

CODE OF  
ETHICS



**KLEEMANN**

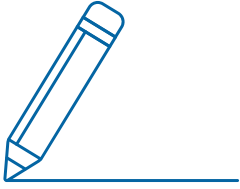
2022



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# Message from the Top Management

Dear Colleagues,

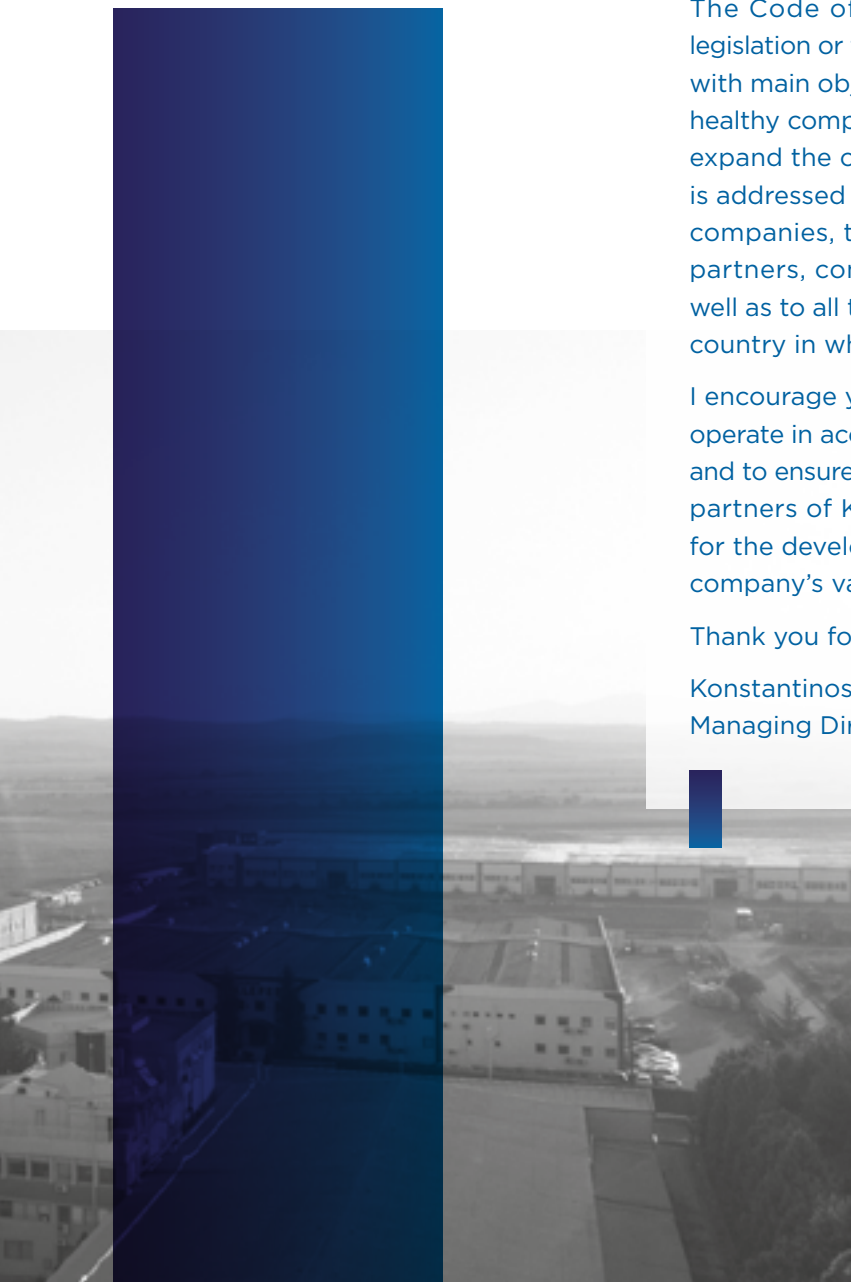
With over 30 years of experience in the lift industry, KLEEMANN is one of the most important companies in both European and International markets. The presence of our company in different places around the world, as well as its expansion in new countries, make it necessary to define specific rules for the observance of good professional behavior and the imprinting of our values in our daily business activities.

