



# **CODE OF CONDUCT**

# Contents

<b>Preface</b>	5
<b>Introduction</b>	7
<b>Decision making</b>	8
<b>Compliance with law/ internal guidelines</b>	9
<b>We are socially responsible</b>	
Respectful interactions.....	10
Responsible governance .....	12
Human rights.....	14
Occupational health and safety.....	16
Data protection.....	18
<b>We act with integrity and in compliance with the law</b>	
Combating corruption and bribery .....	20
Fair Competition.....	22
Conflicts of interest.....	24
Dealing with business partners.....	26
Dealing with governments, administration, and public enterprises.....	28
International trade and customs.....	30
<b>We act with integrity and in compliance with the law</b>	
Business and financial records, taxes.....	32
Measures against money laundering and terrorist financing .....	34
Corporate resources & communication on behalf of Leistriz .....	36
Information security.....	38
<b>We work responsibly</b>	
Quality .....	40
Sustainability, emissions reduction, and environmental protection.....	42

## Preface

At Leistritz, we are committed to integrity and trustworthiness, to upholding our reputation through ethical action, and fostering a culture that strengthens our success and mission.

## Message from the board

We'd like to thank you for your commitment to a company that regards dedication and trustworthiness as the cornerstone of its success. At Leistritz, we are committed to unwavering integrity to meet our obligations to employees, customers, shareholders, and society. We will not breach the trust placed in us.

Over decades, we have built a reputation for integrity that must not be compromised under any circumstances. Especially with respect to our families and colleagues, we are all called upon to consistently act appropriately and in the best interests of all. Our actions are always guided by this Code of Conduct. If there are signs of any discrepancies, it is our duty to ask questions and raise concerns.

Leistritz is highly valued for its ethical principles and compliance as well as its innovative and sustainable products. Maintaining this good reputation is the shared responsibility of all employees. By making ethical decisions in compliance with the law, we help solve global challenges and to contribute with a positive impact.

I invite you to thoroughly read and internalize our Code of Conduct. It is a fundamental pillar of our culture of integrity and guides us in our daily actions. Each and every one of us plays an important role in meeting our ethical standards, regulations, and laws. Right action and good business conduct are not only the basis of our success, but also our promise to the world.

Your personal commitment is essential to upholding our values and fulfilling our mission. Thank you very much.

**Michael Everts**  
Speaker of the Executive  
Board

# Introduction

The Leistriz Code of Conduct is a guide to ethical and responsible conduct that helps us act appropriately and uphold the company's reputation.

## We respect our Code of Conduct

This Code of Conduct is a valuable tool that guides us in achieving our goals by always acting with integrity and appropriateness.

Our Code of Conduct reflects the values of Leistriz and defines the principles and guidelines for our daily business conduct. It applies uniformly to all Leistriz Group locations and to all Leistriz employees, regardless of their position, area of responsibility or rank.

Its norms are based on the ethical principles of Leistriz, which are decisive for our success: Fairness, honesty, integrity, respect, and responsibility. It is the duty of all Leistriz employees to act in accordance with this Code of Conduct.

### What we do



We adhere to the guidelines in this Code of Conduct and use it when questions arise about proper conduct.



We ourselves have a responsibility to maintain our reputation for lawful and ethical conduct.

### What we don't do



We never violate the Code of Conduct, even when requested to do so by a supervisor or manager.



We will not be influenced by other companies, especially not if their practices are not in line with our Code of Conduct.



**Q: I'm on a business trip to a country where there's a conflict between the laws and our Code of Conduct. How should I deal with this?**

**A: Always follow the stricter rule in the particular context. If it's not clear which is stricter, seek advice from your compliance officer or legal department.**

# Decision making

Ethical issues are not easy but need to be addressed. They require careful decisions, guided by ethics guidelines, internal rules, and compliance with the law.

## Making good decisions

In some cases, we encounter complex challenges where it is not immediately clear what the best decision is. Our decision-making model helps you find a way forward in consistence with our Code of Conduct, internal rules, and ethical guidelines. It is essential that all your actions and decisions always comply with local laws and regulations. When making important decisions, you should involve another person.

Ask yourself the following questions about your actions:

**Do they meet the interests of all stakeholders and the community?**



**Are you sure they're in compliance with the law and our Code of Conduct?**

**If they were revealed publicly, would you still be happy with them?**

**Are you ready to take personal responsibility for them?**

**Does it feel right?**

Answers	Recommendation for action
All YES	Proceed in action.
UNCERTAIN	Seek advice from your compliance officer or legal department.
One NO	Do NOT proceed. Your actions could have serious consequences. Discuss the action with your supervisor, compliance officer or legal department.

# Adherence to guidelines is our top priority

Leistritz, as part of the Rothenberger Group, emphasizes compliance with the law and ethical standards in all business areas and when working with stakeholders.

## Compliance with the law

As part of the Rothenberger Group, LEISTRITZ attaches great importance to legal, honest, and fair action, which forms the basis for sustainable growth and long-term corporate success. Legal conduct protects our company from compliance violations, which can result in severe fines or loss of reputation as well as individual criminal liability. We are also committed to promoting high ethical standards among our stakeholders, including customers, suppliers, partners, and contractors.

Our Code of Conduct is published on our website and accessible to all employees and stakeholders above-mentioned, to whom we also recommend compliance with it. For activities involving different jurisdictions, we always comply with the applicable local law. In the event of a conflict between local law and this Code of Conduct, local law shall prevail. In case of uncertainty, please consult the Compliance Officer or the Legal Department.

## Internal compliance

This Code of Conduct serves as a guide to making the right decisions, however, it cannot answer every question. There are other guidelines and instructions that serve as additional sources of information for your compliant behavior.

We never make important decisions or take measures as individuals, but always with the involvement of another authorized person (with the 4-eyes principle). Where organizationally feasible, we separate the responsibilities for decision making, executing, and controlling business transactions both functionally and amongst positions.

