

Supplier Code of Conduct



Table of Content

Introduction.....	3
Business Ethics and Compliance	4
Law-abiding.....	4
Anti-bribery and anti-corruption.....	4
Fair competition.....	4
Anti-money laundering.....	4
Conflict of interest.....	4
Sanctions and export controls.....	4
Disclosure of information	4
Intellectual property rights and protection of confidential information	4
Data protection and information security	5
Usage of Artificial Intelligence (AI)	5
Human and Labour Rights.....	6
Free choice of employment / Prohibition of forced labour	6
Prohibition of inhumane treatment and harassment	6
Prohibition of child labour	6
Prohibition of discrimination	6
Security guards	6
Working hours	6
Wages and benefits.....	6
Freedom of association	7

Rights of minorities and affected communities.....	7
Health and Safety	8
Health and safety practices.....	8
Emergency preparedness	8
Occupational accidents and diseases	8
Industrial hygiene.....	8
Physically demanding work	8
Machine safeguarding.....	8
Sanitary facilities, catering and accommodation	8
Climate and Environment	9
Climate and environmental compliance and monitoring	9
Decarbonization.....	9
Manufacturing process.....	9
Responsible chemical management.....	9
Waste	9
Soil, water, air pollution	9
Biodiversity and deforestation	10
Circularity	10
Responsible sourcing of minerals.....	10
Implementation.....	11
Reporting of Misconduct	11

Introduction

At KION Group (hereinafter referred to as “**KION**”), we are committed to driving the future of intralogistics with integrity, responsibility, and innovation in an economically, socially and environmentally sustainable manner. As one of the world’s leading providers of industrial trucks and supply chain solutions, we recognize that long-term overall sustainable success requires strong partnerships built on shared values.

The [KION Group Code of Compliance, Statement on the KION Group's human rights strategy](#) and our [Minimum Employment Standards](#) are the basis for our corporate, social and environmental activities. We commit our operations to sustainable standards and embrace our responsibility to foster respect for human rights along the value chain.

The KION Group Supplier Code of Conduct (hereinafter referred to as “**SCoC**”) sets out the minimum requirements for our Suppliers with respect for human rights, the promotion of safe and healthy working conditions, the protection of the environment, and the adherence to ethical business practices. The SCoC is based on internationally recognized and applicable standards in human rights, environmental protection, anti-bribery and anti-corruption, as well as other national and international laws and regulations.

Our Suppliers are obliged to operate in accordance with responsible business principles detailed in this SCoC and in full compliance with all applicable laws and regulations.

KION and its Suppliers will have a greater impact and a better chance of identifying and mitigating human rights and environmental risks if we work together and assume our shared responsibility. By working collaboratively with our Suppliers, we can drive positive change, create long-term value, and

contribute to a more sustainable future. We appreciate our Suppliers' partnership and shared commitment to these essential values.

Scope

This SCoC applies to all KION Suppliers. ‘**Suppliers**’ refers to suppliers and sub-contractors, agents, consultants, and their respective affiliates which provide goods and/or services to KION.

We further expect our Suppliers to implement the principles and standards of this SCoC or similar internationally recognized standards in their own supply chain. Where required, we request our Suppliers to support KION by providing required information on the topics mentioned below.



Business Ethics and Compliance

Law-abiding: Suppliers are required to comply with all applicable local, national and international laws, rules and regulations.

Anti-bribery and anti-corruption: Suppliers reject and prevent all forms of bribery and corruption. This includes payments made to expedite or secure the performance of routine government officials' tasks (facilitation payments). Suppliers ensure that no bribes, kickbacks, improper payments, services, gifts, entertainment, or other benefits are offered or given to any KION employee or third party with the intent to influence an administrative process or a business decision.

Fair competition: Suppliers respect fair and free competition and adhere to the applicable competition and antitrust laws. In particular, Suppliers must never enter into illegal agreements with competitors that may restrict or distort competition, such as setting of prices and terms or allocation of customers and markets. Suppliers ensure that they do not exchange or disclose competition-relevant information between competitors.

Anti-money laundering: Suppliers must comply with all applicable laws governing the prevention of money laundering and take active steps to prevent money laundering and the financing of terrorism within the scope of their business operations. Suppliers must ensure that their financial transactions are lawful, transparent, and traceable, and must not be used to disguise the origins of criminal proceeds.

Conflict of interest: Suppliers conduct business in a manner that avoids any actual, potential, or perceived conflicts of interest. Business decisions and interactions must be made objectively, transparently, and solely in the best interest of the business relationship, without the influence of personal

interests. Suppliers must ensure that no personal, financial, or other relationships exist between their employees and any KION employees that could improperly influence business decisions or create the appearance of impropriety. Suppliers must immediately disclose to KION any such conflict of interest.