The Code of Ethics does not replace KLEEMANN's current legislation or the existing procedures but operates complementary with main objective to promote transparency, integrity, reliability, healthy competition within the company and at the same time to expand the chain of corporate responsibility. KLEEMANN Code is addressed to all members of the Board of Directors of related companies, to all employees, to all interested parties (external partners, consultants, customers, suppliers, shareholders), as well as to all those who represent the company, regardless of the country in which they are employed.

I encourage you to carefully study the Code of Ethics, to always operate in accordance with its principles in all your daily activities and to ensure that it is implemented by all colleagues and external partners of KLEEMANN Group. Your contribution is important for the development of our culture and the consolidation of our company's values.

Thank you for your commitment

Konstantinos Koukountzos  
Managing Director





# 01.

## Implementation of the Code of Ethics

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KLEEMANN Code of Ethics is approved by the Board of Directors of the parent company and then by the local Boards of Directors of the other companies of KLEEMANN Group. The Code is dynamic, and its content may be changed at least once a year or more, if circumstances require so. Changes may be due either to possible variations in the applicable laws and regulations of the standards of conduct, or to any suggestions of the recipients of the Code inside or outside the company.

KLEEMANN Management is committed to the implementation and observance of the principles of the Code of Ethics. It does not tolerate any incident of violation of its principles, as in every violation the reputation, the image, and the operation of KLEEMANN are compromised.

KLEEMANN Management and Human Resources Division are responsible for informing all employees and understanding the principles of the Code of Ethics, as well as for their compliance with them.

KLEEMANN Internal Audit is responsible for handling and implementing compliance issues of the Code by the employees, shareholders, investors, customers, suppliers, and representatives of the company. For this reason, it carries out regular audits, inside and outside the company, to eliminate any risks of non-compliance.

The relevant findings that ensure the proper implementation of the Code and its further revision are the responsibility of the Respective Board of Directors of KLEEMANN Group companies.

### 1.1 Our responsibility as Managers & Supervisors

As Managers and Supervisors of KLEEMANN Group, we have the responsibility to inform and explain to our employees the implementation of the principles of the Code of Ethics in our daily practice. As we act as a role model for our employees to follow, we ensure that our personal behavior and actions are in accordance with the principles of the Code of Ethics and do not hinder its implementation. We regularly recall the importance and seriousness of its observance. We create the right conditions so that employees feel comfortable to express any concerns or violations of the Code.

In case we cannot respond to an employee's question or concern, we contact the Deputy HR Director.



## 1.2 Our responsibility as employees

As KLEEMANN Group employees, we read and make sure that we understand the Code of Ethics. We comply with the principles of the Code of Ethics and apply them in our daily lives. In the context of the performance of our duties, we detect any violations, inside or outside the company (in our communication with colleagues, suppliers, customers, other institutions, and organizations) and we report them without any fear or hesitation.

If we have a question about the content of the Code of Ethics or doubt about any risk of its violation, we will contact our Supervisor or Manager or the Deputy HR Director.

## 1.3 Procedure for Reporting Violations of the Code of Ethics

The procedure for reporting violations of the Code of Ethics aims to:

- notify all interested parties of KLEEMANN Group (employees, shareholders, customers, suppliers, other representatives) of the ways in which they will report any violations or risks of non-compliance.
- contribute to the creation of a working climate of transparency, fairness, and integrity.

In KLEEMANN Headoffice and in subsidiaries abroad, the management of violations of the Code is assigned to the Board of Compliance with the Code of Ethics, which consists of the Internal Audit Manager and Deputy HR Director. The Council meets and takes disciplinary measures for the handling of each incident. It also informs the HR & Coaching Director and the General Manager on the progress of the issues that arise.

