

LEMKEN Code of Conduct

Respect and Integrity

Human dignity, protection of personal rights and privacy of every individual are very important to us. We respect different cultures as well as ethical and religious backgrounds and are committed to the principle of equality irrespective of age, disability, race, colour, sexual orientation, gender and ideology. We will not, under any circumstances, tolerate discrimination or any form of harassment or offence, be it personal or sexual.

In no case may any information be retrieved or distributed in our Company which supports or incites racial hatred, glorification of hatred, or other criminal acts, or contains within the respective cultural background, sexually offensive material.

We make business decisions based solely on objective and economic criteria and not based on any other subjective motives. The deployment of staff and use of Company property for purposes other than those of the Company are prohibited.

As a matter of course, we expect integrity and honesty in conduct towards our business partners and employees.

Local traditions and the mentality of other nations shall be considered when conducting international business.

Employees and management are obliged to actively prevent any type of discrimination.

Antitrust and Competition

Regulations LEMKEN's basic principles require all employees to comply with applicable antitrust laws and regulations. Fair competition is a prerequisite for free market development for the benefit of the common good. Every employee is obliged to comply with the rules of fair competition.

It can be difficult to assess matters of antitrust law due to differing legal norms in different countries. The following principles are our guidelines:

- No inadmissible agreements or concerted practices with competitors about prices, price increases, conditions or capacities, including profit, profit margins, costs, sales and marketing methods or other factors relevant to competition that determine or influence our conduct, with the objective or effect of preventing, restricting or distorting competition.
- No inadmissible non-competition agreements with competitors, no agreements restricting business relationships with suppliers, or agreements regarding the submission of bogus tenders or dividing up of customers, markets, territories or product portfolios. 7
- No prohibited exchange with competitors of competition sensitive information.
- No industrial espionage, bribery, theft and distribution of knowingly false information about our competitors, their products or services.

Relationship with Business Partners

When dealing with business partners such as customers, suppliers and service providers and government institutions and their representatives, the interest of the Company or the institutions as well as the private interests of the individuals involved must be kept strictly separate from one another. When accepting gifts or other benefits, it is absolutely necessary to prevent even the mere impression that such benefits could be perceived as a service in return for certain conduct desired from LEMKEN. In particular, if the benefit bears a certain

temporal relationship to negotiations of important contracts, this must be very closely examined and in case of doubt, the gift or benefit must not be accepted.

LEMKEN is committed to ethical and lawful company management and expects the same of its suppliers. Our suppliers must observe the following basic principles:

- Compliance with applicable laws
- No participation in corruption
- Respect of human rights
- Prohibition of child labour
- Protection of employees' health and safety
- Protection of LEMKEN's intellectual property
- Confidentiality
- Promotion of environmental protection

Communication and Information

Confidential business information and trade secrets may not be disclosed to third parties, either during or after termination of the employment relationship unless the employee is specifically authorized to make such disclosures on account of their role at the Company.

Direct or indirect use of confidential business information either during or after termination of the employment relationship to the personal advantage of the employee or third parties or to the disadvantage of LEMKEN is prohibited.

Information Technology Security (IT)

LEMKEN uses IT systems and data are processed on a regular basis in day-to-day business. Suitable security precautions (passwords, authorized technologies and licensed software) are used to ensure the protection of intellectual property and personal data.

Data Protection

We only collect, process or use personal data when this is necessary for specified, clear and legitimate purposes. Furthermore, personal data are stored securely and may only be transmitted when the necessary precautions are observed.

High standards must be maintained with regard to data quality and technical protection against unauthorized access. The use of data must be transparent for those affected. The rights of those affected must be safeguarded with regards to disclosure and, if applicable, to objection, blocking and deletion of this data.

Environmental Protection

We strive towards responsible use and procurement of natural resources in the production and distribution of our products and services. Therefore, we place importance on a responsible, ecological approach to energy, water, land and materials.