

Code of conduct



Content

- We observe the rules of free and fair competition
- We combat corruption
- We comply with foreign trade requirements
- We have an ombudsman system
- We act in accordance with human rights, labor standards, and social standards
- Protecting the environment is important to us
- We are vigilant about product safety
- We observe privacy and data protection regulations and safeguard trade secrets and confidential information
- We obey laws to combat money laundering
- We pledge to protect company assets



Imprint

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1

We observe the rules of free and fair competition

As a globally active corporate group, we are in constant competition. Fair competition is indispensable for us, as the long-term success of our company can only be ensured through lawful and honest competition.

One of the fundamental principles of the LSG Group is, therefore, that all of its subsidiaries, executives, and employees act in accordance with the relevant provisions under competition law.

The standard we hold ourselves to is that we do not make, participate in or tolerate agreements with competitors regarding prices, price increases, terms and conditions or capacities, profits, profit margins, costs, sales and marketing measures, or other competition-relevant factors.

We refrain from any prohibited exchange of competition-sensitive information or coordinated conduct with competitors.

We likewise refrain from making agreements with competitors regarding non-competition, restrictions on business relationships with suppliers, submission of unlawful or irregular bids in tender processes, or the division of customers, markets, regions, or product portfolios.



2

We combat corruption

The LSG Group companies and their employees act in a responsible manner and fight against all forms of bribery and corruption.

Both in the initiation and in the maintenance of business relationships, we base our decisions solely on objective criteria and allow ourselves to be guided neither by personal interests or relationships nor by material or immaterial personal advantages.

Our goal is to avoid even the appearance that gifts of any kind might be considered or construed as compensation for a certain desired behavior. This is particularly true in our dealings with government officials.

We, therefore, refrain from demanding, promising, granting, or accepting any material or immaterial advantages as compensation for the procurement of products or services.

Furthermore, all bodies, executives, and employees of the LSG Group companies are obligated to ensure that their business decisions remain free of conflicts of interest and are made exclusively in the best interests of the LSG Group.



3

We comply with foreign trade requirements

Our principles also include strict adherence to national and international embargoes on countries and individuals. Embargoes that restrict the freedom of foreign trade with certain countries may be imposed for foreign policy and security policy reasons.

That is why we are careful not to violate any embargoes in our contracts involving the granting of funds and/or economic resources.

As a globally active company, we comply with the export control laws that are currently applicable. All bodies, executives, and employees of the LSG Group are obligated to familiarize themselves with and adhere to the laws governing import and export control.



4

We have an ombudsman system

To allow for the confidential submission of information regarding potential offences or violations of laws or rules applicable to our business, the LSG Group has established an ombudsman system. The LSG Group ombudsman is an external attorney. He relays all compliance-relevant facts that are transmitted to him, and to the LSG Group Compliance Office. The identity of the whistleblower may only be disclosed to the LSG Group Compliance Office or third parties if expressly permitted by the whistle-blower or ordered by public authorities.