# Respectful treatment

At Leistritz, we ensure fair working conditions, including adequate remuneration and privacy, to create a safe and respectful working environment where discrimination has no place.

## Leistritz ensures a fair and healthy working environment

We observe provisions that guarantee fair working conditions, including for pay, working time regulations, and the protection of privacy. Our compensation systems are consistent and comprehensible, ensuring compensation that takes market value, function and performance into account and incorporates business-specific specificities. We comply with occupational health and safety laws and regulations to create a safe and healthy working environment.

We value the contributions of all employees and provide a workplace where everyone is treated with respect and dignity. Leistritz protects employees from unlawful discrimination and from conduct that could in any way create an offensive, hostile or intimidating work environment. We will not tolerate retaliation against employees who lawfully report violations of our policies.

## Success through collaboration

We are aware that a positive working atmosphere and the success of Leistritz in general only arises through teamwork. We support each other across departmental and divisional boundaries and promote a friendly, cooperative atmosphere and an open, positive working environment. Our team's diversity of backgrounds, skills, and experience drives innovation and helps us meet the needs of our global customers. We welcome cultural differences as well as different opinions and approaches with openness and interest. We value diversity.

# Respectful treatment

We value diversity and foster a culture of collaboration and open exchange of ideas. With this as a guiding principle, we will continue to drive innovation and meet the needs of our global customers.

## What we do



-  We work together across functions and across countries to achieve company-wide goals.
-  We treat each other and business partners the way we want to be treated ourselves - with respect and appreciation.

## What we don't do



-  We are not dismissive of the input of colleagues from other departments or divisions.
-  We do not disrespect or disregard others.



**Q: An applicant mentions in the interview that she has two young children and asks if the position requires overtime. May I ask her about her childcare arrangements?**

**A:** No, this type of question is not allowed. No consideration of marital status, parenthood or pregnancy matters in recruitment decisions. However, it is appropriate to explain that the position requires occasional overtime and to ask if the applicant could arrange availability for this.

**Q: What should I do if I am diagnosed with a medical condition that makes it difficult to fulfil my contractual obligations?**

**A:** Leistritz is obliged to make appropriate arrangements for qualified persons with disabilities. Tell your supervisor or HR department about your situation so that appropriate measures can be taken to allow you to continue your work.

**Q: What can I do if a manager in the workplace makes offensive and inappropriate jokes?**

**A:** You can and should report this. Such behavior can affect the working atmosphere. Report the incident to another manager, directly to Human Resources, or use the compliance form at [Compliance@Leistritz](mailto:Compliance@Leistritz)

# Responsible leadership

Leaders at Leistritz set an example by implementing our strategic goals and fostering a culture of integrity, actively exemplifying our values, and making ethical principles clear in their team.

All employees of Leistritz are obliged to comply with this Code of Conduct. Managers and team leaders at all levels have a special responsibility. They implement strategic guidelines, promote change processes, and guide others to achieve our common goals. Our leaders are mandated to cultivate a culture of integrity:

- They act as role models, exemplify our values, and create an ethical and honest working environment in both word and deed.

- They should address ethics not only during compliance training, but regularly in a team setting.

- They should discuss ethical challenges in their work openly with the team and find solutions using this Code of Conduct and other guidelines.

- They should attend regular compliance training and expect their employees to do the same.

They should ensure their team is familiar with this Code of Conduct and any other relevant guidelines.

- They should recognize and promote ethical and courageous behavior in their team.

# Responsible leadership

Our managers attend compliance training and promote the understanding and implementation of our Code of Conduct and relevant policies.

## What we do

-  We are authentic, modest, and value others.

-  We support a culture of open exchange and encourage our team to express different opinions and consider alternative perspectives.

## What we don't do

-  We don't rush complex decisions.

-  We don't spread rumors or badmouth the work of others.



**Q:** How do I best deal with questions from my team about ethical behavior and integrity?

**A:** Ethical issues can be complex and sometimes lead to dilemmas. An ethical dilemma arises when conflicting ethical requirements collide and the consideration of one value may require the overlooking of another. Therefore, the solution often requires a consideration of the relative weight of different ethical values. Take time to address the concerns of your employees and show appreciation that this type of question has been brought to your attention. Listen carefully so that you will fully grasp the situation. Inquire into the main objective of the decision to be made. Offer support and advice but remain modest and acknowledge that you cannot resolve all ethical issues. In such cases, seek advice from the Compliance Officer.

# Compliance with human rights

As an international company, Leistritz is committed to upholding human rights by actively promoting and protecting them both in our own areas of operation and along our supply chain.

LEISTRITZ assumes special responsibility for respect for human rights due to its international business activities. That's why we pay close attention to these rights and implement appropriate measures, both in our own areas of operation and throughout our supply chain.

We expect our employees to integrate these rights into their business activities, respect the dignity of each individual, and ensure fair and respectful coexistence. If human rights violations are suspected or confirmed, we act immediately and take appropriate corrective and preventive measures.

We encourage our employees to report suspected violations of human rights to help clarify them. We believe that the following safeguards of human rights are fundamental in our business activities and attach great importance to their significance and compliance:

- No child labor
- Prohibition of forced labor
- Anti-discrimination measures
- Protection of personal data
- Appropriate working conditions
- Freedom of association and the right to collective bargaining

# Compliance with human rights

We motivate our employees to respect the dignity of all and pro-actively contribute to the education and prevention of human rights violations.

## What we do



- ✓ We always act appropriately and respectfully with one another.
- ✓ We address every potential instance of human rights violations until it is fully clarified.
- ✓ We always report unequal treatment or other human rights violations in our working environment.

## What we don't do



- ✗ We don't discriminate against one another.
- ✗ We do not ignore any indication of human rights violations, even if they do not directly affect us.
- ✗ We must not look the other way in the name of convenience.



