

# Code of Conduct

for business partners of the Kampmann Group



# Content

## 1 Aim and motivation

Aim and motivation ..... 4

## 2 Application and scope

Application and scope ..... 6

## 3 Requirements

3.1 Compliance with the applicable legislation ..... 8

3.2 Product quality and product safety ..... 9

3.3 Human and labour rights ..... 10

3.4 Avoidance of conflicts of interest.....12

3.5 Ban on corruption.....13

3.6 Fair market behaviour.....14

3.7 Handling resources .....15

3.8 Data protection and security.....16

3.9 Operational and business secrets .....17

## 4 Consequences of violations of the Code of Conduct

Consequences of violations of the Code of Conduct .....19

## 5 Handling of misconduct

Handling of misconduct.....21

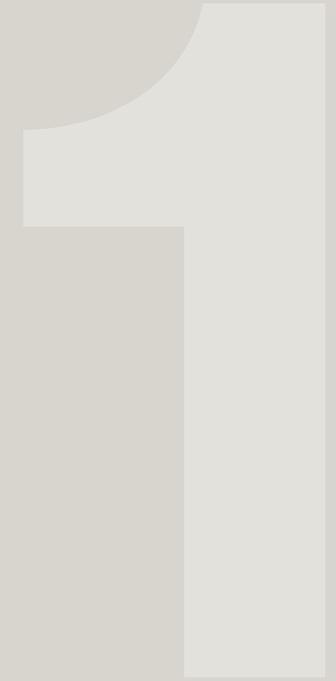
Document number/version:  
2024/A

The male form is used in this document for ease of legibility. However, we would advise at this point that the exclusive use of the male form should be understood as being independent of gender. This is not intended to express any gender discrimination or a violation of the principles of equality.

**Contact for questions and comments**



# Aim and motivation



# Aim and motivation

Kampmann combines successful business management with responsible actions to shape the future of the company sustainably and successfully.

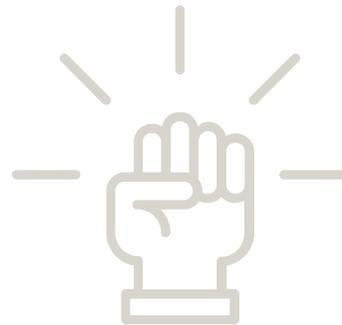
We also require our business partners to take stringent social, ethical and environmental standards into account and respect human rights as a fundamental element of a responsible business concept.

Our business partners include, in particular, suppliers, representatives, distributors, authorised agents and other service providers.

Kampmann does not tolerate human rights violations and adheres to the UN's "Universal Declaration of Human Rights".

**Our business partners commit to complying with national and international human rights regulations and ensuring that they themselves and their suppliers are not involved in any form of human rights violations.**

The following requirements specify the expectations of the Kampmann Group regarding the appointment and conduct of business partners in their business activities. The requirements are to be regarded as the basis for a successful business relationship between the Kampmann Group and its partners.



# Application and scope



# Application and scope

This Code of Conduct for Business Partners applies to all business relationships between the Kampmann Group (including all subsidiaries and affiliates) and its business partners insofar as they apply to the respective business activities.

Furthermore, the business partners commit to **complying with the requirements** in an appropriate manner, including by their own business partners and along the supply chain.



# Requirements



- 3.1 Compliance with the applicable legislation
- 3.2 Product quality and product safety
- 3.3 Human and labour rights
- 3.4 Avoidance of conflicts of interest
- 3.5 Ban on corruption
- 3.6 Fair market behaviour
- 3.7 Handling resources
- 3.8 Data protection and security
- 3.9 Operational and business secrets

**REQUIREMENTS**

- 3.1 Compliance with the applicable legislation
- 3.2 Product quality and product safety
- 3.3 Human and labour rights
- 3.4 Avoidance of conflicts of interest
- 3.5 Ban on corruption
- 3.6 Fair market behaviour
- 3.7 Handling resources
- 3.8 Data protection and security
- 3.9 Operational and business secrets

**CONSEQUENCES OF VIOLATIONS OF THE CODE OF CONDUCT**

**HANDLING OF MISCONDUCT**

# Requirements



## 3.1 Compliance with the applicable legislation

The business partner undertakes to comply with the applicable laws in the countries in which it operates in all business activities and decisions.

In particular, the business partner undertakes to observe and implement the relevant legal provisions on human rights and environmental protection in the supply chain.

