

We are global
but strong on
local support

Kamstrup Code of conduct

Office | +90 certified partners



Contact

For questions about this code of conduct in general, feel free to reach out to the designated contacts in [Commercial & Legal Services](#) or to the email: coc@kamstrup.com

Introduction

Kamstrup is a world-leading supplier of energy and water metering solutions. Our solutions are used by utilities and property managers worldwide and ensure reliable and cost-effective solutions and services.

With this code of conduct, we aim to set the minimum standards for legal compliance, quality, and business ethics to ensure a common understanding within the Kamstrup group of how we and the partners we engage with are expected to conduct business. We also want to provide guidance to enable each other to speak up using a common language when faced with grey zone situations.

Our common understanding of our responsibilities is based on the following principles:

- We conduct business and respect and follow all relevant laws and regulations in all countries in which we operate and in accordance with our internal rules and policies.
- We conduct business in line with the UN Global Compact principles, the relevant Sustainable Development Goals, and the relevant ILO convention.

November 2022, Skanderborg, Denmark



How do you use this code of conduct?

This code of conduct is applicable to everyone in Kamstrup. **The purpose of the code of conduct is to guide you in your daily work and how you interact with your colleagues and third parties**, thereby setting the ethical standard for how we do business.

The principles set in this code of conduct are the same ones we value in the partners we cooperate with. Kamstrup will not conduct business with third parties that do not share our ethical standards and principles.

We have chosen seven areas, which are further detailed in this code of conduct. These are areas where we must ensure that everyone in Kamstrup has practical, easy-understandable compliance guidance.

However, the guidance can never address every potential situation that we will face in our daily work. So always seek advice from your leaders or colleagues with relevant compliance competencies if you have doubts about what to do.

Also, you will receive more focused training in the areas which are of particular relevance to your area of work.

Everyone has an obligation to act in accordance with and ensure compliance with our code of conduct. Compliance comes with culture. If you see a potential issue or concern, you are expected to speak up!

How do I remember all of this?

A little rule of thumb can be helpful if you find yourself in a grey zone situation. Stop and think about Kamstrup's values before you act.

– **INSPIRE, LEAD, and DELIVER.**

➡ Do I **INSPIRE** by doing this?

Would your action inspire others?

To answer this, think about if you would be comfortable with this being made public to your neighbour, your manager, your family, or perhaps the media.

➡ Do I **LEAD** by doing this?

Do you lead the way by example?

To answer this, try talking to a colleague to test if you are doing the right thing. Speak up!

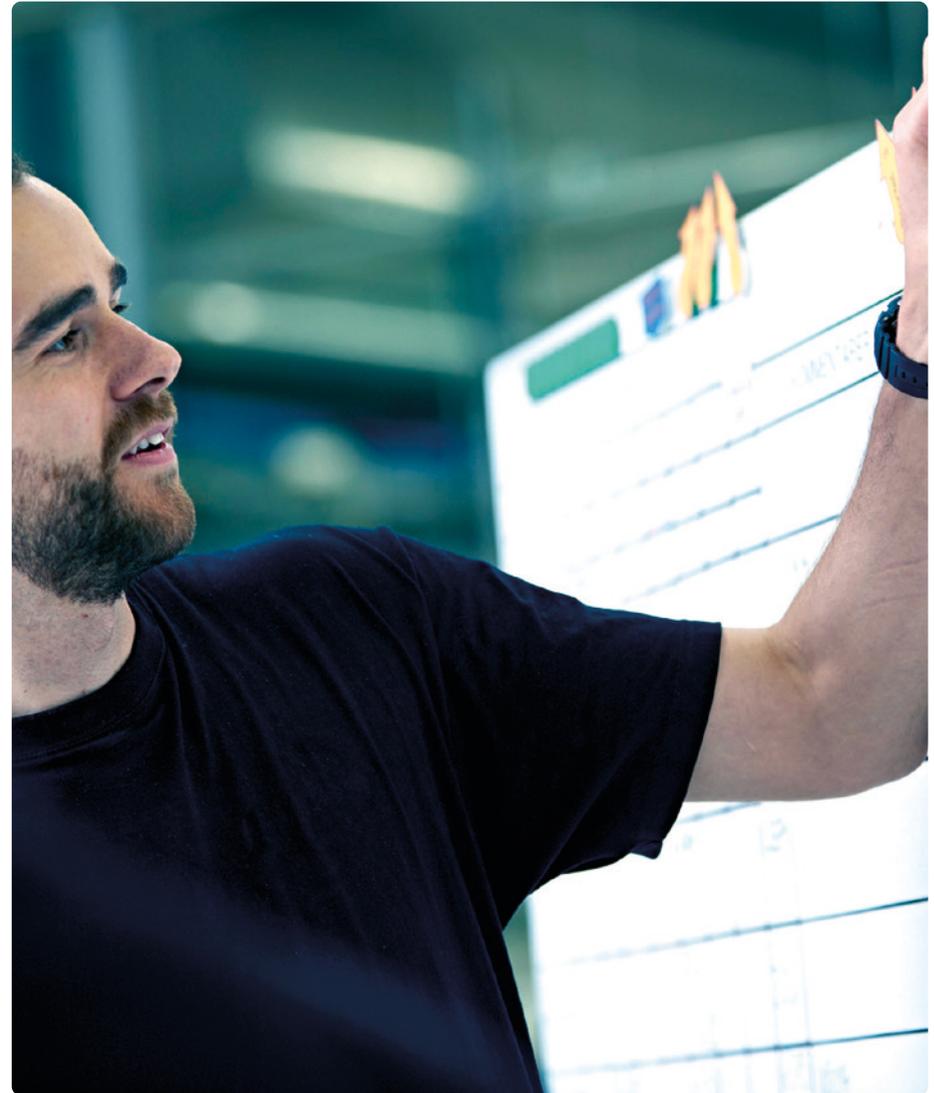
➡ Do I **DELIVER** by doing this?