Any violation of the Code will result in disciplinary measures being taken, in accordance with the applicable legislation, the applicable corporate labor regulation and corporate procedures. We are committed to taking fair disciplinary action, when necessary, regardless of the position of the offender.

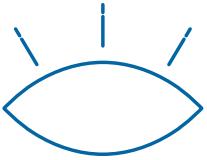
If we suspect any violation of the Code of Ethics, we address primarily to our Supervisor or Manager. Alternatively, all complaints are filed either by name or anonymously in the following ways on the Whistleblowing channel:

1. **by post** to KLEEMANN, Industrial Area of Kilkis, P.O. Box 25, 61100 Kilkis, CONFIDENTIAL to the attention of the Internal Audit Manager
2. **via e-mail** to [whistleblower@KLEEMANNlifts.com](mailto:whistleblower@KLEEMANNlifts.com), to the attention of the Internal Audit Manager
3. **via telephone lines** for Greece and abroad:  
6948 515133  
addressed to the Internal Audit Manager  
6949 068715  
addressed to the Deputy HR Director

For each incoming report, we will take all necessary measures to keep the person's identity completely confidential. We will handle all information provided through a strictly confidential process and trained individuals who have signed a confidentiality agreement and can verify its reliability.

Employees who point out unacceptable behaviors in relation to the Code will be protected from any behaviors that may be retaliative in nature.

Complaints must be made based on good faith and on the basis of knowledge or belief. However, anyone who voluntarily makes false, malicious, or unfounded accusations or allegations may be subject, where appropriate, to disciplinary action as provided by law.



## 02. Vision and Values

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The company's vision, values, and strategic goals are the fundamental components of our business activity. As members of KLEEMANN Group, we must be aware of the vision, mission, values, and strategic goals of our company, as all the above help us operate in a way that reflects the Group's culture.



### **Our Vision**

We are a world leader in the lift manufacturing industry and we are always growing as a company and as people.

### **Our Mission**

We grow globally through innovation, by offering exceptional customer experience and investing in our people.

### **Our Values**

#### **Safety**

- We take all measures for the health and safety of ourselves and our people
- We ensure with our actions the safety of the customers-users of our products
- We take care of the safety of our premises

#### **Trust**

- We are consistent and keep our promises
- We trust people, their abilities, and their intentions
- We freely share our ideas
- We align with each other quickly

### **Passion for People**

- We love and care for our colleague, partner, and fellow people
- We have excellent relations with each other, and we respect each other
- We love our job, and we create growth opportunities for everyone

### **Breakthrough Culture**

- We innovate in all areas
- We are growing, constantly evolving, and improving
- We set great goals and we are committed
- We take the risk, and we are not afraid to fail



# 03.

## Corporate Social Responsibility

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Responsible behavior is part of KLEEMANN culture and Corporate Social Responsibility is a strong commitment.

### **3.1 Co-operation and trust relations with our Customers**

At KLEEMANN Group, customers are at the heart of our activities. Firmly oriented towards innovation and excellent service, we offer an exceptional experience to our customers, which is based on the principles of transparency, integrity, trust, and fairness.

As KLEEMANN Group employees, we provide our customers with high quality, safe and innovative products, in accordance with the legislation standards. We are consistent, fair and create partnerships based on trust and mutual respect.

### **3.2 Co-operation and trust relations with our Suppliers**

For KLEEMANN, the high quality of raw materials we procure is non-negotiable and the supply management is done through specific procedures.

As KLEEMANN Group employees, we treat our suppliers with honesty, objectivity, and respect. By enabling the dialogue between the company and our partners, we consolidate our relationship, recognize the existing needs and deal with the market with consistency, transparency, and fairness.





### 3.3 Corporate Governance

As a company, we have adopted a set of principles and practices to ensure our performance, our shareholders' interests, as well as all our stakeholders. Applying the principle of prevention, we follow corporate governance policies and best practices.

We comply with the applicable national legislation and have adopted the Greek Corporate Governance Code. The adequate and valid information towards its stakeholders is achieved through the Corporate Governance System, which includes management bodies with explicit responsibilities, an effective internal control system and risk management.