**Q: What is discrimination?**

**A:** Discrimination means any form of discrimination or harassment based on sex, age, color, sexual orientation, religion, nationality, ethnicity, disability, or characteristics protected by local laws.

**Q: What should I do if I witness a possible human rights violation?**

**A:** You should report such incidents to your supervisor, local compliance officer, human resources department, or other manager as appropriate. In addition, the compliance form is open to all employees and business partners for reporting suspected human rights violations at [Compliance@Leistritz](mailto:Compliance@Leistritz). The form can be submitted anonymously. All reports are kept confidential and carefully investigated.

# Occupational safety and health

Our employees are our most valuable asset, and their health and safety are paramount. We are committed to safe working conditions. Our goal is to avoid both accidents at work and occupational illnesses.

## Safety of our employees is a top priority

At Leistritz we are convinced that our employees are the company's most valuable resource. Your health and safety enjoy the highest priority. We are therefore strongly committed to creating and maintaining safe working conditions. Our goal is to prevent accidents at work and occupational illnesses altogether.

## Commitment to a safe working environment

The health of our employees is our most valuable asset. A safe workplace is not only a legal obligation, but also a firm promise to our workforce. We strive not only to meet standards, but to ensure a permanently safe working environment through regular training and programs.

## Holistic health

We pay attention not only to the physical but also to the mental health of our employees. We promote an open culture of communication in which employees can freely express concerns. In addition, we offer professional support and resources to address mental well-being as seriously as physical health.

## Role model and responsibility

Our upper management and all managers promote proactive risk amelioration, ensuring every employee actively contributes to the early identification and prevention of potential hazards. The central Health and Safety Management, Environmental Protection & Security (HSE+S) division is responsible for the centralized management and continuous improvement of occupational health and safety policy on behalf of the Executive Board.

# Occupational safety and health

We comply with all regulations and safety guidelines for occupational safety. We behave in constant consciousness of risk to avoid danger to ourselves and others. We are alert to dangers and will act immediately to intervene if necessary. We talk openly about unsafe situations and behaviors.

## What we do



- ✓ We bear responsibility for our own health and safety and that of our colleagues.
- ✓ We report accidents and near misses immediately to our direct supervisor or our local occupational safety officer.
- ✓ We are vigilant against health and safety risks and proactively minimize them before we start our activities.

## What we don't do



- ✗ We do not compromise on health and safety.
- ✗ We do not ignore situation in which others are working in unsafe conditions.
- ✗ We do not disregard health and safety policies and procedures, even if their importance is unclear to us.



**Q: What should I do if the management considers safety to be the highest priority, but my supervisor demands disregarding safety regulations in order to achieve production goals?**

**A:** Safety regulations should not be disregarded under any circumstances. In line with our corporate values, we always put safety before productivity. Communicate your concerns to your supervisor. If this is uncomfortable, report the matter to the local HSE+S representative or via the compliance form at [Compliance@Leistritz](mailto:Compliance@Leistritz).

**Q: What should I do if I suspect a security risk?**

**A:** Stop your work immediately and ensure safe conditions for yourself and others before continuing to work. Please report any suspected safety problem immediately to your direct supervisor or local occupational safety officer.

# Data protection

Leistritz respects everyone's right to privacy. Protection of personal data is essential for the fair and honest treatment of our employees and business partners.

## Why is data protection important?

The worldwide electronic exchange of information supports the efficacy of our work and contributes to the success of Leistritz. However, as the exchange of information increases, so do the risks to the protection of personal data. "Personal Data" means information that directly or indirectly identifies or allows conclusions about an individual, such as names, email addresses, employee identification numbers or telephone numbers.

To protect privacy, personal data may only be processed for lawful purposes, as required by the laws of many countries. "Processing" means the collection, compilation, organization, storage, disclosure, or transmission of such data.

## Data protection in our daily work

We are aware that disclosing personal information – even accidentally – may not only be problematic for the person in question but may also have legal consequences for Leistritz and affect trust in our company. We comply with international and national data protection laws and implement appropriate safeguards. When working with personal data, we ensure that its use is lawful. This is the case, for example, if

- the individual in question has consented to,
- Leistritz requires the data needed to fulfill contractual obligations, or
- Leistritz has a legitimate interest in the use of the data.

## Additional materials:

For additional information, please visit the "Privacy & Information Security" section of the Leistritz intranet, where you will find further documents on this topic.

# Data protection

We always act in accordance with international and national data protection laws and implement effective safeguards.

## What we do



- ✓ We process personal data only if there is a legal basis for it and exclusively for necessary and appropriate business purposes.
- ✓ Documents and data carriers must be protected from unauthorized access.

## What we don't do



- ✗ We do not pass personal data on to third parties inside or outside Leistritz without first ensuring a legitimate business interest and legal basis.
- ✗ We do not use personal data collected for any specific or other purpose without re-verifying the lawfulness of the processing.



**Q: An external legal expert calls and wants information about one of your employees. How should you react?**

**A:** Never share employee information with third parties without first verifying such disclosure is admissible. Contact your supervisor or legal department before releasing any personal information or other sensitive information.

**Q: I want to create a "photo board" with photos of members of my team. Is that allowed?**

**A:** Photos are considered personal data. You must obtain the consent of all persons depicted before using their images. If someone does not agree, you may not use their photo.

# Fighting corruption and bribery

Leistritz is committed to ethics and transparency in order to positively contribute to the market and society.

At Leistritz, we attach great importance to ethical action as we are aware of the impact our actions have on the market and society at large. Our goal is to continue to build and maintain our positive reputation through transparency and hard-won recognition. It is of central importance for us to make decisions through transparent and performance-based services to ensure our fair participation in the competitive market.