Will your behaviour and actions create the desired outcome?

To answer this, think broader than just the specific task you are facing, and consider the effect on future deliverables and the future image of Kamstrup.

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Securing information, data, and systems

One of the key factors to our future success in Kamstrup is that we protect our innovation efforts, our systems, and our data.

In comparison to competitors, Kamstrup invests heavily in innovation and technological leadership, and if we do not protect our intellectual property rights and information assets, the competitive advantage of being a technological leader will be limited. Furthermore, Kamstrup handles large amounts of data on behalf of our customers, and therefore, our image as a trusted partner will be severely damaged if we are not able to handle our customers' data and systems appropriately.

At Kamstrup, we are all responsible for protecting our information, data, and systems.



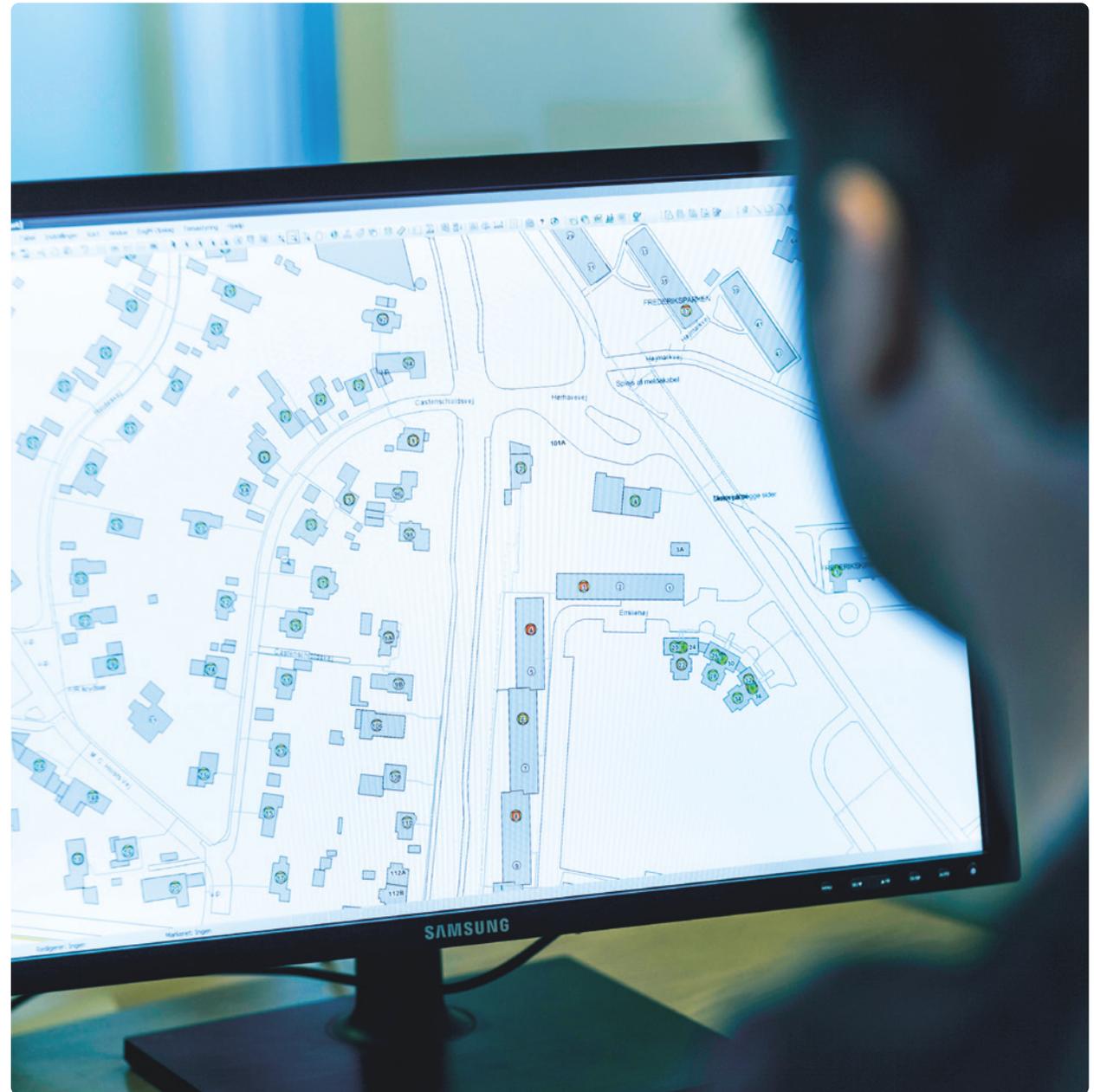
This means

- At Kamstrup, we do not reveal information of confidential nature, such as trade secrets and personal data, outside of Kamstrup without purpose and without an agreement regulating the disclosure.
- At Kamstrup, we handle confidential information securely and with care.
- Our customers, suppliers, and other business partners can trust that Kamstrup safely handles their confidential information.
- We monitor the risks associated with our information assets and personal data and mitigate vulnerabilities and threats.



