

GIRA

Our commitment to
human rights and the
environment



Gira Giersiepen GmbH & Co. KG (Gira) policy statement concerning due diligence obligations relating to human rights and the environment in accordance with the German Supply Chain Due Diligence Act (LkSG)

1 January 2024

1. Preface

Shaping the future means taking responsibility for it now, not later. This is why awareness of Gira's role in society and therefore assuming and embodying the values of a „good citizen“, including beyond our factory gates, has been one of our corporate values since the company's foundation in 1905.

Sustainable business practices will help unlock this reshaped future at Gira while demonstrating our philosophy. This is because we firmly believe that sustainable and responsible business practices are not only the right choice from an ethical perspective, but also help ensure our company's long-term success — so make perfect business sense too.

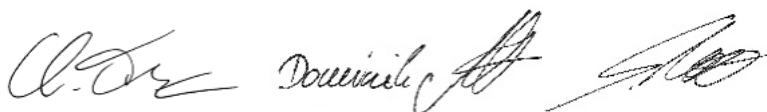
Human rights compliance and environmental protection are therefore integral to our corporate agenda — both within our company and throughout our entire supply chain. This includes continuous and systematic analysis of risks relating to human rights and the environment in addition to efforts focused on effectively minimising and ultimately eliminating any risks identified. We are guided in this endeavour by relevant international standards, such as those laid down by the United Nations, the International Labour Organization (ILO), the Organisation for Economic Co-operation and Development (OECD), the European Union (EU) and the Council of Europe.

By adopting and proclaiming its Supply Chain Due Diligence Act (Gesetz über die unternehmerischen Sorgfaltpflichten in Lieferketten [LkSG]) in 2021, Germany seeks to protect human rights and the environment more vigorously at macroeconomic level. We acknowledge this ambition and endorse the act through our firm commitment to fully meeting the due diligence obligations that it requires us to fulfil.

The following policy statement, which is binding for all national and international Gira entities, sets out how we intend to deliver on this commitment in our routine work in accordance with Section 6(II) LkSG. Its implementation is the responsibility of our company management, while the managing directors of our foreign subsidiaries will assume responsibility for its local-level implementation at our international sites. With this in mind, Gira's Management ensures that all divisions and staff of the company are aware of their own responsibilities for meeting our due diligence obligations to protect human rights and the environment, which is why all Gira employees are required to familiarise themselves with the requirements set out in this policy statement and to fully comply with the requirements when carrying out their routine work on behalf of Gira.

We view our policy statement as an ever-changing document that we will update where this proves necessary, based on our experiences in realising our obligations to protect human rights and the environment.

Radevormwald, 1 January 2024



Management of Gira Giersiepen GmbH & Co. KG

2. Our commitment to human rights

2.1 Our guidelines

At Gira, we are unwaveringly committed to universal, indivisible and inalienable human rights as enshrined in the Universal Declaration of Human Rights (UDHR) adopted by the United Nations on 10 December 1948. Our position is to fully respect and help safeguard these rights both in our internal business division and throughout our supply chain — as stipulated in the preamble to the UDHR. This commitment includes our absolute willingness to help anyone affected by human rights violations or breaches of environmental law in the course of our operations pursue an effective resolution.

We also expect the same unequivocal commitment and willingness from all of our staff and suppliers, which is why our Gira Code of Conduct (CoC) and Code of Conduct for Suppliers (CoCfS) have included compliance with fundamental human and labour rights since 2016.

In implementing our due diligence obligations to protect human rights, we are primarily guided, in addition to the UDHR, by the following internationally recognised human rights regulations and standards:

- the United Nations Universal Declaration of Human Rights of 10 December 1948,
- the United Nations International Covenant on Civil and Political Rights of 16 December 1966;
- the United Nations International Covenant on Economic, Social and Cultural Rights of 16 December 1966;
- the United Nations Guiding Principles on Business and Human Rights of 2011;
- the eight fundamental ILO conventions and further recommendations on work and social standards;
- the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of 1977;
- the OECD Guidelines for Multinational Enterprises of 1976;
- the principles of the United Nations Global Compact (UNGC) of 31 January 1999;
- the Charter of Fundamental Rights of the European Union of 7 December 2000; and
- the Council of Europe Convention for the Protection of Human Rights and Fundamental Freedoms (European Convention on Human Rights) of 4 November 1950.

