

# **Code of Conduct of the KEMPER Group (COC)**



## Introduction by the Management

Ladies and Gentlemen,

Gebr. Kemper GmbH + Co. KG is a family-run business with strong values, which has been operating since 1864. "Fortschritt machen" – "Making progress" – is not just a slogan for us, but our fundamental philosophy. We set equally high standards for the quality and sustainability of our products.

Our mission is to create products and services of the highest quality by using innovative and state-of-the-art technology. By taking social and economic responsibility, we promote and strengthen the German manufacturing sector. It is our firm belief that economics and ethics are inextricably linked and that sustainable economic viability can only be ensured by adhering to moral and ethical values



Olpe, October 2025

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## 1. Purpose / scope of application

This Code of Conduct contains the essential rules and principles of conduct that apply to all employees of the KEMPER Group. The term "employee" applies to both male and female employees and also includes members of the board of the management.

This Code of Conduct serves to make the employees of the KEMPER Group, hereinafter referred to as employees, transparent and aware of the basic legal and ethical requirements that they must comply with in the course of their work for the KEMPER Group and to provide them with guidance in this regard.

## 2. General principles

KEMPER is guided by ethical values and principles, in particular integrity and honesty, as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, the core labor standards of the International Labor Organization (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, and the Charter of Human Rights. This also includes the involvement of individuals in our own workforce and in the value chain, as well as measures to remedy any impact on human rights. KEMPER is committed to respecting the rights of affected communities, especially minorities and indigenous peoples, protecting their cultures, and involving them in all relevant decisions. This also includes respecting land, forest, and water rights, as well as protection from forced eviction. In the event that private or public security forces are used, appropriate training and supervision of these forces will be ensured.

This Code of Conduct is binding for all employees and is actively enforced.

The Code of Conduct is developed in cooperation with the relevant departments at KEMPER and is reviewed and updated at regular intervals, at least every two (2) years. The main responsibility for the Code of Conduct lies with the management and the Compliance Officer at KEMPER.

### Compliance with Law and Justice

A fundamental rule of our actions is compliance with the law in the respective legal system in which we operate.

The management of the KEMPER Group and all employees are obliged to comply with applicable national and international laws, trade practices and sub-statutory standards and regulations, to maintain proper business documentation and to disclose information where required by binding disclosure requirements.

KEMPER does not accept or tolerate any violations of applicable law within the company.

The same applies to the company's internal policies and guidelines. Our principles also include avoiding any involvement in transactions that are clearly intended to circumvent statutory provisions.

Every employee is obliged to uphold the reputation of the KEMPER Group and to avoid anything that could cause damage to the company.

We expect personal integrity and reliability from our employees.

#### **Export control and sanctions law**

In particular, we are committed to complying with national and international laws and regulations governing the import and export of goods, software and services. KEMPER has implemented processes and procedures to prevent import and export violations of any kind.

#### **Dealing with business partners**

KEMPER is committed to the principle of open dealings with its business partners. In particular, KEMPER endeavors to cooperate with its business partners in a fair and trusting manner in order to create an economically satisfactory situation for both parties. KEMPER expects the same from its business partners.

### **3. Compliance and integrity**

#### **Integrity**

KEMPER strictly adheres to its values and convictions in its day-to-day business. KEMPER requires its employees and business partners to share these values and convictions.

### Fair competition

KEMPER is committed to fair competition and undertakes to act fairly and decently in the conduct of its own business activities. KEMPER undertakes to conduct its business activities in accordance with national and international competition and antitrust law and does not participate in price fixing, market sharing or customer, market or bid rigging. In line with this policy, KEMPER cooperates with authorities in suspected cases to clarify the situation and undertakes to disclose information. This disclosure also includes financial matters. In accordance with this financial responsibility, KEMPER is committed to transparent, proper accounting and records financial transactions in detail.

### Conflicts of interest

KEMPER avoids situations that could lead to conflicts of interest for itself or its business partners. Every business decision must be made on the basis of objective judgment and must be free from personal gain.

### Fighting corruption

KEMPER expressly prohibits its employees from engaging in business practices involving bribery and the granting of advantages and demands fair competition from its business partners. KEMPER prohibits its employees from granting private advantages to its business partners which are likely to influence correct decisions, as well as from accepting private advantages from business partners themselves.