Your guidelines

- Ensure that no confidential company information is disclosed unless the receiver is authorised to receive such information and needs to know – even within Kamstrup.
- Be cautious when discussing or working with confidential information in public spaces, and use a privacy protection screen on your laptop.
- Protect physical copies of confidential information – e.g. in a locked cabinet. As a starting point, consider if you really need a printed version – if so, it might not be necessary to store it physically afterwards, and you might as well shred it after use.
- Be careful who is allowed access to Kamstrup’s premises and systems and ensure that access is controlled and managed. If you discover something suspicious, don’t ignore it – act!
- When sharing confidential information with business partners, ensure you obtain a signed non-disclosure agreement beforehand. If the disclosure is related to personal data, consider the need for a data processing agreement.
- Think of personal data as something you borrow. Only use personal data for the necessary purpose and give it back or delete it when you don’t need it anymore.
- Do not store more data than necessary. When you consider whether you have a necessary purpose to use personal data, try imagining if the data was about you. Would you personally be okay with how such data was used, shared, or stored?



What

Confidential information

Confidential information comes in many forms and includes information on Kamstrup's intellectual property (e.g. patents), trade secrets as well as strategic decisions and information on future business opportunities and objectives. The leak of such information may have devastating effects on Kamstrup's future business success.

At Kamstrup, we classify information into segments of public, internal, confidential, and strictly confidential. When in doubt about how to treat confidential information, please find guidance in our [Procedure on Classification and handling of information, including trade secrets](#).

Personal data

Personal data is all information related to an identified or identifiable physical person. This is, for example, information on names, addresses, consumption data from our meters, HR information, etc.

We can process personal data when we have a legitimate reason. But only when necessary.

For handling our customer data, we obtain a yearly ISAE3000 declaration, which proves that we are handling personal data properly, securely, and in compliance with the data processing agreements entered into with our customers.

Further information on the use of personal data can be found on [KamSite](#).

Information assets

An information asset is any type of information that, if lost or misused, could affect our ability to deliver products, systems or services, and could damage Kamstrup's reputation and/or affect Kamstrup's ability to meet its business objectives. The information asset can be a system, a process or a product.

Grey zone

We understand that there are situations where it can be difficult to assess what the right thing to do is. If in doubt – stop and think through our values and read the examples below. Still in doubt? Reach out to your manager or [Commercial & Legal Services](#).

Can I discuss or work on a project in a public space?

- ✓ Discussing a project with a colleague in a taxi in such a way that no confidential information is shared. If this is not possible, I must wait until I am at a place where no one is listening.
- ✗ Reviewing or working on confidential presentations in aeroplanes or trains without a privacy screen where others behind me might see the content of the presentation.

During the development process of a new product, I have assessed that there is no major risk to the security of the product. However, I know from a colleague that another project will add a new function to our system, which will affect the overall security of the project I am working on when connected to it. What do I do?

- ✓ I raise my concerns to my manager or colleagues, the steering committee, or at the next gate meeting regarding a possible backdoor to our system to make

sure the security risk is handled within the project or the information is passed on to the project for proper mitigation and handling.

- ✗ I ignore the potential security risk in the new function because I am sure someone else has thought of this and handled the issue. Furthermore, I do not raise issues as I might look stupid or irritate my colleagues or manager.

What do I do if I meet someone unfamiliar at the office who does not have a Kamstrup nametag or guest card?

- ✓ I reach out in a friendly tone and ask who they are and what they are doing. Afterwards, I follow them to the reception and assist them in obtaining the proper guest card.
- ✗ I reach out in a friendly tone and ask who they are and what they are doing. If the person sounds nice, I wish them a lovely day and move on.

Ensuring fair trade and competition

We take pride in competing fairly and winning new business based on the fact that our products and services are superior and valued by our customers.



This means

- At Kamstrup, we will conduct our business in full compliance with all **competition laws** which apply to our activities or business.
- At Kamstrup, we will not pay or receive any direct or indirect **bribes**, just as we will not accept that third parties, such as agents, distributors, or other representatives, pay a bribe on behalf of Kamstrup or in the interest of Kamstrup.
- At Kamstrup, we will not make **facilitation payments** intended to secure or speed up routine government actions, which we are already entitled to without the need for such payment; or to obtain unlawful preferential treatment.
- At Kamstrup, we will not grant any **benefit or gift** which might unduly influence the decisions taken by Kamstrup's business relations.
- At Kamstrup, we value fair trade and will comply with all applicable regulation on **trade control**.



Your guidelines

Competition law

- Acquaint yourself with the competition rules that apply to Kamstrup and your activities or ask your manager to introduce you to these.
- Never exchange, compare, or inform competitors of commercially sensitive information, including prices. This is, for example, if you participate in trade associations.
- Never agree to share or allocate markets and/or customers, including coordinating bid or tender responses with competitors.
- Do not define binding minimum retail prices for distributors.
- If you are considering entering into an agreement (written or verbal, signed or not signed) with a competitor (or a potential competitor) – e.g. in the form of a consortium - please obtain support from Commercial & Legal Services.
- If we hold a leading market position in a certain market, never act in a way that could be perceived as abuse of this position. Support from Commercial & Legal Services is relevant if e.g. a new bonus scheme has a tying effect on customers or if there is a risk of transferring a leading market position from one product market to another e.g. through combination sales.

Bribes

- Never offer, pay, or accept bribes.