**REQUIREMENTS**

- 3.1 Compliance with the applicable legislation
- 3.2 Product quality and product safety**
- 3.3 Human and labour rights
- 3.4 Avoidance of conflicts of interest
- 3.5 Ban on corruption
- 3.6 Fair market behaviour
- 3.7 Handling resources
- 3.8 Data protection and security
- 3.9 Operational and business secrets

CONSEQUENCES OF VIOLATIONS OF THE CODE OF CONDUCT

HANDLING OF MISCONDUCT

### **3.2 Product quality and product safety**

Kampmann's knowledge and expertise in development, production and sales is the basis for the ongoing improvement of our products. We set quality standards in production. We expect our business partners' products to meet our quality standards and national and international standards.



## REQUIREMENTS

- 3.1 Compliance with the applicable legislation
- 3.2 Product quality and product safety
- 3.3 Human and labour rights**
- 3.4 Avoidance of conflicts of interest
- 3.5 Ban on corruption
- 3.6 Fair market behaviour
- 3.7 Handling resources
- 3.8 Data protection and security
- 3.9 Operational and business secrets

## CONSEQUENCES OF VIOLATIONS OF THE CODE OF CONDUCT

## HANDLING OF MISCONDUCT

### 3.3 Human and labour rights

**Respect for internationally recognised human rights is the basis of all business relations for the Kampmann Group.**

**Our business partners commit to respecting the rights of employees and others affected by corporate actions and to treating them in accordance with the guidelines of the international community.**



#### **No slavery and no human trafficking**

Employment in forced labour is prohibited. This includes any work or service that is required of a person under threat of punishment and for which the person concerned has not volunteered. All forms of slavery or practices similar to slavery are also prohibited. This includes, in particular, servitude, as well as other forms of oppression or domination or oppression in the workplace, for example through economic or sexual exploitation and humiliation.

#### **No child labour**

The business partner rejects child labour and any form of exploitation and ensures that appropriate legal regulations are complied with.

#### **Equal opportunities and a ban on discrimination**

The business partner is committed to equal opportunities and will never discriminate against a person on account of their ethnic or social origin, gender, religion, belief or political attitude, disability, age or sexual identity.

The business partner will promote a working environment that permits inclusion and in which the diversity of its employees is appreciated.

**REQUIREMENTS**

- 3.1 Compliance with the applicable legislation
- 3.2 Product quality and product safety
- 3.3 Human and labour rights
- 3.4 Avoidance of conflicts of interest
- 3.5 Ban on corruption
- 3.6 Fair market behaviour
- 3.7 Handling resources
- 3.8 Data protection and security
- 3.9 Operational and business secrets

**CONSEQUENCES OF VIOLATIONS OF THE CODE OF CONDUCT****HANDLING OF MISCONDUCT****Working hours and remuneration**

The business partner will adhere to all applicable national laws and binding industry standards on working hours, including overtime, breaks and paid rest leave.

The business partner will pay its employees in accordance with the local Minimum Wage Act and applicable collective agreements and in accordance with industry standards. The business partner will pay its employees on time and provide them with clear and understandable information about the basis on which they are paid. Deductions of wages and salary as a disciplinary measure are not allowed unless legally permitted.

**Occupational health and safety**

We expect our business partners to strive to achieve a high level of occupational health and safety by applying a health and safety management approach appropriate to their business.

The business partner will comply with applicable occupational health and safety regulations and ensure a safe and healthy working environment in order to maintain the safety and health of employees, protect third parties, and prevent accidents, injuries and work-related illnesses. This will involve regular workplace risk assessments and the implementation of appropriate security and precautionary measures, including the provision of appropriate work clothing. Employees must be adequately trained in occupational health and safety issues – in a language they understand.

To achieve this, the business partners must in particular:

- + Inform employees about identified hazards and the associated preventative and corrective measures to minimise the hazard. The information must be available in the languages relevant to employees.
- + Provide adequate qualifications for the prevention of work-related health disorders, prevention of work-related accidents, first aid and fire protection of employees.
- + Provide suitable protective equipment free of charge.
- + Organise appropriate emergency plans, fire protection equipment and first aid – provide material for initial medical care in the event of an accident, as well as an adequate transport for the further care of casualties.
- + Ensure an appropriate number of emergency exits, escape routes and assembly points marked with sufficient signs.
- + Monitor and control these measures.

