

## 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 world wide. 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 world wide.
- 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-Conventions<sup>1</sup>. In appropriate manner we support action with integrity, responsible management as well as control in the company and we take

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<sup>1</sup> UN Convention against corruption dated 2003, effective since 2005

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.

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. With supervisory authorities we associate in a cooperative and trustful way.

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 is considered impolite to decline a gift) these should be discussed with the supervisor or compliance representative.

### 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

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.

## 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 Rights<sup>2</sup>. Furthermore we comply with the core job norms of ILO<sup>3</sup>, as far as these are referred to in the following.

### 3.5.1 Privacy and data protection

Privacy including personal data is protected.

### 3.5.2 Health and safety

Protection of health and operational safety, particularly guarantee of a secure and health-promoting working environment, to avoid accidents and injuries.

### 3.5.3 Protection against harassment

Employees are protected against physical punishment and against physical, sexual, psychological or verbal harassment or violation.

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

<sup>3</sup> ILO = International Labour Organization

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## 3.5.4 Freedom of opinion

Freedom of opinion and expression are granted and protected.

## 3.5.5 Prohibition of child labour

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<sup>4</sup>.

## 3.5.6 Prohibition of forced labor

The prohibition of forced labor is observed<sup>5</sup>.

## 3.5.7 Remuneration

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

## 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<sup>7</sup>.

## 3.5.9 Prohibition of discrimination

Employees are not discriminated<sup>8</sup>.

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<sup>4</sup> ILO-Convention Nr. 138 of 1973 and ILO-Convention Nr. 182 of 1999

<sup>5</sup> ILO-Convention Nr. 29 of 1930 and ILO-Convention Nr. 105 of 1957

<sup>6</sup> ILO-Convention Nr. 100 of 1951

<sup>7</sup> ILO-Convention Nr. 87 of 1948 and ILO-Convention Nr. 98 of 1949

<sup>8</sup> ILO-Convention Nr. 111 of 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-Declaration<sup>9</sup> we act responsibly towards natural resources.

## 3.7 Civil Engagement

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

## 3.8 Implementation and enforcement

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

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<sup>9</sup> The 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.

# Integrity Declaration

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Supervisory Board:



Carl Heinrich Schmitt (Chairman of the Supervisory Board)



Harald Manz



Wilfried Scharny

Board:



Marco März



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