



Standard for clean air

Code of Conduct

at Keller Lufttechnik GmbH + Co. KG

Foreword

Success story

We are a people-minded family business - globally present and locally based. Our goal is to provide clean air using innovative technology. We operate in a manner that makes everyone a winner - the company, as well as our employees and business partners.

Dear employees,

with its global operations, Keller Lufttechnik demands a commitment to an image of excellence by acting both responsibly and legally. After all, the success of any company is measured by not only the high-quality product or service that it provides, but also by its public image and reputation.

Keller Lufttechnik relies on the confidence that customers, suppliers, employees and the general public place in us. Our reputation and public image are significantly influenced by the appearance, actions and behaviour of each individual employee. As employers, we comply with the existing laws and regulations of the countries in which we operate. Agreements which have been made will be adhered to, and will shape our business relationships in a long-term and sustainable manner.

The following Code of Conduct summarizes the rules and conditions that characterize our daily business dealings, and which are demanded of all employees. It defines the standards we operate by, which all employees must live up to throughout their daily tasks. The Code of Conduct should serve as a guideline for practicing our corporate values, and simultaneously sensitize us to identifying any misconduct that does not meet our values.

Each of us can help Keller Lufttechnik to succeed by practicing and representing our values both internally and externally. Therefore, we expect all of our employees to act in accordance with the Code of Conduct.

Kirchheim unter Teck, May 20th 2020



Horst Keller



Frank Keller

- 1. Scope**
- 2. General conduct requirements**
 - 2.1 Compliance with the law
 - 2.2 Transparency and trust
 - 2.3 Respect for human rights
 - 2.4 Avoiding conflicts of interest
- 3. Conduct in the business environment**
 - 3.1 Fair competition
 - 3.2 Fighting corruption
 - 3.3 Invitations, gifts and others
- 4. Interaction with employees**
 - 4.1 Fair working conditions
 - 4.2 Values
- 5. Environment, safety and health**
 - 5.1 Sustainability and environmental safety
 - 5.2 Occupational health and safety
- 6. Handling data and information**
- 7. Actions in the event of infractions**

1. Scope

Keller Lufttechnik GmbH + Co. KG (commonly known as Keller Lufttechnik) expects all its advisory boards, managing directors, executives and employees to comply with the Code of Conduct and to act in accordance with the principles defined therein.

Additionally, it is not sufficient to merely base our conduct and actions on the Code of Conduct. Every entity or individual who is in a business relationship with Keller Lufttechnik shall comply with the principles set out in our Code of Conduct. Customers and suppliers must also act in accordance with the ethical and legal principles defined in this Code of Conduct. In addition, we also expect our business partners to establish binding rules to ensure legally compliant conduct along their supply chain.

2. General requirements of conduct

2.1 Legal compliance

Keller Lufttechnik and its employees comply with all applicable laws and regulations. The same applies to embargo, customs and export control regulations. Illegal activities do not comport with the stated values of our company since, aside from any ethical considerations, penalties, lost orders and loss of reputation could create great harm to the company. Especially abroad, laws must be observed if criminal prosecution does not necessarily comply with constitutional principles. Every employee is obliged to inform him or herself regarding all regulations and laws that apply in his or her own area of responsibility. Keller Lufttechnik will provide the necessary support.

2.2 Transparency and trust

Transparency and trust are key to successful and professional cooperation. In order to make actions and decisions comprehensible to colleagues and business partners, transparency must prevail, otherwise the necessary compliance is often not accorded. This also requires an open and honest manner of addressing problems and errors. Ultimately, transparency and clear communication help to prevent misunderstandings.

2.3 Respect for human rights

Safeguarding human rights is part of Keller Lufttechnik's corporate responsibility. This is why all employees are expected to treat each and every individual with fairness and respect and to cooperate with Keller Lufttechnik in creating conditions that do not conflict with human dignity. Keller Lufttechnik firmly rejects all types of child and forced labour and respects the rights of children and youths. Our business partners are also required to practise this attitude so that the entire supply chain is free of products that are associated with child or forced labour. In this context, we ensure that materials and products do neither originate from conflict regions nor our products are supplied to such regions. This is to prevent violations of human rights or other negative impacts from being supported in any way.

2.4 Avoiding conflicts of interest

All employees are to make decisions in their dealings with customers and suppliers according to objective criteria and free of conflicts of interest. Possible conflicts due to private interests, economic pressures or other activities must be avoided. All employees are obliged to clearly separate private and business interests and to act without bias.

