

CODE OF CONDUCT AND RULES FOR COMPLIANCE WITH COMPETITION LAW/rev. Dec. 2025

PREAMBLE:

KUMA was founded in 1998 and over the years has built a reputation in its relationships with employees, customers, and suppliers.

Through this Code of Ethical Conduct, we want to give every employee the opportunity to understand the standards we must maintain in our work.

As stated in our Quality and Compliance Policy, we pay close attention to four qualities: responsibility, competitiveness, loyalty, and reliability.

Our company has grown precisely because our employees have been loyal to the company and management has given them its full trust and support.

While our Quality Policy focuses more on the quality of our products and how we achieve these standards, this code of ethics focuses on seriousness and your responsibility to ensure the confidentiality of the company's activities, which obviously depends on everyone's loyalty.

CODE OF CONDUCT

A. Principles of conduct within KUMA:

These ethical principles apply to all employees regardless of their position.

Compliance with the duties in the job description, the Internal Regulations, the Code of Conduct, and the procedures established within each process and each department.

These job duties must be performed with responsibility, competence, efficiency, and fairness. Managers and senior staff within the company must set an example of behavior for the newer generation of employees at KUMA.

Loyalty to the company translates into the development of a cohesive and motivated team, maintaining the confidentiality of data and activities, and being RECEPTIVE to the achievement of the company's objectives. This positive culture can contribute to improving morale, productivity, and reducing staff turnover.

No employee shall use their position in the company to gain advantages from their relationship with colleagues or third parties outside the company. KUMA has zero tolerance for such practices; giving or taking bribes in relation to colleagues, suppliers, and customers will result in the termination of the employment contract.

Indifference towards company property and negligence towards the technical condition of equipment are considered negative employee behavior, and measures will be taken in this regard.

KUMA does not tolerate illegal and immoral acts. We rely on a transparent information policy and efficient and responsible management.

B. Responsible communication and compliance with KUMA ROMANIA's principles

1. Purpose of the policy

This policy establishes the rules regarding public communication and the use of social networks by KUMA ROMANIA S.R.L. employees, with a view to:

- protecting the image, reputation, and legitimate interests of the company;
- preventing the company from being associated with the personal, political, or ideological opinions of its employees;
- complying with the obligation of loyalty provided for in the Labor Code.

2. Scope

(1) The policy applies to all company employees, regardless of their position.

(2) Employees with management, coordination, or representation positions (managers, directors, department heads) have additional obligations of discretion and public responsibility.

3. General principles

- KUMA ROMANIA S.R.L. is politically neutral with regard to the personal opinions of its employees.
- The opinions expressed by employees in the public sphere are considered strictly personal,

provided that they are not directly or indirectly associated with the company.

- Freedom of expression is respected, within the limits of the law and contractual employment obligations.

4. Rules on public communication and social media

4.1 It is prohibited to:

- a) use the company's name, logo, headquarters, internal documents, or projects in public posts expressing personal, political, or ideological opinions;
- b) mention the position held within KUMA ROMANIA S.R.L. in political, civic, or ideological contexts;
- c) publicly expressing opinions that may be interpreted as official company positions without express authorization;
- d) publishing content that may damage the company's image, reputation, or commercial interests;
- e) involving the company, directly or indirectly, in political, institutional, or ideological disputes.

4.2 Special obligations for management personnel

Employees in management positions:

- shall exercise restraint and responsibility in public communication;
- shall ensure that their online activity does not create confusion between personal opinion and the company's position;
- shall avoid any form of public communication that may affect the confidence of partners, customers, or employees in the company's neutrality and professionalism.

4.3 Clarifying the personal nature of opinions

The explicit statement "these are my personal opinions" is not sufficient if:

- the position or name of the company is visibly associated with the person;
- the context of the post may lead to the company being identified with the message.
- When using social networks or other public channels and there is a visible association with the organization (e.g., by mentioning the employer on the personal profile or through public links with colleagues and customers), employees must ensure that the opinions or information published cannot be interpreted as official positions of the organization and do not affect its image or credibility.