These regulations inform us how to play our part and globally promote human rights and humane working conditions in the course of our international operations. They help us to conduct our business responsibly and to act properly and appropriately, with the required level of due diligence. We always follow the international regulations or the higher standard in countries in which national requirements are not as stringent as or contradict those imposed by international standards..

2.2 Our corporate practices

This approach is tangibly reflected in our everyday corporate practices through the following principles in our corporate policies, our CoC and our CoCfS. At Gira, we promise all of our staff that these principles will be fully complied with and that compliance will be checked on a regular basis. In return, at Gira, we also expect our employees and suppliers to comply unconditionally with the following fundamental rules:

- **Zero discrimination:** We treat everyone with fairness, respect and dignity and are therefore committed to implementing a zero discrimination policy. In specific terms, this means that we do not tolerate any form of unequal treatment or discrimination in the workplace or in public based on an individual's background, ethnicity, skin colour, sexual orientation, age, gender, religion, beliefs or political opinions; opinions and beliefs that contravene our zero discrimination policy will however not be tolerated. We specifically do not allow the traits mentioned above to influence any decisions affecting the individuals in question.
- **Prohibition of abuse and harassment:** Under no circumstances do we tolerate physical violence, threats of physical violence or any form of sexual harassment. We are also staunchly opposed to any form of psychological or verbal abuse. Specifically, this means that no form of physical violence, including slapping, pushing or other forms of physical contact, will be used or threatened as a means of maintaining work discipline; (2) no form of verbal abuse, including screaming, shouting, threats and degrading, insulting or sexually suggestive language, will be used as a means of maintaining work discipline.

- **Prohibition of child labour:** We condemn all forms of child labour and the employment of minors who are still of school age in their country of education or under the age of 16. We therefore consistently check the age of new employees before hiring them. Furthermore, we oppose all working conditions and practices that have the potential to jeopardise or harm the physical and mental development of adolescents or which infringe or threaten to infringe the liberties and rights of children. Gira fundamentally considers resources and materials acquired or produced by means of child labour to be non-compliant, which is why it neither purchases nor uses such resources or materials.
 - **Prohibition of forced labour:** We condemn all forms of deliberate exploitation of forced and conscripted labour and other forms of exploitation and slavery. This includes labour in which the worker is politically re-educated or works to settle financial obligations („bonded labour“), or labour with ties to human trafficking. Gira fundamentally considers resources and materials acquired or produced by means of forced labour to be non-compliant, which is why it neither purchases nor uses such resources or materials.
 - **Reasonable remuneration:** At Gira, we are committed to providing reasonable and prompt remuneration that at least matches the statutory minimum wage in the country of labour and always aims to be a living wage for all work performed on our behalf. In addition, we are committed to collective bargaining in any region in which we are a collective bargaining partner. We are committed to ensuring that the hours worked by our employees fall within permissible limits. We remunerate overtime work, shift work and work performed on Sundays at the collectively agreed or statutory rates and remunerate holidays and other forms of paid leave in line with the collectively agreed or statutory regulations that apply. For this purpose, we keep active records of overtime hours worked in addition to rest and holiday days. Naturally, we fully provide employer social security contributions and all other benefits required by law on time on behalf of our employees.
 - **Freedom of association:** Given the major importance of dialogue and collaboration with social partners to a country's prospects of achieving economic growth and prosperity, we recognise the rights of employees working in every one of our operational areas to unite and form legal trade unions or other workers' organisations designed to promote their interests in collective negotiations and fight for those interests to be asserted, including through industrial action. This recognition extends to sites in countries where national law restricts freedom of association and the right to collective bargaining.
 - **Occupational safety:** Ensuring and enhancing the employability of our employees is a top priority for us and is therefore a major pillar of our integrated management system. We always organise our jobs and workplaces in such a way that accidents are avoided and our employees do not suffer health problems. This includes a suitable emergency plan and associated contingency management system that enable us to respond quickly and effectively to emergency incidents. We are also committed to ensuring that all of our buildings are equipped with sufficient sanitary facilities and personal hygiene amenities so that our employees have access to drinking water and toilets. Appropriate measures for fire protection and the structural and electrical safety of our buildings are a matter of course for us in order to provide our employees with the best possible protection..
- All of our national and international business activities must, at all times, comply with applicable law, our Code of Conduct, the provisions of our anti-corruption statement and the human rights protection principles mentioned above, in accordance with our CoC guidelines. We ensure this compliance by incorporating them into our integrated management system, internal regulations and procedural instructions — such as those for our sustainability, supplier, purchasing, site and compliance management and for occupational health and safety at Gira.