- Always refuse to pay out commission to contacts, distributors, agents, or similar service providers without detailed written agreement containing a detailed job/service description.
- Never make any payments to public officials that are not required by law or in accordance with a written and signed agreement with the public authority in question.
- You should do proper due diligence before you select a business partner, and if you suspect that a business partner is using bribes for our benefit, you need to address it.

Facilitation payments

- If a public official requests a facilitation payment, you may only make the payment if there is a threat to your or another person's health or safety. Afterwards, you must immediately report it to Commercial & Legal Services or the Whistleblower Platform.

Benefits and gifts

- As a main rule, all gifts received as part of your job belong to Kamstrup and should be used in the company. Gifts with an insignificant value or personal gifts, e.g. in connection with resignations/appointments/birthdays/anniversaries, as well as gifts given to you in connection with external speeches and presentations you can keep.
- Invitations from business partners to participate in arrangements such as lunches, dinners or similar are allowed if they take place in connection with a professional arrangement, start-up, or closure of a project or similar. The value of the arrangement should not under any circumstances be significant,

taking local customs into consideration. Offers from business partners to participate in travels, concerts, and similar arrangements where the primary purpose is of social character should be rejected unless the value is insignificant.

- If declining a gift or an invitation would be considered disrespectful and in conflict with local customs, acceptance of such gifts may be acceptable upon agreement with the local country manager.
- Giving gifts can be acceptable, but we must exercise caution by always considering the circumstances, type, and purpose of the gift.
- Contact Commercial & Legal Services regarding any gifts (of any value) to be given to public officials.

Trade control

- A small part of Kamstrup's products falls under export control. If you are exporting one of these products, please be aware and always follow the guidelines provided by Commercial & Legal Services.
- Be careful not to conduct any kind of transaction with a sanctioned person or entity or with a sanctioned country. Do respect existing guidelines and restrictions as provided by Commercial & Legal Services related to sanctions.
- If you have a concern relating to a distributor or other partners, who might sell our products to a sanctioned party, you are expected to speak up.

What

Competition law

Competition rules define how we can act horizontally in the relationship with competitors and vertically in the relationship with suppliers or customers. Generally speaking, it is illegal to enter into agreements or arrangements that do or are likely to restrict competition in the market.

Any violation of the competition rules may result in severe fines from relevant competition law authorities.

Furthermore, in certain jurisdictions, violations of the competition rules may result in imprisonment for the responsible people.

For Kamstrup, any sanction for a competition law violation is likely to jeopardise our ability to participate in certain future tenders as well as seriously damage our reputation in the market.

Bribes

A bribe is any payment or granting of valuable advantages (including some gifts) to people not employed

by Kamstrup, including public officials, with the intention of obtaining an advantage for Kamstrup or yourself.

Giving bribes is a serious criminal offence and may result in imprisonment for the responsible people. For Kamstrup, any sanction for a bribe is likely to jeopardise our ability to participate in future tenders as well as seriously damage our reputation.

Facilitation payments

A facilitation payment is a form of payment made to unduly expediting or facilitating the performance by a public official of a routine public service to which the payer is already entitled without such payment.

Benefits and gifts

Any decision you make on behalf of Kamstrup should be in the sole interest of Kamstrup. The exchange of entertainment, gifts, and other personal benefits is only allowed if the exchange has a clear business purpose. Entertainment, gifts, or other personal benefits that are considered disproportionate or

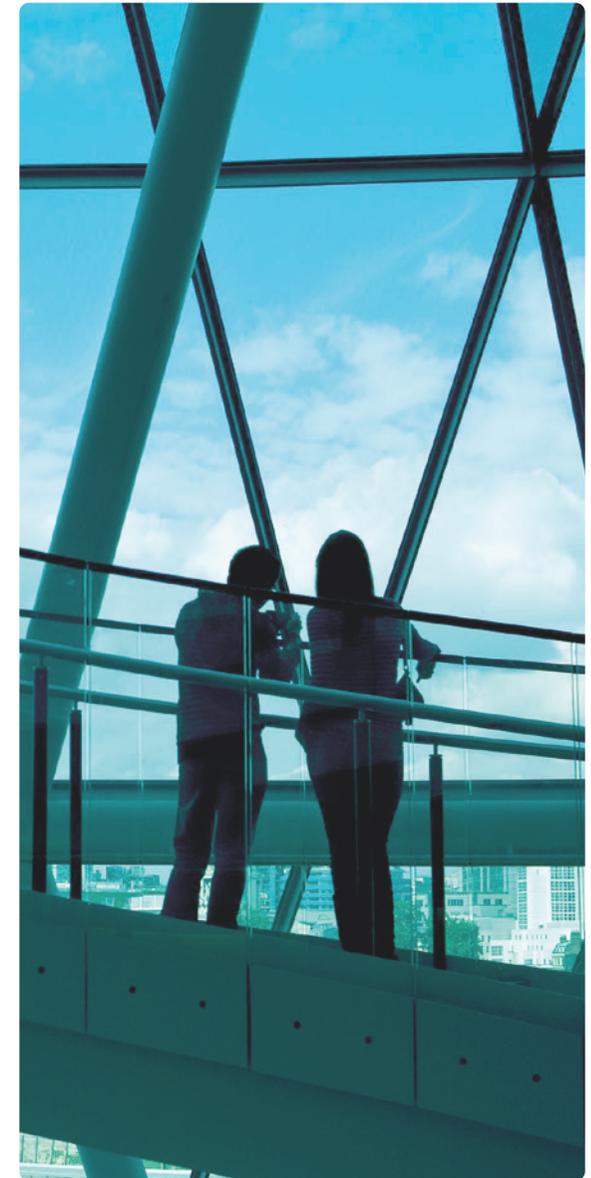
inappropriate might influence your decision-making or the treatment of the business partner (and may, in some cases, be considered a bribe).

