



Corporate Ethics and Compliance Policy

December 2025

ZEMPER



At **Electrozemper, S.A.**, our track record as benchmarks in security and emergency lighting is not only based on the technical excellence of our products, but also on the integrity and trust that we project towards our clients, suppliers and society.

With the aim of continuing to strengthen our Quality Management System and ensure a transparent work environment, we implement our new **Ethical Compliance Policy**, centered on four fundamental pillars::

1. Measures against Corruption and Bribery

Objective: Establish a "Zero Tolerance" culture toward any offer or request for undue benefits that may alter impartiality in business decisions..

- **Qualitative Goals:**

- Use an ethical complaints channel that guarantees anonymity and the absence of reprisals.
- Ensure that 100% of the personnel with purchasing or sales decision-making capacity receives specific training in business ethics.
- Establish a strict protocol for accepting gifts and courtesies, limiting them to purely institutional acts.

2. Management of Conflicts of Interes

Objective: Ensure that the personal, financial or family interests of Electrozemper employees do not interfere with the objective performance of their professional functions.

- **Qualitative Goals:**

- Institute an "Annual Declaration of Interests" for positions of responsibility and purchasing departments.
- Foster a culture of transparency where the employee feels safe proactively reporting any potential conflict.
- Disengage any employee involved in a decision-making process where a family or economic link exists with the supplier or client.

3. Prevention of Fraud

Objective: Protect the assets and reputation of the company through early detection and prevention of deceptive conduct or embezzlement.

- **Qualitative Goals:**

- Reinforce the segregation of duties: that no single person controls a critical process (such as payments or purchases) from beginning to end autonomously.
- Perform surprise internal audits in processes of high economic exposure.
- Digitize and centralize approval processes to leave an unalterable audit trail.

4. Prevention of Money Laundering

Objective: Ensure that Electrozemper is not used as a vehicle for the introduction of funds of illicit origin into the financial system.

- **Qualitative Goals:**

- Apply the principle of "Know your customer/supplier" (Due Diligence), verifying the identity and legitimacy of business partners before formalizing agreements.
- Prohibit cash payments that exceed legal limits, always promoting the use of traceable banking channels.
- Monitor unusual payment patterns or those coming from high-risk jurisdictions.

What does this mean for you as part of the Electrozemper personnel?

This policy is not just a regulatory document; it is a guide for our day-to-day life. You have at your disposal the **Ethical Channel**, a confidential tool where you can consult doubts or report behaviors that do not align with these principles, always guaranteeing the maximum protection for the informant.

Quality at Electrozemper is not only measured in lumens or battery autonomy, but also in the ethics of each of our actions.

We count on your commitment to continue making this company a model of integrity in our province.

*Fdo.: Jesús María Espinosa
General Management
Ciudad Real, 2 de diciembre de 2025*





Entirely designed and
manufactured in **Spain**



The Zemper Way to a Better World

We use recycled paper in the production of our catalogues, thus contributing to the conservation of forests and biodiversity. This paper requires up to 50% less energy and 90% less water, which significantly reduces environmental impact, reduces carbon dioxide emissions and promotes the circular economy. The ink we use is free of mineral oils, cobalt salts and VOCs (volatile organic compounds) so we contribute to limiting the environmental impact. We make more sustainable decisions and help protect our planet.

ZEMPER

THE EMERGENCY LIGHTING SPECIALIST

Zemper España

Avda. de la Ciencia, 3 · Pol. Industrial Avanzado
13005 Ciudad Real (Spain)
Tel. +34 **677 476 876** · export@zemper.com

Zemper BeLux

Baronstraat 122
8870 IZEGEM · Bélgica
Tel. +32 51 800 210
belux@zemper.com

Zemper France

ZA des Berthilliers
189 Chemin des Frozières
71850 Charnay-lès-Mâcon · Francia
Tel. +33 3 85 34 66 20
commercial@zemperfrance.com

Zemper UK

Thornhill House, Thornhill Road,
Solihull, B91 2HB
Tel. +44 (0)121 703 2867
hello@zemper.co.uk

Commercial Offices

Marruecos
maroc@zemper.com
Colombia
colombia@zemper.com
Dubai
dubai@zemper.com

www.zemper.com

The information given in this catalogue is typical and must not be interpreted as a guarantee of individual product performance and/or characteristics. We reserve the right to alter specifications and designs without prior notice.