

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 anti-corruption and bribery legislation, UK & EU Competition Law, Modern slavery, GDPR, tax avoidance and evasion, equal opportunities, anti-discrimination and all applicable human rights legislation. In this respect we have emphasized these below, highlighting the appropriate definition of the requirement:

Fair Treatment of Employees and Equal Opportunities

We promote our values of Menschlichkeit, Partnership, Commitment and Entrepreneurship and ensure we have high standards and expectations around leadership, team management and general conduct, with managers annually appraised in line with these values. In compliance with the Equality Act 2010, we are also committed to ensuring there is no unfair discrimination in employment or occupation and that practices adopted are non-discriminatory. Further details are included in our Equality and Diversity, Dignity at Work, and Recruitment Policies.

Modern Slavery and Labour Rights

All employment relationships with the company are voluntary and based on mutual consent, without the threat of a penalty. We will ensure compliance with Modern Slavery Act 2015 and that the following practices do not take place, including, but not limited to:

- physical and sexual violence
- bonded labour
- withholding of wages /including payment of employment fees and or payment of deposit to commence employment (other than lawful deductions)
- unreasonable restriction of mobility/movement
- retention of passport and identity documents
- threats of denunciation to the authorities.

Child Labour

We are committed to the ILO and Ethical Trading Initiative (ETI) codes of conduct and as part of that commitment shall not use or employ any form of child labour of UK compulsory school age. We will however support work experience, where coordinated through schools and colleges, as part of a young person's education and is aware of its obligations to comply with Employment of Children Act 1973.

Any under 18 persons who are legally employed by Knauf (UK) GmbH will be subject to a specific under 18's risk assessment. No person under the age of 18 will be employed in work that impacts on health including hazardous or heavy work, the company's OH & S risk assessment process shall ensure this is the case.

Anti-Corruption and Bribery

We take a zero-tolerance approach to any form of bribery or corruption and are committed to acting professionally and fairly in all our relationships and business dealings wherever we operate. Our policies put in place principles and procedures to support this commitment.

Sourcing of Suppliers

All new suppliers must be approved through our supplier questionnaire process. This approval process checks compliance with the Modern Slavery Act 2015 and anti-corruption legislation to ensure that our supply chain upholds the same standards and ethical practices as ourselves.

Data Privacy

The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR). We ensure that any personal data processed by us or on our behalf 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 necessary
- Handled in way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction, or damage

Tax avoidance and 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.

Fair Competition

Our policies and procedures ensure our compliance with competition law. Compliance is not only a legal requirement but is also essential to our brand and reputation and the long-term success of our business.

Training

Training is provided to raise awareness and sensitivity to issues around equality and dignity at work in order to ensure that all relevant employees receive training in the areas of Modern Slavery, Anti-Corruption and Bribery and Competition compliance.

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.

Freedom of Association and Collective Bargaining

We respect the right of all our employees to join employee representative bodies and trade unions and to bargain collectively.

We work closely with the employee representatives to achieve the best possible results for the Knauf Group. We recognize the value that cooperation based on trust and mutual respect brings to all Knauf Companies and its employees. No employee is disadvantaged or favoured because of their affiliation with an employee representative body.

Summary:

Fundamentally, the success of our approach depends upon our management and employees understanding the Company's values, applying judgment 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 above key areas of social responsibility and business ethics, with additional information and resource available when necessary and we work proactively with clients and stakeholders to achieve our goals and constantly strive for continual improvement in these areas.



Ian Stokes, Managing Director
Knauf UK GmbH
31st March 2024