

# Declaration of Principles

for the respect and the promotion of human rights



**KAMPMANN**

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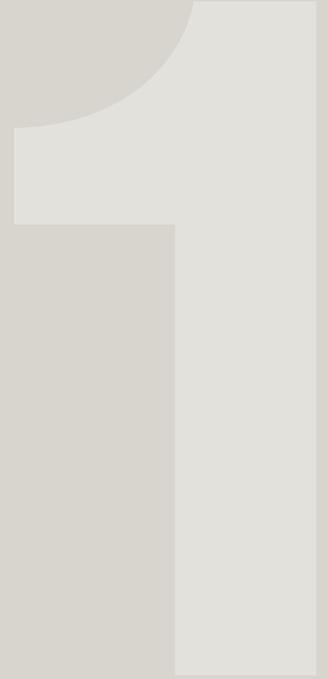
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The male form is used in this document for ease of legibility. However, we would advise at this point that the exclusive use of the male form should be understood as being independent of gender. This is not intended to express any gender discrimination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

Contact for questions and comments



# Foreword by the Management



# Foreword by the Management

Dear Colleagues  
and Employees,

„**Genau mein Klima**“ – under this motto Kampmann stands for a strong togetherness, for innovations, sustainability and a cooperative partnership within the company, as well as with our customers and other business partners. As a family-owned company, we stand for these values.

For us, the **focus is on people**, because our products are developed, distributed and produced by people. Respect for human rights is of central importance to us and an indispensable component of our responsible corporate governance. We are committed to ensuring that human rights are respected and recognized both within the entire Kampmann Group and by our business partners. We would like to emphasize that we take our corporate responsibility beyond the factory gates.

The clearly defined goal is: our products should be produced without human rights violations. We expect our business partners to also commit to respecting human rights, to establish appropriate due diligence processes, and to pass this expectation on to their own suppliers.

The “Declaration of Principles” for the respect and the promotion of human rights supplements the Code of Conduct for Business Partners, which we introduced at the beginning of 2023.

This document is nevertheless the basis and benchmark for all guidelines and regulations that ensure responsible and ethically sound conduct within the Kampmann Group - it applies to all Kampmann Group companies.

We are committed to implementing our human rights due diligence in our own processes and in our cooperation with business partners.

Board of Management



**Hendrik Kampmann**  
Chief Executive Officer



**Martin Wessling**  
Managing Director



**Stefan Reisch**  
Managing Director  
Sales



**Frank Bolkenius**  
Managing Director  
Technology



**Udo Scheyk**  
Managing Director  
Customer  
Communication



**Knut Spekkers**  
Managing Director  
Commercial  
Administration



**Daniel Lucas**  
Managing Director  
Finance & Compliance

# Standards and guidelines



# Standards and guidelines

In this respect, we align our corporate actions with the following nationally and internationally recognized standards:

- + The Lieferkettensorgfaltspflichtengesetz
- + The United Nations Universal Declaration of Human Rights
- + The United Nations International Covenant on Political and Civil Rights
- + The United Nations International Covenant on Economic, Social and Cultural Rights
- + The conventions and recommendations of the International Labor Organization (ILO) on labor and social standards
- + The Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- + European Convention for the Protection of Human Rights and Fundamental Freedoms
- + UK Modern Slavery Act

In the Kampmann Group, we are aware of our corporate responsibility to respect human rights.

The standards and values anchored in the aforementioned frameworks are reflected in our own group-wide guidelines (download at: <https://www.kampmann.de/unternehmen/compliance>).

Our **Code of Conduct** makes it clear what we mean by integrity, what rules apply to us, and what principles guide us.

Our **Code of Conduct for Business Partners** specifies the Kampmann Group's expectations regarding the attitude and behavior of business partners in their corporate activities.

With our **General Terms and Conditions of Purchase**, which are in line with our compliance guidelines, we define internal criteria for the purchase of goods and contracts for work and services.

In addition, **ISO 9001** for quality management systems (QMS) requires companies to address risks, evaluate suppliers, establish mechanisms for obtaining external perceptions of their performance, and derive actions in each case.

An audit has proven that we meet the requirements of **ISO 9001** - and this, by the way, always and continuously since 1996!



# Main focus



# Main focus

Kampmann respects human rights. As part of the introduction of our „Code of Conduct“ and the „Code of Conduct for Business Partners“, we have identified topics of relevance with regard to significant human rights and environment-related risks that may be directly or indirectly related to our business activities or in the global supply chain. Based on these findings, the following focal areas have been identified for our human rights and environmental due diligence activities:

- + Preventing slavery and human trafficking: We are committed to ensuring that no forms of slavery or human trafficking exist in our value chain..
- + Prohibition of child labor: We strive to ensure that no children are forced to work in any part of our supply chain and that their rights to education and healthy development are upheld.
- + Ensuring fair wages: We are committed to ensuring that all employees are fairly compensated and receive living wages that meet their basic needs.
- + Promoting equal opportunities and prohibiting discrimination: We strive for a working environment that ensures equal opportunities and treatment for all employees and rejects discriminatory behavior in any form.
- + Working hours and remuneration: We are committed to ensuring that working hours are reasonable, that overtime is avoided and that all hours worked are fairly remunerated.
- + Occupational health and safety: We attach great importance to the health and safety of our employees by ensuring safe working conditions and taking measures to prevent accidents and injuries.

