

Principles on Corporate Responsibility, Anti-corruption Policy as well as Code of Conduct and the Ethics Escalation Policy

Long-term economic success requires complying with ethical values. This includes treating each other in a fair manner as well as acting within the framework of the provided standards in everyday business. We consider the success of our customers to be the key to achieving long-term and sustainable business success and continuous growth and see it as a matter of course to meet the requirements of all stakeholders in the process.

Management bears responsibility for a sustainable corporate strategy and its respective implementation. Integrity and compliance with the law and ethical principles are essential elements in maintaining our company's authenticity (ethical and socially responsible manner).

In combination with the Principles of Management and the Quality, Safety and Environmental Guidelines, standards and directives are laid down to ensure employees are treated with respect and dignity, safe working conditions and a sustainable approach to the environment.

The Code of Conduct contains the following:

- how our management fulfils its responsibilities,
- how we treat each other, our employees and colleagues,
- the behaviour customers can expect from us,
- how we treat our suppliers and
- our conduct when interacting with communities and the environment.

Each manager as well as individual employee is responsible for acting in accordance with this Code. The conduct of our managers acts as a model for others, because they live by the Principles of Conduct and stand up for these in every situation.

Human Rights

We respect and promote the dignity of every human being and are committed to the protection and observance of international human rights. It goes without saying that we do not use child labour of any kind and reject all forms of forced labour.

We do not tolerate any working conditions that conflict with international or local laws and practices.

Discrimination

We do not discriminate in recruitment, compensation, further training options, promotion, termination or retirement on the basis of race, ethnicity, gender, age, marital status, religion or belief, disability, pregnancy, sexual orientation, trade union membership or political party affiliation of an employee, and we also require our employees to actively oppose the same.

Freedom of Association & Right to Collective Bargaining

As Laukötter GmbH, we respect the right of all employees to join or leave, work for or establish associations or organisations of their choice for the purpose of promoting and protecting the interests of employees, and in doing so, we comply with the relevant agreements with collective representations of our employees in accordance with the locally applicable laws and regulations.

Disciplinary Measures

We firmly oppose the use of corporal punishment, mental or physical coercion, and verbal abuse.

Motivation & Further Training of Employees

We see motivated employees and their identification with the goals of our company as a key factor for success. We thus especially emphasise the support and promotion of our employees. We focus on job-related further training that can be applied in the company and on the development and promotion of individuals with the potential to become future leaders.

Health & Safety

The health and safety of our employees is protected to the highest degree by providing a healthy and safe work environment. By complying with the safety regulations in force in our company, every individual contributes to a safe and healthy working environment.

Compliance with Antitrust & Competition Rules

With our high-quality products, innovative solutions and our reliability we openly and fairly compete on the world markets. In doing so, we do not engage in any unlawful and/or criminal practices, such as bid rigging, which exclude, distort or restrict the competition.

Conflict of Interests & Bribing/ Corruption

All our employees avoid situations in which their personal or financial interests conflict with those of the company. More specifically, they are prohibited from acquiring stakes in competing companies, customers or suppliers or from entering into business relationships with them in a private capacity if this generates any conflict of interest. A conflict of that nature always exists if the nature and scope of a shareholding is likely to influence actions in the course of our company's activities in any way. Our employees unequivocally refrain from requesting, accepting or receiving unjustified or unlawful benefits that may influence business decisions or transactions. Likewise, none of our employees will offer, procure or attempt to offer improper advantages to business partners, their employees or other third parties in business activities of any kind or enter into agreements to this effect.

Protection of Assets & Confidentiality

Each individual is expected to protect the company's tangible and intangible assets, to treat trade and business secrets and customer-related business information confidentially, and to comply with the data protection principles that apply.

Suppliers

We place high demands on our suppliers and require them to adhere to the same strict principles when conducting their business, particularly in the treatment of employees, that we apply ourselves. As an importer, we pay close attention to the exact description and classification of good and raw materials, the precise specification of their value and country of origin. Local customs and import laws, regulations and procedures of state authorities are expressly observed.

Environment & Recycling

As Laukötter Druckguss we are committed to nature. We help protect our environment by using state-of-the-art plants and systems. Every employee contributes to the production of high-quality products in environmentally friendly processes, including the responsible use of energy resources.

Social Commitment

We expressly acknowledge our responsibility as citizens of the community in which we pursue our operations and we are committed to maintaining open communications with all authorities, as well as community and public stakeholders.

Compliance

All employees have been made familiar with this Code of Ethics and Conduct, which has been approved by management. Our employees comply with this Code without exception in carrying out their duties. Stricter or more detailed guidelines may apply to specific regions, countries or functions, but they are fundamentally in line with these corporate principles. Questions regarding application or interpretation, as well as reports of potential violations, will be directed to the appropriate supervisor.

Measures in Case of Non-Compliance

Procedures, practices or actions by employees that are inconsistent with this Code shall be corrected and will result in disciplinary action. Depending on the severity of the violation and previous history (e.g. repetition), this may result in a warning, admonishment or even termination.

In the event that suppliers or other business partners do not comply with the guidelines, this will be discussed with the supplier and remedial action is urged. Depending on the severity of the violation and previous history (e.g. repetition), it may also lead to termination of the business relationship.

If Laukötter employees, suppliers or other business partners violate the rules or their behaviour raises cause for concern, management (Michael.Laukoetter@laukoetter.com) should be informed promptly.

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