

Code of Conduct of the LÄPPLE Group



Forward

Our market environment is challenging and we have worked hard to gain respect and recognition for our company, our products and our services. We have achieved a great deal and stayed strong in our position in the automotive supply industry. High quality, innovation and integrity are building blocks of our successful approach to maintaining our position and continuing to build trust with customers and other stakeholders.

Our philosophy and approach – in other words, the way we think and act – are crucial to the successful development of our company: This is what our values stand for. They determine our corporate culture and represent our commitment regarding our behavior towards society, our business partners, and each other.

Our values

- Success-oriented (brand value: Reliability)
- Innovative (brand value: Proximity)
- Responsible (brand value: Competence)



As a global company, we are committed to our social responsibility with our Code of Conduct. The Code of Conduct is an essential part of the formal corporate governance policy at LÄPPLE. This code defines the core principles and ethical standards that are the basis for how we work and act in our company and expect our business partners to act in our value chain.

The Code of Conduct was approved by the LÄPPLE Board of Directors and is the foundation for how LÄPPLE does business.

While our strategy defines short-, medium- and long-term goals, the Code of Conduct clarifies how we want to achieve our goals. The Code of Conduct outlines correct behavior in the LÄPPLE Group in different situations and at all employee levels.

This code applies to the entire LÄPPLE Group (including all subsidiaries) and to members of the Board of Directors, managers as well as generally to all LÄPPLE employees and to all those who act on behalf of the company. It contributes to the creation of a solid corporate structure.

This code is also intended to apply to our business partners. We expect our business partners to also commit to these values, to create appropriate due diligence processes and to hold their own suppliers to these standards.

The code defines how we think about our actions and what we should and should not do. This code affects the daily work activities of all our employees and defines how to act in the LÄPPLE Group. It is the personal responsibility of each employee

to comply with the relevant standards. That means we expect all employees to act lawfully in all matters concerning the LÄPPLE Group at all times.

We comply with the applicable laws and regulations. If there are differences between these laws and regulations and the standards set out in our Code of Conduct, the highest standard that complies with relevant local laws applies. We attach particular importance to complying with and protecting human rights, protecting fundamental rights at work, protecting the environment in a sustainable manner and fighting corruption.

Supervisors have additional responsibility in their areas because they must ensure, within the scope of their own role, the creation, supervision and evaluation of an impeccable atmosphere in accordance with the requirements of this code.

Although this code covers all relevant areas of ethical behavior, there will be situations in which this code does not provide explicit guidance. In such situations, acting in the best interest of LÄPPLE and consulting with supervisors about the proper course of action when in doubt is paramount.

Each of our employees makes a valuable and necessary contribution to our continued success. I would like to thank each and every one of you for your continued commitment to doing business our way.

Stephan Itter
CEO
LÄPPLE AG



Who the Code of Conduct applies to

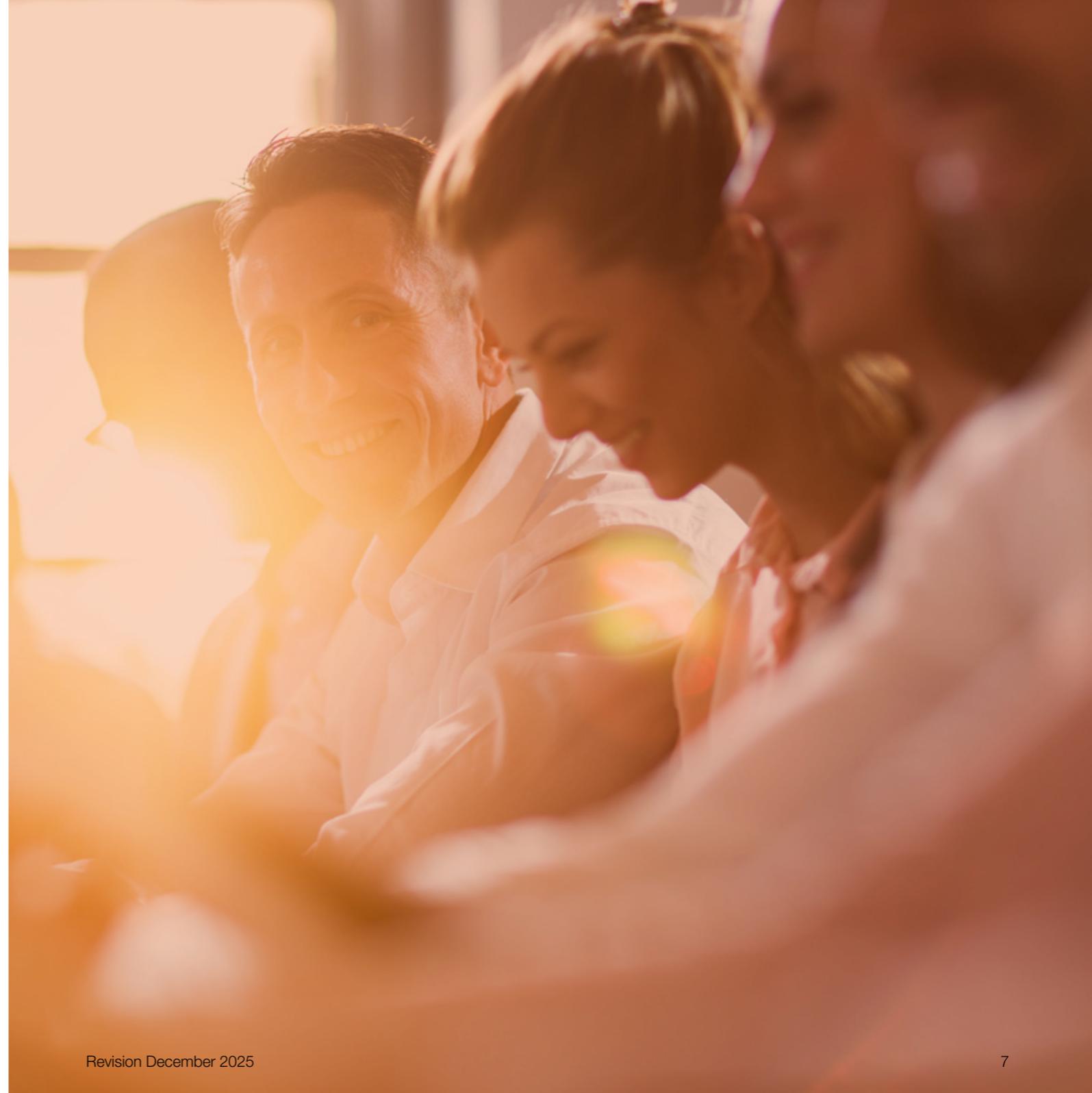
This Code of Conduct is consistent with our policy statement in accordance with the Supply Chain Due Diligence Act (LkSG). Our policy statement describes our commitment to human rights, environmental protection and fair working conditions throughout our supply chain. We expect all employees and business partners to respect the principles of the policy statement and to take them into account in their daily actions and decision-making processes. Together, we contribute to creating an ethical and responsible business environment. For more information on the policy statement and the standards it sets, please refer to the corresponding document, which is available on the Internet.