We do not tolerate bribery or corruption in any form. This applies uniformly to all our business activities worldwide. Our decisions are consistently based on objective criteria such as performance, quality, price, and reliability. In doing so, we reject any form of bribery, facilitation payment or granting or accepting direct or indirect benefits.

Benefits are all contributions to which the recipient is not legally entitled, and which lead to an improvement in his economic, legal, or personal situation. Facilitation payments are payments made specifically to public officials (e.g. officials or other administrative staff) to speed up legitimate administrative processes, e.g. customs clearance.

We do not enter into any direct, implied, or indirect agreements relating to the granting of benefits to individuals in connection with the placement, award, or approval of contracts. These principles further strengthen confidence in our integrity and commitment to excellence.

Granting benefits can take many forms, such as donations in cash, gifts or gift vouchers, invitations and entertainment, unreasonable discounts, career promotion or hiring a family member/friend, or certain donations to charity.

Remuneration to third parties, in particular sales representatives, brokers, consultants, or intermediaries, must be proportionate and commensurate with their activities. Remuneration shall be calculated in such a way as not to be presumed to be used to circumvent the above rules to confer undue benefits. Agreements with sales representatives, brokers, consultants, and other intermediaries, including subsequent amendments, shall be fully recorded in writing and shall oblige the contractual partner to always observe the above principles.

# Fighting corruption and bribery

We promote fairness and reject all forms of bribery and corruption worldwide.

## What we do



-  We only grant or accept gifts and invitations that are in accordance with our specific policy.
-  Remuneration paid to third parties, in particular to agents, brokers, consultants or other intermediaries, shall be reasonable and transparent.

## What we don't do



-  We do not provide monetary payments or monetary benefits to third parties.
-  We will not extend invitations or private or extravagant hospitality that no longer corresponds to the normal course of business.



**Q: On the occasion of a contract signing, the supplier presents me with a high-quality ballpoint pen. I am meant to keep this and lobby the purchasing department to award them the contract at the next available opportunity. The pen is definitely not worth more than 35 EUR. Can I take it?**

**A:** No. The value of the ballpoint pen offered is within the range permitted by our policy. But here a quid pro quo is explicitly expected in exchange for the 'gift'. Such agreements are always prohibited.

**Q: You have successfully concluded contract negotiations with a larger supplier and are considering inviting the supplier's negotiating team to dinner. Do compliance considerations prevent this?**

**A:** No. An invitation after conclusion of contract negotiations is fine. Whether you can issue or accept an invitation depends to a large extent on whether a decision-making process is pending and whether it can give the impression that decision-making is influenced by the invitation. Catering is permitted if there is a clear link to the business activity, if it is customary for business, and if it corresponds to the professional/social position of the parties involved.

# Fair competition

Leistritz promotes fair competition through technological innovation and quality without engaging in unfair business practices.

Leistritz is committed to fair competition. We earn the trust of our business partners through technologically advanced and high-quality products and services. Our success is based on our own achievements, which we do not want to jeopardize through dishonest business practices. Various business operations may be considered anticompetitive.

Antitrust and competition law supports fair competition. Violations can result in severe fines for the company and criminal penalties for employees. Therefore, it is the duty of our employees to know and comply with local antitrust and fair competition regulations. If uncertainties arise, the legal department should be consulted.

We do not exchange competitive information with competitors and generally do not collude with them. Both formal and informal agreements and discussions with competitors which seek or result in obstacles to competition are prohibited.

Special care should be taken when meeting competitors, for example at trade fairs or industry meetings.

Don't talk about:

- Prices, pricing policies, margins, or costs
- Marketing and strategic plans
- Technological improvements or proprietary confidential information
- Specific customer information such as offer content or behavior
- Supply relationships
- Market shares and capacities

Formal or informal agreements with competitors on the following are prohibited:

- Allocation of territories and customers
- Pricing agreements
- The above information

# Fair competition

Our employees strictly comply with antitrust and competition regulations, avoid exchanging information with competitors, and consult the legal department if uncertainties arise.

## What we do



- ✓ We provide all agreements with a competitor to the legal department and the commercial manager for review.
- ✓ We do not talk to competitors about sensitive information and, if necessary, leave the room at association meetings when inappropriate topics come up.

## What we don't do



- ✗ We do not disrupt competitive bidding processes.
- ✗ We do not unfairly prevent competitors from entering the market.



**Q: You meet an old classmate at a trade fair who is now working for a competitor. She inquires about how business is going at Leistritz. How do you react?**

**A:** It is fine to respond in a general and non-specific way. However, be careful not to go into detail in your conversation. Bear in mind that even talking with a competitor could give the impression of an inappropriate connection between Leistritz and the competitor.

**Q: You are active in sales and would like to strengthen our market position by exclusively supplying a customer. Is that possible?**

**A:** Exclusivity agreements with customers or suppliers are not generally prohibited. However, they can potentially restrict competition and are therefore only legally permissible under strict conditions. They always carry the risk of breaching competition rules. Hence, forward any agreement regarding the exclusive supply of customers or our exclusive supply by a seller to the legal department for consideration.

# Open resolution of conflicts of interest

At Leistritz, we are committed to making objective decisions to achieve excellence. We are vigilant against conflicts of interest that might affect our integrity.

We at Leistritz jointly strive for excellence and are aware that this is best achieved through objective decisions. Each of us plays an important role in safeguarding the interests of our company and making decisions that contribute to our shared success. It is important that we all stay vigilant to identify potential conflicts of interest or loyalty when personal benefits or relationships could negatively affect objective decision-making. Openness in such matters protects the integrity of Leistritz and preserves our excellent reputation.

We are convinced that we need to make objective decisions to achieve the best results for Leistritz. A conflict of interest arises if you could use your position at Leistritz for personal gain or if you have a personal interest that could affect your ability to perform your work objectively.