### 3.4 Environment

The protection of the environment and the awareness of our employees on environmental issues is a priority in KLEEMANN Group. As a Group of companies, we operate responsibly and make sure to combine our growth with environmental responsibility in all aspects of our activities.

The commitment of responsible environmental behavior runs throughout the organization and is reflected in the Environmental Policy that we have adopted and implemented.

In addition, we apply an Environmental Management System according to ISO 14001:2015 having the legal obligation of the Company for energy inspections and management of Law 4342 incorporated, while we have

been certified according to the standard ISO 14006 (Eco Product Design). Having adopted the principles of eco-design products, we proceed to the redesign of specific products, in accordance with the «Eco-design Process». In the context of efficient waste management, we recycle and manage waste beyond the requirements of the regulatory framework.

As KLEEMANN Group employees, we apply the Group's environmental policy in the field of recycling, proper management of water, energy, and other resources.



# 04. Bribery

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## 4.1 Active Bribery

Active bribery is the provision by an employee of our company to a third party or other related person, directly or through the mediation of a third party, of any kind of benefits, in order to act in violation of their duties or to omit their execution.

As KLEEMANN Group employees, we do not proceed to any form of bribery and do not tolerate any corrupt professional behavior.

The following can be considered as means of bribery: providing money or gifts to third parties, commissions, unusual or covert benefits, political or charitable sponsorships, as well as anything else of value.

In case we become aware of an incident of bribery, we immediately contact our Supervisor or Manager, as well as the Internal Audit Manager.

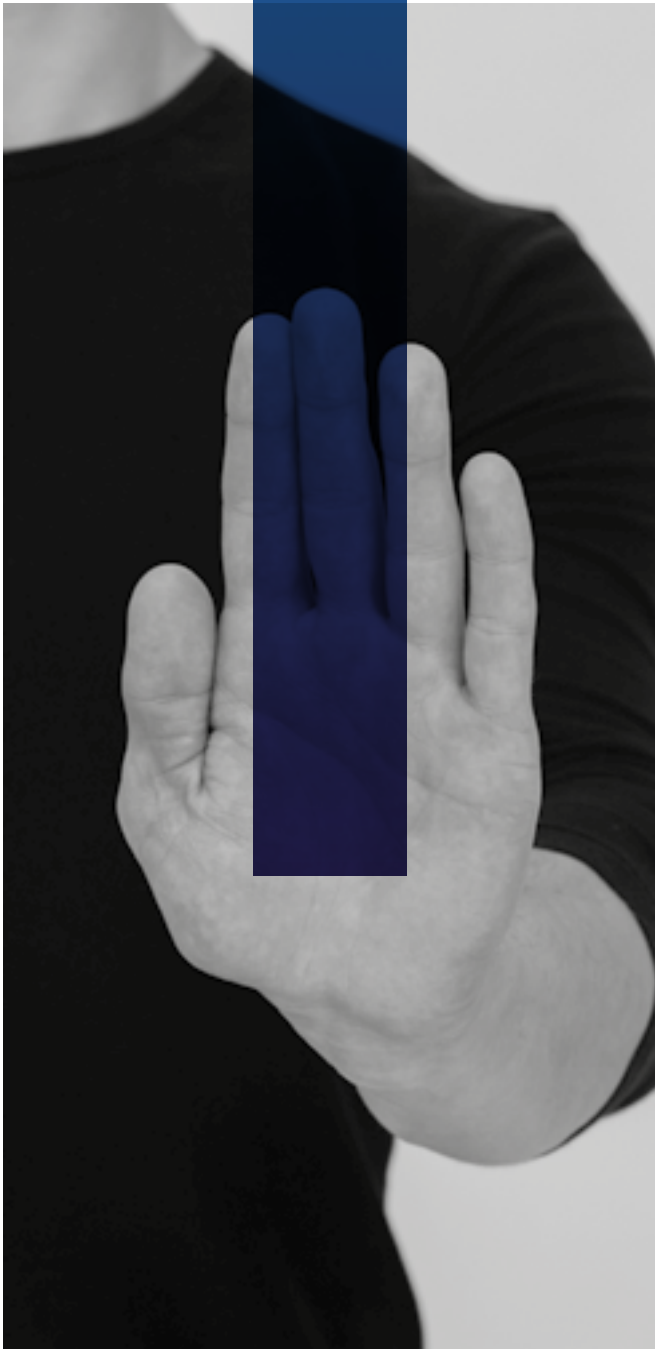
### How do I handle it?

