

Preamble

Konvekta AG as well as its affiliated and subsidiary companies both at home and abroad, admit their social responsibility within the scope of the entrepreneurial activities worldwide. This integrity declaration concerning the social responsibilities describes its meaning regarding working conditions, social acceptability and environmental friendliness as well as transparency, trustful cooperation and dialogue. The contents of this declaration express the collective core values of all companies associated with the Konvekta Group (hereinafter referred to as “Konvekta”)

This integrity declaration is conceptualized as self-commitment. It does not constitute any third-party rights. Konvekta herewith wishes to react on the diverse framework conditions in a global market and to meet the challenges and social expectations, resulting from the increasingly linked-up cooperation in the value-added chains. It shall emphasise Konvekta’s interest in fair, lasting, respectable and ethical action principles.

1 Basic understanding about corporate management

A collective basic understanding of socially responsible corporate management forms the basis of this integrity declaration. For Konvekta this means to take over responsibility by considering the consequences of entrepreneurial decisions and action in economical, technological as well as in social and ecological terms and by bringing about an adequate balance of interest. Within its respective possibilities and scopes of action, Konvekta adds voluntarily to the well-being and to the lasting development of the global society at the locations they operate at. Konvekta’s action is guided by generally accepted ethical values and principles, in particular such as integrity and virtue as well as the respect for the dignity of people.

2 Scope of application

- 2.1 This integrity declaration is valid for all Konvekta locations and business units worldwide.
- 2.2 Konvekta commits itself to support the abidance of the contents of this integrity declaration by our suppliers and in the further value-added chain within our possibilities and in the scopes of action.

3 Basic principles

Konvekta actively works towards observance and abidance of the values and principles mentioned in the following.

3.1 Abidance by the law

Konvekta abides by the applicable laws and other statutory provisions of the countries in which we operate. In countries with weak institutional framework we check carefully, what good management practice from the own home country should be adopted to support responsible management.

3.2 Integrity and management

Konvekta's action is guided by generally accepted ethical values and principles, in particular such as integrity, transparency, virtue, respect for the dignity of people, openness and non-discrimination towards race, ethnical origin, gender, religion or conviction, disability, age or sexual identity.

Konvekta disapproves of corruption and bribery within the meaning of the corresponding UN-Conventions¹. In appropriate manner, we support action with integrity, responsible management as well as control in the company and we take appropriate measures to particularly avoid direct or indirect commission of the following contraventions:

Theft, fraud, misappropriation, disloyalty, forging, granting of an undue advantage, anticompetitive bid-rigging, betrayal of trade and company secrets, unauthorized utilization of guidelines or instructions of technical nature, corruptibility and corruption in commercial transactions, granting of an undue advantage, granting of benefits or other advantages to employees of contractual partners, resp. the receipt of such benefits or advantages.

A conflict of interest exists when a personal interest of an employee interferes or overlaps the interests of Konvekta or when an employee or its close relative benefits personally from a transaction in which a company of the Konvekta group is involved in. Konvekta expects from its employees to make business decisions solely in the best interest of Konvekta and they are not allowed to enter conflicts of interests. Potential conflicts of interest must be reported beforehand to the supervisor.

Konvekta pursues serious and approved business practices and a fair competition, considering cartel and antitrust regulations. In competition we aim at professional behavior and quality fulfilling work. We are committed to ensure a fair competition on the markets and strictly obey the applicable competition and antitrust laws.

Konvekta employees and their relatives may not accept or ask for gifts or other personal advantages from suppliers, customers or other business partners. Promotion material and other goods at a maximum value of 30 euros/dollars may be accepted, provided that these are granted voluntarily and that it is ensured, that these do not affect the employee's decision. Gifts, exceeding the above-mentioned value may not be accepted and this Konvekta Integrity Declaration has to be mentioned to the business partner.

If questions arise (e.g. regarding an international context, in which it may be considered impolite to decline a gift) these should be discussed with the supervisor or compliance representative.

¹ UN Convention against corruption dated 2003, effective since 2005

3.3 Consumer's interests

Konvekta abides by consumer protection regulations, as far as consumer interests, such as appropriate sales, marketing and information practices, are concerned. Particularly groups in need of protection (e.g. youth protection) enjoy special attention.

3.4 Communication, financial responsibility

Konvekta communicates openly and conversationally about the requirements of the integrity declaration and its implementation towards employees, customers, suppliers and other stakeholders. All documents and records are created dutifully, are not altered or destroyed dishonestly and are kept appropriately. Company secrets and information of partners are treated sensitively and confidentially and are neither passed on without authority to third parties nor made accessible to them. Documents that are subject to publicity requirements are published within the deadlines foreseen and in accordance with applicable law.

Books and records are kept in accordance with the applicable law and the generally accepted accounting principles. Besides of legal restrictions relevant internal company instructions and directives apply. Documents such as annual financial statements, quality reports, time logs, expenses invoices and submissions to customers and regulatory authorities are issued, maintained and, where necessary, disclosed with the conscientiousness and care of a prudent businessman.

3.5 Human rights and working conditions

Konvekta pleads for the support of human rights. We abide by the human rights according to the UN Declaration of Human Rights². Furthermore, we comply with the core job norms of ILO³, as far as these are referred to in the following.

