

# Code of Conduct

Code of Conduct for employees  
of the Kampmann Group



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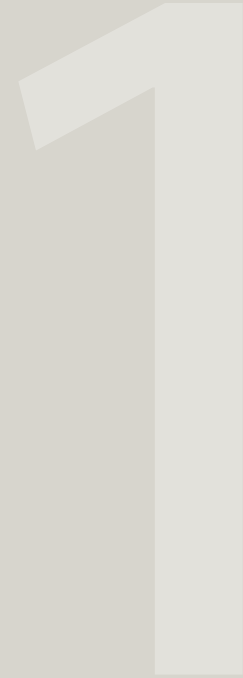
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The male form is used in this document for ease of legibility (with the exception of the “Foreword by the Management”). However, we would advise at this point that the exclusive use of the male form should be understood as being independent of gender.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

Contact for questions and comments



# Foreword from the *Management*



# Foreword from the Management

Dear Colleagues

and Employees,

With a history going back over 50 years, the Kampmann Group is today a globally successful specialist and leading manufacturer of heating, cooling and ventilation systems. We owe this success largely to you, our employees.

“Genau mein Klima - Precisely my kind of climate” – with this slogan, Kampmann advocates strong cooperation, innovations, sustainability and partnership-based cooperation within the company, as well as with our customers and other business partners. As a family-owned company, we embody these values and convictions.

Our good reputation and the relationships we have built up with great dedication and passion in the past can quickly be severely damaged by unethical conduct or legal violations.

Each and every one of us is therefore required to behave responsibly and to act in accordance with applicable law.

This Code of Conduct therefore provides you with guidelines for your actions.

We want to be successful, but also to act with joy, a clear conscience and in accordance with the legitimate interests of our customers, suppliers, managers, colleagues and society. We have acted successfully on these principles in the past – and they also form the foundation of our future.

Board of Management



Hendrik Kampmann  
Chief Executive Officer



Martin Wessling  
Managing Director  
Production



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

# Application and scope



# Application and scope

This Code of Conduct represents a promise to the outside world that we will deal reliably with all business partners and society – but it is also a promise of good cooperation within the Kampmann Group. In particular, the management and all managers, acting as role models, bear responsibility for the active implementation of these conduct standards.

The principles laid down in this Code of Conduct, which are binding for all employees of the Kampmann Group (including all subsidiaries and affiliated companies), form a binding framework for our employees to act independently in their day-to-day work.

This Code of Conduct is primarily intended to protect employees and the company and is part of our Corporate Social Responsibility (CSR).



# Duty of information & basic conduct requirements



# Duty of information & basic conduct requirements

Each and every employee must be aware of the laws, regulations and internal instructions that apply to their area of responsibility. If in doubt, advice must be sought from the manager, the management or the Legal Compliance Manager of the Kampmann Group.

Each employee is obliged to:

- + Comply with the laws, regulations and internal instructions applicable in their area of responsibility.
- + Be fair, respectful and trustworthy in all activities and business relationships.
- + Respect and promote the reputation of the Kampmann Group.
- + Avoid conflicts of interest between business and private matters.
- + Not give themselves or others any unlawful advantage.
- + Comply with occupational health and safety, environmental protection and data protection provisions.
- + Report compliance violations immediately via the following channels.

In addition, every manager is also obliged to:

- + Maintain a friendly, factual, fair and respectful relationship with colleagues and employees.
- + Ensure compliance with this Code of Conduct within their area of responsibility.
- + Clearly communicate to employees that compliance violations are disapproved of and have consequences.





# Code of Conduct

# 4

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# Code of Conduct



## 4.1 Compliance with the applicable legislation

It goes without saying that we comply with the applicable laws and regulations of the states in which we operate in all cases. This applies regardless of whether compliance is controlled by state authorities.

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## 4.2 Respect for human rights and a ban on forced and child labour

It is the responsibility of all subsidiaries, affiliated companies and employees of the Kampmann Group to ensure a safe and healthy working environment.

