Conflict-Minerals-Policy (CMP) of the KEMPER-Group





1. Introduction

This Conflict Minerals Policy outlines the commitments and measures of Gebr. Kemper GmbH + Co. KG to ensure that the minerals used in our products, particularly tin, copper, and nickel, are sourced responsibly and under humane conditions. Our goal is to comply with applicable legal requirements and meet our customers' expectations while promoting ethical business practices.

2. Customer-Oriented Commitments

Responsible Sourcing

Gebr. Kemper GmbH + Co. KG is committed to working only with suppliers who demonstrably apply responsible sourcing practices. This means that the minerals we procure, particularly tin, copper, and nickel, come from conflict-free and ethically acceptable sources.

Transparency and Traceability

We place great importance on transparency in our supply chain. Our customers can trust that we carefully verify and document the origin of the minerals we use. We work closely with our suppliers to ensure seamless traceability of the minerals.

3. Due Diligence in the Supply Chain

Supplier Requirements

Our suppliers are required to demonstrate to the best of their knowledge and belief that they meet the requirements for responsible sourcing. This includes providing information about the origin of the minerals and complying with internationally recognized standards for ethical business practices.

Risk Assessment and Management

Gebr. Kemper GmbH + Co. KG conducts regular risk assessments to identify and mitigate potential risks in the supply chain. This includes verifying the origin of the minerals and, where feasible, conducting audits of suppliers.

Continuous Improvement

We strive for continuous improvement in our processes to comply with due diligence obligations and work closely with suppliers and other stakeholders to promote best practices.



4. Customer Communication

Disclosure and Reporting

Gebr. Kemper GmbH + Co. KG is committed to disclosing relevant information about the origin of the minerals used. We regularly provide our customers with reports documenting our efforts in responsible sourcing and the results of our risk assessments.

Customer Satisfaction

Customer satisfaction is at the heart of our business practices. We take our customers' feedback seriously and adjust our policies and procedures accordingly to best meet their expectations.

5. Training and Awareness

Employee Training

Our employees are regularly trained to ensure they understand and comply with the requirements and obligations related to conflict minerals.

Supplier Training

We also offer training for our suppliers upon request to ensure they understand and can implement our and our customers' expectations regarding responsible sourcing.

6. Final Provisions

This policy takes effect immediately and will be reviewed and updated regularly to ensure it meets our customers' current requirements.

Olpe, July 2025

Christian Ruster

Dr. Michael Rehse

Martin Thiel



Document Properties

Approval Responsibility:	Guido F. Höck (Legal Counsel and Head of Legal Department)		
Maintenance Responsibility:	(Intern) Guido F. Höck		
Version	2.0		
Target group:	All employees of the Kemper Group		
Valid from:	01.07.2025		
Validity:	unlimited, until revoked		
Period of review:	on demand		
Document name:	2025-07-01, Kemper-Group Conflict-Minerals-Policy (CMP).docx		

Document and Approval History

Version	Date	Reason	Dokument	Author
1.0	24.11.2021	Creation	New Document	Guido F. Höck
2.0	01.07.2025	Review	Revised Document	Guido F. Höck