**1st case:** I work for a subsidiary and in this country, there is the informal practice of offering gifts to various bodies in order to promote various requests more quickly. How should I act in similar cases?

Our inviolable principle for all KLEEMANN Group companies is not to use such practices by employees so as to be treated more favorably and promptly by various statutory bodies.

## 4.2. Passive Bribery

Passive bribery is the provision to an employee of our company by a third party or other person related to the employee, directly or through the mediation of a third party of any kind of benefits, in order to act in violation of their duties or to omit their execution.



#### How do I handle it?

**1st Case:** I am an employee, and a partner offers me an expensive meal in a restaurant (the meeting context is not for business). Can I accept the invitation?

We will need to politely refuse and inform our Supervisor or Manager in advance.

**2nd Case:** I work in the procurement department, and I accept a basket of wines for the New Year, is it allowed?

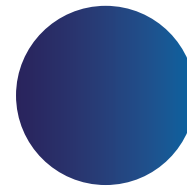
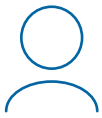
We should directly inform our Supervisor or Manager in writing and after we get their consent we should thank our supplier for the gift and accept it.

In case the gift, which is given by a supplier or our partner, is not symbolic (for example, a mobile phone, a trip, a hotel stay, etc.), we will need to politely refuse, as this action might affect our judgment and lead us to choose the specific supplier. Prior to refusing the gift, we need to inform our Supervisor or Manager.

As KLEEMANN Group employees, we do not accept gifts or entertainment invitations from any third party, as it might be misinterpreted and cause doubts on our personal integrity. Gifts include, not only, material goods, but also all kinds of benefits (cash, correlation with a possible contract or supply tender). If we accept a gift or an entertainment invitation or any other kind of entertainment offer, it should not raise suspicions that it creates an obligation to reciprocate to us.

In the event that we become aware of a bribery incident, either personally or towards another colleague, we address directly our Supervisor or Manager, as well as the Internal Audit Manager.





# 05.

## Conflict of Interest

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As KLEEMANN Group employees, we avoid situations in which our personal interests, or those of our relatives or close associates, collide with those of KLEEMANN.

Indicatively, a conflict of interest occurs in cases where either we or our relatives participate as shareholders, members of the Board of Directors, managers, external partners in a company that deals with KLEEMANN (customer, supplier, consultant, etc.), or we are commercially active in a competitive field with it. Furthermore, a conflict of interest occurs in all cases where, while having a personal gain, we obtain a financial or other benefit at the expense of KLEEMANN Group's interests.

In case we notice an incident of conflict of interest, we immediately inform our Supervisor or Manager, as well as the Internal Audit Manager.

### How do I handle it?

**1st Case:** I am an employee, and I need to choose an external partner for a company's project. One of the shortlisted candidates is a relative of mine. How do I proceed?

Our relationship with the candidate seems to collide with our position to objectively choose the most suitable supplier. We should inform our Supervisor or Manager and state that we need to be excluded from the selection process.



**2nd Case:** I am a Manager and I want to hire my nephew to cover a position in my department. What should I do? According to the recruitment policy, Managers are not allowed to employ a relative of any degree within their departments.

**3rd Case:** I hold a managerial or other position of responsibility and I want to promote an associate, with whom I either have a family relationship or I am a shareholder of their company. What should I do?