Trade control

Kamstrup's business and activities are to, a certain extent, subject to national and international trade control regulations.

Trade control regulations restrict business transactions with certain countries, organisations, and individuals (sanctions) and/or limit the transfer of certain goods, technologies, and software between countries (export controls).

Trading with a sanctioned person or country or exporting controlled products without a license may lead to severe fines, imprisonment for the responsible people, and seriously damage our reputation in the market.



Grey zone

We understand that there are situations where it can be difficult to assess what the right thing to do is. If in doubt – stop and think through our values and read the examples below where the examples in green are allowed. Still in doubt? Reach out to your manager or [Commercial & Legal Services](#).

How do I interact with competitors or potential competitors?

- ✓ Going to fairs and trade association meetings and engaging discussions with competitors on the general developments and trends in the market.
- ✓ Entering into partnerships after conducting proper due diligence of the partner.
- ✗ Going to fairs and trade association meetings and engaging in a dialogue with a competitor regarding our strategy in an upcoming tender.
- ✗ Making any agreements with competitors which restrict our or their freedom to act in the market – for example, that we cannot sell in a certain country/territory or agree to set the price to a certain level.
- ✗ Sharing our pricing strategy with anyone.

I heard a rumour that my business partner has been involved in bribery. Can I conduct business with them?

- ✓ If we can ensure the rumour is untrue, or if the partner has made a proper clean-up, we can conduct business with the partner. Always reach out to Commercial & Legal Services for support.

- ✗ If the partner has been involved in a bribery case which has not been properly cleaned up, we should not do business with the partner.

I am very pressed for time to obtain a governmental permit. Can I pay a small amount to a local government official to speed up the process?

- ✓ If the government has a fast-track option, which is legal, this is not a facilitation payment and you can go ahead.
- ✗ If you cannot get any confirmation that the option is legal, you should not make such payment or offer anything else of value to speed up the process.

I am not sure what types of benefits and gifts are allowed? Can I have some examples?

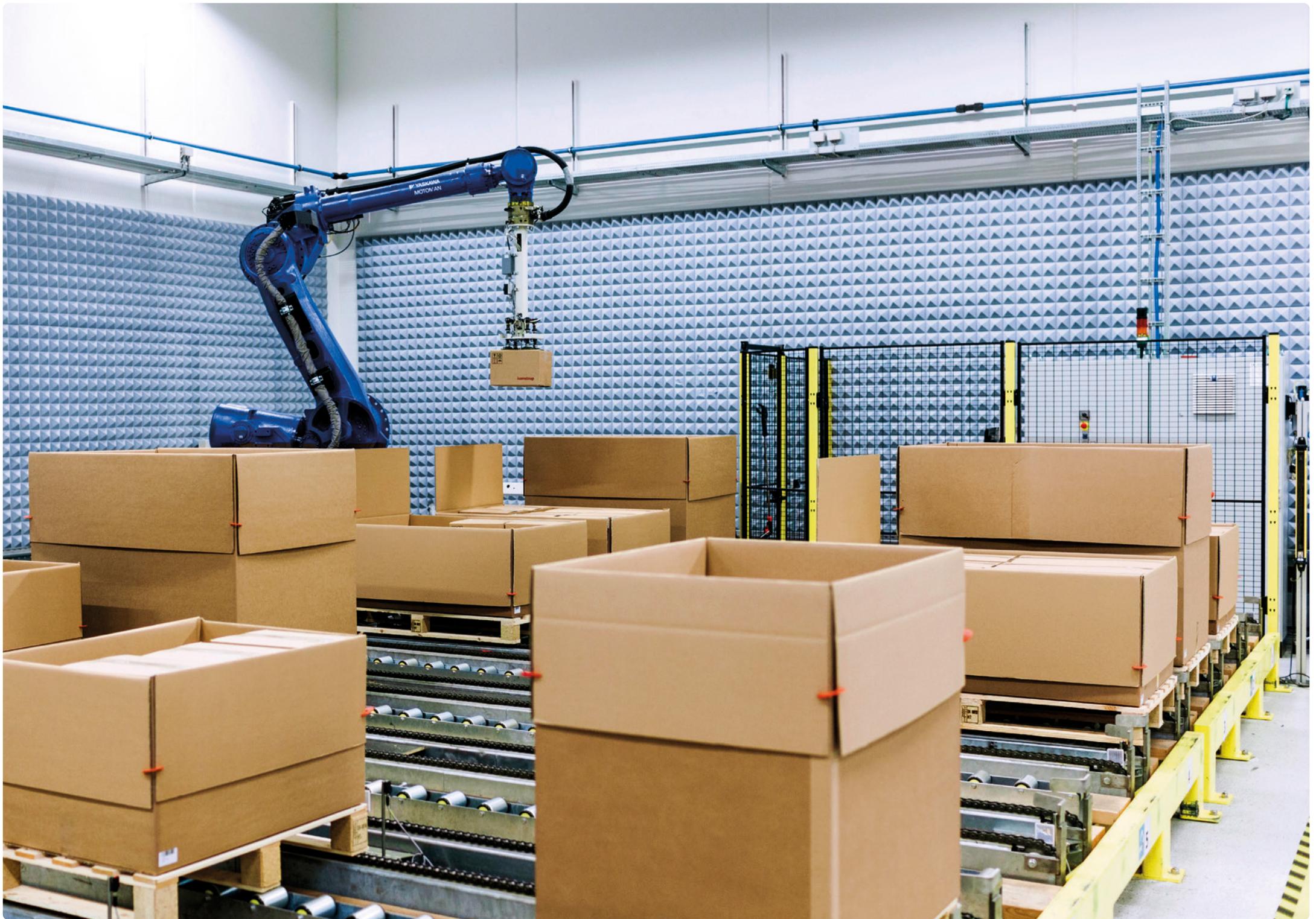
- ✓ A box of chocolate or similarly with a non-significant value to you from a business partner as a seasonal greeting.
- ✓ A dinner paid for by our business partner following the closure of a project.
- ✓ Participating in a social event paid for by a business partner in connection with, e.g. a seminar or a networking event.

