

**Supplier Code of Conduct
of the
KEMPER Group of Companies (SCOC)**



Introduction by the Management

Dear Suppliers,

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.

As a further step within our local and global responsibility, we, the management of Gebr. Kemper GmbH + Co. KG, are introducing the following Code of Conduct for Suppliers. In order to deliver on this responsibility, we also expect you, as our suppliers, to actively support us in upholding our high values, also downstream in the supply chain.

Olpe, October 2025



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1. Purpose/area of application

This Code of Conduct contains the essential rules and principles of behaviour that apply to all suppliers of KEMPER and serves to make suppliers of KEMPER aware of the fundamental legal and ethical requirements that KEMPER expects for our working together.

2. General principles

KEMPER expects its suppliers to adhere to 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 people in our own workforce and in the value chain, as well as measures to remedy any impact on human rights. Our suppliers undertake to respect the rights of affected communities, in particular minorities and indigenous peoples, to protect their cultures and to involve them in all relevant decisions. This also includes compliance with land, forest and water rights and protection against forced eviction. In the event of the use of private or public security forces, appropriate training and control of these forces is ensured.

This Code of Conduct is binding for all our suppliers and all employees of our suppliers' workforces and is actively enforced. Furthermore, KEMPER expects the same basic understanding from its direct suppliers, service providers, affected communities (suppliers), consumers, customers, and end users (users), as well as all persons associated with KEMPER. This does not establish any rights in favor of third parties.

This Code of Conduct is drawn up in cooperation with the relevant departments at KEMPER and is reviewed and, if necessary, updated at regular intervals, at least every two (2) years. The main responsibility for compliance with this Code of Conduct lies with the management of our suppliers.

Compliance with Laws and Regulations

As an elementary basic rule, KEMPER expects its suppliers to comply with the laws and regulations of the respective jurisdiction in which they operate.

All suppliers are obliged to comply with the applicable national and international laws, trade customs and regulatory rules and requirements, maintain proper business documentation and disclose information where required by mandatory disclosure requirements.

KEMPER does not accept or tolerate any violations of applicable law in its own company and also requires its suppliers to comply with applicable rules and regulations.

Export control and sanctions law

In particular, the supplier strictly undertakes to comply with national and international laws and regulations governing the import and export of goods, software and services. KEMPER requires its suppliers to introduce processes and procedures that are suitable to prevent import and export violations and to provide KEMPER, where requested, with information and evidence necessary for import or export activities.

Interaction with business partners

KEMPER is committed to the principle of open interaction with its business partners. In particular, KEMPER seeks a fair and trustful cooperation with its suppliers in order to create an economically satisfactory situation for both parties. KEMPER also expects such behaviour from its suppliers and commits them to share this principle.

3. Compliance and integrity

Integrity

KEMPER strictly adheres to its values and beliefs in everyday business. KEMPER requires its suppliers to share these values and beliefs.

Fair competition

KEMPER is committed to fair competition and hereby commits its suppliers to likewise act fairly and decently in the conduct of their own business activities and to conduct their 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 accordance with this stipulation, the supplier cooperates with authorities in cases of suspicion in order to clarify the situation and undertakes to disclose information. This disclosure also includes financial matters. In accordance with this financial responsibility, the supplier

undertakes to maintain transparent, proper accounting and to record financial transactions in detail.

Conflicts of interest

KEMPER hereby requires its suppliers to avoid situations that are likely to lead to conflicts of interest for themselves or for business partners. Every business decision must be made on the basis of an objective assessment and must be free from accepting personal benefits.

Anti-corruption policy

KEMPER expressly prohibits its suppliers from engaging in business practices involving bribery and granting advantages and requires a fair competition from its suppliers. Particularly in business relations with KEMPER suppliers are not permitted to grant personal benefits to KEMPER staff that are likely to influence relevant decisions of KEMPER staff.

Moreover, every supplier must report directly to KEMPER's management or to the KEMPER Compliance Officer any inappropriate conduct of KEMPER staff members that is likely to influence correct and objective decisions of the supplier by granting benefits.

Money laundering and terrorism financing

KEMPER commits its suppliers to strictly comply with the legal obligation to combat money laundering and terrorism financing. KEMPER further requires its suppliers not to engage in or facilitate activities related to money laundering and terrorism financing.