Official company communication

(1) Official communication on behalf of KUMA ROMANIA S.R.L. shall be carried out exclusively by persons designated by internal decision.

(2) Any public position regarding the company's activity, values, or direction requires prior approval from management.

C. Principles and rules for compliance with competition law

We do not have the right to obtain strictly confidential information about competing companies by illegal means or means that contravene ethical principles such as theft, espionage, or breach of confidentiality agreements.

We promote open and fair competition and, last but not least, we always respect the rights of our business partners and competitors. All business partners are treated fairly and equally.

All data, activities within KUMA, data about customers, suppliers, prices, know-how, and processes are strictly confidential.

C1. Mandatory rules:

- It is prohibited to have contractual provisions in relation to customers/suppliers that mention the obligation to exchange sensitive information (prices, market shares).
- It is prohibited to impose prices when reselling own products/goods to dealers.
- It is prohibited to recruit personnel with management roles or sales responsibilities from

competitors for the purpose of obtaining secret data.

- Employees are prohibited from interacting with competing companies for the purpose of obtaining secret information and from disclosing confidential data belonging to KUMA.
- Auctions/bidding—it is prohibited to bid directly to a state entity that is required to access SEAP (Public Electronic Procurement System) in accordance with the legislation in force.
- Tenders/bids shall not be submitted directly to a state entity that is required to access SEAP in accordance with the legislation in force
- It is prohibited to disclose know-how, the level of utilization of production capacities, strategic information on price structure (research, production, distribution), information about sales/promotion strategies, sales-related revenues and volumes, profit margins, customer lists, supplier lists, raw material purchase prices, auxiliary materials.
- It is prohibited to disclose strategic information related to the company's development and budgets.
- It is forbidden to offer/receive gifts (except for promotional gifts of reasonable value) between employees and superiors, between TESA sales employees and dealer employees, between TESA production and suppliers, between SERVICE employees and end customers. If an employee is confronted with "bribery," this must be reported to Management (CO or JD).

Conflict of interest - is a situation in which a person or organization is involved in multiple interests, such as financial or other interests, that may corrupt or significantly affect the correct and impartial decision-making of that person or organization. In the relationship between KUMA employees and customers/suppliers/colleagues/management, a conflict of interest exists when the independence or integrity of decisions is affected by strictly personal considerations.

A conflict of interest exists when, in various circumstances, there is a risk (based on previous experience and objective evidence) that a decision may be influenced by other secondary interests

Secondary interests include personal benefits that are not limited to financial gain, but also other

motives such as the desire to do favors for family and friends or the desire for professional advancement. These secondary interests are not treated as negative in themselves, but are unacceptable when they affect the primary interest.

All cases where misconduct may constitute a criminal offense will be reported to the appropriate authorities. In the event of misconduct in violation of the rules of conduct and legal provisions in force, in order to respond appropriately to the acts committed and to combat any future misconduct, legal disciplinary measures (in accordance with the Labor Code and Internal Regulations) will be applied, ranging from a warning to the termination of the individual employment contract.

D. MORAL AND ETHICAL VALUES

D1. COMPLIANCE WITH THE LAW – The company must operate in good faith, within the appropriate legal framework. We comply with the rules, regulations, and laws, including legislative requirements, industry codes, and organizational standards relating to our business activities.

We consider regulatory measures as benchmarks. Our ethics go beyond legal compliance, integrating standards of good corporate governance, best practices, and community expectations.

D2. RESPONSIBILITY- KUMA takes responsibility for the impact of its activities and considers the needs and expectations of all internal and external parties, including colleagues, shareholders, business partners, suppliers, joint venture partners, customers, competitors, government and political stakeholders, non-governmental organizations (NGOs), and local communities.

By adopting the Sustainable Development policy, we act responsibly at the economic, social, and environmental levels.

