

## Social Responsibility and Business Ethics Policy

Knauf is committed to the highest standards of ethical conduct.

We require all employees of Knauf, all third parties that represent the Company directly or indirectly, such as our supply chain, consultants, representatives, distributors, joint venture partners and any other third parties that supply goods or services to the Company, to meet our standards and ensure compliance with all matters relating to social responsibility and business ethics.

Whilst all employees are responsible for their own adherence to the policy, managers are also required to consider whether the actions of their staff and representatives are undertaken in accordance with the company requirements.

We are committed to ensuring compliance with laws to which our activities may be subject, including in particular Anti-corruption and bribery legislation, UK & EU Competition Law, Modern slavery, GDPR, Tax avoidance/evasion & Equal opportunities/anti-discrimination. In this respect we have emphasised these below, highlighting the appropriate definition of the requirement:

### **Anti-corruption legislation:**

The Bribery Act 2010 is an Act of the Parliament of the United Kingdom that covers the criminal law relating to bribery. We are committed to complying wholly and without exception with this legislation.

### **Competition:**

Both UK and EU competition law prohibit agreements, arrangements and concerted business practices which appreciably prevent, restrict or distort competition (or where this is the intended result) and which affect or may affect trade within the UK or the EU respectively. We are committed to complying wholly and without exception with this legislation.

### **Modern slavery:**

The Modern Slavery Act 2015 is an Act of the Parliament of the United Kingdom. It is designed to combat modern slavery in the UK and consolidates previous offences relating to trafficking and slavery. The act extends to England and Wales. We are committed to complying wholly and without exception with this legislation. We will not enter into or will terminate business dealings with any supplier, contractor or other third party whom we have reason to believe is involved in slavery or human trafficking.

### **GDPR:**

The Data Protection Act 2018 is a United Kingdom Act of Parliament which updates data protection laws in the UK. It is a national law which complements the European Union's General Data Protection Regulation and updates the Data Protection Act 1998. We ensure that any information held is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

### **Tax avoidance/evasion:**

Whilst UK law differentiates between avoidance and evasion, neither practice is acceptable within Knauf or within its supply chain. We are committed to complying wholly and without exception with this legislation.

### **Equal opportunities & anti-discrimination:**

The right to be treated without discrimination, especially on the grounds of one's sex, race, or age. We are committed to complying wholly and without exception with this legislation.

Denying any employee or prospective employee their right to equal opportunity in the workplace is tantamount to discrimination, which is considered unlawful under the Equality Act 2010. The Equality Act has specified 9 areas that are termed in the legislation as protected characteristics. We are committed to complying wholly and without exception with this legislation.

Whilst these laws and regulations (detailed above) can be complex, the company is committed to providing staff and partners with sufficient information in order that personnel can recognise when issues arise, avoid prohibited conduct and/or promptly seek guidance where appropriate.

### **Reporting breaches:**

Any employee who has concerns regarding a breach or suspected breach of the Company's policies can raise them initially with their Line Manager, or where confidential reporting is appropriate, directly to the Director. Where any concerns raised are proven to be justified, any training or re-training required will be made available, together with changes/improvements to procedures, and/or disciplinary action will be taken as deemed appropriate.

### **Summary:**

Fundamentally, the success of our approach depends upon our management and employees understanding the Company's values, applying judgement and reason in an open environment and having the confidence that the Company will help and support them when dealing with difficult issues.

Knauf has highlighted and controls the following key areas of social responsibility and business ethics, with additional information and resource available when necessary:

- UK Competition Law – credit circles and Trade Associations
- Anti-corruption, bribery, gifts and hospitality
- Investigation of potential ethical violations

- Modern slavery
- GDPR
- Equal opportunities
- Training needs and plans
- Dealing with staff issues and dilemmas

We work proactively with clients and stakeholders to achieve our goals and constantly strive for continual improvement in these areas.

A handwritten signature in blue ink, appearing to read "Ian Deen".

**Managing Director  
Knauf (UK) GmbH  
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