In addition, every business partner is obliged to report inappropriate behavior by Kemper employees that is likely to influence proper and objective decisions at the business partner by giving an advantage to the management of KEMPER directly or to the KEMPER Compliance Officer.

### Money laundering and terrorist financing

KEMPER commits itself and its business partners to strict compliance with the legal obligation to combat money laundering and the financing of terrorism. KEMPER will not participate in or facilitate activities related to money laundering and terrorist financing and expects the same behavior from its business partners without restriction.

### Intellectual property and plagiarism

KEMPER is committed to intellectual property rights and will only use third-party intellectual property if the rights holder has expressly consented to the use. KEMPER expects its business partners to behave in an equally legally compliant manner. KEMPER undertakes to only use products and manufacturing processes for the manufacture of its products which KEMPER has developed itself, which are free from third-party intellectual property or for which KEMPER has acquired the corresponding rights of use.

We do not tolerate deliberate or negligent behavior that results in a reduction in the quality of KEMPER products. For this reason, we strictly prohibit the use of plagiarized or counterfeit materials.

### Invitations and gifts

KEMPER regulates the acceptance of invitations and gifts. Invitations and gifts may only be accepted if their scope and occasion can be considered reasonable and socially appropriate and if they comply with the local value limits applicable in business practice. Furthermore, it is prohibited to demand or grant benefits that exceed the applicable value limits.

## 4. Working conditions and occupational health and safety

### Human rights

KEMPER respects internationally proclaimed human rights and supports their observance within its sphere of influence. KEMPER demands the same behavior from its business partners and expects that its business partners do not participate in actions that violate human rights. The treatment of our own workforce is based on the core labor standards of the International Labor Organization (ILO), taking into account the laws and legal forms applicable in the various countries and locations. For KEMPER, it goes without saying that the interests, views, rights, and expectations of its own workforce (both actual and potential) that are significantly affected are taken into account in the decision-making process. The goal of all activities is to be able to offer its own workforce secure and long-term employment.

### Anti-slavery, forced and child labor

As an upright company, KEMPER attaches great importance to the prevention of criminal exploitation of human labor, such as human trafficking, but also forced or child labor. In this context, specific reference is made to ILO Convention No. 138 and ILO Convention No. 182.

Proof of age is requested and documented for every new hire. All work must be voluntary, and it must be possible to terminate the employment relationship.

KEMPER is fully committed to Article 5 of the Charter of Fundamental Rights of the European Union and openly supports the prohibition of slavery and forced labor and expects the same attitude from its business partners. KEMPER will do everything in its power to ensure that slavery, forced labor and child labor are neither directly nor indirectly supported within its own supply chain.

#### **Prohibition of discrimination and sexual harassment**

KEMPER is expressly committed to a working environment free of prejudice and discrimination, which respects the personal dignity, privacy and personal rights of each individual and enables respectful and cooperative cooperation. KEMPER does not tolerate discrimination on the basis of race, skin color, nationality, ancestry, gender, sexual identity, creed, ideology, political views, age, appearance or physical constitution, neither among itself nor among its business partners. KEMPER prohibits any kind of sexual or other personal harassment or insults and mobbing and opposes any kind of coercion, violence or threat of violence and expects its business partners to commit themselves to the same and to take legal action against offenders.

#### **Freedom of association**

KEMPER respects the freedom of association and the right of its employees to freedom of association and assembly and that every employee may freely join a labor organization or trade union or form such an organization or trade union. KEMPER expects its business partners to give its employees the same opportunities to put forward their concerns in this regard at any time without restriction.

#### **Family friendliness**

KEMPER has repeatedly been recognized as a family-friendly company. KEMPER thus proves that career and family can be well combined and is known as an attractive employer for specialists and executives.

## Working hours, wages and social benefits

KEMPER undertakes not to exceed the legally permissible number of working hours of its employees. KEMPER remunerates its employees appropriately and the remuneration corresponds to the industry standard and the national and local legal provisions. KEMPER complies with the applicable legal provisions regarding social benefits.