D3. INTEGRITY- We can earn the trust of others through integrity, which means consistency in thought, words, and actions.

This means promoting professional ethical standards even before individual or organizational goals. Maintaining integrity often requires moral courage, the strength to do what is right, to live by ethical principles despite strong pressure to act otherwise.

D4. RESPECT FOR OTHERS—We treat all people with respect. We respect the human dignity, autonomy, privacy, rights, and interests of all people.

We follow the Golden Rule, striving to treat others as we would like to be treated. Respect is the foundation of our team spirit and our partnerships.

D5. HONESTY—We are honest in all our communications and actions. We believe that honesty is the cornerstone of mutual trust, upon which we build and protect the company's good reputation and integrity.

Our relationships are based on mutual trust and respect, and we are fair to our business partners.

D6. CARE- We interpret the concept of stakeholders broadly and constantly strive to consider the impact of our actions on them from a business, social, environmental, and health perspective. We try to achieve our business goals in a way that causes as little harm and as much good as possible to our Group, our entire value chain, our communities, society, and the environment in general.

D7. TRUST- We constantly strive for excellence in all aspects and constantly strive to increase our level of competence and trust by providing reliable, high-quality products and services.

It is essential that our values become part of the conduct of everyone who works for and with our organization at all levels. We are committed to honoring all our contracts and make every reasonable effort to comply with the letter and spirit of our promises and commitments.

D8. ACCOUNTABILITY—We are transparent and accountable. We recognize and accept corporate and personal responsibility for the ethical quality of our actions and operations.

All directors and employees are required to comply with our Code of Ethics and Business Conduct. If we know or suspect that someone is violating our values, we have a duty and the courage to speak up.

WE ARE INTEGRITY WHISTLEBLOWERS and report any misconduct that may harm the smooth running of the company or our relationship with colleagues/employees:

- we report any breach of the Internal Regulations, any violation of the law that may harm the company and, implicitly, other employees

- we protect the identity of the whistleblower and any third parties mentioned

- we send the whistleblower confirmation of receipt of the report within 3 working days and inform them of the measures taken within a maximum of 3 months

- We report to the Production Manager or Administrator Jan Dohn—you can find them on the KUMA website www.kumaromania.ro/ About Us-link WHISTLEBLOWER,

E. FAIR COMPETITION - Competition provides the best incentive for efficiency. Competition encourages innovation and guarantees the best options for consumers to select the best price.

Anti-competitive practices are unacceptable and will not be tolerated, and are also illegal in most countries, with the risk of heavy fines. Competition law prohibits a variety of practices that restrict free and fair competition, such as illegal agreements between competitors or abusive conduct designed to obtain or maintain a monopoly.

F. ANTI-CORRUPTION AND ANTI-FRAUD

KUMA does not engage in or tolerate corruption in any form (including bribes, payments to facilitate certain services, financial support, blackmail, abuse of power for personal gain, undue benefits or gifts with the intention of influencing), whether it occurs in the public or private sector and regardless of its size.

We maintain this position even if our commitment to this policy places the company in an uncompetitive business position or if speaking out against these activities results in business losses.

Throughout our entire value chain, including community involvement, charitable giving, and

sponsorship, we are committed to a zero-tolerance policy when it comes to corruption and bribery. Fraud, including falsification of financial or non-financial records, money laundering, and insider trading, is prohibited.

It is our shared responsibility to create and maintain a company culture throughout the value chain that encourages people to act without fear and in an environment that does not tolerate retaliation when they observe or suspect possible acts such as bribery, corruption, or fraud. KUMA operates an anti-corruption and anti-fraud system that aims to reduce the risk of fraud and highlight prohibited behavior.

G. BRIBERY AND CORRUPTION

Corruption is a form of misuse of influence to obtain a personal benefit or a benefit for a third party. Corruption includes:

- Offering, promising, granting, or requesting anything of value or an advantage to government officials, individuals, or third parties in connection with their relationships with officials or decision-makers for the purpose of improperly influencing them for a business advantage (active bribery/giving bribes).