**REQUIREMENTS**

- 3.1 Compliance with the applicable legislation
- 3.2 Product quality and product safety
- 3.3 Human and labour rights
- 3.4 Avoidance of conflicts of interest
- 3.5 Ban on corruption
- 3.6 Fair market behaviour
- 3.7 Handling resources
- 3.8 Data protection and security
- 3.9 Operational and business secrets

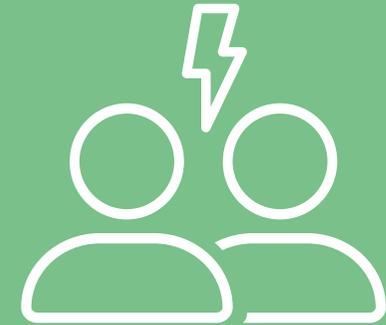
**CONSEQUENCES OF VIOLATIONS OF THE CODE OF CONDUCT**

**HANDLING OF MISCONDUCT**

### 3.4 Avoidance of conflicts of interest

The business partner will ensure that they avoid situations in which their interests could conflict with the business interests of Kampmann.

The business partner will immediately inform Kampmann if they become aware of a conflict of interest. This also applies to Kampmann employees who have a financial share in the business partner's company or who are related to the business partner in another way.



**REQUIREMENTS**

- 3.1 Compliance with the applicable legislation
- 3.2 Product quality and product safety
- 3.3 Human and labour rights
- 3.4 Avoidance of conflicts of interest
- 3.5 Ban on corruption**
- 3.6 Fair market behaviour
- 3.7 Handling resources
- 3.8 Data protection and security
- 3.9 Operational and business secrets

**CONSEQUENCES OF VIOLATIONS OF THE CODE OF CONDUCT**

**HANDLING OF MISCONDUCT**



### 3.5 Ban on corruption

Our business partners will ensure compliance with the applicable anti-corruption laws. In particular, they will ensure that their employees, subcontractors or representatives do not offer, promise or grant benefits to employees of the Kampmann Group with the aim of obtaining an order or other preferential business treatment. These principles also apply if our business partners cooperate with other third parties in connection with their work for Kampmann.

In no event will our business partners tolerate payments or other benefits to an individual, company or public official with the aim of influencing the decision-making processes of the beneficiary or a third party, regardless of whether this violates the applicable laws and regulations or not. Benefits and gifts relating to advertising, donations and sponsorship may only be made by our business partners to the extent permitted and customary by law.

Likewise, our business partners will not offer, grant, demand or accept any illegal payments, such as bribes, slush money and kickbacks, or any other benefits to obtain business or in connection with the business relationship.

**REQUIREMENTS**

- 3.1 Compliance with the applicable legislation
- 3.2 Product quality and product safety
- 3.3 Human and labour rights
- 3.4 Avoidance of conflicts of interest
- 3.5 Ban on corruption
- 3.6 Fair market behaviour**
- 3.7 Handling resources
- 3.8 Data protection and security
- 3.9 Operational and business secrets

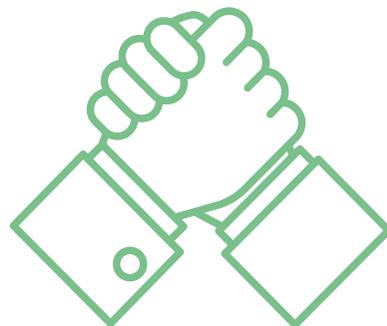
CONSEQUENCES OF VIOLATIONS OF THE CODE OF CONDUCT

HANDLING OF MISCONDUCT

### 3.6 Fair market behaviour

#### Free competition

The business partners will respect **fair and free competition**. The Kampmann Group therefore requires its business partners to comply with all applicable competition and antitrust regulations. In specific terms, they will not enter into anti-competitive agreements and agreements with competitors, suppliers, customers or other third parties, and will not abuse any potential dominant position in the market. Business partners will ensure that there is no exchange of information sensitive to competition law or any other conduct that may improperly limit or restrict competition.



#### Prevention of money laundering

The business partner will comply with all laws and regulations set up to combat money laundering.