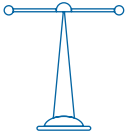
This case can be considered a conflict of interest. What we need to do to protect ourselves and the company is to inform the Internal Audit Manager immediately and in writing.

**4th Case:** A relative of mine participates in the Board of Directors of another company that belongs to the competition or is directly affiliated with a competing company. What should I do?

This is a conflict of interest. It is forbidden for us or our (up to 2nd degree) relatives to be members of the Board of Directors of another company that belongs to the competition.

**5th Case:** I know that a company executive or another interested party, gets informed of the details regarding offers submitted by prospective suppliers for the assumption of a specific good or service. Their purpose is to inform a specific candidate supplier with whom it has a kinship or other personal relationship, so that it can be selected as a key one with the lowest possible cost (price). What should I do?

This code prohibits the falsification and manipulation of offers by any employee, regardless of their position in the company. The bids of various candidate suppliers are confidential and under no circumstances should be shared with third parties which are not involved in the supplier's selection process. What we need to do is to inform the Internal Audit Manager immediately and in writing.



# 06.

## Fair Competition

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At KLEEMANN Group, we support any action to enhance fair competition and at the same time we prohibit behaviors that aim to prevent, restrict, or distort it.

As KLEEMANN Group employees, we adhere to the legislation, follow the basic principles of fair competition, and show caution, especially in the context of our professional relations with customers and suppliers. We avoid sharing or discussing with competitors any issues regarding pricing, pricing policy, advertising or strategy plans, price setting of products or services, market shares, etc.

If we have any doubt about the legality of an issue (communication, contract, commercial activity), we consult our Supervisor or Manager.

In case that we notice an incident of violation of competition law, we should address directly our Supervisor or Manager or the Internal Audit Manager.





### How do I handle it;

**1st Case:** I work in the procurement department and a potential supplier asks me for the prices of the competition to offer a more competitive price. How do I handle it?

We do not provide or exchange information about the prices or offers of our suppliers. We need to, politely and in a direct and straight manner, interrupt the discussion and immediately inform our Supervisor or Manager.





# 07.

## Behavior Patterns

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### 7.1 Professional Behavior

Our People are our strength and the most important parameter for the growth and development of the company. At KLEEMANN Group, our working relations are characterized as friends and family, are marked by the spirit of teamwork and solidarity, and are based on mutual trust, honesty, sincerity, and respect.

As KLEEMANN Group employees, we act ethically and transparently and do not tolerate malignity and intimidating or offensive behavior. In our transactions we communicate with accuracy, clarity, and consistency. We apply the CFA (Conversation For Action) model in order to work responsibly, and honestly. We are regularly informed about the scope of our work and take initiatives to improve our work.

We are passionate about the goals we set and dedicated to achieving them. Our overall appearance is characterized by virtue and professionalism. We behave taking into consideration that our professional relations with the company's associates, greatly affect the integrity and reputation of KLEEMANN Group.

In case we become aware of an incident that violates the above standards of professional behavior, we immediately inform our Supervisor or Manager.





## 7.2 Social Media Management

As KLEEMANN Group employees, we are free to participate in any kind of social media activity, such as Facebook, Twitter, LinkedIn. We use social media in the right way, as otherwise its use can have negative consequences for the company.

We express our opinion, while following certain standards of behavior, as any information we publish cannot be considered a separate part of our professional life. We communicate with courtesy, respect and we are guided by moderation, prudence, and acceptance of diversity. Under no circumstances do we disclose confidential or personal information regarding the company or other people. We clarify under which role we communicate (whether we speak as representatives of the company or not).

Through our participation in social media, we protect the reputation and image of the company, as well as its products and services, and we take responsibility for our actions and words while using all of these platforms. We use company symbols or the company name only upon approval.

When we are no longer members of KLEEMANN Group, we change our current professional activity in our profile, we erase the title of the job while we were working in KLEEMANN Group, as well as the company name.