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Only the masculine form is used in the text for purposes of better readability and without any intent to discriminate. This includes all genders.



1. Code of Conduct

1.1. Combating corruption, bribery and extortion

“We have a zero-tolerance policy when it comes to corruption and bribery“

The foundation of our actions



- We tolerate neither bribery, improper payments nor favors of any kind. Bribery is illegal and exposes the parties involved and LÄPPLE to reputational and legal risk.
- Bribery can take many forms, including payments or kick-back schemes. Gifts, hospitality, donations and sponsorships can also be considered bribery or granting of undue advantages in situations where they result in an organization gaining a commercial advantage.
- Corruption in our supply chain can pose a significant risk for LÄPPLE, even if we are not directly involved.
- The Läpple Group provides monetary donations and donations in kind for science and education, culture and sports as well as for social causes. In line with our social responsibility, we only make donations and provide sponsorship in the framework of applicable legal provisions. We only make donations to institutions that are recognized as charitable or are authorized to accept donations in line with special regulations. In order to ensure that donations are made with transparency, the purpose, recipient of the donation and the donation receipt are documented in writing.

What is expected from all employees



- We never engage in bribery or corruption.
- We never offer, give, demand or accept improper payments or advantages.
- We always report any demand for a bribe or kickback from a third party.
- We never ask anyone to do something that we are not allowed to do ourselves.
- As a matter of principle, no gifts may be provided to civil servants or other public officials.
- We choose our business partners carefully and monitor their commitment to ethical and lawful behavior.
- All employees are required to seek advice and/or assistance from their supervisor or from designated specialists in the company or to use the hotline if they have any suspicions or legal doubts regarding the existence of corruption or white-collar crime. Employees can also contact the works council or the relevant human resources department.

What we have to consider day after day



- Unusual or excessive payments that do not appear to have a clear business purpose.
- If there is suspicion that a business partner is not complying with the LÄPPLE Code of Conduct.
- If we get offers for gifts, trips, donations or extensive hospitality or we are asked to provide them (including cash payments).

1.2. Business partners

“We support fair competition”

The foundation of our actions



- We only do business with partners who demonstrate satisfactory standards of responsible business behavior and ethical values.
- The actions of our business partners can damage our reputation and legally incriminate us.
- Business partners include natural and legal persons with whom LÄPPLE has business relationships (e.g. suppliers, OEMs, other customers, consultants, etc.).
- Our business partners, especially our suppliers, are required to comply with all applicable customs and foreign trade laws and regulations and to fulfill their customs obligations. Our business partners comply with all regulations concerning the transport of goods, technologies, services and information, as well as the fight against terrorist financing.