² General Declaration of Human Rights, UN-Resolution 217 A (III) of 1948

³ ILO = International Labour Organization

3.5.1 Privacy and data protection

Privacy including personal data is protected. Konvekta fulfils the respective legal obligations to protect personal data. Employees and business partners are informed and obliged to comply with data protection in accordance with the relevant applicable laws and regulations as well as with the current valid internal directives. Our data protection officer continuously controls the underlying legal bases and the compliance of external and internal directives and updates the internal processes and directives accordingly.

3.5.2 Health and safety

Our duty is to avoid threats to people or the environment. Processes, production sites and resources have to meet at least the applicable legal requirements. Internal directives regarding work safety, handling of hazardous materials as well as health, fire and environmental protection exist. These internal directives are subject to a continuous review within the framework of our management systems and are adjusted and enhanced appropriately in case of statutory changes and/or organizational matters.

3.5.3 Protection against harassment

As a global player, we value and encourage diversity. Furthermore, we fight against discrimination and harassment: We prohibit any sexual or psychological harassment, intimidation or similar behaviors that affect the work performance of each individual or create a working environment characterized by intimidation, hostility or insult.

3.5.4 Freedom of opinion

Freedom of opinion and expression are granted and protected.

3.5.5 Prohibition of child labor

The prohibition of child labor, that is, the occupation of persons younger than 15 years of age, as far as the local legal regulation does not determine higher age limits and provided that no exceptions are permitted, is observed.⁴

3.5.6 Prohibition of forced labor

The prohibition of forced labor is observed.⁵

3.5.7 Remuneration

The job norms regarding remuneration are observed, particularly regarding the remuneration level according to the valid laws and regulations.⁶

3.5.8 Employee rights

The employees' rights of freedom of association and assembly as well as collective bargaining are respected, as far as this is legally allowed and possible in the respective country.⁷

3.5.9 Prohibition of discrimination

Employees are not discriminated.⁸

⁴ ILO-Konvention Nr. 138 von 1973 und ILO-Konvention Nr. 182 von 1999

⁵ ILO-Konvention Nr. 29 von 1930 und ILO-Konvention Nr. 105 von 1957

⁶ ILO-Konvention Nr. 100 von 1951

⁷ ILO-Konvention Nr. 87 von 1948 und ILO-Konvention Nr. 98 von 1949

⁸ ILO-Konvention Nr. 111 von 1958

3.6 Environment protection

Konvekta fulfils the regulations and standards regarding environmental protection concerning the respective companies and acts environmentally conscious at all locations. Based on the principles of the Rio-Declaration⁹ we act responsibly towards natural resources. We give high priority to measures to reduce energy consumption and greenhouse gas emissions, improve water quality and air quality, avoid waste, and manage chemicals and natural resources. Besides, we constantly strive to develop our processes according to sustainable corporate action. We have an environmental management manual and are currently certified in accordance with DIN EN ISO 14001:2015. Herewith our energy efficiency is evaluated regularly and audited by a third party.

3.7 Civil engagement

Konvekta contributes to the social and economic development of the country and area, in which we operate with our respective location. We support appropriate voluntary activities of our employees.

3.8 Export control, foreign trade law

In all conscience, Konvekta reports its import and export activities to the competent customs authority. We thereby unrestrictedly comply with the applicable statutory provisions of the respective company site. We expect the same from our suppliers. Besides legal regulations the relevant internal company directives apply, in particular the work instruction for export control.

⁹The 27 principles of the „Rio Declaration on Environment and Development“ of 1992 as a result of the United Nations Conference on Environment and Development in Rio de Janeiro.

3.9 Know-How, property rights, counterfeit products

Know-how and intellectual property are basis of our innovations and our business success. Therefore, we strive for increasing and protecting our know-how and intellectual property and, where applicable, using it for commercial purposes. If possible, products should be free of third party patent rights. Notifications of plagiarism will be reviewed immediately and if required initiate/support criminal and civil law measures.

4 Implementation and enforcement

Konvekta makes all appropriate and comparative endeavors, to implement and apply the fundamentals and values of this integrity declaration continuously.

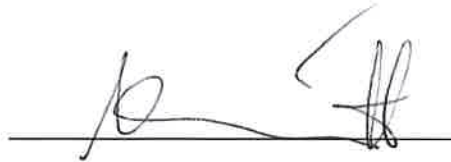
Indications for a suspected misconduct should be addressed to the compliance representative. Each indication and all related information are handled strictly confidential and if desired also anonymously by the compliance representative. For anonymous indications you can use the letterboxes installed in the Konvekta companies at any time.

Breach of the Konvekta Integrity Declaration or other Konvekta regulations or guidelines lead to disciplinary action. It is the responsibility of each Konvekta manager in the company to ensure, that all employees know this guideline and respect its terms. Managers, who do not comply with this obligation, must also expect disciplinary measures and legal consequences.

On request and within the limit of reciprocity, contractual partners shall be informed about the essential measures, to make comprehensible how its abidance is ensured in principle. Entitlement to disclosure of company and trade secrets as well as of information referring to the competition or otherwise worth protecting does not exist.

Schwalmstadt, 1st March, 2021

Supervisory Board:



Carl Heinrich Schmitt
(Chairman)



Wilfried Scharny



Klaus Grow

Board of Directors:



Marco März



Dr. Holger Buchner



Dr. Wolfgang Reuter