Intellectual property and Counterfeits

KEMPER is committed to intellectual property rights and will itself only use third-party intellectual property if the rights holder has expressly consented to such use. KEMPER expects its suppliers to behave likewise in a law-abiding manner. For manufacturing its products, the supplier undertakes to use only products and manufacturing processes that it has developed itself, that are free of third-party intellectual property rights or for which it has acquired the corresponding rights of use. We do not tolerate any intentional or negligent behaviour that leads to 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 appropriate and socially acceptable 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. KEMPER expects the same behavior from its business partners.

4. Working conditions and occupational safety

Human rights

KEMPER respects the internationally proclaimed human rights and supports their protection within its sphere of influence. KEMPER requires the same behaviour from its suppliers and expects that its suppliers will not participate in actions that violate human rights.

KEMPER's approach to its 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. In all activities, the goal is to be able to offer its own workforce secure and long-term employment. KEMPER expects its suppliers to apply the same high standards to their own workforces.

Anti-slavery, forced and child labour

As a law-abiding company, KEMPER attaches great importance to preventing the criminal exploitation of human labour, such as human trafficking, but also forced or child labour, and expects its suppliers to share the same attitude.

KEMPER also expects its suppliers to fully comply with Art. 5 of the Charter of Fundamental Rights of the European Union and to openly support the ban on slavery and forced labour. KEMPER expects its suppliers to do everything in their power to ensure that slavery, forced labour and child labour are neither directly nor indirectly supported within their own supply chains. 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.

Anti-discrimination policy

KEMPER is expressly committed to a working environment free of prejudice and discrimination and expects its suppliers to respect the personal dignity, privacy and moral rights of each individual and enable a respectful cooperation as partners. KEMPER does not tolerate any discrimination, either within its own company or among its suppliers, based on race, colour, nationality, ethnicity, gender, sexual identity, belief, ideology, political views, age, appearance or physical constitution. KEMPER prohibits any kind of sexual or other personal harassment or insults and mobbing, condemns any kind of coercion or violence or threat of violence, and also expects its suppliers to commit to this and to take legal action against the perpetrators.

Freedom of association

KEMPER requires its suppliers to respect the freedom of association and to uphold the right of its staff members to freedom of assembly and association and that each staff member is free to join a labour organisation or trade union or to form such an organisation or trade union. Moreover, KEMPER expects its suppliers to give their staff members the opportunity to voice their concerns in this respect at any time without restrictions.

Family-friendliness

KEMPER has received many commendations as a family-friendly company. Hence, KEMPER proves that it is possible to combine career and family and is thus well-known as an attractive employer for professional and managerial staff. KEMPER also expects its suppliers to commit to family friendliness and thus to be a sustainable partner for KEMPER.

Working hours, wages and social benefits

The supplier undertakes not to exceed the legally permissible number of working hours of its staff members. KEMPER expects its suppliers to pay their staff members an adequate wage in accordance with industry standards as well as national and local statutory requirements. KEMPER expects its suppliers to comply with the respective applicable statutory provisions on social benefits and to pay them duly according to the requirements of the economic area in which they operate.

Occupational safety

KEMPER attaches great importance to good working conditions in its own companies and requires its suppliers to meet minimum standards in the following areas:

- Personal protective equipment
- Machine safety
- Emergency precautions
- Incident and accident management
- Workplace ergonomics
- Fire Protection

Working conditions

KEMPER expects its suppliers to adhere 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 the applicable rights and laws are essential components of the strategy for social responsibility and economic orientation. If freedom of association and collective bargaining are not permitted, appropriate compromises will be sought with the workforce. Employees must always be informed clearly, in detail, and regularly about the composition of their remuneration. Wherever possible, the supplier supports its own workforce with flexible working time models and work-life balance issues, such as granting family-related leave or childcare solutions. Compliance with the maximum permissible working hours and associated rest periods in accordance with applicable laws and regulations is, of course, also required. The supplier shall also ensure 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 the supplier's own workforce must be respected and actively protected. Continuous training of the workforce and regular reviews of qualification levels must be regulated as part of personnel development. Social compatibility must be ensured when terminating employment relationships. Young employees must receive special protection in all areas.

Promotion of diversity and equal opportunities

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

Promoting Diversity and Equal Opportunity

We promote equal opportunity and do not tolerate discrimination¹. We treat everyone equally, regardless of gender, age, colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology, or other personal characteristics.