#### Import and export controls

Business partners strictly commit to complying with all applicable laws governing the import and export of goods, services and information. They also observe sanction lists

**REQUIREMENTS**

- 3.1 Compliance with the applicable legislation
- 3.2 Product quality and product safety
- 3.3 Human and labour rights
- 3.4 Avoidance of conflicts of interest
- 3.5 Ban on corruption
- 3.6 Fair market behaviour
- 3.7 Handling resources**
- 3.8 Data protection and security
- 3.9 Operational and business secrets

**CONSEQUENCES OF VIOLATIONS OF THE CODE OF CONDUCT**

**HANDLING OF MISCONDUCT**

### 3.7 Handling resources

#### **Sustainability and the environment**

We expect our business partners to comply with all applicable environmental, occupational health and safety regulations and international conventions. We also expect them to use suitable management systems to ensure that product quality and safety meet current requirements. Furthermore, they should promote the safe and environmentally friendly development, manufacture, transport, use and provision of their products. It is particularly important to us that we use resources economically, rely on energy-efficient and environmentally friendly technologies and reduce both waste volumes and emissions to air, water and soil.



**REQUIREMENTS**

- 3.1 Compliance with the applicable legislation
- 3.2 Product quality and product safety
- 3.3 Human and labour rights
- 3.4 Avoidance of conflicts of interest
- 3.5 Ban on corruption
- 3.6 Fair market behaviour
- 3.7 Handling resources
- 3.8 Data protection and security**
- 3.9 Operational and business secrets

**CONSEQUENCES OF VIOLATIONS OF THE CODE OF CONDUCT**

**HANDLING OF MISCONDUCT**

### 3.8 Data protection and security

The business partner will comply with the applicable data protection laws and regulations, including the protection of personal data (including the European GDPR). This applies in particular to customers', consumers', employees' and shareholders' personal data. The business partner will observe all of the above requirements in the collection, recording, retention, processing, transfer, use or deletion of personal data.

The business partner will protect and use confidential information solely in an appropriate manner. This means that the business partner will comply with all contractual requirements regarding data protection and information security and will not disclose information that is not in the public domain.



**REQUIREMENTS**

- 3.1 Compliance with the applicable legislation
- 3.2 Product quality and product safety
- 3.3 Human and labour rights
- 3.4 Avoidance of conflicts of interest
- 3.5 Ban on corruption
- 3.6 Fair market behaviour
- 3.7 Handling resources
- 3.8 Data protection and security
- 3.9 Operational and business secrets



**3.9 Operational and business secrets**

The business partner will oblige its employees to observe operational and business secrets. Confidential information and confidential documents may not be passed on to third parties or made available in any other way, unless authorisation has been granted. Public information is not governed by confidentiality.

CONSEQUENCES  
OF VIOLATIONS OF THE  
CODE OF CONDUCT

HANDLING  
OF MISCONDUCT

# Consequences of violations of the Code of Conduct



# Consequences of violations of the Code of Conduct

In case of a suspected breach of the standards and guidelines set out in this Code of Conduct for Business Partners, suppliers agree that Kampmann may conduct audits to verify compliance with the standards and regulations on the supplier's premises, business premises and commercial buildings during normal business hours after reasonable notice (not less than 14 working days). Kampmann is also authorised to carry out an audit at the supplier's premises at least once a year.

Any violation of any of the provisions of this Code of Conduct for Business Partners will qualify as an ethical and compliance incident and will affect the business relationship between Kampmann and the business partner. In this event and without prejudice to further rights, Kampmann reserves the right to request clarification of the facts and initiate countermeasures. If the business partner demonstrably does not initiate suitable improvement measures within a reasonable period of time or if the violation is so serious that a continuation of the business relationship becomes unreasonable for Kampmann, Kampmann reserves the right, notwithstanding further rights, to terminate the affected contractual relationship without notice or to withdraw from the contract in question.

We therefore ask all our business partners to work with us to ensure that we all act with integrity, fairness and independence in our daily business.



# Handling of misconduct



# Handling of misconduct

We expect our business partners to notify us of possible violations of our Code of Conduct.

The **digital whistleblower system** provides both our own employees and our business partners and their employees with the opportunity to report unlawful conduct within our company confidentially and, if desired, anonymously, so that it can be rectified as quickly as possible. We are aware of the sensitivity of a whistleblower culture. Any information will therefore be objectively examined.

All information will be kept strictly confidential if legally possible.

Digital whistleblower system →



## Contact for questions and comments



**The Kampmann Group**  
**Legal Compliance Manager**

Stephan Meiners  
T +49 591 7108-5829  
M +49 151 29257381  
[stephan.meiners@kampmann.de](mailto:stephan.meiners@kampmann.de)

[kampmann.de](http://kampmann.de)