What is expected from all employees

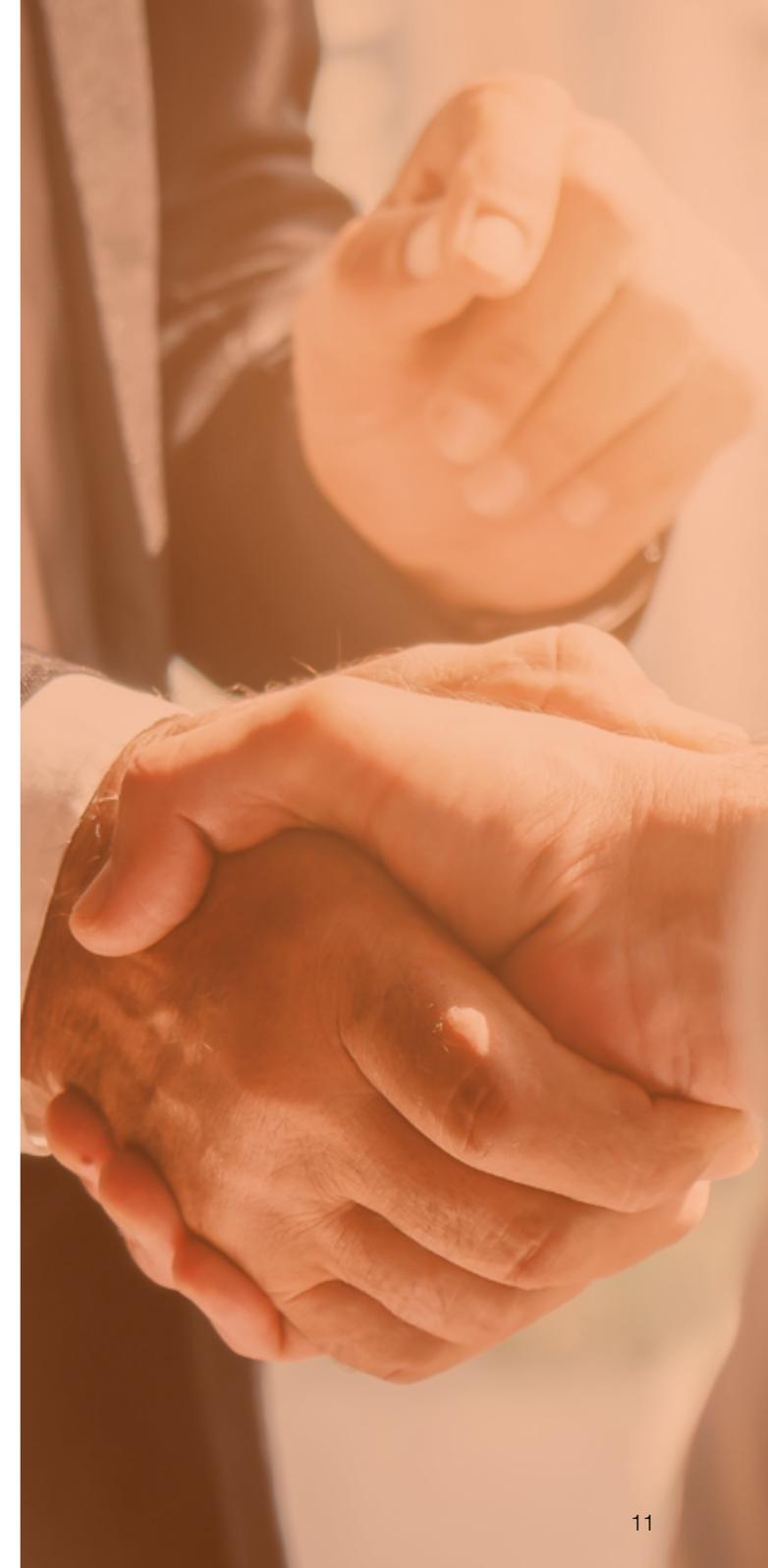


- We are careful when selecting business partners and follow internal company processes, including risk assessments.
- We monitor and support our business partners in conducting their activities in accordance with the LÄPPLE Code of Conduct.
- We treat all business partners with respect and in a fair and transparent manner.
- Agreements with customers and suppliers must be complete and unambiguous. Any subsequent amendments and additions must be documented in writing.
- Suppliers must be selected on a competitive basis after comparing price, quality, performance and suitability of the products or services offered while taking selected ESG criteria into account.
- Commissions and fees paid to contractual partners, representatives or consultants must have close, appropriate and reasonable relation to their activities in line with the dual control principle.

What we have to consider day after day



- If we encounter a business partner who is not fully committed to complying with our standards (including our Code of Conduct for suppliers).
- If we find out that a business partner conducts business in a way that could cast a negative light on LÄPPLE.
- If a business partner has not been properly evaluated and managed in accordance with LÄPPLE requirements.
- If we become aware of other behavior or circumstances that cast doubt on the behavior or ethics of a business partner.
- Employees of the LÄPPLE Group are able, at the request of the customer, to name the places of origin associated with the service provided.