Sanctions and export controls: Suppliers must comply with all applicable national and international trade regulations and customs, including sanctions, embargoes, and export control laws imposed by the United Nations, the European Union, the United States, and any other relevant jurisdiction. This includes restrictions on the transfer of goods, technologies, services, and financial transactions to or from individuals, organizations, or countries subject to trade sanctions. KION expects its Suppliers to conduct regular screening of their business partners and supply chain to ensure compliance with all relevant export control and sanctions requirements.

Disclosure of information: Suppliers must maintain accurate, transparent, and up-to-date records of their business activities and the information shared with KION. Any attempt to falsify records, conceal information, or misrepresent actual working conditions, production processes, or supply chain practices is prohibited. KION reserves the right to verify the accuracy of disclosed information. These records must be made available to KION upon request, provided such disclosure does not violate applicable data protection laws or legal confidentiality obligations.

Intellectual property rights and protection of confidential information: Suppliers recognize and respect intellectual property rights and protect associated information. Suppliers must not share confidential information, as well as confidential documents, with third parties without proper authorization or provide alternative means of access to them.

Data protection and information security: Suppliers must protect all personal data and business information in accordance with applicable data protection laws, such as the EU General Data Protection Regulation (GDPR), and industry best practices. They must implement appropriate technical and organizational measures to safeguard information against unauthorized access, loss, alteration, or misuse. Suppliers must ensure a high level of information security across their systems and processes. This includes maintaining a secure IT/OT infrastructure, promptly addressing vulnerabilities, and preventing any compromise that could impact KION, its employees, or its customers. Suppliers must prepare for potential information security incidents and set up their operations to ensure business continuity in exceptional situations. Suppliers must report any information security incidents and data breaches according to GDPR or other data protection laws to KION.

Usage of Artificial Intelligence (AI): Suppliers must use artificial intelligence responsibly and in compliance with applicable laws such as the EU AI Act. AI systems must be transparent, safe, and respect fundamental rights.



Human and Labour Rights

Free choice of employment / Prohibition of forced labour: Suppliers must strictly prohibit all forms of forced or compulsory labour as defined by ILO Conventions No. 29 and No. 105. This includes any work or service performed involuntarily under the threat of penalty, whether through coercion, confinement, debt bondage, withholding of identity or immigration documents, or restriction of movement. Any form of modern slavery, human trafficking, or involuntary prison labour is strictly forbidden. All employment relationships must be entered into freely and based on informed consent. Suppliers must ensure that workers are free to leave their employment at any time, subject only to reasonable notice as required by law or contract. It is prohibited to use any recruitment fees, deposits or other practices that may prevent employees from freely ending their employment. Employees must be provided with a written contract or other written documents that lay out the employment relationship and respective rights and duties in their native language or alternatively a language they can understand.

Prohibition of inhumane treatment and harassment: Suppliers must ensure a workplace free of harassment. Any form of inhumane treatment, including physical punishment, mental or physical coercion, verbal abuse, threats, intimidation, and sexual or non-sexual harassment, is prohibited. Disciplinary measures must be fair, transparent, and in line with applicable laws and international human rights standards.

Prohibition of child labour: Suppliers must not employ any person under the age of 15, or under the legal minimum age for employment in accordance with ILO Convention No. 138. If a national regulation concerning child labour provides for stricter measures, these shall have precedence. Hazardous work or work that interferes with a child's education or development is strictly prohibited. Therefore, Suppliers shall ensure that workers, under the age of 18

do not undertake nightshift work or work overtime or carry out any kind of work that can harm their health, safety, and physical development.

Prohibition of discrimination: Suppliers must provide equal opportunities and must not tolerate any form of discrimination in hiring, employment conditions, access to training, promotion, or termination. Discrimination based on for example nationality, ethnic origin, race, colour, religion, gender, age, disability, sexual orientation, gender identity, political opinion or union membership is prohibited. Discrimination also includes differential treatment that is not objectively and reasonably justified by a legitimate aim or where the means of achieving that aim are neither appropriate nor necessary.

Security guards: Suppliers must ensure that security forces operating at their premises and operations act in accordance with international recognized human rights standards. Hiring or deploying (public) security forces to protect a business project is prohibited if inadequate instruction or oversight by the company results in human rights violations.

Working hours: Suppliers must comply with applicable local laws and collective agreements on working hours, including maximum limits, breaks and rest periods. Regular working hours and overtime shall not exceed the thresholds set in the Articles 2 and 3 of ILO Convention No.1 and must be managed to safeguard workers' health and well-being. Excessive working hours shall be avoided.

Wages and benefits: Suppliers must pay workers at least the minimum wage required by applicable laws. Compensation paid to workers must be paid regularly and in a traceable manner. Deductions from wages as a disciplinary measure are prohibited. Suppliers shall ensure that employees receive equal compensation for equal work, irrespective of gender, and grant them the social benefits mandated by local law (e.g. sick leave).