5

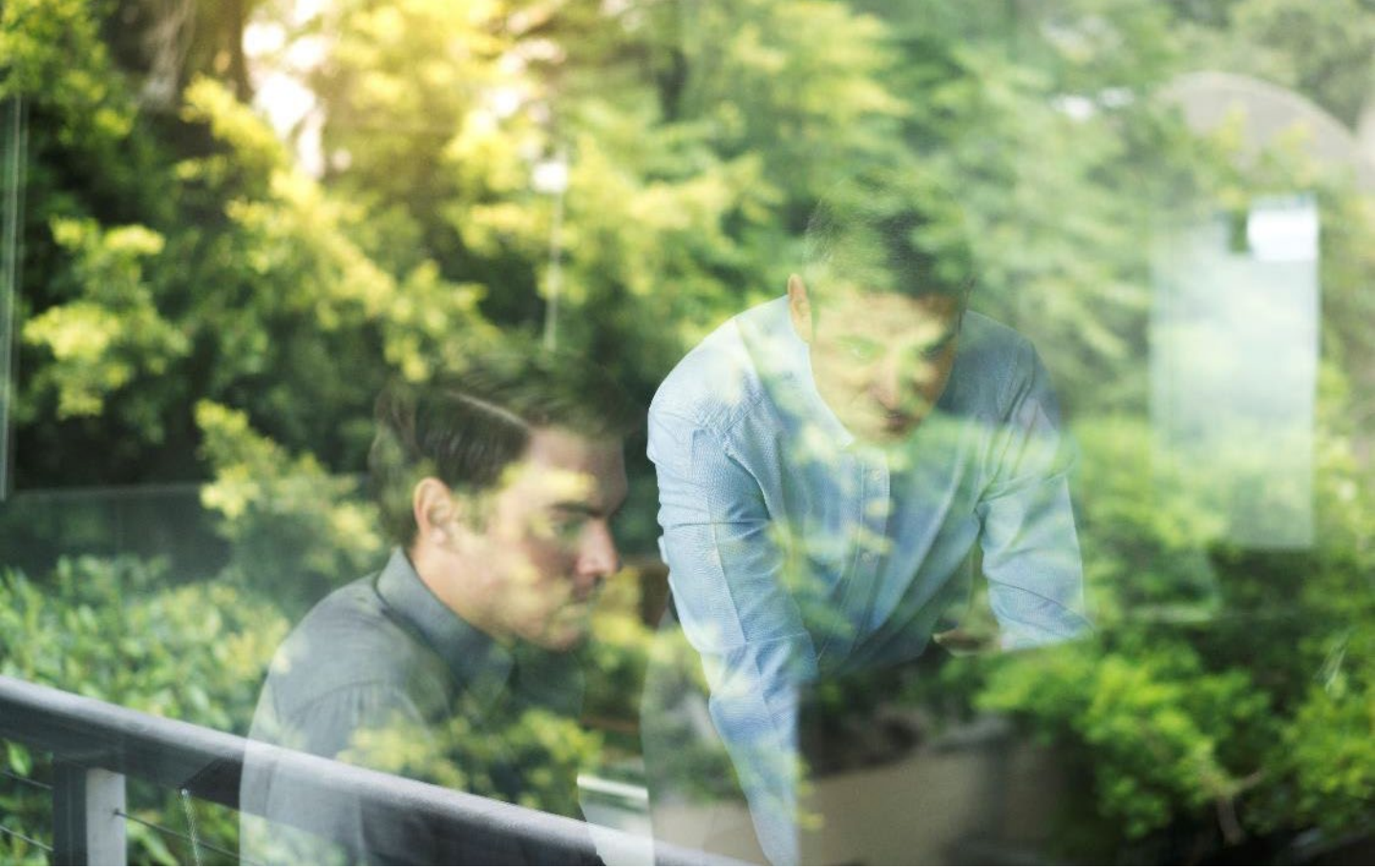
We act in accordance with human rights, labor and social standards

We respect and uphold the dignity of our employees, customers, and business partners. In all our actions, we ensure that we act in accordance with human rights, the principles of the UN Global Compact, and recognized international labor and social standards. In particular, we reject child labor, forced labor, and exploitation of any kind.

We do not tolerate any form of discrimination, including discrimination based on gender, age, skin color, family background, nationality, religious affiliation, sexual orientation, disability, political views or union activity.

We do not tolerate sexual harassment. In particular, this includes unwelcome advances, as well as physical and verbal attacks.

We adhere to the right of free assembly, freedom of association, and collective bargaining, as well as the relevant regulations to ensure fair working conditions. Free choice of occupation, equal pay, and the right to rest and take regular paid vacations are firmly embedded in our company. It is important to us to promote and preserve the health and safety of our employees. We promote social security in our sphere of responsibility and respect the right to freedom of opinion and freedom of expression.



6

Protecting the environment is important to us

To continuously reduce the detrimental environmental effects of our business activities, we deploy the necessary resources as efficiently as possible and work towards the development and proliferation of environmentally friendly technologies.

Following the environmental guidelines of the LSG Group, and maintaining and gradually expanding the certified, validated environmental management system are an essential foundation for this and, at the same time, the primary instrument for managing and continuously improving our environmental performance.

7

We are vigilant about product safety

In creating our products and providing our services, we fulfill the legal and company-internal requirements and take great care to only use products and materials of absolutely certain origin and suitability.



8

We observe privacy and data protection regulations and safeguard trade secrets and confidential information

We only collect, process, and use personal data to the extent required for legitimate and clearly defined purposes. Moreover, to maintain the confidentiality of personal data, we enforce high standards regarding the secure use, retention, and storage of data and transmit such data only under the condition that there is a legitimate reason and that additional high-standard security measures are in place.

The success of the LSG Group is also dependent on its handling of confidential information. Data and information we gain access to on an operational level may only be used to the permitted extent. Such information may only be disclosed once it has been determined that the recipient is authorized to receive this information.



9

We obey laws to combat money laundering

Money laundering refers to the covert introduction of illegally acquired assets into the legitimate financial system, thereby concealing the criminal origin of the money. Money laundering is a crime in many countries. The LSG Group does not tolerate violations of laws combating money laundering. Our objective is to only enter into business relationships with legitimate partners whose business activities are in accordance with legal provisions.

10

e pledge to protect company assets

It is the duty of everybody, every executive, and every employee to handle the property of the LSG Group companies responsibly.

Company property may only be used for company purposes. The improper use for other purposes, in particular for inappropriate personal, illegal, or other unauthorized purposes, is prohibited.