- + Environmental protection: We are actively committed to protecting the environment and implement measures to minimize our negative impact on nature. We strive for sustainable use of natural resources and protection of biodiversity.
- + Sustainable use of resources: We are committed to the efficient use of resources and strive to reduce waste, emissions and the use of environmentally harmful substances.

The following groups of people whose human rights can potentially be affected by our business activities along our supply chain are considered in focus:

- + Kampmann Group’s own employees at national and international locations, including employees at group companies over which Kampmann Group exercises a certain influence
- + Employees of our direct suppliers

If we have factual indications that suggest a violation of a human rights or environmental obligation at indirect suppliers is possible, we also try to include indirect suppliers in the analysis.

# Risk analysis and implementation



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MANAGEMENT

STANDARDS AND  
GUIDELINES

MAIN FOCUS

4 **RISK ANALYSIS AND  
IMPLEMENTATION**

DOCUMENTATION,  
REMEDATION AND  
REPORTING

WHISTLEBLOWER SYSTEM  
AND COMPLAINTS  
PROCEDURE

CLOSING WORDS

# Risk analysis and implementation

As part of our risk management, we regularly exchange information with our suppliers within our group of companies. This is not only to prevent possible human rights violations, but also to share knowledge and experience within the supply chains.

We use an IT-supported tool („Kampmann Risk Manager“) when performing risk analyses, which meets all applicable legal requirements.

On the one hand, our suppliers receive a risk assessment questionnaire on a regular basis; on the other hand, the program provides us with up-to-date reports on the topics of environmental protection and human rights. By bundling various pieces of information within the tool, we are able to assess and evaluate risks within our company and in relation to our direct suppliers more accurately and better.



# Documentation, remediation and reporting



# Documentation, remediation and reporting

Transparent communication about human and environmental risks is a core element of our human rights due diligence. To create the basis for an efficient communication process, we attach great importance to continuous documentation. With regard to risk assessment, we document our risk analysis and track our identified risks via a risk inventory, which includes a description of the identified risk, the derived measures including an action plan with a timeline, an assessment of the measure, the lessons learned, and the responsibility for monitoring the risk and relevant measures. This documented information will be compiled in an annual report in accordance with the Supply Chain Due Diligence Act. This will be prepared for the first time at the beginning of 2025.

We have appointed a **Human Rights Officer** who is responsible for monitoring the implementation of the requirements of the LkSG.

Our annual Sustainability Report is another instrument for documenting and making transparent our company's progress and performance in the area of sustainability/environment.



# Whistleblower system and complaints procedure



# Whistleblower system and complaints procedure

We are aware that, despite our high standards and due diligence, violations may occur that cannot always be identified due to the large number of business relationships. We have therefore established a complaints procedure as an essential tool. It supports us in identifying risks and human rights violations. Our whistleblower system is available to everyone - whether business partners, customers or employees - at <https://kampmann.integrityline.com/frontpage>.

Digital whistleblower system →

In designing and applying the whistleblower system, we paid particular attention to the following features:

- + Maximum security.
- + Guaranteed EU-DSGVO conformity.
- + Preservation of the anonymity of the whistleblower(s) throughout the process.
- + Clarity and ease of accessibility for anyone wishing to report concerns or suspicions regarding potential human rights, environmental risks or otherwise in our own business and supply chain.
- + Confidential treatment of all reports, with due care for the privacy and safety of the person making the report.
- + Providing regular feedback to the reporting person on the status of his/her report and the outcome of the investigation, to the extent permitted by law.
- + Maintaining a detailed record of all reports and investigations, including any remedial actions, and preserving that record.
- + Ensuring that our complaint procedure complies with the Whistleblower Protection Act (HinSchG), including protecting whistleblowers from reprisals

# Closing words



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Our world today is characterized by constant and rapid change. Against this backdrop, it is essential that we continually review and continuously improve our tools and our approach to respecting and promoting human rights. In this way, we aim to ensure that we remain compliant with relevant laws and international standards on human rights and the environment over the long term.

We always strive for cooperation that is free from any violations of human rights.

7 CLOSING WORDS

## Contact for questions and comments

Each and every one of us is required to contact the Legal Compliance Manager of the Kampmann Group in the event of ambiguity or questions requiring clarification.



### Legal Compliance Manager der Kampmann Group

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