1.3. Climate and environmental protection

“We take measures to minimize our impact on the climate and the environment and to actively contribute to climate protection”

The foundation of our actions



- The Lämple Group commits to complying with the applicable environmental requirements and to continuously improving its environmental performance. We have verification that our employees are trained by the company or a suitable representative in accordance with applicable environmental requirements and in the handling of hazardous substances. We comply with local laws and internationally recognized environmental standards.
- We are committed to minimizing our consumption of resources, including energy, water and raw materials. The Lämple Group undertakes to reduce, optimize, or (where possible) avoid the consumption of natural resources, including water and energy, and the generation of waste of any kind during production.
- As part of our environmental and energy management endeavors, we constantly monitor and improve our environmental performance and energy efficiency. To this end, both key figures as well as greenhouse gas emissions are recorded. Our integrated management system enables us to take targeted measures to advance decarbonization at the LÄPPLE Group.
- The LÄPPLE Group ensures that it obtains all necessary environmental permits and approvals. LÄPPLE continuously monitors and complies with the necessary requirements in order to ensure compliance with the law.
- The Lämple Group undertakes not to cause any harmful changes to the soil, water pollution, air pollution, noise emissions, or excessive water consumption. We take effective measures to prevent environmental pollution and minimize the generation of waste, waste water, and air emissions so as not to significantly impair the natural basis for the production of food or damage human health.
- Wastewater and waste are labeled and treated in accordance with applicable laws and regulations prior to discharge or disposal.

What is expected from all employees



- We are committed to making reasonable efforts to minimize greenhouse gas emissions from our operations.
- We take into account the impact on the climate and the environment when purchasing products and services and evaluate our suppliers in line with responsible business criteria.
- We support sustainable waste management and make reasonable efforts to minimize our waste.
- We are transparent and report how our activities affect the climate and the environment. We report incidents that harm the climate and the environment.
- We undertake to comply with all relevant legal and official regulations regarding biodiversity, land use, and deforestation in all projects and to check/implement them accordingly in our supply chain. LÄPPLE requires its employees to take active responsibility to contribute to animal and species protection in an exemplary manner.

What we have to consider day after day



- If we become aware that we at LÄPPLE and our suppliers are not complying with our requirements on climate and environmental protection.
- If we become aware that relevant environmental regulations or company guidelines are being violated.

1.4. Competition and antitrust law

“We support fair competition”

The foundation of our actions



- Fair competition is important for society and creates lasting business opportunities for the countries in which we operate.
- If we gain or benefit from an unfair advantage, it damages our reputation with our customers, business partners and the public.
- Anti-competitive agreements or practices are not only in conflict with our standards, but are also against the law.

What is expected from all employees



- We define our own pricing and business strategies and are successful on the basis of the quality of our offers.
- We are committed to always complying with competition rules when working with other suppliers and competitors when it comes to individual components for the OEMs and to ensuring that our partnerships are transparent and do not contain any anti-competitive agreements in order to comply with the general principles of fair market practice.
- Employees of the LÄPPLE Group are required to comply with the rules of fair competition and antitrust law within the framework of legal regulations.
- Prohibited activities among competitors include dividing up territories or customers, fixing prices/price components, delivery relationships and their conditions, capacities and bidding behavior, as well as market and investment strategies.

What we have to consider day after day



- The exchange of information regarding necessary product-related information when working with competitors on a joint tender or when working together on individual components is possible in the spirit of compliance with the rules of fair competition, but must be kept to a minimum.
- Agreements or exchanges of information on research and development projects are only permissible in very limited exceptional cases and after consultation with the supervisor.
- The market position of the LÄPPLE Group must not be exploited in an unlawful manner, for example to achieve price discrimination, delivery of unsolicited products or refusal of delivery.
- If actual or potential competitors, customers or business partners approach us and request information on pricing, strategies, business tactics or similar topics.
- If we suspect that formal or informal agreements exist or will be made that restrict our actual or potential competitors' access to customers or related markets.
- If we are invited to participate in informal or social gatherings with actual or potential competitors.

1.5. Confidentiality and handling of information

“Information is valuable data that requires protection”

The foundation of our actions



- As employees of the company, we sometimes come across confidential information concerning LÄPPLE, customers or business partners.
- Confidentiality is crucial for the reputation of LÄPPLE and for safeguarding the integrity of our assets.

What is expected from all employees



- We only disclose confidential information if we are officially authorized to do so and have a legitimate reason.
- We protect confidential information from unauthorized access.
- We promote a culture of knowledge sharing, but take precautions when processing confidential information.
- We treat third-party information with the same level of confidentiality and care as we do our own information.
- We do not discuss sensitive topics in public places.
- Inside information is specific information about circumstances that are not publicly known that investors would consider crucial for their investment decision. Such information must be treated in strict confidence and must not be passed on to third parties. Purchasing or selling securities or recommending their purchase or sale based on inside information is prohibited.

What we have to consider day after day



- If we hear a LÄPPLE employee talking about non-public information in public.
- If a business partner asks us to sign a confidentiality or non-disclosure agreement.
- If we handle sensitive information that requires protection or company documents.
- If someone tries to involve us in discussions about details of our group business.

1.6. Conflicts of interest

“We always act in the interest of LÄPPLE”

The foundation of our actions



- A conflict of interest exists when our personal interests conflict with the interests of LÄPPLE or the impression could be given that they conflict.
- Personal interests include our financial interests, business opportunities, secondary employment or the interests of people close to us, such as close family members, personal friends or business partners.