3. Conduct in the business environment

3.1 Fair competition

Keller Lufttechnik expects all employees to comply with applicable national and international laws governing fair competitive practices, and not engage in unethical pricing, false marketing, nor offer any agreements in their own interest or in the interest of third parties. Furthermore, the intellectual property of others must be respected. Also, they must refrain from gaining an unfair advantage through fraudulent conduct, such as concealment or manipulation, so that all competition is firmly based on fair business practices.

Keller Lufttechnik invalidates any order obtained through a violation of applicable laws. Should Keller Lufttechnik achieve a particular market domination, it will not use this position for its own benefit, but shall continue to act in accordance with the law.

3.2 Fighting corruption

Keller Lufttechnik consistently rejects corrupt, unfair business practices and any behaviour detrimental to the company, and also demands this from its business partners. All employees are required to comply with the applicable laws to prevent corruption and money laundering.

Keller Lufttechnik expects its employees to not participate directly or indirectly in money laundering activities and to maintain open, fair and reliable relationships with customers, suppliers and service contractors. All business practices are characterized by honest and responsible thinking and actions.

3.3 Invitations, gifts and others

Employees of Keller Lufttechnik do not have their business decisions influenced by invitations or the like and reject such offers unless they are within the bounds of customary business courtesy. Accepting monetary gifts and vouchers is not permitted in any case. Gifts of monetary value may also not be accepted. Exceptions to this rule are low-value courtesy gifts that are customary, that comply with generally held business practices, and that do not unduly influence the recipient in his or her business decision. Gifts beyond this generally accepted standard always require the approval of management. This is intended to protect employees from becoming dependent on third parties, or from being manipulated in their own actions and decisions. Keller Lufttechnik as a whole does not expect preferential treatment when offering gifts to business partners.

4. Interacting with employees

4.1 Fair work conditions

Keller Lufttechnik treats its employees with respect, open-mindedness and tolerance. The personal dignity of each individual is fully respected, and a positive work environment free of discrimination and harassment is ensured. Harassment (e.g., bullying), unwanted or offensive advances of any type, or a work environment impaired by insulting jokes and remarks will not be tolerated. Fair treatment exists and is demanded in all activities of the company.

4.2 Values

Keller Lufttechnik firmly opposes any type of discrimination and expects the same of its employees. The values of the family business, such as peaceful co-existence, diversity and equal opportunity, are to be respected and lived both internally and in business relationships. Any non-compliance with these values must be firmly rejected.

5. Environment, safety and health

5.1 Sustainability and climate protection

Keller Lufttechnik is highly committed to protecting the environment and to being economically, ecologically and socially responsible, not only through its own products but also through its own actions. In doing so, current laws on climate and environmental safeguards are complied with, resources are used with care and, with the help of an environmental management system, the amount of waste is reduced and recycling is optimized. Moreover, with the help of solar systems on the company premises and lighting upgrades, efforts are being made to lower electricity consumption. All employees are also required to actively participate in environmental and climate protection in their daily work.

5.2 Occupational health and safety

Keller Lufttechnik complies with the applicable occupational health and safety regulations and guarantees that these regulations are observed to protect its own employees. We create a safe, hygienic and healthful working environment to prevent accidents and illness in the workplace. In addition to regular workplace risk assessments, employees receive annual training in occupational health and safety issues. The efficiency and control of occupational safety and health protection measures is managed by an occupational health and safety specialist at Keller Lufttechnik.

6. Dealing with data and information

The use and handling of data and information is a special priority for Keller Lufttechnik. Particularly in a business context, where a large volume of data is exchanged, sensitive handling of this data is absolutely essential. Keller Lufttechnik has committed itself to complying with the currently valid legal data protection regulations, to fulfilling the prescribed reporting obligations in the event of data breaches, and in taking sufficient precautions with regard to data security and data protection. These precautions include, in addition to electronic data, any physical data. Besides its own data, Keller Lufttechnik also protects all data entrusted to it by its suppliers and customers that is not in the public domain. Any disclosure of proprietary data is done only with the prior explicit consent of the affected party.

7. Actions in case of violations

Anyone disclosing possible violations should not fear any reprisals. Keller Lufttechnik intends to create a supportive corporate climate and culture. All such disclosures should be communicated to the appropriate manager or the next higher levels of management. Any misconduct or violation of the Code of Conduct will be consistently and without exception investigated and prosecuted by Keller Lufttechnik, regardless of the rank and position of the individual(s) involved.



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