We are committed to:

- + Respecting human rights, in accordance with the UN Universal Declaration of Human Rights
- + Ostracising any form of child labour, i.e.:
  - > an absolute ban on child labour
  - > The ILO Conventions are the minimum standards for the employment of young people
- + Ostracising any form of forced labour, i.e.:
  - > an absolute ban on forced and slave labour
- + Equal opportunities and non-discrimination.
 

We are opposed to any kind of discrimination within our group of companies. We employ people of different backgrounds and experience, regardless of their ethnic or social origin, gender, religion, belief or political attitude, disability, age or sexual identity. In this context, we should also mention our award as an "Inclusive company" by concluding a cooperation agreement with the Christophorus factory and successfully offering people with disabilities integration into the everyday work of our company.



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### 4.3 Occupational health and safety

The aim of the Kampmann Group’s occupational health and safety policy is to prevent health risks and to permanently maintain the health of all employees. To achieve this goal, the Kampmann Group has set up an occupational health and safety organisation and a safety committee, which coordinate current issues relating to occupational health and safety at regular meetings. Employees of the Kampmann Group all receive initial training from the occupational safety expert. Training for individual workplaces is regularly provided by managers. Our employees must comply with the applicable laws, regulations and standards regarding occupational safety and health at their workplace.

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## 4.4 Working hours and remuneration

The Kampmann Group offers a reasonable level of remuneration. Kampmann also ensures that the minimum wage and working hours are adhered to within the framework of the applicable legal system. We attach great importance to equal pay and therefore pay our employees regardless of their gender.



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## 4.5 Work-life balance

Kampmann systematically embodies a family-friendly corporate culture and therefore offers various flexible solutions to reconcile work and family life. We are certified as a family-friendly company.

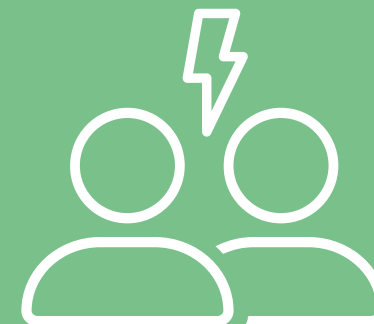
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## 4.6 Avoidance of conflicts of interest

Loyalty to the company and fellow employees is an essential basis of our understanding of business. We avoid situations where personal or financial interests conflict with those of the company. We expect our employees to act with integrity when faced with conflicts of interest. The employee must inform the company directly about relationships with individuals or companies that could lead to conflicts of interest, such as family relationships, (private) partnerships or business partnerships.

Contractually, employees must ensure that their secondary activities are not exploited to the detriment of the company. Employees' additional work must be notified in writing and approved by the company. Secondary employment with competitors is not permitted.



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## 4.7 Corruption and bribery

We would like to state that we are generally interested in good relationships with our customers and other business partners.

However, we have a zero-tolerance strategy in relation to corruption and bribery – we do not tolerate any form of corruption, bribery, corruptibility or any other unlawful granting of benefits.

Our business relationships should be based solely on objective criteria. Alongside quality, reliability and competitive prices, this also includes adherence to environmental and social standards as well as the principles of good corporate governance.

The Kampmann Group's Anti-Corruption Policy contains more detailed rules on this.



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## 4.8 Granting and acceptance of benefits, invitations and gifts

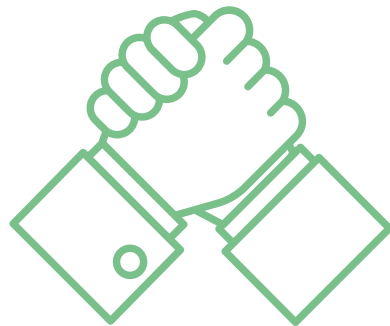
Gratuities, business lunches and dinners and events for information, representation or entertainment purposes may be a legitimate means of establishing and supporting business relationships. However, they must never be used to obtain unfair business advantages and not to the extent or in a manner likely to jeopardise the professional independence and judgement of the parties involved.

The Kampmann Group's Anti-Corruption Policy contains more detailed rules on this.



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## 4.9 Antitrust and competition law

We operate in the market as a fair and responsible competitor and are committed to full compliance with applicable competition and antitrust laws.