5. Sustainable actions

Environment

KEMPER commits to its responsibility for environmental protection and sustainability. KEMPER has therefore adopted regulations and guidelines to protect the environment. KEMPER also requires its suppliers to act and take responsibility, especially for reducing air pollution, energy and water consumption, as well as carbon emissions. To this end, we also expect our suppliers to provide specific data on this, such as its carbon footprint.

Renewable Energy

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

- Goal setting, definition and implementation of measures and their continuous improvement;
- Environmental aspects such as the reduction of CO2 emissions, the increase of energy efficiency and the use of renewable energies, the assurance of water quality and the reduction of water consumption, the assurance of air quality, the promotion of resource efficiency, the reduction of waste and its proper disposal and the responsible handling of hazardous substances for people and the environment.

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

Water management, biodiversity, chemicals management

KEMPER expects its suppliers to strive for continuous reduction in water consumption and sustainable water management. The minimum goal is to maintain water quality and availability

¹ ILO-Convention Nr. 111

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.

The supplier also undertakes to reduce air emissions to a minimum and to monitor measures to maintain air quality.

To preserve biodiversity and ecology, the supplier pursues the goal of sustainable land use (including soil sealing) and opposes deforestation measures. The supplier also monitors soil quality. In addition, the supplier undertakes to continuously reduce noise and light emissions in connection with economic activities, whether caused directly or indirectly. The supplier is committed to animal welfare and the preservation of biodiversity. In addition, the supplier 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. The supplier must strive to achieve these goals through a product development process designed according to circular principles (durability, reusability, reparability, disassemblability, 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 organisations and industry associations in their efforts to stop the trade of so-called conflict commodities in accordance with the Dodd Frank Wall Street Reform and Consumer Protection Act Section 1502 or equivalent European or national regulations. This applies in particular to the trade of 3TG materials (tin, tantalum, tungsten and gold) and cobalt mined under inhumane conditions in the Democratic Republic of Congo, neighbouring countries or other conflict and high-risk areas. By careful monitoring and auditing of the supply chain KEMPER ensures that such conflict minerals are neither procured nor processed in its own production. KEMPER requires its suppliers to exercise the

same care in product selection and product monitoring and to inform KEMPER regularly, and in the manner required by KEMPER, about the status of its own initiatives in this area.

7. Consumer interests

Insofar as consumer interests are affected, the supplier shall comply with consumer protection regulations and appropriate sales, marketing, and information practices. Particularly vulnerable groups (e.g., young people or pregnant women) shall receive increased attention.

8. Supply chain due diligence

The supplier undertakes to pass on social and environmental sustainability requirements in accordance with this 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. KEMPER 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

Data protection and the confidentiality of personal data entrusted to KEMPER is a high priority for KEMPER. KEMPER shall process personal data exclusively in accordance with the requirements of the respective applicable data protection laws and undertakes to ensure appropriate data and IT security measures. In return, KEMPER requires its suppliers to establish and maintain an equally high level of protection. The supplier shall grant KEMPER insight into its data protection activities at any time and shall in particular disclose its records of processing activities and data protection impact assessments on KEMPER's request.

Information

KEMPER shall treat the information submitted to it confidentially and also requires its suppliers to treat information submitted to them confidentially and with due care, even if no separate confidentiality agreement has been concluded in this respect. KEMPER shall hold the supplier liable under civil law if it falsifies information or knowingly passes on falsified information to KEMPER as true facts in order to obtain economic benefits.

IT security

For all operational and personal data submitted by KEMPER, KEMPER expects maximum protection against unauthorised access. To this extent, KEMPER requires its suppliers to design secure IT systems and to service them regularly.

10. Whistleblowing and Protection from Retaliation

KEMPER attaches great importance to a correct, open and transparent business policy. Violations can be reported via a dedicated whistleblowing hotline. KEMPER expects the same degree of care from its suppliers.

11. Protection of corporate assets and sanctions

KEMPER attaches great importance to protecting its corporate values as outlined above and requires its suppliers to comply with these values or apply equivalent codes of conduct and to implement them in their own supply chains. KEMPER reserves the right to terminate the business relationship with the supplier without notice in the event of significant violations of legal requirements or essential provisions of this code. Furthermore, we reserve the right to systematically and occasionally check the application of this Code of Conduct by our suppliers. This can take the form of questionnaires, evaluations, or audits, for example.

Document properties

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