Freedom of association: Suppliers shall respect the right of workers to freely associate, join or form trade unions and engage in collective bargaining. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations. Workers shall be able to exercise these rights, communicate openly and share ideas as well as concerns regarding working conditions and management practices without fear of discrimination, intimidation, reprisal, or harassment.

Rights of minorities and affected communities: Suppliers must respect the rights of local communities to appropriate standards of living, education, work, social activities, and the right of free, prior, and informed consent (FPIC) regarding projects that affect the land on which they live. Suppliers must not engage in any manner of unlawful land acquisition or appropriation when obtaining or developing land, water, or forests.



Health and Safety

Health and safety practices: Suppliers must provide a safe and healthy working environment that complies with all applicable health and safety laws, regulations, and industry standards. This includes identifying, assessing, and mitigating risks related to physical, chemical, biological, and ergonomic hazards as well as continuously developing and improving their health and safety measures and systems. Suppliers shall provide workers with appropriate information and training on all aspects of occupational health and safety in their native language or a language they can understand. Information on health and safety issues shall be clearly visible and accessible to workers. Trainings shall be provided to all workers before they start work and at regular intervals thereafter.

Emergency preparedness: Suppliers shall implement an emergency preparedness system that identifies and assesses potential hot spots. This includes emergency plans that incorporate notification systems, reporting chains and evacuation measures. Trainings and drills shall be held in accordance with local regulations, but at a minimum, at least once a year.

Occupational accidents and diseases: Suppliers shall ensure the prevention of occupational accidents and diseases through appropriate procedures. This includes the recording and classification of accidents and illnesses, the provision of necessary medical care and the investigation of such incidents. Any causes shall be remedied, and the supplier shall ensure that workers are facilitated to return to work.

Industrial hygiene: Suppliers must ensure special protection for workers that handle chemical, biological, or physical agents.

Physically demanding work: Suppliers must record, classify, and monitor if workers are engaged in physically demanding activities.

Machine safeguarding: Suppliers must carry out regular checks and maintenance on production facilities and other machines with regards to safety risks.

Sanitary facilities, catering and accommodation: Suppliers shall ensure clean sanitary facilities, drinking water and hygienic facilities for the preparation, storage and consumption of meals are always made available to workers. Workers' housing provided by Suppliers or labor brokers shall be well-maintained, clean, and safe. It shall have adequate emergency exits, hot water for bathing or showering, sufficient lighting, heating, and ventilation systems. Additionally, workers shall have individually secured storage space for personal belongings and adequate living space. Access and egress authorizations shall be properly regulated.



Climate and Environment

Climate and environmental compliance and monitoring: At KION we are committed to the Paris Agreement (COP21) and aim to reduce our CO2 emissions of our production, upstream and downstream value chain to NetZero by 2050 at the latest. We manage our decarbonization transition in alignment with the SBT initiative to ensure a science-based target approach and have set near-term (2030) and long-term (2050) reduction targets. We expect our Suppliers to align with our commitment to upholding the goal of climate and environmental protection for current and future generations. This includes continuously reducing greenhouse gas emissions, responsibly managing natural materials, waste, water, soil, air emissions, and hazardous substances, and operating in a resource-efficient and conservation-minded manner. Additionally, we support a circular economy and actively avoid actions that contribute to environmental harm. Laws passed for the protection of the environment are to be obeyed.

Decarbonization: Suppliers shall agree to measure or to start to measure, calculate, manage and report its total CO2 emissions in accordance with the international reporting standards. Suppliers are also required to develop and implement a plan of continual improvement with the objective of reducing its total CO2 emissions to contribute to efforts to limit global temperature increase to 1.5 Celsius above pre-industrial levels (the Paris Agreement). Reduction efforts include measures such as switching to green energy and increase the use of secondary raw materials. Furthermore, Suppliers undertake to providing the necessary data on their total CO2 emissions annually upon KION's request, ensuring full transparency.

Manufacturing process: Suppliers shall ensure that the entire manufacturing process of their products, from the extraction of raw materials to production and waste management, takes into account the relevant environmental

standards and commits to the goal of sustainable business. Such standards shall include the reduction of CO2 emissions, usage of resource-saving methods and increased use of secondary raw material. Suppliers are advised to ensure that their own tier-n supply chain will support such sustainable goals and act accordingly. Suppliers are expected to comply with the law as well as with the specifications given by KION.

Responsible chemical management: Responsible chemical management includes compliance with regulatory and customer requirements with regards to the restriction and prohibition of hazardous chemicals. Suppliers shall ensure that the products delivered to KION comply with the applicable legal requirements, such as EU REACH Regulation, EU POP Regulation, US TSCA. Furthermore, Suppliers must identify and minimize the use of hazardous substances by actively searching for safer alternatives to uphold product and environmental responsibility. Workers shall receive regular trainings on handling such substances.