## Occupational safety

KEMPER attaches great importance to good working conditions in its own companies and pays particular attention to complying with the statutory provisions in the areas of:

- Personal protective equipment
- Machine safety
- Emergency preparedness
- Incident and accident management
- Workplace ergonomics
- Fire protection

## Working conditions

KEMPER is committed to fair and social working conditions. Fair and equitable wages (salaries), equal pay for work of equal value, the right to freedom of association and collective bargaining, and social benefits within the framework of applicable rights and laws are essential components of the strategy for social responsibility and economic orientation. Employees are always informed clearly, in detail, and regularly about the composition of their remuneration. KEMPER supports its own workforce wherever possible with flexible working time models and work-life balance issues, such as granting family-related leave or childcare solutions. Compliance with maximum permissible working hours and associated rest periods in accordance with applicable laws and regulations is a matter of course. KEMPER also ensures that there is adequate lead time for changes in working hours, such as weekend work or shift changes. Providing access to sufficient drinking water and clean sanitary facilities for employees is the minimum standard for social facilities. The privacy of our own workforce is respected and actively protected. Continuous training of our own workforce and regular reviews of qualification levels are anchored in our personnel development policy. Social compatibility is taken into account when terminating employment relationships. Young employees receive special protection in all areas.

### Promotion of variety and diversity, equal opportunities, inclusion

We promote equal opportunities and do not tolerate discrimination.<sup>1</sup> We treat all people equally, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

KEMPER actively promotes equality, equal treatment, and equal opportunities. Vacancies are advertised in accordance with applicable collective bargaining agreements. KEMPER embraces social and cultural openness and diversity. This also includes the inclusion of people with disabilities in operational processes.

KEMPER complies with specific policy commitments relating to inclusion or support measures for people from groups that are particularly vulnerable within its own workforce, where such commitments exist.

## 5. Sustainable actions

### Environment

KEMPER is committed to its responsibility for environmental protection and sustainability. KEMPER has therefore adopted regulations and guidelines to protect the environment. KEMPER requires its business partners to also actively assume responsibility, in particular to reduce air pollution, energy and water consumption and CO<sub>2</sub> emissions. <sup>2</sup>We also expect our suppliers to provide specific information on this, such as the carbon footprint.

### Energy

As an energy-intensive company, it is very important for Kemper to constantly identify opportunities to save energy and increase energy efficiency in all areas of the company. To this end, Kemper has long established an energy management system that is certified annually and guides the company's energy strategy. Experts from production, maintenance, and facility management meet with senior management at regular energy management meetings to operate this system together with the energy management officer.

In addition, each employee is encouraged to identify potential savings in his or her personal work environment and to bring them to the attention of the company. The Company Suggestion Scheme (BVW) gives employees the opportunity to submit their own suggestions for

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<sup>1</sup> ILO Convention No. 111

improvement and to share in the savings to be achieved through appropriate suggestion bonuses. In addition to these systems, however, it is also a matter of the personal conduct of each individual member of the Kemper family. The company's management urges employees to always use energy sources and media such as compressed air and water sparingly.

### Renewable energy

KEMPER has taken appropriate environmental protection measures (e.g. the implementation of an operational environmental protection management system) that adequately cover the following topics:

- Objectives, definition and implementation of measures and their continuous improvement.
- Environmental aspects such as reducing CO<sub>2</sub> emissions, increasing energy efficiency, and using renewable energies, ensuring water quality and reducing water consumption, ensuring air quality, promoting resource efficiency, reducing waste and disposing of it properly and handling hazardous substances responsibly for people and the environment.

KEMPER expects its business partners to make the same efforts and to set themselves sustainable goals.

### Water management, biodiversity, chemicals management

In addition, KEMPER strives to continuously reduce water consumption and promote sustainable water management. The minimum goal is to maintain water quality and availability depending on the respective local conditions. This also applies to water and marine resource-related issues with regard to the design of products and services.

KEMPER is also committed to reducing air emissions to a minimum and monitoring measures to maintain air quality.

To preserve biodiversity and ecology, KEMPER pursues the goal of sustainable land use (including soil sealing) and opposes deforestation measures. KEMPER also monitors soil quality. In addition, KEMPER is committed to continuously reducing noise and light emissions in connection with economic activities, whether caused directly or indirectly. KEMPER is committed to animal welfare and the preservation of biodiversity. In addition, KEMPER takes into account the impact on the status of species, the impact on the extent and status of ecosystems, and

the impact on the status and dependencies of ecosystem services. The company's commitment also includes the protection of seas and oceans.