A conflict of interest may arise, for example, if you:

- conduct business with a family member or a person with whom you have a close personal relationship.
- do a side job that reduces loyalty and time for your position at Leistritz.

Please note that even the appearance of a conflict of interest poses a threat to you and Leistritz. Not every conflict of interest is problematic, but it can become a problem if not disclosed and properly managed.

Therefore, report any potential conflict of interest to your supervisor or the compliance officer so that they can act transparently and with honesty to find a suitable solution for the individual case.

# Open resolution of conflicts of interest

To protect our reputation through transparent and honest action, we report all potential conflicts such as dealings with related parties or ancillary activities.

## What we do



- ✓ We immediately report a potential conflict of interest to our supervisor or legal department and hand over the business decision for Leistritz to colleagues.
- ✓ We apply for the approval of secondary jobs or activities by the supervisor or HR department in advance and in written form.

## What we don't do



- ✗ We do not exploit our position at Leistritz for our own personal interests or for the interests of those close to us.
- ✗ We do not use corporate resources for our own personal activities or for the activities of those close to us.



**Q: I have a good friend who provides a service Leistritz needs. May I give his contact details to my colleague at Leistritz?**

**A:** Of course, you can talk to the purchasing department about your friend's company. However, you should leave it to the purchasing department and other colleagues in the department to contact him. You must disclose the fact that this supplier is friends with you and must not participate in the supplier selection process in any way.

**Q: I'm in a relationship with someone who works for one of our clients. We got to know each other through work. That can't be forbidden, correct?**

**A:** Of course not, you are free to see whomever you choose! However, to protect Leistritz from rumors of favoritism, be sure to inform your supervisor or HR department if there are relevant professional dealings we should know about. Leistritz will treat the situation confidentially and respectfully.

# Dealing with business partners

Leistritz is committed to ethical business conduct and social responsibility to reduce negative environmental impacts and establish trusting partnerships.

### Our claim to ourselves:

Leistritz attaches great importance to ethical conduct in all business matters. We strive for being a reliable and integer partner. We are aware that our activities affect the environment and community. That's why we take on social responsibility and continually aim to minimize any negative impacts on the environment and resources that might arise from our actions.

### Our expectations for business relationships:

With our business partners, we aim for a lasting, trusting partnership for mutual benefit. We are committed to transparent, fair selection procedures and choose partners who share our ethical principles. The actions of our business partners could cast a direct light on Leistritz, and we could be held legally liable in case they act without integrity. Sometimes more intense examination is needed. It is our job to exemplify integrity, to communicate clear expectations and consistently ensure that they are met. The choice of our partners is based on objective criteria such as quality, reliability, pricing, and integrity.

### Contracts to prevent risks:

We sign complete and comprehensible contracts with customers and suppliers and seamlessly document all changes. In order to avoid misunderstandings and undesirable consequences, all contractual employees must carefully examine the rights, obligations, and risks involved. In case of questions, consult the legal department at an early stage. We expect suppliers to recognize our Supplier Code of Conduct.

# Dealing with business partners

Contracts are concluded clearly and completely, with partners required to recognize our ethical standards.

### What we do



- ✓ We select suppliers according to objective criteria, always obtain (at least) three offers, and adhere to the specifications of the Leistritz purchasing manual.
- ✓ We know our business partners and carry out a background check if in doubt.

### What we don't do



- ✗ We do not purchase products or services without obtaining prior information about the market and alternative suppliers.
- ✗ We do not give preference to suppliers without objective reason.



**Q: One of our suppliers is under investigation for unfair accounting practices. Since Leistritz is not directly involved, this does not affect us - does it?**

**A:** Yes, it does. We expect legally compliant behavior from all our partners. The supplier's approach could endanger our supply and damage Leistritz's reputation. Please report the incident immediately via our whistleblower system at Compliance@Leistritz so that we can act appropriately.

**Q: You notice that a colleague at Leistritz intends to hire a supplier without involving the responsible purchasing department.**

**A:** Inform the relevant purchasing department or use our compliance form at Compliance@Leistritz to ensure that the supplier is verified appropriately and that Leistritz receives the best offer.

# Business with governments and public companies

Legally, we observe the stricter requirements of working with public bodies and take action in an upfront and transparent way.

Laws governing cooperation with governments or public companies are often stricter than those governing cooperation with private business partners. We observe the stricter requirements and adhere to the highest ethical standards in the name of being a responsible partner of governments and public companies.

When dealing with governments and public companies:

- We familiarize ourselves with the relevant rules for this particular cooperation.
- We abide by the procurement directives and obligations under contracts.
- We always provide complete, timely, and accurate information.
- We do not, directly or indirectly, grant gifts or benefits that violate applicable laws, our Code of Conduct, or our policies.
- We expect equally high ethical standards from our business partners involved in our business or business initiation.

We are committed to establishing open, honest, and transparent relationships with all third parties, including government and administrative authorities. We comply with applicable laws and interact sincerely and transparently with representatives of governments and administrations.

For official investigations and audits:

- We cooperate fully with the authorities.
- We provide truthful, complete, and accurate information at all times.
- We will immediately forward enquiries relating to regulatory investigations to the Legal Department.
- Employees who have reported misconduct or safety concerns in good faith need not fear any negative consequences.

# Business with governments and public companies

## What we do



- ✓ We know that particularly strict rules apply when dealing with contracting authorities. We will inform ourselves about this proactively. If you have any questions, seek advice from our legal department.
- ✓ We strictly adhere to the requirements of public procurement law for public tenders. We award contracts only to efficient, reliable, and legally compliant companies. The award is always made to the most economical offer.

## What we don't do



- ✗ Granting or offering the prospects of benefits to employees of public authorities or public companies - not even in small amounts.
- ✗ Withholding necessary information.



