

Management Policy Statement from the KEMPER Group on Upholding Human Rights



1. Preface

Gebr. Kemper GmbH + Co. KG is a family-owned company, established in 1864, with a strong set of guiding principles. For us, "Making Progress" is not just a slogan, but a fundamental belief. Our commitment to product excellence goes hand in hand with our focus on sustainability.

Our aim is to deliver the highest quality products and services by harnessing innovative, cutting-edge technology. Through our social and economic responsibility, we both support and strengthen

Germany as a manufacturing location. We firmly believe that economics and ethics are inseparable, and that sustainable business success is only achievable by adhering to moral and ethical standards.

As the management of Gebr. Kemper GmbH + Co. KG, we are taking an important step towards fulfilling our local and global responsibilities by introducing the supplier code outlined below. To meet these responsibilities, we also expect you, as our supplier, to actively support us in maintaining our high ethical standards throughout the entire supply chain.

Gebr. Kemper GmbH + Co. KG is committed to respecting and protecting human rights and ensuring accountability across its supply chain. We uphold internationally recognised human rights and are committed to ensuring that no human rights violations occur within the scope of our business activities. We comply with all relevant laws and apply national regulations in all our global operations.

This Policy Statement applies to all companies within the Kemper Group, both in Germany and at our international locations.

2. STANDARDS AND GUIDELINES

In keeping with the United Nations' Guiding Principles on Business and Human Rights, we are committed to the following internationally recognised human rights frameworks and standards:

- The Universal Declaration of Human Rights (United Nations)
- The International Covenant on Civil and Political Rights (United Nations)
- The International Covenant on Economic, Social and Cultural Rights (United Nations)
- The Conventions and Recommendations of the International Labour Organisation (ILO) on labour and social standards
- The ILO Declaration on Multinational Enterprises and Social Policy (MNE Declaration)
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- The 10 Principles of the United Nations Global Compact (UNGC)
- The Charter of Fundamental Rights of the European Union

3. WHAT WE EXPECT FROM OURSELVES AND OUR PARTNERS

Our commitment to respecting and upholding human rights is clearly defined in the following codes of conduct for ourselves, our employees, and our business partners:

- The Kemper Group Code of Conduct
- The Kemper Group Employee Code of Conduct

and

- The Kemper Group Group Supplier Code of Conduct

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We expect both our employees and our business partners, including suppliers, to fulfil their duty of care and avoid any adverse impacts on themselves or on us. In particular, we ask our suppliers to pass on our human rights standards to their own suppliers and contractors.

4. RISK ANALYSIS

In 2023, we conducted our first risk analysis to assess the impact of our operations on human rights. The aim was to identify potential risks within our supply chains and prioritise areas where human rights issues need to be addressed.

Our declared objective, based on the findings of this risk analysis, is to implement measures that minimise potential risks, align our management processes accordingly, and raise awareness among our employees, business partners, and suppliers about human rights and their importance.

The risk analysis is grounded in the aforementioned standards and guidelines, focusing on the following:

- Prohibition of the worst forms of child labour and slavery
- Prohibition of forced labour or employment under threat of punishment
- Prohibition of all forms of oppression through economic or sexual exploitation
- Prohibition of the violation of local occupational health and safety obligations
- Prohibition of the disregard for freedom of association
- Prohibition of discrimination based on protected characteristics
- Prohibition of withholding a fair wage, at least in line with local laws
- Prohibition of causing harmful environmental damage or contamination
- Prohibition of unlawful forced evictions and illegal land seizures
- Prohibition of the use of violence by security forces
- Prohibition of any further human rights violations

Additionally, the law defines the following environmental prohibitions:

- Prohibition of manufacturing mercury-added products
- Prohibition of using mercury (or mercury compounds) in manufacturing processes
- Prohibition of the improper disposal of mercury waste (in accordance with the Minamata Convention)
- Prohibition of the production and use of chemicals listed under the Stockholm Convention
- Prohibition of improper handling, storage, and disposal of waste
- Prohibition of exporting hazardous waste as defined by the Basel Convention

- Prohibition of importing hazardous waste as defined by the Basel Convention

As a manufacturer of rolled copper products and copper-based alloys, as well as building technology fittings made from gunmetal, we have limited influence over the supply chain. Nevertheless, we are actively involved in the Responsible Minerals Initiative (RMI), which advocates for the extraction of conflict-free raw materials.

5. COMPLAINT PROCEDURE

In line with § 8 of the German Supply Chain Due Diligence Act (LKSG), Gebr. Kemper GmbH + Co. KG provides a complaint channel for anyone to report concerns and violations of human rights or environmental standards, regardless of the nature of their contractual or business relationship with Kemper or its subsidiaries.

Reports can be submitted at any time via the digital whistleblower portal at whistleblower@kemper.email or confidentially to the Ombudsman of Gebr. Kemper GmbH + Co. KG, Mr. Guido F. Höck. As the Data Protection Officer, Mr. Höck is legally bound by confidentiality and may not disclose any information to third parties without consent.

6. RESPONSIBILITIES

The management of Gebr. Kemper GmbH + Co. KG is responsible for ensuring compliance with our self-imposed standards and for fulfilling and implementing our human rights due diligence obligations.

The management defines internal responsibilities for achieving human rights objectives and appoints a dedicated Human Rights Officer.

The Corporate Compliance Department monitors the implementation of human rights risk analyses in accordance with management's directives.

7. REPORTING AND FURTHER DEVELOPMENT

Our efforts regarding human rights and environmental impacts are summarised in our annual Sustainability Report.

As part of our self-imposed reporting obligations, we provide information on human rights and environmental risks or violations, detailing the impacts and any corrective actions taken.

Olpe, January 2024

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