

Code of Conduct.

We are all KAISER.



Table of contents.

Foreword.	3
We are all KAISER. Code of Conduct for social responsibility.	
Preamble.	4
Our corporate image.	4
Scope.	5

Our principles.	
1. Compliance with laws.	5
2. Our values.	6
3. Procurement.	6
4. Benefits.	6
5. Our suppliers.	6
6. Our customers.	7
7. Consumer interests.	7
8. Communication.	7
9. Data protection .	7
10. Company secrets.	7
11. Human rights.	8
12. Privacy.	8
13. Health and safety.	8
14. Harassment.	8
15. Freedom of expression.	8
16. Working conditions.	9
17. Our ecological requirement.	9
18. Implementation and enforcement.	9



Foreword.

For generations, and including far outside the sector, the KAISER GROUP has been known as a highly moral, fair and reliable family-owned company. It is on these values that the trust of our business partners is based in respect of us and our products, and this reputation is something which we will never put at risk. We have developed the following Code of Conduct in order to comply with all of our corporate image and the responsibility which accompanies that, and to protect the company and ourselves against the consequences of unlawful behaviour. It is based on the ZVEI's Code of Conduct, which we have signed (Details can be found [here](#).)

Our Code of Conduct is the basis for all our commercial activities and provides all of us with binding rules for our business dealings. We expect all those who are part of the KAISER GROUP to identify with the Code and at all times to make it the obligatory guideline of their professional actions.

Burkard Kaiser

We are all KAISER.

Code of Conduct for social responsibility.

Preamble

The KAISER GROUP commits itself unreservedly to its business responsibilities in the framework of its entire commercial activities. In the course of more than 115 years, we have developed into one of the most important European brands of electrical installation products and systems. Understanding corporate and social responsibility - something which has guided our family-owned company for three generations - is one of the most significant foundations of this success. However, our successes are also based on joint ethical principles which characterise our activities at all the sites in Europe.

In our group, mutual trust and reliability with regard to employees, market partners and suppliers form an important basis to enable us to achieve joint goals. By using the motivation and know-how of our workforce both at home and abroad, and also by providing innovative high-quality products, our intention is to continue to remain one step ahead in the sector with our powerful ideas and solutions.

The aim of the Code of Conduct is to convey the principles of our corporate image as a family-owned company and to act as a guideline for the productive and trusting cooperation of all employees among each other and in respect of our customers and service providers. We strongly believe that everybody who works for the KAISER GROUP actively supports the rules of conduct and makes them the benchmarks for his and her daily activities.

Our corporate image

The Code of Conduct is based on a fundamental understanding of socially responsible company management. For us, this means that we take on responsibility by being mindful of the consequences of business-related decisions and actions in respect of economic, technological and also social and ecological aspects. Within the context of its relevant possibilities and areas of action, the KAISER GROUP is voluntarily playing its part in supporting the sustainable development of society in those countries in which it is active. In doing this, we orientate ourselves towards the generally accepted ethical values and standards as well as respect for human dignity. In particular, KAISER stands for the values of justice, reliability, openness, tolerance and honesty.

Scope

This Code of Conduct is valid for all of the KAISER GROUP's locations and for all persons and companies which represent the group or are active as service providers and suppliers for it.

The KAISER GROUP requires of all business partners that they, too, respect the principles of our Code of Conduct and make them the basis of their business relations with us. In addition, we expect them to comply with comparable rules of conduct and also, to the extent of their relevant possibilities and areas of action, promote these in their dealings with their suppliers and throughout the rest of their added-value chain.

Our principles

The KAISER GROUP works actively towards ensuring that the values and principles stated below are respected and maintained on an ongoing basis:

1. Compliance with laws

Our employees are personally responsible for ensuring that the valid laws and other legal regulations and also the social standards of those countries in which we are active are adhered to. In countries with a weak institutional framework we examine carefully which business practice(s) in our home country can be used in a supportive way for responsible company management. If KAISER's Code of Conduct regulates situations in ways that are stricter than those of the relevant national law, our Code of Conduct applies.

Our principles

2. Our values

The KAISER GROUP aligns its activities with universal values and principles, in particular with regard to integrity, probity, respect for human dignity, openness and also non-discrimination against religion, ideology, sex and ethnicity.

In addition, we oppose corruption of any kind. Our employees must not accept or grant benefits of any kind. At all times we stand for and support transparency, honest actions and responsible management and control in all our companies.

We pursue clean and acknowledged business practices and fair competition. With regard to competition, all the companies in the KAISER GROUP orientate themselves towards legal and ethical principles, professional behaviour and work which ensures high quality. Agreements with competitors which result in restriction of competition are forbidden. We maintain fair and trusting interaction with the regulatory authorities.