3. Our commitment to the environment

3.1 Our guidelines

At Gira, we recognise that our business activities affect the environment, which is why our stated long-term aim has been to continuously improve our environmental performance. To achieve this, we are embracing protection of the environment, pursuing it as a cornerstone of our overarching sustainability management approach. As stated in our sustainability mission statement, the purpose of this is to strike a permanent balance between economic, ecological and social responsibilities. Our future targets will be based on the UN Sustainable Development Goals. In our publicly accessible sustainability report (<http://www.sustainability.gira.com>), we periodically disclose information concerning the extent to which we have met our targets using key figures derived from the German Sustainability Index.

3.2 Our corporate practices

When carrying out our daily operations, we ensure that our business activities and our conduct consistently comply with the relevant environmental regulations that apply and our CoC. Our other priorities include making our buildings, facilities and machinery more energy efficient, minimising the volume of resources we consume, replacing environmentally harmful materials with eco-friendly ones and identifying and eliminating any other environmental risks at an early stage. We measure the progress made in these priority areas using a comprehensive and varied array of key figures in order to methodically record and analyse our emission and consumption levels. This then allows us to determine where action is required and where suitable adjustments can be made to further improve our environmental performance. We analyse and document incidents that are harmful to the environment in order to eliminate causes and consequences as quickly as possible.

Faced with climate change and its repercussions for humanity, the environment and the economy, we are deliberately implementing measures that will systematically reduce our greenhouse gas emissions, aiming for our production chain to be climate neutral by 2050. These measures are included in our overarching climate strategy, which forms part of our corporate strategy at Gira and sets annual CO₂ reduction targets, up until 2050, along our entire value chain — from acquisition of the raw materials required for production to disposal of products

at the end of their life cycle. Actively contributing to the 1.5°C global warming target agreed at the UN Climate Change Conference in Paris is the criterion we use to measure success. Our internal climate impact assessment is updated every two years and provides information about the extent to which we are meeting this target.

We have set out how we intend to effectively improve our environmental performance and how all of us at Gira can support this within our Gira environmental policy, which is part of our integrated management system. Our actions are driven by the following principles:

Minimal use of resources and energy management: True to our belief that using resources responsibly is a core principle of sustainability, we have implemented an ISO 50001-certified energy management system to systematically reduce our greenhouse gas emissions and continuously improve energy performance across the company. This is the reason why we record all energy flows and measure the energy we use in production, for every single machine. We use this data to plan cost-saving measures and we regularly assess how effective these measures have been following their implementation. Another one of our objectives is to use fewer resources and produce less waste by using more recycled materials in our production cycle and ensuring that our products can be recycled. Our long-term objective is to actively establish a circular economy.

Material compliance: When manufacturing our products, we always use materials and resources that comply with legal requirements, such as the European REACH chemicals regulation, and, in particular, we handle chemicals and hazardous substances in accordance with the relevant applicable legal regulations. We want to avoid using substances deemed harmful to the environment and human health and to use harmless alternatives instead. The mechanical products we are designing and developing are an example of this. They are manufactured without the use of lead, which is commonly used in the sector. To this end, we have recorded the constituent materials in every component of our products within our ERP system. Checking the material compliance of the materials and resources required is also an intrinsic part of our product development process and our product change management system.

Waste management: We aim to systematically reduce the amount of waste, and particularly hazardous waste,

we produce. That is why we record and analyse all waste streams within our company to ensure that waste is correctly sorted and professionally disposed of, but also to optimise the streams. We are also committed to reducing the amount of waste produced by using recycled and recyclable materials and substances in our product packaging and the product manufacturing process. This commitment includes a targeted reduction in the proportion of plastic packaging we use.

Environmentally and climate conscious products: We extrapolate the carbon footprints of all Gira product categories using life cycle assessments for selected reference products and subsequent analysis in accordance with ISO 14044. These footprint assessments cover resource extraction, production, use, and recovery at the end of the product life cycle. This provides us with the basic information to design the products in our range in an environmentally and climate conscious way. This approach is also consolidated by our efforts to increasingly use recycled materials in the plastic products we manufacture and thus ensure that these products can be recycled.