- ✓ Giving Kamstrup merchandise to a business partner.

- ✗ A dinner paid for by a present or potential business partner which in local standards seems “over the top”.
- ✗ Going to a sports event or concert with VIP tickets worth a significant amount paid for by a business partner can be an issue.
- ✗ Giving or receiving cash or cash equivalent gifts.

Sanctions apply for deliveries to a specific country. A distributor, who would normally get deliveries to that country, is asking to redirect all sales to another country. Can I do this?

- ✓ If you do not see a risk that the products will be redistributed to the sanctioned country, you should involve Commercial & Legal Services for support on how to move on.
- ✗ If there is a risk the products will end up in the sanctioned country, this is just as bad as selling directly.



Avoiding conflict of interests

We need to ensure that everything we do is in the best interest of Kamstrup.



This means

- At Kamstrup, we will not use our position in the organisation for personal gain or in the interest of anything or anyone else, other than Kamstrup's best interest.

Your guidelines

- Do not involve yourself directly or indirectly in commercial activities if they contain a financial or private interest that risks being in conflict with your responsibilities towards Kamstrup or to influencing your business decisions away from Kamstrup's best interest.
- Ownership, managerial involvement, or financial interest in a company that is a customer or supplier to Kamstrup should be approved by your direct manager in writing.
- Never direct business or give favourable terms to a company that you, a close friend, or a family member have an interest in.
- Conflicts of interest do occur. We expect you to speak up when you have, potentially have, or could be perceived as having a conflict of interest in a given situation, so that we can act appropriately. Consult your manager if in doubt about what circumstances might create or constitute a conflict of interest. Remember to document what has been agreed on with your manager.

What

At Kamstrup, we want to ensure that we make business decisions in the best interest of Kamstrup. To avoid any issues, we need to be transparent and disclose any potential conflict of interest. This is to protect both the employee and Kamstrup's integrity and reputation and to avoid that we end up in a situation where there is reason to suspect that actions, decisions, or behaviour have been influenced by anything other than the sole interest of Kamstrup.

Grey zone

We understand that there are situations where it can be difficult to assess what is the right thing to do. If in doubt – stop and think through our values and read the examples below where the examples in green are allowed. Still in doubt? Reach out to your manager or [Commercial & Legal Services](#).

How do I know there is a conflict of interest?

- ✓ The existence of a relationship – such as a long-term professional relationship or even a friendship with a customer/supplier - is not automatically seen as a conflict of interest. A conflict arises when the relationship could potentially interfere with your ability to work in the best interest of Kamstrup. If in doubt, you should always consult your manager. Transparency is the key.
- ✗ Having a financial or private interest in a relationship or the decision is a conflict of interest - e.g. if you are a member of the board of directors in a company which is a supplier or service provider to Kamstrup. This does not mean that you cannot be a board member or participate in the board work in the company in question, but you should disclose your position for both the supplier and Kamstrup, and you should avoid participating in or influencing certain decisions.

Preventing fraud and misuse of Kamstrup assets

Kamstrup does not tolerate any form of fraud, theft, embezzlement, money laundering, or otherwise misuse of Kamstrup's assets or property.



This means

- At Kamstrup, we adhere to group accounting standards as well as local laws and generally accepted accounting standards.
- At Kamstrup, we report in a timely manner, objectively, and with integrity. Our stakeholders must always be able to trust information from us.
- At Kamstrup, we will not make detailed rules and guidelines for every potential area, but we expect everyone to act honestly and show sound business judgment to the benefit of Kamstrup.

Your guidance

- Use Kamstrup funds and assets solely for the benefit of Kamstrup.
- All expenses and reimbursements must be accurately reported and documented.
- Do not accept or authorise payments without the correct underlying documentation or invoice.
- Refuse any cash payments by an unknown third party.
- Always be alert if you receive unusual or suspicious requests by email.
- Speak up if you become aware of financial matters that are falsely or misleadingly reported – or if you see a situation which should have been stated but is not.
- Avoid any financial transactions which bypass internal controls or registration requirements.
- Do not use Kamstrup's letterhead or Kamstrup's name or trademark for personal or unauthorised purposes.

What

Fraud is a broad legal term referring to dishonest acts that intentionally use deception to illegally deprive another person or entity of money, property, or legal rights.

This can be a direct misuse of actual available assets as well as related to fraudulent financial reporting (in other words: giving the wrong data).

Fraud is a serious criminal offence that may result in imprisonment for the responsible people and, consequently, is also likely to negatively affect Kamstrup's reputation.

