

# CODE OF CONDUCT

## Lessmann GmbH

Lessmann GmbH are committed to environmentally and socially responsible business management. The Code of Conduct defines the principles of ecological, social, and ethical behavior. Compliance with these principles is a matter of course for us. We expect our suppliers to observe these principals equally.

Furthermore, we strive continually to optimize the sustainability of our corporate. We ask our suppliers to contribute to these efforts. By signing this Code of Conduct, the supplier accepts the validity of the following regulations as the basis for all future deliveries. The supplier undertakes to comply with the principles and requirements of the Code of Conduct. The supplier shall take reasonable steps to contractually oblige its subcontractors to comply with the standards and regulations specified in this document.

Violation of this Code of Conduct can constitute a cause and reason for Lessmann GmbH to terminate the business relationship, including all associated supply contracts.

Jürgen Lessmann, Dieter Lessmann, Cornelia Kitzsteiner

The Code of Conduct is based on national laws and regulations as well as international conventions such as

- The United Nations' Universal Declaration of Human Rights,
- Guiding principles about children's rights and child labor,
- The United Nations Guiding Principles on Business and Human Rights and
- The International Labor Organization's international labor standards.

## **I. Social Responsibility**

### **A. Elimination of forced labor**

No forced labor, slave labor or similar form of labor may be used. All work must be done by choice, and employees must be able to end the work or the employment relationship at any time. Furthermore, no worker may be subjected to unacceptable treatment such as psychological cruelty or sexual or other personal harassment. This Content refers to ILO Conventions 29 and 105.

### **B. Prohibition of child labor**

Child labor is forbidden at every phase of business activity. The supplier is called upon to adhere to the ILO conventions recommended minimum age for the employment of children. According to these recommendations, no employees under the minimum age of 15 years may be employed, except for developing countries, where a minimum age of 14 years applies. A minimum age of 18 years applies for high-risk work. This Content refers to ILO Conventions 79, 138, 142 and 182.

### **C. Fair wages and fair working hours**

The supplier undertakes to pay its employees appropriate remuneration. It undertakes to comply with the applicable wage / remuneration regulations and the applicable working time regulations worldwide. This Content refers to ILO Conventions 1, 14, 26 and 131.

### **D. Freedom of association**

The supplier shall respect, in accordance with local laws, the right of workers to freedom of association, to join trade unions, to call on labor representation or to be members of works councils. Members in workers' organizations and trade unions must neither be favored nor disadvantaged. This Content refers to ILO Conventions 87, 98, 135 and 154.

### **E. Prohibition of discrimination**

Discrimination against employees in any form is prohibited. This applies, for example, to discrimination based on gender, race, caste, skin color, disability, political convictions, family background, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of every individual shall be respected. This Content refers to ILO Conventions 110, 111 and 159.

### **F. Health protection; occupational safety**

The supplier is responsible for a safe and healthy working environment. Through the construction and use of suitable workplace safety systems, the necessary preventive measures shall be taken against accidents and injuries to health that could occur in connection with workplace activities. In addition, employees shall be regularly informed and trained on applicable health protection and safety norms and safety measures.

Employees shall be provided with access to adequate quantities of drinking water and to clean sanitary facilities. This Content refers to ILO Conventions 155 and 164.

#### **G. Complaint mechanisms**

The supplier shall establish a protected procedure to enable its employees to report violations of this Code of Conduct.

#### **H. Dealing with conflict materials**

The supplier shall take appropriate measures to avoid the use of raw materials from conflict and risk areas in its products, insofar as this may contribute to corruption, human rights violations, financing of militias and similar negative consequences. It shall establish processes in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and it expects its suppliers to do the same.

## **II. Environmental responsibility**

Insofar as the supplier's services have a significant impact on the environment, it must maintain an environmental management system, ideally in accordance with ISO 14001 or EMAS as well as ISO 50001. Irrespective of this, the supplier undertakes to operate in a considerate, sustainable, and environmentally friendly manner, in particular with regard to the following environmental aspects:

- A. Treatment and discharge of industrial wastewater**
- B. Dealing with air emissions**
- C. Dealing with wastes and hazardous substances**
- D. Consumption of raw materials and natural resources**
- E. Dealing with energy consumption and efficiency**

### **III. Business ethics**

#### **A. Fair competition**

Norms of fair business practices, fair advertising and fair competition are to be observed. Beyond this, the relevant antitrust laws, which particularly prohibit agreements and other activities to influence prices or conditions, are to be applied. These rules further prohibit agreements between customers and suppliers that are intended to limit customers' freedom to autonomously determine the prices and conditions for their resale of goods.

#### **B. Privacy/data security**

The supplier undertakes to treat personal data and recognizably confidential information of Lessmann GmbH as confidential. In the collection, storage, processing, transmission and transfer of personal information, the supplier is to observe the laws on data protection and information security as well as the regulatory requirements. The supplier shall process personal data responsibly and ensure that it is only used for justified purposes.

#### **C. Intellectual Property**

The supplier undertakes to respect the intellectual property rights of others.

#### **D. Integrity/corruption, personal gains**

The highest standards of integrity are to be applied to all business activities. The supplier must pursue a zero-tolerance policy regarding the prohibition of bribery, corruption, extortion, and embezzlement. Processes for monitoring and implementing norms are to be applied to ensure compliance with anti-corruption laws.

#### **E. Export control**

The supplier undertakes to comply with the applicable provisions on export control and customs.

The Supplier undertakes, in relation to supply chains, to take reasonable steps to ensure that its suppliers comply with the principles of this Code of Conduct. In the case of suspected violations and to safeguard supply chains with increased risks, we reserve the right to demand disclosure of the supply chains.

We check compliance with the standards and regulations listed in this document using a self-assessment questionnaire where appropriate. We reserve the right to take appropriate measures against suppliers who do not meet these requirements, which may ultimately lead to the suspension or termination of a supply relationship.

By signing this document, the supplier commits to act responsibly and adhere to the principles and requirements specified herein. The supplier commits to communicate the content of this Code of Conduct in a comprehensible manner to employees, contractors, and subcontractors and to make all necessary arrangements to meet the requirements.

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Supplier Name

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Name, Function

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Place, Date

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Signature, Stamp