The availability of the resources we need to meet our environmental and sustainability targets is ensured by involving Gira Management in the formulation and implementation of our environmental policy. This is particularly true since our sustainability and climate strategy forms part of our overarching corporate strategy. As part of our integrated management system, our environmental policy governs how our implementation obligations are exercised and our environmental performance is monitored.

4. Our supply chain

Not only are sustainable business practices the principle that guides our business activities and conduct, but they also set what we expect from our suppliers. As such, we want assurances that we are only ever working with environmentally and socially responsible suppliers because our objective is to ensure that every product, resource, material and service we acquire is exclusively sourced from sustainable and fair supply chains. In 2016, we finalised our sustainability requirements and expectations for supply companies in our Gira CoCfS, which we communicated to our suppliers. For many of our key suppliers, these requirements and expectations have since become a binding part of our contractual terms and conditions, which our purchasing management ensures are observed.

4.1 Protecting human rights in our supply chain

The Gira CoCfS includes specifications designed to optimally ensure that our suppliers respect human rights within their companies and throughout their supply chains and provide humane working conditions.

In addition to the general duty to comply with applicable law, specific issues include:

- Compliance with the ILO Core Labour Standards and the UNGC principles
- Prohibition of forced labour and child labour
- Prohibition of discrimination and harassment
- Humane working conditions and equitable employment conditions (remuneration, working hours, holidays)
- Occupational health and safety

4.2 Protecting the environment in our supply chain

In our Gira CoCfS, we impose a comprehensive obligation on our suppliers to protect the environment throughout their operations and supply chains. More specifically, we require our supplier companies to:

- comply with the applicable environmental laws and regulations;
- additionally set environmental targets and continuously optimise environmental performance in a continuous improvement process;
- reduce the volume of resources they use and become more energy efficient;
- reduce emissions of climate-damaging pollutants to within statutory limits;
- minimise waste and ensure that their products can be recycled;
- minimise the use of environmentally harmful resources and materials; and
- generally do everything in their power to avoid polluting the environment

We also encourage our suppliers to implement an internationally harmonised environmental management system in accordance with ISO 14001 and an energy management system in accordance with ISO 50001.

4.3 Supplier selection and collaboration

In addition to assessing the performance of our suppliers during the selection process, we also place great value on their commitment to upholding basic human rights and protecting the environment. We consider this commitment to be utterly vital for any cooperation to be successful and long-lasting. We only work with supply companies that have signed either an agreement to fully comply with our CoCfS or a separate or general code of conduct that includes provisions which align with the standards of our CoCfS. Our supplier portal features a list of general codes of conduct which we recognise.

At Gira, we have pledged to tackle corruption and bribery, which we do not tolerate in any form whatsoever. On the basis of this pledge, we have specified the following in our Gira CoC and in our CoCfS in connection with working with suppliers, with reference to our Gira anti-corruption statement:

- our employees and our suppliers shall make all decisions in the course of collaborative work exclusively on the basis of objective and technical criteria and shall avoid being influenced by personal relationships and/or interests;
- our suppliers shall neither offer Gira employees socially inappropriate benefits in the form of gifts, hospitality or entertainment, nor accept such benefits from Gira staff;
- our suppliers shall comply with all valid and applicable antitrust and competition laws, exactly as we do;
- our suppliers shall ensure that their employees, subcontractors and other third parties that they involve in collaborative work with Gira understand and comply with these requirements.

At Gira, we have established a compliance management system that is designed to identify risks of material regulatory breaches at an early stage, to assess those risks and to minimise them via suitable preventive measures. This system also includes an organised procedure through which reported cases of corruption and bribery or suspected corruption and bribery are processed in order to investigate such cases, eliminate corruption and bribery and develop measures to prevent repeated similar behaviour. A special steering committee is responsible for implementing this system and reports to Management on an annual basis.

Our compliance management system also gives our entire staff access to expert advice, if they have any questions or concerns, and to relevant information, if they have reason to suspect an offence has been committed.

4.4. Identifying risks and breaches in order to respond

Managing risk effectively, both in our internal business division and throughout our supply chain, is essential if we are to fully honour our due diligence obligations relating to human rights and the environment. It is also a key aspect of our continuous improvement process.