What is expected from all employees



- We avoid conflicts of interest and other situations that could impair our judgment.
- We withdraw from situations and decisions in which we find ourselves in a potential or perceived conflict of interest.
- We immediately disclose actual, potential and perceived conflicts of interest to our supervisor.
- We work with our supervisors or designated specialists in the company to resolve conflicts of interest and document our decisions and actions.

- Conflicts of interest with private concerns or other economic or further activities, including those of relatives or other close persons or organizations, should be avoided from the beginning. If they do arise, they must be resolved in accordance with the law and the relevant guidelines of the LÄPPLE Group. This also includes secondary employment at companies that compete with LÄPPLE Group companies, as well as a share in or secondary employment at customers and suppliers of the LÄPPLE Group. The prerequisite for this is transparent disclosure of the conflict.
- The LÄPPLE Group welcomes and supports volunteer work by its employees in associations or other organizations, provided that this work does not conflict with the interests of the LÄPPLE Group or interfere with the contractual obligations of the employees. The company must be notified of any secondary employment.

What we have to consider day after day



- If we have a financial or other interest in an existing or potential business partner of LÄPPLE.
- If we have secondary employment or positions that may affect our ability to perform our work for the company.
- If we recruit, hire or directly supervise a family member, friend or person with whom we have a close personal relationship.
- Employees who are directly involved in awarding or processing orders may only use a business partner of the LÄPPLE Group for private purposes with the prior written consent of the respective manager or the Board of Directors. This does not apply to goods or services that are generally offered for sale on the market.

1.7. Financial integrity, proper accounting, and financial reporting

“We comply with all accounting standards and disclosure requirements”

The foundation of our actions



- Financial integrity is key to maintaining the trust of our shareholders, customers, business partners and employees.
- All records created or received as evidence of a business transaction, regardless of format, must fully and accurately reflect the event being documented. Records must be retained in accordance with applicable regulations.

