

version 1 2020-10-09	<b>LUKAS-ERZETT</b> <b>Code of Conduct for suppliers</b>	
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LUKAS-ERZETT GmbH & Co.KG is committed to ecologically and socially responsible business conduct and practices in accordance with all applicable laws, rules and regulations. The applicable laws and standards of the respective countries in which we operate are observed. We are guided by the generally applicable ethical values and principles, in particular integrity, righteousness and human dignity.

With this Code of Conduct (CoC) LUKAS-ERZETT communicates its expectations and principles to suppliers. The Code of Conduct, as a third-party commitment, forms the interface between the sustainability values and goals of the own company and the desired behaviour of suppliers. Usually the code of conduct addresses direct suppliers. However, LUKAS-ERZETT can expect direct suppliers to forward the Code of Conduct to sub-suppliers or to demand the implementation of the requirements of sub-suppliers.

**HUMAN AND LABOUR RIGHTS**

**Child labour:** Child labour in any form of exploitation of children and young people is rejected and action must be taken against it. The employment of children or young people below the minimum age in the respective country for taking up employment or below the age prescribed in the respective country for fulfilling compulsory schooling is prohibited.

**Reasonable compensation and working hours:** As a supplier, you agree to comply with all applicable and valid laws regarding working hours, overtime, compensation and social benefits. Overtime is only permitted if it is voluntary and does not exceed 12 hours per week, while employees must be given at least one day off after six consecutive working days.

**No forced labour:** All forms of forced labour, debt bondage, servitude and slave labour or slavery, and conditions similar to these, are rejected. All work must be voluntary, based on local law recognising the employment relationship. Each employee must be provided with a legally binding and comprehensible employment contract in writing.

**Respect for freedom of association and collective bargaining:** Workers have the right to form and join organisations of their choice and to bargain collectively. This must be respected.

**No harassment or discrimination:** Discrimination against employees in any form is not permitted. This applies, for example, to disadvantages due to race, religion, national origin, disability, sexual orientation, gender, age, skin colour, political convictions. The personal dignity, privacy and personal rights of each individual are respected.

**CONFLICT MATERIALS**

We expect our suppliers and business partners to take appropriate measures to avoid using in their products raw materials that are grown and promoted in conflict or high-risk areas (e.g. Democratic Republic of Congo and neighbouring countries) and armed groups that violate human rights.

Conflict materials include columbite-tantalite (coltan), cassiterite (tin), gold, wolframite (tungsten) or their products. However, the definition may be extended to other minerals and their products which, in the opinion of the U.S. Secretary of State, are used to finance armed conflict in affected countries.

**ENVIRONMENT, HEALTH AND SAFETY**

**Health and safety:** In order to protect the health and safety of our employees, we expect that national and international regulations for ensuring health and safety at work are observed. This includes in particular protection against fire, accidents and toxic substances.

**Minimisation of waste and emissions:** We expect that measures are taken to ensure that the environment is treated responsibly. They commit themselves to comply with applicable national environmental laws, regulations and standards, to use environmentally friendly technologies and to minimise various wastes and emissions to soil, water and air.

**Improving energy efficiency:** We expect natural resources to be used sparingly and you will continuously improve the energy efficiency of your operations.

**ETHICS AND LEGAL PROVISIONS**

**Compliance with laws:** We expect compliance with applicable laws and standards of the countries in which you operate. They are based on generally applicable ethical values and principles, in particular integrity, righteousness and human dignity.

**No bribery, corruption or conflicts of interest:** The highest standards of integrity must be applied to all business activities. The supplier must have a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement.

**Fair competition:** You undertake to comply with the applicable competition and antitrust laws.

**Data protection:** You commit yourself to protect private and business information of LUKAS-ERZETT. You also undertake to act in such a way that their misuse, theft or unauthorised disclosure is avoided. All applicable data protection laws must be observed.

**Compliance with trade regulations:** Comply at all times with all applicable trade and import regulations, export control laws and regulations, including sanctions and embargoes.

**Precise documents:** You undertake to keep precise documents about all business transactions with LUKAS-ERZETT.

**MONITORING AND ENFORCEMENT**

LUKAS-ERZETT expects its suppliers and business partners, as well as their employees, to act responsibly, to adhere to this Code of Conduct and to work according to the guidelines and principles contained therein. If third parties (such as subcontractors or representatives) are commissioned by the supplier, we expect that these third parties also work according to the basic principles set out in this code of conduct. If LUKAS-ERZETT is of the opinion that the supplier does not meet the requirements and expectations set out in this Code of Conduct, LUKAS-ERZETT can make recommendations for action in which problems are identified for which corrective or improvement measures are required. In the event of violations of this Code of Conduct it must be ensured that remedial action is taken with a coordinated plan of action and that the requirements of LUKAS-ERZETT are fulfilled within an acceptable time frame. In case of serious violations of this code of conduct, LUKAS-ERZETT reserves the right to terminate the cooperation immediately.

With your signature you confirm that you comply with the requirements of this Supplier Code of Conduct.

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Company

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Place, date

\_\_\_\_\_  
Name, Position