- Soliciting, requesting, accepting, or receiving anything of value or a service to secure an advantage in any form in exchange for or as a condition for performing duties or influencing third parties to do so (passive bribery/taking bribes). Indirect bribery includes contributions to

intermediaries such as scholarship funds, charitable donations, or payments to entities that provide the corrupt party with a direct or indirect benefit. Indirect bribery may include a third-party intermediary (e.g., an agent, broker, distributor, or representative) who commits any of the wrongful acts mentioned above on behalf of or for the benefit of KUMA.

Corruption also includes the abuse of office or position by claiming to illegally influence a person and, through this deception, soliciting or receiving an illegal advantage or accepting a promise of such an advantage.

KUMA does not tolerate corruption in any form. We are committed to not entering into or terminating business relationships with individuals engaged in corrupt practices.

H. FRAUD -Fraud includes all types of intentional and unlawful deception. Fraud includes misrepresentation or concealment of a material fact for the purpose of inducing another person to act in order to obtain an advantage that causes damage.

Fraud can also occur without the element of deception, when individuals or parties conspire to obstruct due process in order to create the appearance of legitimate business activity or transactions for personal gain.

KUMA is committed to fighting fraud and does not tolerate fraudulent practices. To protect the company's values, assets, and reputation, each of us is personally responsible for acting in good faith, in accordance with relevant rules and regulations, and for being alert to any signs of fraud.

Even ignoring suspected fraud can result in liability for the company and for you personally.

I. MONEY LAUNDERING -Money laundering is the process of concealing illicit funds or the process of making illicit funds appear legitimate so that the origin or criminal nature of the funds or assets is concealed under the guise of legitimate business activities.

It can also mean using legitimate funds to support crime or terrorism. The legal provisions in most countries also criminalize activities that obstruct an investigation or failure to report suspected money laundering. We never excuse, facilitate, or support money laundering, which means that:

- We comply with all applicable anti-money laundering laws and regulations;
- We never engage in business that is intended to finance or support crime or terrorism;
- We seek solutions to minimize risk through anti-money laundering processes;
- We take reasonable and appropriate measures to identify and assess the integrity of our business partners.

Final provisions

(1) This Code of Conduct shall enter into force on the date of its communication to employees and is an integral part of the company's Internal Regulations.

(2) Employees have received this revised CODE OF CONDUCT electronically and it is displayed in the departments.

Failure to comply with these rules constitutes a disciplinary offense and may result in sanctions in accordance with labor legislation and internal regulations.

Camelia Olesen—Executive Director

Se aliniaza urmatoarelor prevederi legislative:

Legislație generală

- Codul muncii (Legea nr. 53/2003)
 - drepturi și obligații ale angajaților
 - disciplină, sancțiuni, hărțuire, demnitate la locul de muncă
- Constituția României
 - egalitate, nediscriminare, libertăți fundamentale
 - ◆ Etică, integritate și comportament
- Legea nr. 361/2022 (whistleblowing)
 - protecția avertizorilor de integritate
- Legea nr. 78/2000
 - prevenirea și sancționarea faptelor de corupție
- Codul penal (conflict de interese, abuz în serviciu, luare/dare de mită)
 - ◆ Egalitate și respect
- OUG nr. 137/2000 – prevenirea și sancționarea discriminării
- Legea nr. 202/2002 – egalitate de șanse între femei și bărbați
- Legea nr. 167/2020 – prevenirea hărțuirii morale la locul de muncă
 - ◆ Protecția datelor și confidențialitate
- Regulamentul (UE) 2016/679 – GDPR
- Legea nr. 190/2018 – aplicarea GDPR în România
 - ◆ Sănătate, securitate și mediu
- Legea nr. 319/2006 – securitatea și sănătatea în muncă
- Legislație de mediu (dacă este relevantă activității)