

**Code of Conduct
of the
KEMPER Group Companies**



Introduction by the Management

Dear Sir or Madam,

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.



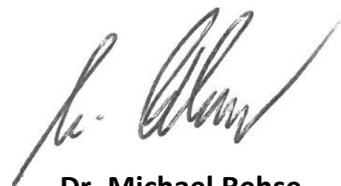
Olpe, January 2022



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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 staff members of the KEMPER Group. The term “staff member” applies to both male and female employees and also includes members of the board of management.

This Code of Conduct serves to make the staff members of the KEMPER Group, hereinafter referred to as staff members, aware of the fundamental legal and ethical requirements they must comply with when working for the KEMPER Group in a transparent manner and to provide them with some direction for this purpose.

2. General principles

As an elementary basic rule of our actions, we comply with the laws and regulations of the respective jurisdiction in which we operate. All staff members are obliged to comply with the statutory regulations applicable to us. This same applies to our internal instructions and guidelines. Our principles also include avoiding any involvement in transactions that recognisably aim at circumventing statutory provisions.

Every staff member is obliged to safeguard the reputation of the KEMPER Group and to avoid doing anything that could cause damage to the company.

In particular, we expect our staff members to act with personal integrity and reliability.

3. Human rights

We respect the internationally proclaimed human rights and support their protection within our sphere of influence. In addition, we categorically reject any form of child or forced labour. We expect our business partners to adhere to these principles as well.

4. Conflict minerals/metals

The KEMPER Group supports authorities, non-governmental organisations and industry associations in their efforts to stop the trade of so-called conflict minerals/metals (Dodd Frank Wall Street Reform and Consumer Protection Act Section 1502). This applies in particular to the trade in tin mined under inhumane conditions. Accordingly, it is the goal of the KEMPER Group to ensure that no so-called

conflict minerals/metals are procured or processed in production by carefully monitoring and auditing the supplier chain.

5. Anti-discrimination policy

We expect all our staff members to respect the personal dignity, privacy and moral rights of each individual and enable a respectful cooperation as partners. We do not tolerate any discrimination based on race, colour, nationality, ethnicity, gender, sexual identity, belief, ideology, political views, age, appearance or physical constitution. We prohibit any kind of sexual or other personal harassment or insults and mobbing. We will take action against any kind of coercion or violence or threat of violence with all legally available means.

6. 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.

KEMPER fully endorses Art. 5 of the Charter of Fundamental Rights of the European Union and openly supports the ban on slavery and forced labour. KEMPER commits to take all economically reasonable measures in its power to ensure that slavery, forced labour and child labour are neither directly nor indirectly supported within its own supply chains.

KEMPER expects the same depth of measures from its business partners as KEMPER undertakes in the course of its business activities to stop slavery, forced and child labour.

7. Freedom of association

Every staff member of the KEMPER group of companies has the right to form a workers' organisation or trade union of his or her choice, or to join such an organisation or trade union for the purpose of collective bargaining.

8. Conflicts of interest

Our staff members must avoid situations that could lead to personal conflicts of interest with you or our business partners. In particular, the paragraph below on our anti-corruption policy must be observed in this regard.

Every staff member must immediately notify Human Resources and the management of any business relations of a private nature with companies that are directly associated with the KEMPER Group. Interests in such companies as part of a governing body shall be treated in the same way.

9. Confidentiality/data protection

Our staff members are sworn to secrecy regarding all internal confidential matters of the company as well as all confidential information from or about our business partners. Confidential information must be protected against unauthorised access by third parties. In particular, our staff members are obliged to comply with data protection regulations and to actively contribute to ensuring that personal data is reliably secured against unauthorised access.

The KEMPER Group is committed to the interests of integrity, also and above all in respect of the property of third parties. We expect our staff members to refrain from obtaining information by unfair means and strongly advocate a policy of strict confidentiality.

10. Competition/prohibition of concerted practices

The KEMPER Group is committed to the principle of pursuing its business objectives by legally and ethically sound means. We therefore engage in competition with lawful and fair methods.

The obligation to comply with the rules of competition law also applies to each individual staff member. Conduct that constitutes a breach of competition law, such as agreements with competitors on prices and conditions, is not permitted.

11. Anti-corruption policy

It is our goal to compete fairly and to convince people with the quality and excellence of our products, and we are firmly opposed to bribery and unfair competition. None of our staff members may use his or her position and business connections of the company for his or her own or a third party's advantage or to the disadvantage of the KEMPER Group.

This means that in interactions with business partners, no staff member may offer or accept private benefits such as money, material assets or services that are intended or could be intended to influence appropriate decisions.

Every staff member of the KEMPER Group has the right and obligation to seek advice and support in the case of doubts or suspicions pointing to the perpetration of corruption or economic crimes. In each case, advice and support will be provided by the management and the legal department.

12. Interaction with business partners

We are committed to the principle of fair and open interaction with our business partners. In particular, we make every effort to cooperate with our customers in the best way possible, so that they can make reasonable decisions that meet their interests. Potential conflicts with the interests of customers and other business partners must be identified in good time, avoided as far as possible or – where this is not possible – resolved appropriately.

13. Integrity of information/communication

All records and reports must be accurate, complete and truthful – no matter whether they are used only for internal communications or also for external communications.

This applies in particular to the accounts and financial statements as well as to other reports on the company's business development and financial position.

Only the management or expressly authorised staff members shall issue official statements to the media and/or communicate with the media.

14. Data protection

Data protection and the confidentiality of information entrusted to us is a high priority for us.

We shall process your data exclusively in accordance with the requirements of the respective applicable data protection laws and undertake to ensure appropriate data and IT security measures.

15. Environment

The KEMPER Group commits to its responsibility for environmental protection and sustainability. It has therefore adopted regulations and guidelines for protecting the environment, which staff members are directed to observe. This obliges staff members to consider the impacts on the environment in their actions and decisions and to avoid harming the environment as far as possible.

16. Protection of corporate assets

The assets of our companies include not only tangible assets and/or property, but also intangible assets (intellectual property including software products), information, and the ideas and knowledge of our staff members. Every staff member is responsible for protecting these corporate assets. Corporate assets may only be used for permissible business purposes, and under no circumstances for unlawful purposes.

17. Donations/sponsorship

In the case of donations and sponsorships, we take care to ensure that the provisions of the relevant legal system and the internal regulations applicable to them are complied with. Donations may be made to institutions that promote education and science, art and culture, and for social or other purposes considered worthy of support. No donations are made to political parties.

18. Implementation

This Code of Conduct is a living part of our corporate culture and therefore part of the everyday working life of all staff members of the KEMPER Group. Each staff member is therefore responsible for complying with the rules and principles of conduct set out in this Code of Conduct.

Supervisors/managers shall ensure that their staff members are familiar with the contents of this Code of Conduct and observe the rules and principles of conduct applicable to them; through their own conduct, they shall set an example for their staff members. Vice versa, staff members should contact their supervisors if they have any doubts about the application of these guidelines.

The management of Gebr. Kemper GmbH + Co. KG, representing the KEMPER Group, feels particularly committed to this Code of Conduct and will enforce compliance with these guidelines or have them enforced by all means.