

LEBEN Code of Conduct- CoC

1 Introduction/Preamble

LEBEN-Dämpfungstechnik GmbH is committed to ecologically and socially responsible corporate management. We expect the same behavior from all our suppliers. We also require our employees to observe the principles of ecological, social and ethical behaviour and to integrate them into the corporate culture. Furthermore, we strive to continuously optimize our business activities and our products or services in the sense of sustainability and call on our suppliers and employees to contribute to this in the sense of a holistic approach.

For future cooperation, the contracting parties agree on the validity of the following provisions for a common code of conduct. This agreement shall be deemed to be the basis for all future deliveries. The Contracting Parties undertake to comply with the principles and requirements of the Code of Conduct and to endeavour to contractually oblige their subcontractors to comply with the standards and regulations listed in this document. This Agreement shall enter into force upon signature. A violation of this Code of Conduct may be a reason for the Company to terminate the business relationship, including all associated supply contracts.

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, the Guidelines on Children's Rights and Entrepreneurship, the United Nations Guidelines on Business and Human Rights, the International Labour Organization's International Labour Standards and the United Nations Global Compact.

2 Requirements for suppliers

2.1 Social responsibility

Exclusion of forced labour

No forced labour, slave labour or comparable work may be used. All work must be voluntary and employees must be able to terminate work or employment at any time. In addition, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment. (ILO Conventions 29 and 105)

Prohibition of child labour

Child labour must not be used at any stage of production. Suppliers are required to comply with the recommendation of the ILO conventions on the minimum age for employing children. Accordingly, the age should not be less than the age at which compulsory education ends and in any case not less than 15 years. If children are found at work, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers must be protected and special safeguards must be respected. (ILO Conventions 79, 138, 142 and 182)

Fair remuneration

Remuneration for regular working hours and overtime must comply with the national statutory minimum wage or minimum industry standards, whichever is higher. The remuneration for overtime must in any case exceed the remuneration for regular hours. Insofar as the remuneration is not sufficient to cover the costs of normal subsistence and to build up a minimum of reserves, the supplier is obliged to increase the remuneration accordingly. Employees must be granted all benefits prescribed by law. Wage deductions as punitive measures are not permitted. The supplier shall ensure that employees receive clear, detailed and regular written information on the composition of their remuneration. (ILO Conventions 26 and 131)

Fair working hours

Working hours must comply with applicable laws or industry standards. Overtime is only permitted if it is voluntary and does not exceed 12 hours per week, while employees are allowed at least one day off after six



consecutive working days. The weekly working time must not exceed 48 hours on a regular basis. (ILO Conventions 1 and 14)

Freedom of association

The right of workers to set up, join and collective bargaining organisations of their choice must be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative possibilities for an independent and free association of workers for the purpose of collective bargaining shall be granted. Employee representatives must be protected against discrimination. They must be given free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner. (ILO Conventions 87, 98, 135, 154)

Discrimination

Discrimination against employees in any form is inadmissible. This applies, for example, to disadvantages based on gender, race, caste, skin colour, disability, political opinion, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected. (ILO Conventions 110, 111 and 159)

health protection; Safety at work

The supplier is responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may occur in connection with the activity. In addition, employees are regularly informed and trained about applicable health and safety standards and measures. Employees are given access to drinking water in sufficient quantities and access to clean sanitary facilities. (ILO Conventions 155 and 164)

Complaint mechanisms

The supplier is responsible at the operational level for establishing an effective complaints mechanism for individuals and communities that may be affected by negative impacts.

Even where legal systems are effective and well-equipped, complaint mechanisms can offer particular advantages, such as rapid access and redress, reduced costs and transnational reach. Employees who make a complaint about violations of this Code of Conduct or applicable laws may not be subject to disciplinary action in any form.

