

Klampfer Holding GmbH's compliance policies for its suppliers

1. Preamble

Klampfer Holding GmbH and the companies affiliated with it (hereafter only referred to as Klampfer) bear a particular responsibility to the companies, employers and business partners in the course of their worldwide work as a specialist for buildings, electrical and technical household systems for industry and trade.

Klampfer expects support from all suppliers in order to fulfil this responsibility, in which the suppliers accept and respect Klampfer's values and principles and take them as a basis for their own business practice.

The present compliance policies apply to all suppliers and service providers in a contractual relationship with Klampfer, and it covers those fundamental principles which Klampfer deems essential for the suppliers. Insofar as applicable, Klampfer expects the suppliers to pass these central principles of the compliance policies on to their own suppliers.

2. Prohibition of active and passive corruption – prohibition on offering and granting benefits, as well as a prohibition on demanding and accepting benefits

The suppliers undertake not to offer or grant any personal benefits to employees or close relatives of employees or other third parties in connection with business activities or vice versa to demand or accept personal benefits, if their total value and the specific circumstances create the impression that the recipient of the benefit will expect a particular performance in return. Whether this is the case depends on the specific circumstances of individual cases.

Occasional and promotional gifts with a low value are always permissible, whereas cash payments and comparable services (e.g. petrol vouchers) are generally prohibited. Hospitality in the course of usual business practices is, insofar as reasonable, permissible in any case.

3. Appropriate handling of business information

It is prohibited for suppliers to pass on business and financial information or confidential documents to third parties without authorisation, or otherwise make such public, unless the suppliers are expressly authorised to pass on the information/documents.

4. Compliance with the provisions of antitrust law

The suppliers undertake not to place restrictions on free competition and not to violate the provisions of national or international antitrust law.

The suppliers undertake to support an open, fair and competitive business environment.

Further they undertake to offer employees who receive goods or services for private purposes a normal market price, or only to grant discounts or other benefits if these are granted to all Klampfer's employees.

5. Equal opportunities and anti-discrimination, attention to fair working conditions

The suppliers undertake to respect and observe human rights as fundamental values, on the basis of the European Convention on Human Rights and the UN Charter. The working environment shall facilitate secure and health-conscious work for staff. Workers shall be employed according to the principle of equal opportunity, without discrimination on the basis of race, skin colour, sex, religion, membership of a group or heritage. That includes fair treatment of employees regarding working hours, regular leave of absence and fair payment. The workers are granted the right to establish or join an independent employee organisation, which can lead collective negotiations on working conditions.

6. Protection of the environment and sustainability

Klampfer will endeavour to comply with the environmental regulations applicable to the company, and therefore relies on support from its suppliers for the promotion, development and distribution of environmentally-friendly technologies. Processes in the production and supply chain are set up in such a way that available resources are used efficiently and the effects on the environment are kept low. Waste/waste water shall be disposed according to the relevant regulations.

7. Compliance with contemporary law and company policies

The suppliers undertake to comply with the laws of the applicable legal system and the applicable company policies, and therefore to act in compliance with this law and these policies.

Company name

Date, company's authorised signature