

Kampmann Group - Modern Slavery Statement

Introduction

Modern Slavery in all its forms is a serious problem in a variety of jurisdictions and industries. The Kampmann group of companies (**Group**) is committed to make all efforts to ensure the absence of any instances of Modern Slavery in its businesses and supply chains. We have summarised below the Group's stance on Modern Slavery and the measures we have taken to combat it for the benefit of our employees, customers, suppliers and stakeholders.

This statement is being delivered amongst others in compliance with legislation in various countries in which the Group's businesses are trading, in particular in compliance with the Modern Slavery Act 2015 (**MSA 2015**) in the United Kingdom.

Definition of Modern Slavery

Modern Slavery is now widely defined as circumstances, in which a person is held in slavery or servitude, for instance by requiring such person to perform forced or compulsory labour. Instances of human trafficking are generally also subsumed under the definition. In determining whether Modern Slavery has occurred, regard must be had to the relevant person's circumstances (e.g. age, mental capacities or physical illness) which may render the person vulnerable. According to the MSA 2015, the consent of a person to any of the acts alleged to constitute holding the person in slavery or servitude does not preclude a determination that the person is being held in slavery or servitude.

In line with various international guidelines, the Group interprets Modern Slavery widely, especially in relation to forced labour, which is the prevalent form of Modern Slavery. Forced labour includes debt bondage and the restrictions of a person's freedom of movement (for example by withholding that person's identity papers).

Our policies reflect our commitment to acting ethically in all our relationships (whether internal or in relation to third parties).

The Group and its business

The Group's holding company is Kampmann Group GmbH, resident in Lingen, Germany. Kampmann Group GmbH holds the entire share capital or majority stakes in the following companies: Kampmann Heating Cooling Ventilation Ltd. (Canada; trading in the North American market), Kampmann UK Limited (United Kingdom), Kampmann Polska Sp.z o. o. (Poland), NOVA Apparate GmbH (Germany) and emco Klima GmbH (Germany).

We are a leading international specialist in heating, cooling, ventilation and integrated building automation. Kampmann is one of the major players in the construction and building services industry.

As at the date of this statement, we are not aware of any occurrences of Modern Slavery in any of our businesses. We are also not aware of any particular risk of Modern Slavery being associated with our core business sectors or that the businesses are vulnerable to such risks. We also note that our businesses do not operate in jurisdictions that are generally deemed to have a high risk of Modern Slavery attached to them. To the limited extent our products are used on construction projects in such jurisdictions, we are mere suppliers to the projects in question with no involvement in the installation of our product on site.

We would also like to put on record that our businesses comply with local laws relating to minimum wage structures with regard to our employees' salaries. In Germany, our employees are payed in line with the IGM collective bargaining agreement which mandates salaries well in excess of statutory minimum wage requirements.

Our supply chains

Our business activities require the outsourcing, subcontracting and procurement of goods or services from third parties. We also make use of agency workers in the context of our production and logistics processes.

No instances of Modern Slavery have been discovered in our supply chain and we have no indications that the supply chain is vulnerable to modern slavery. The vast majority of our supply is from Germany with the remainder coming from other continental European countries. We do therefore not receive supply from jurisdictions that are known to be at risk as far as Modern Slavery is concerned.

We set out below how we make efforts to elicit compliance with our standards by third party suppliers.

Current policies and due diligence - suppliers

While no Modern Slavery has this far to our knowledge occurred in our supply chain, we do have a strict policy which provides for the exclusion of the relevant company if instances of Modern Slavery were to be discovered.

Current policies - individuals

The group has a general ethics and compliance policy. Every group employee is required to comply with these policies and they are handed out to each employee upon joining. Potential non-compliance by an individual will be pursued and sanctions will be implemented under applicable labour laws.

Directors of Kampmann have been briefed (and will continue to be briefed) on the subject of Modern Slavery.

We have processes in place that enable individual employees or contactors to confidentially turn to dedicated persons of trust or the relevant staff council.

Continued monitoring

We will continue to review risks and policies on a regular basis. This statement will be reviewed annually.



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Hendrik Kampmann



KAMPMANN UK Ltd.
- Technical Director -
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