We do not participate in agreements on price, volume and terms and conditions nor in agreements with competitors on market sharing.

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## 4.10 Prevention of money laundering

Kampmann undertakes solely to maintain business relationships with reputable customers, consultants and business partners whose business activities are in compliance with legal regulations and whose financial resources are of legitimate origin. Incoming and outgoing payments are immediately assigned to the associated service. Employees must report suspicious payments or suspicious conduct on the part of business partners. Cash flows must be transparent and open. All applicable external and internal regulations regarding the recording and accounting of cash and other transactions and contracts must be observed.

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## 4.11 Sustainability and the environment

Sustainable environmental conservation and climate protection are important corporate targets for us, which we aim to achieve with appropriate measures both in the research and development of new products and in the operation of our production facilities. Every employee is jointly responsible for the environmental protection in their working environment and is obliged to comply with all environmental protection laws, regulations and standards. In order to get closer to our sustainable development targets, an interdisciplinary team has been working on sustainability reporting and the definition and tracking of sustainability targets since 2022.



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## 4.12 Confidentiality, secrecy and intellectual property

We lose our competitive advantage if we do not protect our innovations. We therefore protect our business secrets by means of appropriate confidentiality measures. Business, operational and customer-related data is subject to a duty of confidentiality.

We limit our internal communication to necessary and appropriate content regarding this Code of Conduct (“need to know basis”).

We maintain confidentiality and send confidential content only in a protected manner.

We defend our intellectual property rights, such as patents, copyright, knowledge and expertise, from misuse. Conversely, we respect the intellectual property rights of third parties.

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### 4.13 Data protection and security

The protection of personal data, especially our employees' personal data, is of particular importance to Kampmann. We therefore established a data protection management system some years ago that has been managed internally since 2012. Kampmann also appointed an internal Data Protection Officer in 2012, who is responsible for ensuring that all company processes are monitored with regard to personal data. The Data Protection Officer is regularly trained and certified to maintain a consistently high quality of Kampmann data protection. We always act in accordance with the European General Data Protection Regulation and the German Federal Data Protection Act.

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## 4.14 Dealing with company property

We expect all employees to protect the business assets of our company, including all tangible and intangible assets. This includes intellectual property as well as all processes, products and designs developed by our employees that are used in our company. With regard to the handling of motor vehicles and work equipment handed over to our employees, the corresponding regulations in the Company Motor Vehicle Agreements and loan agreements for company equipment apply.



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### 4.15 Dealing with social media in a professional context

Many employees use social media, such as XING or LinkedIn, in their professional work. When using social media, we must therefore be aware of our responsibility regarding the reputation of the Kampmann Group. The rules enshrined in this Code of Conduct also govern interaction on online platforms. In specific terms, we do not disclose any confidential or sensitive information about the company. We treat each other with respect, openness and honesty and reject any form of discrimination.



# Consequences of violations of the Code of Conduct



# Consequences of violations of the Code of Conduct

For employees, violations of the Code of Conduct may result in:

- > Employee/personnel interview
- > Warning
- > Termination of employment
- > Third-party claims for damages
- > Kampmann claims for damages
- > Fine
- > Imprisonment

For the Kampmann Group, violations of the Code of Conduct may result in:

- > Third-party claims for damages
- > Fine
- > Loss of image
- > Expensive litigation



# Handling of misconduct



# Handling of misconduct

The Kampmann Group relies on the support and cooperation of all employees in these sensitive areas. No employee will suffer as a result of disclosing information. Rather, the aim is to arrive at and indeed reinforce a common understanding and a communication culture in order to be able to detect unwanted developments at an early stage and prevent damage to Kampmann's reputation or assets that could jeopardise its survival.

Employees can contact their disciplinary manager, the management, the Head of Human Resources, the Works Council, or the Legal Compliance Manager of the Kampmann Group to report violations of laws, this Code of Conduct, or other internal policies.



Alternatively, our digital whistleblower system can also be used.

The digital whistleblower system provides both our own employees and our business partners 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

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.



The Kampmann Group  
Legal Compliance Manager

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