

KION Compliance Principles for Independent Partners in KION's Sales & Service Organisation

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With its brands KION is synonymous worldwide with the highest level of technology and service expertise in the field of forklift trucks and material handling equipment. With more than 21,000 employees and sites throughout the world, we are the market leader in Europe and one of the two major companies worldwide in our industry.

Resulting from our leadership position KION has a special responsibility to our customers, business partners, employees, the environment and society. Clear rules applicable for doing business are important to our company's success, as they contribute to robust and sustainable processes, reduce risks, ensure compliance with laws and regulations, and thus ultimately, raise the company's performance. Compliance serves these purposes.

Our basic commitment in this area is summarized in the KION Group Code of Compliance which constitutes the framework for our business activities. Performance, personal responsibility, integrity, customer focus as well as respect for people and the environment are part of the core values of our corporate culture and form the basis of this Code of Compliance.

Our Code of Compliance is meant to contribute to the creation and continued development of a culture of compliance within the KION Group, to foster the performance and credibility of the KION Group and to support our employees and business partners in their day-to day work.

The success of KION Group is dependent to a large extend to the long lasting business partnership with independent commercial agents. Our joint reputation as part of a winning proposition for our customers can suffer from adverse activities such as the use of illegal sales practices. We are therefore committed to do everything we can to ensure that we and our business partners in our sales and services activities enhance this winning proposition by acting within the applicable legal regulations.

Therefore, it is KION Group's policy to forge a partnership with our business partners in the pursuit of these goals. As part of this partnership we want to ensure that all our independent sales representatives understand our KION Group Code of Compliance and our KION Compliance Principles for Independent Partnership in KION's Sales & Service Organisation (the Compliance Principles) in order for them to be able to direct their own business operations in accordance with them and to maintain practices that are consistent with them. On the basis of the KION Group Code of Compliance our Compliance Principles form a basis for our contractual relationships.

KION Group and its brands values close and productive cooperation with its partners in its Sales & Service Organisation. Therefore we believe that a joint understanding on the principles of doing business is essential for a mutually benefitting business relationship. If our independent partners in our Sales & Service Organisation feel unable to subscribe to these principles and to direct its business along these lines we would expect to be informed accordingly in order to openly discuss the apparent conflict in expectations. As part of our approach to partnership in doing business we however would most likely need to reflect any disconnection between us and the independent partner on these issues in our working relationship going forward which ultimately may make it impossible to continue the business relationship.

Based on these thoughts the KION Compliance Principles contain the following rules:

Avoiding conflicts of interests

Business will be conducted with integrity. No payments, services, gifts, entertainment or other advantages exceeding acceptable thresholds offered or given to any KION Group employee or third party which are intended to influence the way in which the KION Group employee or third party conducts its business.

Export Controls

Sales representatives must adhere to the legal regulations placed on export control if required and should provide necessary information in this context to KION and its brands .

Confidentiality and protection of business needs

Each sales representative is obliged to keep business information confidential and to take precautions against such information from becoming known in advertently. They may only use business information in the interests of the company.

Accuracy of financial reporting

Business transactions are documented and posted accurately and promptly.

Data Protection and Data Security

Access by unauthorised third parties to sales representatives IT systems and resulting loss or destruction of data must be prevented.

Antidiscrimination

There will be respect for human rights. Harassment or discrimination against employees in any form is not acceptable. This includes but is not limited to gender, ethnic origin, skin colour, religion, sexual orientation, disability or age.

Health, Safety and Environment

Sales representatives workers should have safe and healthy working conditions that meet or exceed applicable standards for occupational health and safety. Operations are carried out with care for the environment and will include compliance with all relevant legislation in the country concerned. All products and services will be delivered to meet the environmental, quality and safety criteria specified in relevant contract elements.

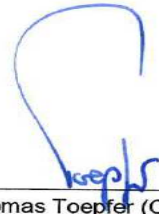
As part of our approach to partnership it is our expectation that our business partners will take responsibility to safeguard adherence to these Compliance Principles and exercise diligence in verifying that these principles are being adhered to in their daily business.

Safeguarding of these standards is a long-term learning and development process. We will work together with our business partners towards compliance and will continually review and revise these principles if needed. It goes without saying that we feel this to be part of our dialogue with you.

KION Group GmbH



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