What is expected from all employees

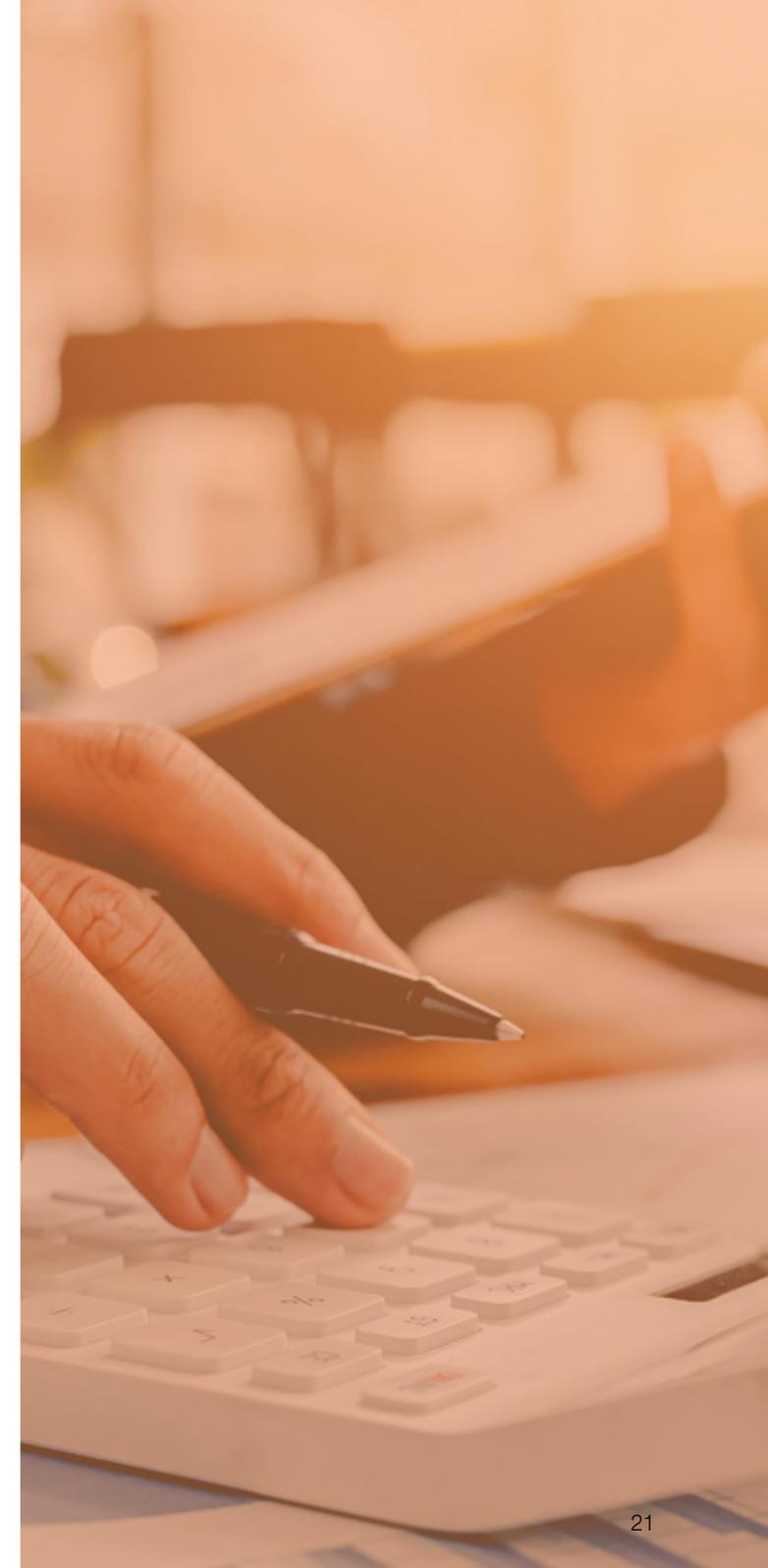


- We follow proper accounting and financial reporting principles, LÄPPLE corporate accounting policies and comply with internal checks executed by LÄPPLE.
- We keep proper records and do not alter any entries in order to conceal or falsify any transactions involved.
- We report accurately, reliably, transparently, consistently and in a timely manner.
- All records created or received as evidence of a business transaction, regardless of format, must fully and accurately reflect the event being documented. Records must be retained in accordance with applicable regulations.
- We ensure that expenses are reasonable and properly recorded when we spend company money.

What we have to consider day after day



- If we become aware of any financial or accounting irregularities.
- If we become aware that a colleague or business partner has falsified records.
- If we are unsure whether we have recorded a transaction accurately.
- If we suspect that an employee is misreporting financial information, including sales results or forecasts.



1.8. Gifts, entertainment and travel

“We do not accept gifts or other courtesies that could be perceived as having an influence on business decisions”

The foundation of our actions



- Business courtesies such as gifts, hospitality and travel can cause a conflict of interest or be considered bribery under certain circumstances.
- In order to avoid not only legal consequences for the LÄPPLE Group and for concerned business partners, but also for themselves, all employees are responsible for educating themselves about the internal guidelines of the LÄPPLE Group in connection with gifts before giving or accepting gifts, or extending or accepting invitations and hospitality.

What is expected from all employees



- We never offer or accept business courtesies that could inappropriately influence, or be perceived as influencing, a business decision.
- We never offer or accept cash, cash equivalents or expensive and extravagant gifts.
- We do not offer or accept gifts, except for promotional items of low value that are typically branded with a company logo and only if it is customary to do so.
- If an employee receives a gift that does not comply with these rules, it must be returned or handed over to LÄPPLE as soon as possible.
- We may offer or accept hospitality if the business purpose is clear and legitimate, the costs are reasonable and the context is open and transparent, but we prefer to cover our own costs.
- We always cover our travel and accommodation costs ourselves, as well as the associated expenses.

What we have to consider day after day



- If business courtesies are offered in sensitive situations, such as on-site negotiations or procurement processes.
- If we learn of business courtesies that have not been disclosed.

1.9. Health, safety, labor protection and product quality

“We provide a safe workplace for our employees and suppliers”

The foundation of our actions



- We are all responsible for providing a healthy, safe and secure workplace for our employees, suppliers and visitors.
- We understand our shared obligation and responsibility to ensure health, safety and well-being in our operations and all along our value chain.
- The Lämple Group undertakes to comply with the applicable health and safety laws and regulations. We provide safe and healthy working conditions for our employees and ensure that measures are in place to prevent fires and accidents and to protect against hazardous substances.
- We train our employees in accordance with the applicable health and safety guidelines and in safety procedures, compliance with which is mandatory and monitored.
- We comply with international and local laws and guidelines on safety and protection of health and strive to meet the highest standards in this regard.

- We label hazardous materials, chemicals and substances and ensure their safe handling, movement, storage, recycling, reuse and disposal.
- LÄPPLE is required to introduce and operate efficient processes as part of its chemicals management. We effectively identify chemicals and other substances that may pose a risk if released into the environment. We reduce use of these identified chemicals and other substances to a minimum. LÄPPLE examines the use of alternative substances with a lower hazard potential.
- LÄPPLE complies with substance restrictions and product safety requirements. We guarantee in particular that our products do not pose any health or environmental risks when used as intended. We undertake to comply with the regulations on prohibited and declarable substances, e.g. RoHS and REACH, and to provide evidence of this.

What is expected from all employees



- We are aware of our working environment, act responsibly and are accountable for our own actions.
- We are proactive in promoting a safety culture and work with our suppliers to identify and mitigate health, safety and security risks.
- We are aware of the potential risks in our workplace and are continuously working to minimize the risks to the health, safety and well-being of our employees and business partners.
- The quality of our services and the safety of our customers are the top priorities of the LÄPPLE Group. That is why it is crucial that all relevant quality control requirements be met. This includes both the applicable legal requirements and provisions as well as internal monitoring processes.

What we have to consider day after day



- If we notice unsafe actions or conditions that could endanger ourselves, our colleagues or suppliers, we are required to report them without delay.
- If we have concerns about the health, safety and well-being of an employee.
- If our policies and requirements are not followed or are not in line with relevant laws.