Our risk management approach focuses on identifying material risks to the effective protection of human rights and the environment in our company and supply chain at an early stage, assessing those risks, and analysing their causes in order to take suitable measures in response.

Within this approach, we draw on existing risk analysis processes, including procedures established within our purchasing, compliance and sustainability management systems, for example. During periodic audits of our most important suppliers, we therefore check the extent to which they are meeting their due diligence obligations to protect human rights and the environment. Furthermore, our CoCfS requires our supply companies to actively inform us if they are in breach of its principles, explain the reasons for this and set out how such breaches are to be prevented in the future. Our suppliers must also provide regular confirmation that they are continuing to comply with the provisions of our CoCfS and, if necessary, information concerning the scale of any breaches of our CoCfS. At Gira, we reserve the right to issue warnings to suppliers that seriously or repeatedly fail to comply with the rules set out in our CoCfS or, as a last resort, to discontinue our existing business partnership. Despite this, we are always prepared to work with the suppliers in breach to find solutions so that we can meet our collective due diligence obligations because our primary objective is to actively ensure that basic human rights are upheld and environmental protections exist within our supply chain.

In addition, in accordance with the provisions of Section 5 LkSG, we determine whether basic human rights or environmental rights are being infringed in our own business activities and in the business activities of our direct supply companies—and also in the business operations of indirect suppliers where there is a justified

suspicion of such infringements in accordance with Section 9(III) LkSG—or whether there is a risk of such rights being infringed. In this instance, we follow a two-stage procedure that relies on weighted criteria to identify risks relating to human rights and the environment that exist within our suppliers' operations. We initially consider multiple criteria and use a traffic light model to conduct an abstract assessment of the potential risk based on the country in which the supplying company has its registered office and on its sector, as defined by the NACE code.

Companies exposed to a country or sector-specific risk will subsequently be required to complete a standardised questionnaire as part of an initial detailed investigation. If the completed self-assessment ultimately indicates that a direct supply company may have breached its duty to protect human rights and the environment, an LkSG task force assigned to our Management and led by Gira's Human Rights Officer will examine each individual case to determine the extent to which the company being investigated has actually infringed human or environmental rights and poses a potential risk, which is then prioritised. Our task force follows the criteria set out in Section 3(II) LkSG when assigning priority levels to potential risks.

In this context, we shall first immediately launch suitable measures to immediately stop any breaches of duty identified in our internal business division or to effectively mitigate or permanently minimise existing risks for a breach of duty of this nature. These measures include suitable precautions designed to prevent a repeat of such breaches of duty in the future, for example provisions to that effect incorporated into our purchasing or compliance management system or else adapted applicable processes. We also ensure that the measures taken are implemented and achieve the desired outcome by conducting risk monitoring, the recording of which is an integral part of our risk management process in accordance with Section 10(I) LkSG.

Secondly, if a breach of human or environmental rights has actually been committed by a direct supply company or if it has been determined that a direct supply company is exposed to a corresponding risk, we undertake to immediately initiate measures in cooperation with the company in question to eliminate the breach detected or to minimise the identified risk of such a breach. As part of this undertaking, we will prepare an action plan in partner-

ship with the supply company in breach, which will also include an implementation schedule. In the meantime, we will ensure that these corrective or precautionary measures are firmly rooted in our business relationships with the company concerned. We are also entitled to carry out separate checks to determine whether such measures are being complied with and implemented effectively. Our risk management process requires that these checks be comprehensively documented in accordance with Section 10(I) LkSG. We shall adopt the same approach if we receive valid evidence that an indirect supply company is failing to meet its due diligence obligations relating to human rights and the environment or is exposed to a risk of that nature. Gira's Human Rights Officer shall report the findings of the risk analysis and the implemented preventive and corrective measures directly to Gira's Management.

Developing our suppliers so that their business operations and supply company partnerships comply with human, labour and environmental rights is our central concern at Gira, which is why they can count on our active support.

However, we reserve the right to terminate our business relationships with a company should it commit serious or repeated breaches of duty or refuse to cooperate with efforts designed to rectify an identified breach of duty or minimise the risk thereof. This condition will equally apply if any measures taken fail to eliminate the established rights violation, or fail to do so within the deadline set, or if corrective measures appear unlikely to succeed. The power to make decisions in this regard lies with Gira's Management.