**In case we become aware of negative comments about the company, we immediately inform our Supervisor or Manager.**



# 08.

## Employment

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### 8.1 Diversity Management

At KLEEMANN Group we do business in over 90 countries worldwide and have partners with different cultural characteristics and traits. To this end, we support respect for diversity and non-discrimination. Social or ethnic background, political, philosophical, or religious beliefs, age, sexual orientation, physical ability, and gender are not discriminatory criteria in KLEEMANN, but an opportunity for new ideas and better results. Diversity is linked with meritocracy and the provision of equal opportunities and space for development.



As KLEEMANN Group employees, we avoid any form of discrimination and treat all our partners equally and fairly. We see diversity as an opportunity for new innovations and new horizons.

In case we become aware of an incident, which could be classified as discrimination or different treatment, we immediately contact our Supervisor or Manager or the Deputy HR Director.

#### How do I handle it?

**1st Case:** One of my colleagues does not want to hire women. How do I handle it?

Any discrimination based on sex is not acceptable for KLEEMANN Group. In the above case we contact the colleague to explain them that their attitude is not acceptable and cannot continue. We should immediately inform our Supervisor or the Deputy HR Director.

**2nd Case:** In my work environment I often hear bad racist/homophobic jokes. What do I need to do?

The above homophobic/racist behavior is not acceptable for KLEEMANN Group. In this case, we talk to our colleagues and explain them that everyone has the right to enjoy the respect of others, regardless of their gender, sexual orientation, or nationality.

We should immediately inform our Supervisor or the Deputy HR Director.



## 8.2 Health and Safety

At KLEEMANN Group we take care of creating a healthy and safe working environment. The adoption of procedures and the implementation of daily actions for Health and Safety ensure a constantly improving environment.

As KLEEMANN Group employees, we follow the health and safety rules and apply them to our daily work. We keep our workplace clean and tidy. We smoke only in the specially designed areas of our facility. We do not consume alcohol or any other addictive substances during our work. We are very careful when operating machinery and we make sure that we use the appropriate personal protective equipment. We respect the highway code, as long as we own corporate vehicles, we do not expose the image of the company with our behavior. We consult the Safety Technician of our premises if we have any concerns.

**In case we become aware of an incident, which could endanger the health and safety of the employees, we immediately contact the Safety Technician of our facilities to take the necessary measures.**

### How do I handle it?

**1st Case:** One of my colleagues consumes alcohol before coming to work and endangers their own safety as well as that of their colleagues. I've spoken to them many times that they are not allowed to do that, but they go on. What should I do?

For KLEEMANN Group, employees' safety is a non-negotiable value. If the above behavior may endanger the employee's safety or our colleagues' safety, we immediately contact our Supervisor or Manager.

## 8.3 Harassment and bullying

A key value of KLEEMANN Group is the promotion of a fair and psychologically healthy working environment without harassment and bullying. Any action or behavior that aims to intimidate us, harm us, offend our dignity (with physical contact, gaze, gestures, comments, distribution of offensive material) can be considered as harassment and bullying. KLEEMANN Group, has adopted and implements a special Policy to combat violence and harassment.

As KLEEMANN Group employees, we do not tolerate any harassment (physical, sexual, racial, psychological) and any threatening or offensive behavior, either from our colleagues, or from our Supervisor or Manager, or by any of our partners.

**In case we become aware of an incident of harassment or bullying, we immediately contact our Supervisor or Manager or the Deputy HR Director.**

### How do I handle it?

**1st Case:** A manager speaks to me in an adverse way and insults me by discrediting my work.

Any colleague regardless of their hierarchical level must speak to everyone with respect and behave with neutrality and integrity. The above behavior is not acceptable in KLEEMANN Group.

What we need to do is to communicate directly with our Supervisor or Manager or the Deputy HR Director.

**2nd Case:** My Supervisor is pushing me to enter into a relationship with them to maintain my job. I'm afraid to talk so as not to lose my job.

Such behavior is unethical. We will need to talk to the Deputy HR Director or the Internal Audit Manager.