**Q: An environmental authority has announced its visit to Leistritz as part of an emissions assessment. We were asked to provide certain documents in advance and to draw up a list of accountable employees for interviews. Your supervisor asks you to withhold some documents.**

**A:** Your supervisor's request is inappropriate and violates our guidelines for open and transparent cooperation with authorities. Do not comply and do report the behavior to the next higher supervisor or via the compliance form at Compliance@Leistritz. In case you're uncertain about preparing departments for the authority's visit, please contact the Legal Department.

**Q: You learn that a public company will tender for a major contract. You are thinking about contacting a local employee you know from a previous project to design the tender so that Leistritz wins.**

**A:** It is imperative to refrain from this plan. Such an attempt to influence would be unlawful and contrary to our principles of integrity and fairness in competition.

# International Trade and Customs

Leistritz is committed to strict compliance with all regulations and export control laws worldwide in order to act as a responsible global player, protect the company and safeguard its reputation.

We are proud to be a global company with worldwide operations. In our international business, it is important that we understand and comply with global regulations that determine where and with whom we are allowed to trade.

States adopt national and international laws and regulations for various reasons, in particular to safeguard national security, which may change frequently and sometimes at short notice. Failure to comply with these rules can have serious consequences for our operations, including fines, and for our reputation.

## Imports and customs

Customs authorities worldwide require importers to accurately declare the tariff classification, value, country of origin, product labeling, and other important data for imported goods.

## Exports and export controls

Certain products and technologies, including technical information, may be subject to authorization, in particular if they are intended or could be utilized for sensitive uses, such as constructing weapons of mass destruction.

## Trade embargoes, sanctions

These prohibit business transactions with specific countries, their nationals and certain organizations or individuals.

Leistritz strictly adheres to all applicable export control laws and regulations and strives to lead the way in this area. That is why we conduct comprehensive audits of sanctions related to certain persons, nation, usage, and product to ensure compliance with export control laws in accordance with the applicable jurisdiction. We also comply with the Union Customs Code and the relevant implementing regulations. Error-free customs clearance is our goal.

# International Trade and Customs

We perform comprehensive audits and error-free customs clearance to ensure that all international trade activities comply with applicable laws and regulations.

## What we do



- ✓ We contact export control for exports, re-exports, or regulated items, including goods, services, software, and technologies.
- ✓ We inform the customs department if goods have been ordered in a third country, provided by the customer, or have come to us from a third country for repair.
- ✓ We involve the export control department in new projects as early as possible.
- ✓ We strictly follow the procedures for exports, determining the origin of goods and preferences to ensure proper customs clearance.

## What we don't do



- ✗ We do not conceal any information in the name of expediting shipping orders.
- ✗ We do not accept uncleared goods unless we have received appropriate permission from customs.
- ✗ We do not export goods abroad without the preparation of the required export documentation, including export accompanying documents for values above 1,000 euros.



**Q: My order is about to be delivered, and my customer has changed the delivery address to another country at short notice. Do I have to react?**

**A:** Yes, it is imperative that you inform the export control department so that they can carry out a country-specific and person-specific inspection.

**Q: I work as a service technician and need to see a customer abroad immediately to fix a machine failure. I have to carry tools and spare parts in my hand luggage. Is there anything to consider?**

**A:** Please inform the customs department immediately so that the necessary customs documents can be prepared. Before checking in at the airport, you should go to the customs office with these documents and the goods and obtain an export clearance.

## Business and financial records, taxes

Our business is based on accurate reporting and diligent accounting, promoting informed decisions, and fulfilling commitments. We ensure integrity and reliability by complying with relevant laws and accounting principles.

### Business and financial documents

Our business is represented by correct, complete, and comprehensible reporting and proper accounting. This allows to make business decisions on a sound basis and to meet our obligations to tax authorities and third parties, such as banks. We ensure that all relevant laws, accepted accounting principles, and corporate policies are observed when preparing business and financial records.

Our accurate recording of business transactions includes not only the preparation of documents, but also their careful management. This is particularly important in order to provide complete, traceable documentation for internal and regulatory audit processes at all times.

### Taxes and duties

As a globally active group of companies, Leistritz is subject to the tax laws of many countries. We are aware of our social responsibility and are committed to strict compliance with national and international tax regulations. Violations in this area can damage our reputation and lead to significant financial risks for the company as well as disciplinary and possibly criminal consequences for responsible employees. All transactions are recorded in accordance with commercial and tax regulations in accounting, as accounting forms the basis for the tax return. Accounting errors can lead to incorrect tax returns and serious tax and customs consequences for the company and the responsible employees.

## Business and financial records, taxes

As a responsible global group of companies, we are committed to complying with national and international tax regulations, ensuring our good reputation and financial stability.

### What we do



- ✓ Managers ensure that their employees know the rules and receive sufficient training.
- ✓ If we do not understand a process, we ask or seek advice.
- ✓ We organize our processes in such a way that all business financial data can be recorded correctly and on time in accounting.
- ✓ We immediately allocate payments to the corresponding services and book them.

### What we don't do



- ✗ We do not omit facts when documenting business transactions.
- ✗ We do not post financial transactions without traceable receipts.
- ✗ We do not pass on planned transactions to the finance or tax and legal departments just before closing or even after closing.



**Q: As an accounting employee, a senior executive asks you to quickly book and arrange a payout to a consultant. It was extremely confidential, so no invoice could be provided.**

**A:** In this case, too, the general principle applies: "No booking without receipt." By skipping an invoice, the executive would exploit their position in the company and bypass our internal control mechanisms. In such a case, please contact your supervisor or management or report this incident.

**Q: I urgently need new work equipment, but my department's budget is already exhausted for the current fiscal year. Can I still purchase the device and post the costs in the next financial year when our budget is replenished?**

**A:** No, unfortunately that's not possible. Costs must always be posted at the time of purchase. Inappropriate bookings can have serious consequences for the company and individual employees.

