protect and respect human rights. The aim is to prevent environmental and human rights-related risks – both in their own business operations and in their value chains – as well as to prevent, minimize or end violations. In addition, the applicable laws, rules and regulations shall be observed at all times. Appropriate measures shall be taken to ensure compliance.

The business partner shall support KUKA Group companies in all of their measures for risk management, risk analysis and prevention as well as in remediation and complaint procedures. They shall do so in their own business area as well as with their direct and indirect suppliers without restriction, without delay and at their own expense. The business partner shall immediately provide us with all relevant information that we require to fulfill our legal due diligence obligations. Naturally, the business secrets of the business partner shall be protected in such a case.

Human rights and fair working conditions

Occupational health and safety and protection against health risks

We expect our business partners to ensure fair working conditions and to comply with applicable national industrial safety laws as well as health and safety regulations worldwide in order to limit work incidents and adverse health effects as much as possible¹. This includes, for example, appropriate workplace design and the provision of suitable (or required by law) personal protective equipment. Employees are adequately trained and instructed accordingly.

Protection against discrimination

Business partners 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.

Working hours

Business partners shall ensure that working hours and breaks are observed in order to prevent work-related incidents and health hazards. The applicable national working hour regulations and international labor standards must be observed. Business partners ensure that weekly working hours, including overtime, do not exceed the relevant maximum limit permitted by law.

Fair compensation

Our business partners ensure that their compensation system does not differentiate between the sexes. Employees receive fair wages and salaries and, naturally, there is compliance with the respective statutory minimum wage regulations and existing collective wage agreements³. If there are no statutory or collectively agreed regulations, business partners are guided by industry-specific as well as local compensation requirements in order to ensure an appropriate standard of living for their employees and their families. The business partner must set clear guidelines for employee working hours.

Prohibition of child labor

All forms of child labor are prohibited. Our business partners 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. Our business partners 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

Forced labor and all forms of slavery, slave-like practices, servitude or other forms of domination or oppression are expressly prohibited⁵. 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. Our business partners respect the protection of physical integrity and ensure appropriate protection within the company framework through suitable measures as well as within the scope of their duty of care. In the event that business partners contract security services, these provisions shall apply to them to the same extent. Ensuring that security personnel are deployed in a manner that complies with human rights can be achieved, for example, through background checks.

Protection of local communities and indigenous peoples

We expect our business partners to respect the protection of property and the prohibition of unlawful deprivation of land, forests and waters. In their business activities and particularly when acquiring and building on land, business partners 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

The business partner guarantees that its own security personnel protects its operating sites and that private security service providers it contracts ensure the observance of internationally recognized human rights at all times.

Freedom of association and collective bargaining

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 organizations is recognized⁶. Our business partners respect the freedom of association of their employees in trade unions, and they respect their representatives. 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 attach great importance to the quality and safety of our products and solutions. We also expect this from our business partners. They set high standards for the safety requirements of their products and services and comply with applicable legal regulations. The contractually defined criteria for quality and safety are met.

Our business partners place emphasis on the recyclability of the materials and products used by supporting the use of sustainable and renewable natural resources as well as increasing their reuse and recycling, and avoiding waste.

In their products, our business partners 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

Our business partners act responsibly as it concerns natural resources and use energy, water and raw materials sparingly. The aim is to avoid or minimize negative impacts on people and the environment throughout the entire life cycle.

We expect our business partners to continuously improve their environmental performance. This includes an ongoing reduction of greenhouse gas emissions and a reduction of their energy consumption through energy efficiency improvements. Our business partners work to pass these requirements on to their value chain.

We expect our business partners to not cause or be involved in harmful soil changes or air and water pollution in violation of applicable law.

Our business partners pay attention to the protection, conservation and restoration of biodiversity and to the sustainable use of the constituent parts of the same.

Hazardous substances should be avoided or reduced as far as possible. If possible, hazardous substances should be replaced by less hazardous ones. If the use of hazardous substances is unavoidable, our business partners handle these substances responsibly.

Our business partners comply with the applicable environmental regulations and international standards. The Minamata⁷, Basel⁸ and Stockholm⁹ Conventions are observed at all times.

Business partners who use tantalum, tin, tungsten or gold (conflict minerals) in their products are required to fulfill their human rights due diligence obligations and not source minerals from Conflict-Affected and High-Risk Areas (CAHRAs) that have not been responsibly extracted, processed or traded. Our business partners must make reasonable efforts to verify the sources and supply chains of the potential conflict minerals listed above and provide a [Conflict Minerals Reporting Template \(CMRT\)](#) upon request.

Prohibition of corruption and bribery

We reject corruption and bribery in any form and take action against them. We also expect this from our business partners. Corrupt behavior to obtain advantages is strictly prohibited and will not be tolerated.

Fair competition

Our business partners observe the rules of fair competition. They act in accordance with applicable national and international competition and antitrust laws and do not participate in collusion and agreements with other market participants or other third parties.

Conflicts of interest

Our business partners avoid conflicts of interest that could adversely affect business relationships. They make their decisions solely on the basis of objective criteria. Individual interests or relationships must not influence professional decisions.

Information security and data protection

Our business partners handle personal data responsibly and undertake to comply with applicable laws and regulations on data protection as well as information and data security.

Protection of intellectual property

Our business partners commit to the protection of intellectual property.

Import and export control

Our business partners commit themselves to compliance with the requirements of all applicable national and international laws, regulations and provisions pertaining to foreign trade law and export control.

Money laundering

Our business partners undertake to comply with the applicable legal provisions against money laundering.

Dealing with violations

We expect our service providers to report specific evidence of misconduct and possible violations at any time via our [whistleblower system](#).

This system offers both the option of contacting the responsible Compliance Officer directly as well as the option of contacting us anonymously. To do so, either the ombudsman can be contacted or a web-based platform can be used. Both reporting channels allow for anonymous communication between the reporting person and us.

Information on reporting channels, the reporting process and the opportunity to submit a tip, as well as the contact information of the Compliance Officers, are publicly available on our website www.kuka.com.

Our business partners provide assistance by making these grievance mechanisms available in their supply chain.

We expect our business partners to promptly remedy violations and disclose remedial actions upon request.

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