Grey zone

We understand that there are situations where it can be difficult to assess what is the right thing to do. If in doubt – stop and think through our values and read the examples below where the examples with check marks are allowed. Still in doubt? Reach out to your manager or [Finance](#).

During my holiday, I receive an instruction from the CEO to transfer EUR 50,000 to a specific account. I am told in the email that the matter is urgent. What do I do?

- ✓ The email looks suspicious, and the CEO rarely contacts me directly, so I contact the CEO and ask for confirmation.
- ✗ I know the CEO is busy and it is not often I receive emails from him. I want to make a good impression, and show him that I will execute his requests during my holiday. So I quickly transfer the money.

In relation to the preparation of the annual report, I am asked for my assessment of the financial result of an ongoing significant customer project. I know that problems have been identified with future earnings, which are not yet taken into consideration. What do I do?

- ✓ I state the risk and the information I have, honestly and loyally.
- ✗ I know the bonus payment might be affected, so I wait to share my knowledge just to make sure that no one gets mad at me. Also, who knows if there will actually be a problem.

Design, produce, and deliver for quality

Our high-quality brand, products, solutions, and services derive from a staff commitment to service and excellence. Our goal is to get it right the first time, every time, and strive to exceed customer expectations whenever possible.

We build mutually beneficial relationships with customers and suppliers, and we design and supply innovative, high-quality products, solutions, and services.



This means

- At Kamstrup, we don't just test and validate for quality – we design, produce, and deliver for quality.
- We are known for our specialist knowledge and outstanding quality – high, long-term accuracy, and reliability.

Your guidelines

Below are the quality principles which are to be considered as key behavioural guidance for all of us in our daily work:

- **Quality before short-sighted profit:** We want our customers to return based on their customer experience. We base our decisions on evidence and data.
- **Quality begins and ends with our customer satisfaction:** Understand customer requirements and how to create customer value for them. Ensure we deliver according to customer agreements and proactively manage expectations [hand-shake].
- **We work together (One Kamstrup) to satisfy our customers:** Ensure proper task handover - do not pass on failures. Ensure consistent results through efficient processes and speak up if the process could be made smarter.
- **You are accountable for quality - lead by example:** You are the expert in your deliverables (otherwise ask for help). Think proactively and preventively (use lessons learned actively).
- **Learn from mistakes:** We only learn from mistakes that we talk about – invite openness and transparency. Find the cause of the issue and prevent it from happening again.

What

At Kamstrup, we want a culture which strives to ensure managed quality. The definition of quality will depend on the specific process in question, however, with customer experience as the ultimately most important parameter.

Through Business Management Reviews, we aim to continually improve business performance, processes, products, and services. Through active mentoring, we create a culture where our staff have the skills and are empowered to take responsibility for the quality of the results of their actions, which contributes to the success of Kamstrup.

We are ISO 9001 certified at our headquarters and production facilities in Denmark and US and have adopted lean tools and methodologies. Our documented Business Management System complies with the requirements of ISO 9001, ISO 27001, and ISO 17025, which serve as key tools in driving a customer-focused and continual improvement quality culture.

Grey zone

We understand that there are situations where it can be difficult to assess what is the right thing to do. If in doubt – stop and think through our values and read the examples below where the examples in green are allowed. Still in doubt? Reach out to your manager or [Quality & Sustainability](#).

A large quantity of meters is being prepared for shipment when you find out that there is a minor quality issue with the lot. What do you do?

- ✓ I report the issue to ensure it is handled before the lot is sent to our customer. This will lead to a slight delay on the time of delivery for this lot, but we value the quality of the product above this.
- ✗ The minor quality issue will probably not cause any problems for the customer, so I ignore it and send the lot to the customer at the agreed time of delivery.

We are on a tight schedule for an updated product development. I have to make a number of documents for the next gate, but one of these is, in my opinion, a complete waste of time. What do I do?

- ✓ I discuss the issue with my colleagues. One colleague tells me the documentation is relevant for a later stage in the process, so I start preparing it. As a follow-up, I ask my colleagues who made the process to describe the purpose better next time.
- ✗ I skip the documentation.

Considering environmental sustainability

Kamstrup's longstanding commitment to protecting the environment and managing environmental issues actively, openly, and ethically meets and often exceeds regulatory requirements.

Kamstrup continuously seeks to prevent pollution and to reduce the environmental impacts of our solutions during design, procurement, manufacturing, installation, use, and end-of-life. At the same time, we strive to empower our customers and end-users to reduce their environmental footprint through our solutions. This is done with a special focus on energy, water, and resource consumption, including waste reduction.



This means

- Kamstrup strives to avoid materials and methods that may cause an environmental risk when better alternatives exist and will encourage the development and diffusion of environmentally friendly technologies and solutions.
- Kamstrup's products comply with various chemical regulations based on the countries where we are present - such as EU REACH, EU RoHS, and regulation on conflicting minerals.
- We also expect our business partners and suppliers to share our commitment to the environment.

Your guidelines

- Our products target the green agenda. Please consider this and make it reflect in how we do business in our daily life.
- If you find yourself torn between costs and environmental impact, remember that the best choice may be more nuanced than price alone – for example, a lighter weight of something might lead to a cost saving in transport or perhaps affect the experience of quality for the customer. Think of total cost and impact.
- Take responsibility for what you see.
- All steps matter – start with small changes within your field of expertise.

What

Environmental sustainability is the responsibility to conserve natural resources and protect global ecosystems to support health and well-being, now and in the future. For Kamstrup, this means a responsibility to ensure least possible environmental footprint in the full lifetime of our products.