1.10. Human rights

“We respect and support human rights”

The foundation of our actions



- We are all equally entitled to human and labor rights without discrimination, as set out in international principles, conventions and local laws.
- We are responsible for respecting human rights. Respect for human rights is an essential part of the business activities of LÄPPLE and the way we work. Labor rights are an important part of human rights.
- We reject all forms of forced labor, child labor and slavery. The minimum age for permission to work in accordance with legal regulations is observed in the LÄPPLE Group.
- We comply with national laws and regulations or industry standards with regard to remuneration, working hours, break times, rest days, vacations and paternity or maternity leave.
- LÄPPLE does not support or carry out any unlawful appropriation or forced eviction of land, forests, and water. LÄPPLE safeguards and recognizes the right of the local population (especially ethnic minorities and indigenous people) to use land, forests, and waters as a source of livelihood.

- We respect the rights of local communities to decent living conditions, education, employment, social activities, and the right to free, prior and informed consent (FPIC) on developments that affect them and the land on which they live.
- We pay special attention to transparent documentation of the supply chain for conflict minerals in accordance with EU Regulation 2017/821 and the US Dodd-Frank Act, Section 1502.
- When using private or public security forces to protect operations, it is ensured that those affected are protected from extensive violence, torture, and the violation of freedom of association and freedom of assembly. Respect for internationally recognized human rights by the security forces is ensured at all times.

What is expected from all employees



- We take the necessary measures to ensure that we do not violate the human and labor rights of our colleagues, the employees of our business partners, our customers and all persons affected by our activities, and that we do not participate in the violations of others.
- We report any actual or potential violation of human or labor rights to our supervisors or through other existing outlets (e.g. hotline).

What we have to consider day after day



- If we learn of, become aware of, or suspect a violation of the human rights of our colleagues.
- If an existing or potential business partner refuses to comply with the Code of Conduct for suppliers or is unwilling to cooperate with inspections, audits or other transparency initiatives.



1.11. Money laundering

“We do not accept any type of money laundering”

The foundation of our actions



- Money laundering is the hiding or divesting oneself of the proceeds of a crime.
- Money laundering can take many forms and occur in all types of business and transactions, including banking, investment, invoicing and real estate.
- LÄPPLE Group employees comply with the relevant legal obligations for prevention of money laundering and do not participate in money laundering activities.

What is expected from all employees



- We prevent money laundering by checking and monitoring our business partners in accordance with LÄPPLE processes.
- We question unusual payments or banking agreements and report unusual requests.

What we have to consider day after day



- If payments are made by or through a person who is not a party to the contract.
- If payments are requested or made in a manner other than that agreed in the contract.
- If the payments are made in cash and are not customary in that manner.

1.12. Communication and social media

“We always act responsibly and do not disclose any internal information”

The foundation of our actions



- Only authorized persons may speak on behalf of LÄPPLE, even on social media or other digital platforms.
- Employees are not allowed to publish non-confidential messages, milestones and achievements related to LÄPPLE on their social media accounts.