# Anti-money laundering and anti-terrorist financing

It is our goal that our company and our employees never be involved in money laundering and terrorist financing practices that are punishable in most countries.

## Anti-money laundering and anti-terrorist financing

Money laundering and terrorist financing are punishable in almost all countries. Money laundering is the process by which income from illegal activities is channeled into the legal financial and economic circuit in order to conceal the illegal origin of these funds. Terrorist financing is the provision of financial or other resources for terrorist crimes or to support terrorist organizations.

The liability of a company and its responsible employees does not require knowledge of whether a transaction carried out is directly or indirectly intended for money laundering or terrorist financing. Even unintentional involvement can lead to severe penalties for the company and the responsible employees.

Our primary goal is to prevent our company and employees from being unwittingly exploited for such illegitimate practices.

# Anti-money laundering and anti-terrorist financing

## What we do



-  We only enter into business relationships with reputable business partners whose identity we can verify.
-  We immediately assign payments to the corresponding services and book them.
-  We are attentive and investigate suspicious behavior of business partners.

## What we don't do



-  We do not do business with business partners who are on sanctions lists or subject to embargoes.
-  We do not conduct non-transparent cash flows.



**Q: A customer wants an accidentally overpaid amount to be refunded not to their original business account, but to an account in Switzerland or in cash.**

**A: Do not simply go ahead and comply with this request as it requires explanation. Ask the customer why the refund cannot be made in the same way as the original payment. Seek advice as described in the Decision Making/SpeakUp section.**

# Corporate resources and communication on behalf of Leistritz

We value the responsible use of our corporate resources to achieve our goals. We take care to protect confidential information and only authorized persons may communicate officially on behalf of Leistritz.

## Corporate resources

Our company resources are the foundation of our business activities and are used daily in our work. We use these resources purposefully for the benefit of Leistritz. The company trusts that you, as an employee, use these resources conscientiously to perform your work effectively and contribute to achieving our corporate goals. Our corporate resources include physical assets such as machinery, tools, equipment, inventories, vehicles, buildings, and computer technology, as well as intangible assets such as working hours, confidential information, intellectual property, and information systems. Leistritz relies on you to manage these resources honestly, efficiently and responsibly.

## Confidential information

Leistritz constantly develops innovative products and processes. This results in a large amount of confidential information that contributes significantly to our success. You are expected to keep all non-public information strictly confidential. Confidential information includes in particular:

- Our products and services
- Our financial aspects such as sales figures, pricing, and calculations
- Information about our customers and business partners

## Protecting our reputation – communication on behalf of Leistritz

Leistritz attaches great importance to ensuring that the information communicated to the public and authorities is accurate and complete. Therefore, only authorized persons are permitted to communicate officially on behalf of Leistritz. If you do not belong to this group, you should not make public statements on behalf of Leistritz.

# Corporate resources and communication on behalf of Leistritz

The contribution of our employees to the responsible use of our resources and communication is crucial to our success.

## What we do



- ✓ We do not disclose any confidential information outside of Leistritz without express permission and appropriate confidentiality agreements.
- ✓ Internally, we only share information with colleagues who need it to perform their tasks.
- ✓ We never allow third parties to use our intellectual property without the necessary permission and a license agreement reviewed by our legal department.
- ✓ We proactively protect our corporate values from theft, loss, and abuse.

## What we don't do



- ✗ We do not use Leistritz resources for unauthorized purposes.
- ✗ We do not make public statements on behalf of Leistritz unless we are expressly authorized to do so.
- ✗ We do not use Leistritz logos or trademarks without the necessary permission.



**Q: I have a side business where I design and print wedding and birthday cards. A colleague asked me to design and print an invitation for her. Can I do that?**

**A: You may only do this outside of your working hours and with your own computer and equipment. The use of Leistritz equipment for private purposes and during your working hours is not permitted.**

**Q: I found an online review about Leistritz that contains inaccurate and incorrect information about our company. I know the facts and I want to put things right. Can I publish an appropriate correction online?**

**A: No, if you do not have permission to speak on behalf of Leistritz. Instead, you should contact the responsible marketing department with the correct information.**

# Information security

Information represents proprietary, business-relevant assets of great value to Leistritz and requires appropriate protection.

## Information security

Proper business decisions require comprehensive and accurate information that must be secured at all times in terms of availability, integrity, and confidentiality. At Leistritz, we regard information security as an essential aspect in the selection and operation of our IT systems, in the development of our products, and in our internal processes. For more details on our information security policies and measures, see our Information Security Guidelines.

The responsibility for minimizing these risks lies with both our managers and each individual and is an important part of our IT and information security management.

## Information security in our daily work

Ensuring the confidentiality, integrity, and availability of processed data is a fundamental part of our information security strategy. This means that we ensure that information is only viewed by authorized persons, that data is not altered or manipulated unnoticed, and that data is always available. To achieve this goal, we rely on secure communication channels, access controls, checksums, redundant systems, and regular backups.

We also attach great importance to the secure handling of data, from collection to storage and deletion. This includes the secure exchange of information both inside and outside Leistritz.

Through regular training and raising the specific awareness of our employees, we ensure that our policies are known and adhered to, and continually adapt them to changing conditions.

# Information security

Information security protects critical data from threats, ensures business operations, and reduces economic damage, including financial and reputational damage.

## Our information security guiding principles:

- We use all resources provided solely for business purposes.
- We prohibit and report any kind of fraud, theft, and IT attack.
- We report and document incidents and suspicious behavior.
- We protect data on mobile devices to a particular degree.
- We use multiple redundancies and systems from different manufacturers wherever possible.
- We conduct regular training to raise awareness of information security among all employees.
- We regularly review our information security strategy and continuously adapt it to technological developments and the changing IT security situation.
- We demand compliance with our guiding principles from our business partners.