At Kamstrup, we are ISO 14001 certified at our headquarters and production facility in Denmark as well as our sales offices in Norway and Sweden and expect to extend our certifications. The certification sets out the criteria and framework that we use to set up an effective environmental management system.

Grey zone

We understand that there are situations where it can be difficult to assess what is the right thing to do. If in doubt – stop and think through our values and read the examples below where the examples in green are allowed. Still in doubt? Reach out to your manager or [Quality & Sustainability](#).

Our regular supplier of a component warns of a significant delay in delivery. After looking a bit at the market, we manage to find another supplier, who – however – cannot send us documentation that the component lives up to EU RoHS. What do I do?

- ✓ I try to get hold of the EU RoHS documentation. If the supplier cannot deliver this documentation, we cannot accept the component from that supplier.
- ✗ I order right away to ensure we can deliver on time for our customers.

A very interesting customer wants us to sign their contract within the next couple of days. It is a bit of a rush, but it will be very important to Kamstrup. In the contract, there is a requirement for us to live up to a local regulation on the handling of chemicals, which will enter into force next year. This is new to Kamstrup. What do I do?

- ✓ I involve Quality & Sustainability in the review of the contract. If we do not yet live up to the requirement, we will implement this going forward.
- ✗ I sign – I am sure Quality & Sustainability know this is coming and have this under control.

Respecting and protecting our colleagues

We respect and safeguard the right to free labour, and we care about the working environment, protecting and safeguarding occupational health and safety both physically and psychologically.



This means

- At Kamstrup, we support the freedom of association and the effective recognition of the right to collective bargaining.
- We have a zero tolerance policy in terms of all forms of forced, compulsory, or child labour.
- We will never discriminate on the basis of gender, ethnic origin, race, religion, age, sexual orientation, or anything similar.
- We will not tolerate any form of psychological or physical abuse no matter the level or cause.
- We respect and follow the guidelines for occupational health and safety.

Your guidelines

- What is amusing to you might not be funny to others, especially taking cultural differences into account or when the dialogue is between different generations. If in doubt: let the person receiving the comment or joke decide whether it is appropriate or funny.
- Never compromise your or your colleagues' occupational health and safety.
- When handling production equipment, always ensure that you receive proper instruction before you act. This is your right and obligation.

- Make sure that you also remember to give advice and proper instructions in relation to health and safety to non-Kamstrup employees who are working on our premises.
- You are expected to stop your work or the work of a colleague if you doubt whether sufficient safety measures are in place.
- The Health and Safety Committee has the full mandate to stop work operations.
- Everyone should take responsibility for their own actions.

What

The rights related to free and safe labour are deeply rooted in human rights. Human rights refer to fundamental standards of how we should treat each other and is a treatment all people are entitled to without discussions.

Grey zone

We understand that there are situations where it can be difficult to assess what is the right thing to do. If in doubt – stop and think through our values and read the examples below where the examples in green are allowed. Still in doubt? Reach out to your manager or [Human Resources or Quality & Sustainability](#).

Kamstrup has procured a new production line, and it is important that the new machinery is taken into operation ASAP because we otherwise risk a delivery delay towards an important customer. The customer has threatened with penalty payments in case of delay. Not all tests and health and safety training have been conducted. What do you do?

- ✓ We need to tell the customer that we unfortunately will be delayed, but that we will do our best to recoup the delay at a later stage.
- ✗ Some of the colleagues have received health and safety training, and most tests have been performed with satisfactory results. We risk losing the customer if we do not deliver on time. We pride ourselves on being

solution-oriented, so we initiate production, making sure that at least one of the colleagues operating the machinery has received proper training. Also, by being a little more careful when checking the products before delivery, the lack of final testing will probably be OK.

What to do to ensure you respect your colleagues?

- ✓ Do your best to understand and respect the cultural traditions, beliefs, and personal identification of your colleagues.
- ✗ Do not disregard your colleagues' cultural traditions, beliefs, and personal identification – even if you do not agree or understand.



kamstrup

Kamstrup Whistleblower Portal

At Kamstrup, we want to promote honesty and an environment where it is okay to speak up and challenge the status quo. If you know or feel that something is not right, you are expected to speak up – for yourself, your colleagues, Kamstrup, and our customers and business partners.

You can always raise your concerns through the normal channels (i.e. your manager, Human Resources, or Commercial & Legal Services) as well as anyone within the business you feel comfortable and safe talking to.

In certain cases, you might be reluctant to speak up because you are unsure of the reaction or because you have a feeling your manager or colleagues will object to or be irritated by your input. If you deem the matter sufficiently important and to ensure compliance with the rules in this code of conduct, you could instead use Kamstrup's Whistleblower Portal. The Whistleblower Portal will also be accessible for and available to third parties if they wish to report misbehaviour by Kamstrup employees or Kamstrup partners.

Read more on the [Whistleblower Portal on KamSite](#)

Please access the Kamstrup Whistleblower Portal via this URL: <https://kamstrup.integrityline.com/>

If you file a report through our Whistleblower Portal and opt for anonymity, the system guarantees anonymity (keep in mind that full anonymity requires that you do not type in personal, identifiable information and that you do not use your computer from Kamstrup, as well as keep the reporting off Kamstrup's network). You may also use the system without being anonymous.

All reports will be handled appropriately and may involve investigations, escalations, and/or the need for further explanations. If a Kamstrup employee is accused of misbehaviour, we will ensure all relevant information is collected and assessed to ensure an appropriate process and protection of the employee in question.

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