We have documented the sequence of individual steps for this entire process in our process management system.

5. Our commitment to implementing our policy statement effectively

In order to meet the requirements of the LkSG in full, we have also prepared and implemented measures related to organisation, processes, training and communication which ought to give our employees and suppliers the highest level of support possible so that they can comply with due diligence obligations relating to human rights and the environment.

5.1 Organisation and responsibilities

Mapping out our responsibilities resulting from the LkSG within our organisational structure and processes is enabling us to create the organisational conditions required to effectively implement the legal requirements. This is what led us to create the Human Rights Officer position in spring 2023. The Human Rights Officer is tasked with ensuring that Gira fulfils the requirements under the LkSG and is responsible for the entire risk management process.

We have also deployed the aforementioned LkSG task force, which features representation from every division that shapes our supplier relationships plus the Gira Human Rights Officer. The task force assesses and prioritises any breaches of the LkSG or corresponding risks that have been identified. If due diligence obligations relating to human rights or the environment have been violated or there is a risk that this could occur, the task force devises corrective or preventive measures on this basis. It makes sure that the measures taken are implemented effectively and are monitored in terms of risk.

5.2 Conveying knowledge and developing skills

For us at Gira to meet the requirements resulting from the LkSG in the most effective way possible, all of our employees and suppliers must be made aware of this policy statement so that they can familiarise themselves with the information it contains. This is why we are publishing our policy statement on our Intranet and on our company website and using our internal communication channels to regularly report on our activities that serve to make us compliant with our due diligence obligations relating to human rights and the environment. New hires and trainees are briefed on the policy statement during their induction and are made aware of the need to familiarise themselves with the information it contains.

This policy statement is also being published on our supplier portal. Our updated CoCfS will include a reference to this.

At Gira, it is also vital that we possess knowledge and expertise in all the right places so that we can consistently comply with the legal requirements of the LkSG and effectively implement every measure that this act requires. During regular training sessions held with all of our supplier-facing departments, we share information

about the LkSG, its provisions, and how to apply them in practice while working at Gira. In addition to this, we will add modules that cover human rights-related and environmental due diligence throughout our supply chain to existing employee training wherever this appears logical.

5.3 Audits and complaints procedure

We also make use of regular internal and external audits to ensure that we are effectively implementing the legal requirements of the LkSG and are able to identify breaches or risks of a breach of our due diligence obligations within our internal business division at an early stage.

Alternatively, we provide both internal employees and external third parties with a secure channel for communications in accordance with Section 8 LkSG, through which they can send anonymous emails to report potential breaches of human rights-related or environmental due diligence obligations or risks of such breaches that exist within our internal business operations or the business activities conducted by one of our direct or indirect suppliers. All of these messages go directly to Gira's Human Rights Officer, who confirms receipt and processes them. Justified complaints are immediately forwarded to Gira's LkSG task force, which examines, assesses and prioritises them in accordance with our risk management process so that suitable corrective measures can be introduced, if necessary.

If a complaint is not justified, the case will be closed and the whistleblower will be informed of this, while retaining their anonymity. Unjustified complaints are also recorded as an integral part of our risk management process.

All of the data that Gira receives through this reporting channel is stored on secure servers in Germany in compliance with the applicable data protection regulations and is only ever used and processed in connection with this complaints procedure in accordance with Section 8 LkSG.

Furthermore, all Gira employees can also directly contact their managers, Gira Management, the Gira Human Rights Officer and the Gira Works Council to share any information they may have about possible breaches of duty either in our internal business division or on the part of our suppliers. This option is particularly relevant if a colleague may have committed possible breaches.

The identity of anyone who shares information will always be kept confidential, even if the information was not provided anonymously.

We carry out annual reviews of the effectiveness of the complaints procedure and all other procedures and processes described in this policy statement. However, we do carry out ad hoc reviews if the risk to which our internal business division or a direct supplier is exposed has materially changed or increased.

6. Our reporting

In addition to ongoing internal documentation of our activities to meet our human rights-related and environmental due diligence obligations, we are committed to informing interested members of the public about how we meet our obligations throughout the supply chain, in an annual report, in accordance with Section 10 (II-IV) LkSG. The first of these reports will be released online as part of our sustainability report in 2025. Each report will review the previous financial year and be released no later than 30 April each year.

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