Dealing with conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the company establishes processes in accordance with the Organisation for Economic Cooperation and Development (OECD) guidelines for due diligence to promote responsible supply chains for minerals from conflict-affected and high-risk areas and expects the same from its supplier. Smelting and refining without adequate, audited due diligence processes should be avoided. (Current OECD standards and guidelines)

2.2 Ecological responsibility

For the following areas, reference is made to established standards such as EMAS or ISO 14001. TWO YEARS AFTER the initiation of an order, LEBEN-Dämpfungstechnik GmbH demands the introduction of an environmental management system in accordance with EMAS or ISO 14001. An orientation of the topics which are comparable to EMAS or ISO 14001 standards to meet, is possible. The core topics of the EMAS Regulation (No. 1221/2009) and ISO 14001:2015 are the following environmental aspects:

Emissions into the atmosphere
Discharges into water bodies
Contamination of soils
Consumption of raw materials and natural resources
Energy consumption/efficiency
Release of energy (in the form of heat, radiation, light, noise)
Generation of waste



Land use/biodiversity

Treatment and discharge of industrial wastewater

Waste water from operating procedures, manufacturing processes and sanitary facilities must be typed, monitored, checked and, if necessary, treated before discharge or disposal. In addition, measures should be introduced to reduce the production of wastewater.

Dealing with air emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be typified, routinely monitored, verified and, where necessary, treated prior to their release. The supplier also has the task of monitoring its exhaust gas purification systems and is required to find economical solutions to minimize any emissions.

Handling of waste and hazardous substances

The supplier follows a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. Chemicals or other materials presenting a hazard when released into the environment shall be identified and handled in such a way as to ensure safety when handling, transporting, storing, using, recycling or reusing and disposing of those substances.

Reduce the consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, shall be reduced or avoided. This is done either directly at the point of origin or through procedures and measures, e.g. by changing the production and maintenance processes or procedures in the company, by using alternative materials, by savings, by recycling or by reusing materials.

Dealing with energy consumption/efficiency

Energy consumption shall be monitored and documented. Economical solutions must be found to improve energy efficiency and minimize energy consumption.

2.3 Ethical business conduct

(OECD Guidelines)

Fair competition

The standards of fair business, fair advertising and fair competition must be adhered to. In addition, the applicable antitrust laws are applicable, which prohibit in particular agreements and other activities that influence prices or conditions when dealing with competitors. Furthermore, those rules prohibit agreements between customers and suppliers aimed at restricting customers' freedom to determine their prices and other conditions autonomously when reselling.

Confidentiality/Data Protection

The Supplier undertakes to meet the reasonable expectations of its Client, Suppliers, Customers, Consumers and Employees with regard to the protection of private information. When collecting, storing, processing, transmitting and passing on personal information, the supplier must comply with the laws on data protection and information security and the official regulations.

Intellectual property

Intellectual property rights must be respected; Technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information are protected.

Integrity/bribery, taking advantage

All business activities must be based on the highest standards of integrity. The supplier must have a zero-tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing the standards shall be applied to ensure compliance with anti-corruption laws. (OECD Guidelines for Multinational Enterprises, Chapter 7)



3 Implementation of the requirements

With regard to supply chains, we expect our suppliers to identify risks within them and to take appropriate action. In the event of a suspicion of violations and to secure supply chains with increased risks, the supplier will inform the company promptly and, if necessary, regularly about the identified violations and risks as well as the measures taken. Compliance with the standards and regulations listed in this document is verified by the company by means of a self-assessment questionnaire and sustainability audits at suppliers' production sites. The Supplier agrees that the Client shall carry out such audits to verify compliance with the Code at the Supplier's premises during normal business hours after reasonable prior notice by persons commissioned by the Supplier. The supplier may object to individual audit measures if these would violate mandatory data protection regulations. Should a violation of the provisions of this Code of Conduct be detected, the Customer shall notify the Supplier in writing within one month and set him a reasonable grace period in order to bring his conduct into line with these regulations. If such a breach was culpably committed and makes a continuation of the contract until ordinary termination unreasonable for the client, the client may terminate the contract after fruitless expiry of the set deadline if he has threatened this when setting the grace period. A statutory right to extraordinary termination without setting a grace period remains unaffected, as does the right to damages.

4 Acknowledgement and consent of the supplier

By signing this document, the supplier undertakes to act responsibly and to comply with the principles/requirements listed. The Supplier undertakes to communicate the content of this Code to the employees, agents and subcontractors in a manner that is understandable for this purpose and to take all necessary precautions for the implementation of the requirements.

Place, Date

Pre- / Surname in block letters and signature

Company name of supplier