Waste: Suppliers must avoid and reduce waste as far as possible. This includes systematic recycling.

Soil, water, air pollution: Suppliers must avoid causing any harmful soil change, water pollution, air pollution, harmful noise emission. Additionally, Suppliers must avoid excessive water consumption that disrupts food production and preservation, restricts access to safe and clean drinking water, limits access to sanitary facilities, causes their destruction, or harms human health. Suppliers shall establish systems for monitoring, prevention and control of these emissions and make efforts to reduce them.

Biodiversity and deforestation: Suppliers shall protect natural ecosystems and habitats, especially those vital for the biodiversity, and avoid deforestation, as defined by the Global Platform for Sustainable Natural Rubber, in accordance with the IUCN-guidelines and the REGULATION (EU) 2023/1115 of the European Parliament. Suppliers shall make continuous efforts to apply the principles of certified, sustainable agriculture and forestry in their land and apply the guidelines of High Conservation Value Resource Network (HCV) and High Carbon Stock Approach (HCSA). Some measures may include the management of biodiversity risks by setting offset-targets, application of mitigation hierarchies such as to avoid, minimize, restore and offset, and implementing land conservation efforts.

Circularity: Suppliers shall work on measures to improve the reuse and recycling of products and materials, work on increasing the use of secondary raw materials where possible. Where applicable, Suppliers shall qualify their own supply chains, to use secondary raw material sources and indicate the proportion of secondary raw materials or recyclability.

Responsible sourcing of minerals: KION aims to ensure that its products – as well as those of its Suppliers – are free from so-called conflict minerals. These are minerals that are sourced from or support, either directly or indirectly, countries that are considered conflict-affected or high-risk as defined by the relevant regulations (such as OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas). Furthermore, KION commits and requests such commitment from its Suppliers that the raw materials used and consumed in the goods and finally purchased by KION are sourced, processed and traded in a sustainable and ethical manner. Such raw materials specifically include cobalt, lithium, natural graphite and nickel. Suppliers shall conduct the procurement of minerals from conflict-affected and high-risk areas, particularly tantalum, tin, tungsten and gold, in accordance with the Organization for Economic Co-operation and Development (OECD) guidelines or an equivalent and

recognized due diligence framework. In addition to the aforementioned materials, other raw materials such as cobalt, nickel, natural graphite, lithium, may also be linked to social and environmental rights abuses. Suppliers must follow the OECD Guidelines and Ten Principles of the United Nations Global Compact when supplying or dealing with these materials. Further details can be found at <https://www.kiongroup.com/en/About-us/Suppliers/>.



Implementation

This SCoC is part of the contract concluded between the Supplier and KION. It determines the minimum expectations towards all Suppliers. KION encourages its Suppliers to strive for continuous improvement and go beyond these requirements if appropriate. Therefore, KION expects its Suppliers to implement a process to determine legal compliance in all relevant areas, including due diligence of their sub-suppliers and the assessment of the above-mentioned sustainability risks in their supply chain in order to be able to identify possible risks and take appropriate corrective actions and counter measures. This also includes measures for training and communication of all employees to ensure that they achieve an appropriate level of knowledge, awareness and skill to comply with the principles set out in this document. In case Suppliers should determine a potential violation within its own supply chain, Suppliers shall inform KION accordingly.

Suppliers shall select their own suppliers in a way that encourages compliance with the practices described in the SCoC. Given the appropriateness based on the Suppliers' size and structure, Suppliers shall make an effort to also create transparency and awareness of these principles within their own supply chain.

KION reserves the right to monitor and assess its Suppliers alignment with the principles of this SCoC. Therefore, we employ various methods such as self-assessments via questionnaires and, in case of reasonable suspicions of non-compliance, on-site audits or audits by third parties. All audits will be announced with reasonable advance written notice. The date and the scope of the audit will be mutually agreed upon between KION and the Supplier. The audits will be conducted during regular business hours and in compliance with applicable laws regarding data protection, insider trading and protection of trade and industrial secrets.

KION reserves the right to end the business relationship with Suppliers who violate the requirements of this SCoC and refuse or fail to implement corrective actions necessary for compliance.

Reporting of Misconduct

Suppliers must establish accessible and confidential channels for workers and other stakeholders to report concerns or suspected violations of this SCoC without fear of retaliation. Any form of intimidation or reprisal against individuals who report misconduct in good faith is strictly prohibited.

KION encourages Suppliers to promptly inform us of any actual or suspected breaches of legal obligations, human rights, environmental standards, or the principles outlined in this SCoC. Reports can be submitted directly through [KION Whistleblowing Channels](#). KION will follow up all tip-offs and guarantees the utmost confidentiality and fairness toward the whistleblower during our investigations.



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