

Code of Conduct of the KEMPER Group



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



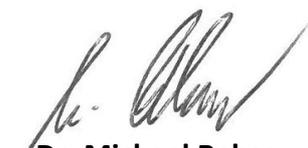
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Christian Küster



Martin Thiel



Dr. Michael Rehse

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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

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.

In particular, 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.

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.

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.

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, and expects the same attitude from its business partners.

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

Promotion of variety and diversity, 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, ideology or other personal characteristics.

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 CO₂ emissions. ²We 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.

¹ ILO Convention No. 111

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 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 CO₂ 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.

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. 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.

8. 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.

9. 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.

10. 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.