3. Procurement

Procurement of goods and services must be based exclusively on objective criteria. Personal interests must not influence the placing of orders. The granting and acceptance of benefits of any kind is strictly forbidden. Any offer of benefits must be refused and reported to the superiors.

4. Benefits

In all cases employees shall not accept any presents or inappropriate invitations offered by a business partner. The only exceptions to this are presents of low value such as advertising articles or appropriate presents of a representative character. Presents must only be given insofar as they are appropriate and no consideration is expected in return. In order to avoid even the appearance of unlawful conduct, in cases of doubt employees should talk to their superior or corresponding offices.

5. Our suppliers

Orders are to be placed with suppliers who, in addition to the legal obligations, also explicitly acknowledge their adherence to the rules of our Code of Conduct.

Our principles

6. Our customers

We place our faith in a reliable, fair and trusting relationship with our customers. In order to be able to offer them the high quality of our products, excellent service and a good price-performance ratio, we constantly check and improve our production methods and services.

7. Consumer interests

The KAISER GROUP adheres strictly to consumer protection regulations and to appropriate sales, marketing and information practices.

8. Communication

The companies in the KAISER GROUP communicate openly and in dialogue-orientated ways about the requirements of this Code of Conduct and its implementation in respect of employees, customers, suppliers and other interested parties and stakeholder groups. All documents and information are compiled in a dutiful way, not unfairly changed or destroyed, and stored in an orderly and correct manner. Our business documents must always be reliable. Partners' trade secrets and company information are dealt with sensitively and in confidence.

9. Data protection

Based on the basic regulation relating to data protection, we treat all personalised data in strict confidence. The collection, processing, use or passing on of personalised data are only permitted if required in order to achieve lawful and unambiguously formulated purposes and provided the parties involved are in agreement. At all times it must be ensured that third parties do not have access to this data.

10. Company secrets

Company secrets such as financial data, production and machine know-how, design documentation, inventions and business strategies are always to be treated in strict confidence. These also include documentation made available to us by business partners.

Our principles

11. Human rights

International human rights are extremely important to us. We adhere strictly to the human rights specified in the UN Human Rights Charter and promote their protection and advancement. This includes estimating in advance the effects of our business activities and also ensuring that neither we nor our suppliers and service providers are involved in infringements of human rights. We expect everybody to respect and comply with the inalienable human rights.

12. Privacy

We also ensure the protection of personal dignity and privacy of our employees. Treatment of each other is to be characterised by mutual trust arising from open communication. In addition, management is expected to display respect, exemplary function, reliability and social competence.

13. Health and safety

Our employees are our greatest potential. As the result of our special responsibility for safeguarding their health and safety, we ensure a safe, secure and health-preserving work environment in order to prevent accidents and injuries. All participants must comply strictly with the occupational and health and safety regulations

14. Harassment

Mistreatment, corporal punishment, sexual, psychological, physical or verbal harassment or abuse and discrimination are strictly forbidden and will be punished.

15. Freedom of expression

All employees have a basic right to freedom of expression and opinion.

Our principles

16. Working conditions

The KAISER GROUP aspires to having a good working environment for all employees and complies with the core labour standards of the International Labour Organization, whose individual details can be found on <https://www.ilo.org/berlin/arbeits-und-standards/kernarbeitsnormen/lang--de/index.htm>.

These also include the exclusion of child labour, all forms of forced labour and trafficking in human beings, discrimination relating to occupation and profession and respect for workers' rights. All the companies in the group comply with the work standards valid at that time with regard to the maximum permissible work time.

17. Our ecological requirement

The KAISER GROUP complies with all regulations and standards which are valid for the relevant site and relate to environmental protection, acts in an environmentally conscious way, and avoids and prevents hazards to human beings and the environment. We deal with natural resources in a responsible way, promote the development of environmentally friendly technologies, and work continually on improving the environmental balance of our products.

18. Implementation and enforcement

The KAISER GROUP undertakes all appropriate efforts to implement and apply on an ongoing basis the principles and values described in this Code of Conduct. The management is required to inform the employees about the aims of the Code of Conduct and to pay attention to compliance with the stipulations. Inappropriate behaviour can almost always be avoided if advice is sought in good time. If employees are unsure which requirements exist or if their behaviour is legal and completely ethical, it is expected that they will consult their superior or the department responsible (e.g. personnel or finance department). Suspected or actual infringements of the law or the Code of Conduct must be reported to the superior and if necessary to a named office.

On request, business partners, associations and other stakeholder groups must be informed of essential measures so that it can be verified that compliance is always guaranteed. A right to the passing on of trade and business secrets and information relating to the competition or otherwise worthy of protection does not exist.



ATTEMA B.V. | Member of **KAISER** GROUP

Schelluinsestraat 1 · 4203 NJ Gornichem
NETHERLANDS

Tel. +31(0)183.650.650 · Fax +31(0)183.650.750

www.atterma.com · info@atterma.nl