# 09.

## Assets

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### 9.1 Asset Protection

As KLEEMANN Group employees, we are responsible for protecting our company's assets. We respect corporate resources and use them wisely and exclusively for corporate purposes. The assets are considered to be machines, computers and other equipment, trademarks, patents, brands, fixed equipment, corporate information, reputation and customers of each KLEEMANN Group company.

### 9.2 Confidentiality and data protection

As KLEEMANN Group employees, we often manage confidential information, which we cannot disclose to third parties, as this would cause a serious impact on the company. We guarantee confidentiality and protect the corporate information we use, either during our work or after the termination of our employment relationship with the company.

Information that has not been disclosed or is not available for the public is confidential. Such information may relate to financial data, technical records, commercial data, new products, photographs, personal data, plans for acquisitions/merger plans and any other information concerning the organization, strategy, and progress of KLEEMANN Group.

When it comes to personal data, in KLEEMANN Group, we recognize that their security and protection is of great importance. Therefore, we make sure that we comply with the applicable legislation. We use appropriate technical and organizational measures (indicatively and not restrictively we mention backups, security checks, actions to protect against malicious material), that guarantee the security of personal data, including their protection from unauthorized access, damage, unauthorized or improper use, loss, and premature destruction. After the expiry of the prescribed data retention period, which has been determined, we must take care of their removal or safe destruction or anonymization.

Additionally, in the Group's agreements with third parties, we include terms that oblige the latter to comply with current legislation on privacy and protection of personal data.





If we become aware of an incident that constitutes or could develop into a violation of the legislation on the protection of personal data, we immediately inform the Deputy HR Director.

### How do I handle it?

**1st Case:** My family asks me about our company's products and future plans. What can I share with them?

All information that has not been communicated to the public, either through the company's website: <https://kleemannlifts.com/>, or through social media accounts:

<https://www.facebook.com/kleemannlifts/>

<https://www.youtube.com/user/KLEEMANNLIFTS>

<https://www.instagram.com/kleemannlifts/>

<https://www.linkedin.com/company/kleemann-sa>

and to which we have access as KLEEMANN Group employees are considered confidential. We may not disclose any information outside the company.

### 9.3 Managing corporate records and information

Corporate files are considered to be any professional documents (printed, electronic, audiovisual, etc.) that we create during our work and serve corporate purposes. The above records can be financial statements, accounting records, expense claims, expenses, e-mails. Before we create any corporate file, we make sure that it complies with the existing legislation, that it is marked by the company's values and that it cannot act as an element against the company or its associates.

KLEEMANN Group applies high standards to ensure the accuracy, transparency, and reliability of our financial and business assets.

As KLEEMANN Group employees, we take care of the data and all other information we create, to ensure the integrity, completeness, and correctness of the results.

In case we become aware of an incident of information distortion or falsification of files, we immediately address our Supervisor or Manager.

### 9.4 Electronic Communication Media Management

As means of Electronic Communication are considered to be corporate telephones, computers, laptops, mobile phones, e-mail systems and internal network and internet systems that belong to the company.

As KLEEMANN Group employees, we use all the above means for reasons related to our work. We take care that they are not subject to any damage or loss. We do not store personal data (e.g. videos, movies, music or photographic files) in storage areas (e.g. Atlas) and on our personal hard drives. We avoid using e-mail for personal use. We only use programs that have been approved by the IT department and are installed on the network, either with purchased licenses, or with free software licenses, or finally that have been developed inhouse.





## AGREEMENT AND COMMITMENT OF EMPLOYEES IN THE PRINCIPLES OF THE CODE OF ETHICS OF KLEEMANN GROUP

With my signature I assure that I have read, agreed, and committed to comply with all the terms of the Code of Ethics and Conduct of KLEEMANN GROUP.

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**Employee**  
(signature & name)

**Date**

This is an integral part of the Company's Code of Ethics.

The Code is subject to revision or changes at least once a year, for which the company has an obligation to immediately inform the employees and request their re-commitment.