**Q: I have received an email asking me to enter my password on a website, send data or change information in our systems (such as delivery address or bank details). How should I react?**

**A:** Never share your passwords! Check carefully whether the request is legitimate and expected. Make sure the sender is actually the person they say they are. Check the sender address carefully and compare it with the information you know. For requests to change data, you should always involve your supervisor and check the request on a second communication channel, such as by telephone. Never let yourself be put under pressure!

**Q: Can I copy business data to a USB flash drive and edit it at home?**

**A:** Use only business devices to store and edit files to ensure data protection, confidentiality, and archiving.

# Quality assurance

We attach great importance to quality awareness in every step of our work. We strive to continuously provide world-class products and solutions and improve our processes.

## Quality as DNA

At Leistritz, we see quality as a core part of our corporate philosophy and identity. Our goal is to provide world-class products, solutions, and processes that not only meet but exceed our customers' expectations. Accuracy, care, and quality awareness characterize every step of our processes. Our goal is to generate trust and added value for our customers through the quality of our products.

Our managers are committed to ensuring that their team members are adequately trained in applicable laws, internal rules, and policies. They take all indications of quality defects seriously and follow them up consistently.

## High quality standards

We place the highest priority on the quality of our products and are constantly looking for improvements. Our products are subject to rigorous quality checks to ensure compliance with our high standards of reliability, durability, and functionality.

## Continuous process improvement

We take the pursuit of improvement and innovation as an absolute given. We continuously strive to implement new technologies, refine our processes, and optimize the design and functionality of our products. By regularly reviewing and adjusting our workflows, we aim to increase efficiency and continuously raise quality standards.

## Transparency and feedback

We advocate a culture of openness and communication. Suggestions and concerns are taken seriously to continuously improve our products and processes.

## Quality control and assurance

Our processes integrate comprehensive quality controls at every point in the value chain. These controls are an indispensable part of our daily work and ensure that our products and solutions meet our quality standards.

# Quality assurance

We regard our high-quality standards, which create trust and added value, as a decisive competitive advantage for our customers

## What we do



- ✓ We are committed to complying with all quality standards, policies, and procedural rules relevant to our products or services.
- ✓ We always contact the quality department for questions about regulations, specifications, or test procedures.
- ✓ We are aware of our responsibility to contribute to the safety and quality of our products in our daily work.

## What we don't do



- ✗ We never provide false, misleading, or incomplete information to clients or auditors and seek support from the quality department if uncertainties arise.
- ✗ Managers do not push back concerns reported by their employees.
- ✗ We do not ignore unsafe conditions or quality defects but address them immediately with the necessary measures.



**Q: If one of the quality checks we perform on a component is repeated later in the production process, can I skip it to speed up the process?**

**A:** Skipping a required inspection is not permitted at any time. If you have suggestions for increasing efficiency, please discuss them with your supervisor or submit a suggestion for improvement using the proper workflow system on site. Until the process is officially reviewed or changed, it is crucial to follow every single step to ensure the high quality of our products.

# Sustainability, emissions reduction, and environmental protection

We take responsibility for our actions and our planet. We actively conserve resources and pay attention to the environment. We shape the future through innovation, efficiency of methods, and ecological product design.

## Corporate responsibility: Sustainability as a fundamental task

Leistritz is convinced that sustainability is much more than social responsibility – it is a core value that plays a significant role in shaping our actions and decisions and contributes significantly to the company’s success. We regard sustainability as a source of inspiration for innovation and progress. Our goal is the continuous development of new methods to overcome environmental and economic challenges because we are convinced that a sustainable orientation will shape not only our future, but also future generations. Sustainability is an integral part of our corporate culture and permeates various key areas of our actions.

## Carbon footprint and energy efficiency

We are keenly aware that our actions have consequences for the environment. That is why we strive to continuously reduce our carbon footprint. We record our Corporate Carbon Footprint (CCF) annually to document the CO2 emissions we generate. Based on this data, we develop strategies to further reduce our CCF. We rely on innovative technologies and processes to reduce energy consumption and make our operations as efficient as possible. We believe that these efforts not only benefit the environment, but also generate long-term economic benefits for our company. To achieve these goals, we rely on the creativity and direct suggestions of our employees. Please get involved and share your ideas on energy saving measures with the relevant departments on site.

## Conservation of the environment

Protection and preservation of the environment are important to us. We are committed to the careful use of natural resources and strive to minimize environmental impact. These include using environmentally friendly materials, promoting responsible waste management, and protecting sensitive ecosystems.

## Circular economy

We support the principles of the circular economy, which focuses on the conservation and regeneration of resources. Our product development is based on the principles of reusability, recycling, and biodegradability. In cooperation with our suppliers, we strive to create and develop a sustainable value chain.

# Sustainability, emissions reduction, and environmental protection

Leistritz regards sustainability as a core value that promotes innovation and progress and contributes to long-term business success. We aim to reduce our carbon footprint.

## What we do



- ✓ We are committed to raising awareness and actively involving all relevant departments in our energy management system.
- ✓ We submit proposals for energy saving to the competent authorities.
- ✓ We are consistently considering switching to renewable energy sources.

## What we don't do



- ✗ We do not stubbornly implement measures without first informing ourselves of the process.
- ✗ We do not ignore suggestions from others.
- ✗ We do not automatically opt for the simplest and most cost-effective options but prefer more environmentally friendly alternatives.



### Q: What is an energy management system?

A: An energy management system (EnMS) records a company's energy consumption and identifies potential savings to increase energy efficiency. The introduction and maintenance of an EnMS is specified in the international standard DIN EN ISO 50001.

### Q: What is the Corporate Carbon Footprint (CCF)?

A: The Corporate Carbon Footprint (CCF) quantifies a company's carbon footprint. It takes stock of direct and relevant indirect greenhouse gas emissions along the value chain. The result is usually expressed in tons of CO2 equivalent (tCO2e).