Responsible chemical management, sustainable use of resources, and circular economy issues are fundamental components of the company's operational strategy. KEMPER strives to achieve these goals through a product development process designed according to circular principles (durability, reusability, reparability, disassembly, reprocessing, refurbishment, recycling), insofar as this can be actively influenced, increasing the circular material utilization rate, minimizing primary raw materials, increasing the proportion of secondary materials, consistently avoiding waste, optimizing waste management in line with the waste hierarchy, sustainable procurement and use of renewable resources, and using resources for reuse and recycling.

## 6. Conflict minerals

KEMPER supports authorities, non-governmental organizations and industry associations in their efforts to prevent the trade of so-called conflict commodities in accordance with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act or equivalent European or national regulations. This applies in particular to the trade in 3TG materials (tin, tantalum, tungsten and gold) and cobalt mined under inhumane conditions from the Democratic Republic of Congo, neighboring countries or other conflict and high-risk areas. Accordingly, KEMPER carefully monitors and checks the supply chain to ensure that such conflict minerals are neither procured nor processed in its own production. KEMPER requires its business partners to exercise the same care in product selection and product monitoring.

## 7. Consumer interests

Insofar as consumer interests are affected, KEMPER complies with consumer protection regulations and appropriate sales, marketing, and information practices. Groups requiring special protection (e.g., young people or pregnant women) receive increased attention.

## 8. Supply chain due diligence

KEMPER undertakes to pass on social and environmental sustainability requirements in accordance with the Code of Conduct to suppliers, service providers, and other business partners to the same extent and to develop these with the aim of sustainable and responsible business

continuity. KERMPER expects immediate notification of any violations of the obligations associated with the Code of Conduct. This binding requirement must be passed on as standard along the supply chain by the company's suppliers, service providers, and other business partners.

## 9. Data protection and information

### Protection of personal data

KEMPER attaches great importance to data protection and the confidentiality of personal data entrusted to KEMPER. KEMPER will process personal data exclusively in accordance with the provisions of the applicable data protection laws and undertakes to ensure appropriate data and IT security measures.

### Information

KEMPER treats the information provided to it confidentially and also requires its business partners to treat information provided to them confidentially and with appropriate care. KEMPER will prosecute violations of data protection regulations under civil law and bring criminal charges.

### IT security

KEMPER expects maximum protection against unauthorized access to all operational and personal data provided by KEMPER. In this respect, KEMPER requires its suppliers to design its IT systems securely and to maintain them regularly.

## 10. Whistleblowing and protection from retaliation

KEMPER attaches great importance to an orderly, open and transparent business policy. Violations of the provisions of this Code of Conduct and reports that fall within the material scope of § 2 of the Whistleblower Protection Act can be addressed via a dedicated whistleblowing hotline. Reporting is made anonymously in accordance with the whistleblower protection procedure and is always treated confidentially to protect against retaliation.

## 11. Donations/Sponsoring

In the case of donations and sponsorship funds, we will ensure that they comply with applicable laws and internal policies. Donations may be made to institutions for the advancement of

education and science, the arts and culture, and for social or other purposes recognized as worthy of support. Contributions will not be made to political parties.

## **12. Protection of corporate values and sanctions**

KEMPER attaches great importance to the protection of its above-mentioned corporate values and requires its employees to comply with these values in a sanction-proof manner. KEMPER encourages its business partners to share these values as well.

## **13. Implementation and enforcement**

KEMPER shall make appropriate and reasonable efforts to continuously implement, document, and apply the principles and values described in this Code of Conduct. All employees shall be made aware of the contents of the Code of Conduct and trained on relevant topics as needed. Violations of the Code of Conduct will not be tolerated and may result in consequences under labor law. Communication regarding the requirements of this Code of Conduct and its implementation will be open and dialogue-oriented with employees, customers, suppliers, and other interest groups and stakeholders. Employees and business partners will be offered access to a protected mechanism for confidentially reporting possible violations of the principles of this Code of Conduct.

### Document properties

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### Document history

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