What is expected from all employees

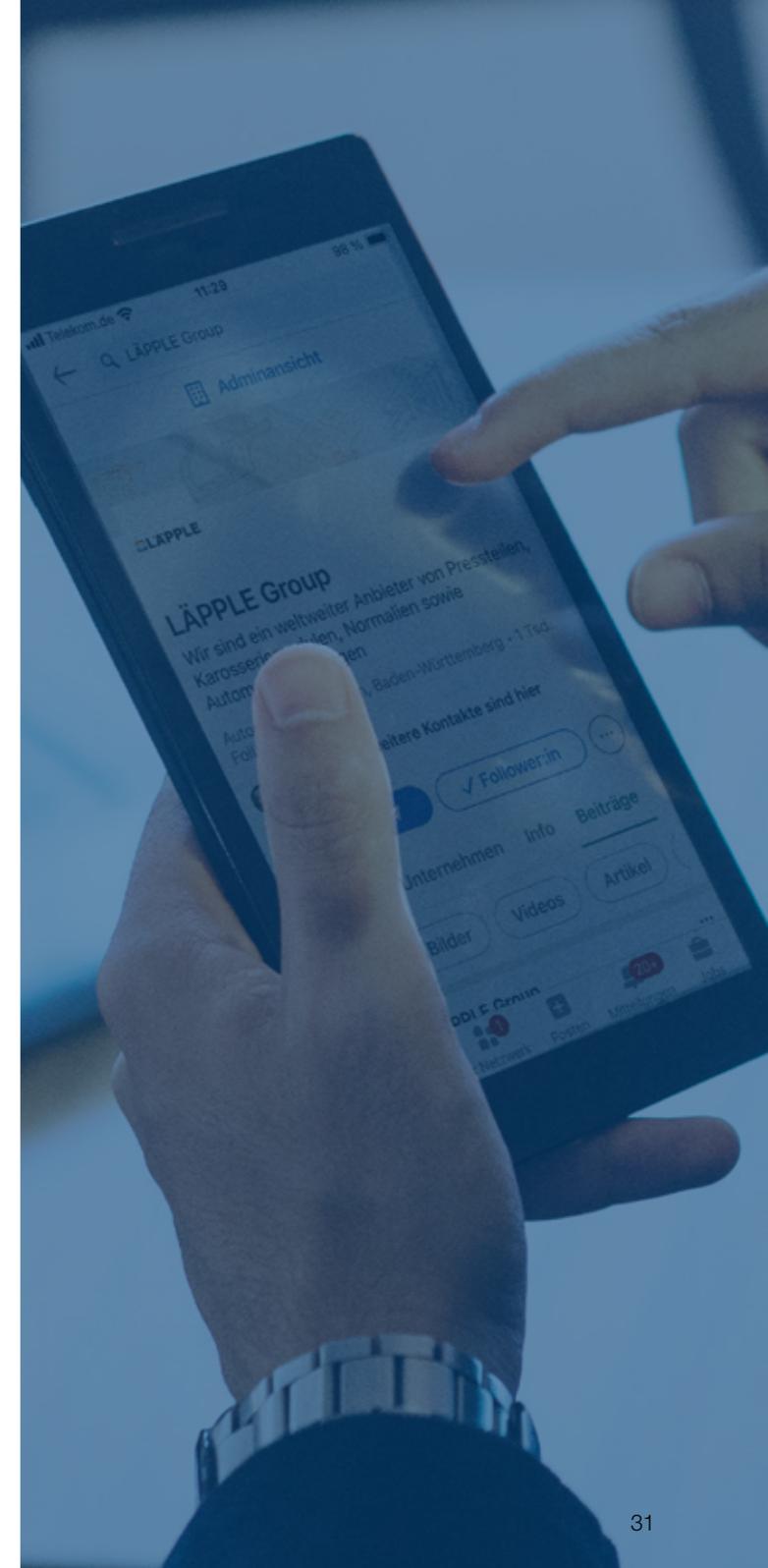


- We do not participate in external discussions on behalf of LÄPPLE, including on social media, unless we have been authorized to do so.
- We forward external questions from journalists/media about LÄPPLE to the communications department and the relevant spokesperson.
- We are aware that LÄPPLE operates in several countries with different values and legal frameworks, which means that local communication can have global effects.

What we have to consider day after day



- If we hear of public discussions in social media or other media platforms that pose a potential risk to the reputation of LÄPPLE.
- If we are concerned that our communication with external sources could reflect negatively on the company.



1.13. Data protection

“We protect all personal data”

The foundation of our actions



- We have access to personal data of our customers and employees and are required to protect it. The protection of confidential, secret and personal data is one of the basic principles of LÄPPLE. The LÄPPLE Group collects, processes and uses personal data only to the extent necessary for defined, explicit and legitimate purposes.
- Personal data includes information about employees, customers and business partners, such as the content of messages, telephone numbers, e-mails, addresses, wages and health information.
- All personal data must be treated with confidentiality.
- The LÄPPLE Group takes state-of-the-art technical and organizational measures to ensure the appropriate level of security for IT systems. To this end, we define minimum requirements for risk management, which include data encryption, risk assessments, and special consideration of the supply chain.
- The LÄPPLE Group ensures that the use of data is transparent for those concerned, and that their rights to information and correction, as well as to objection, blocking and deletion, are protected.

What is expected from all employees



- We only access personal data for specific business purposes and do not pass on any personal data unless disclosure of the data has been authorized or is required by law.
- We ensure that personal data is processed with appropriate access control, security and data protection measures.
- We follow established data protection procedures and processes.

What we have to consider day after day



- If personal data is accessed without authorization, including disclosure of data to third parties without appropriate data protection measures.
- If we collect data about our employees or customers that we would not reasonably expect.

1.14. Protection of our assets

“We respect and protect the tangible and intangible assets of the LÄPPLE Group”

The foundation of our actions



- Our constant efforts to innovate are a key factor in our lasting success in international competition. That is why intellectual property is our top priority.
- Company assets include everything our company owns or uses to conduct its business, including furniture and equipment, facilities, systems and information.
- Protecting company assets is a central task for all of us.
- The management and employees of the LÄPPLE Group observe the applicable laws and regulations, especially on export control, sanctions and customs clearance in all regions and countries. These do not only apply to the movement of goods. They can also have an impact on financial transactions, the use of technologies, purchasing or the hiring of staff, to name some examples.

What is expected from all employees



- We report all security incidents immediately and in compliance with local procedures, laws and regulations.
- We protect company assets against loss, damage, theft, waste and improper use. All of our employees may only use the property of the LÄPPLE Group for business purposes, unless exceptions allow for private use. We expect our employees to treat the property of the LÄPPLE Group responsibly and with appropriate level of care, and to protect it from damage and loss.
- We limit employee and third-party access to company resources to what is required to perform the assigned tasks.
- We protect intellectual property of LÄPPLE in an appropriate manner and respect the intellectual property rights of others. Intellectual property includes, among other things, development results, diagrams, patents, trademarks, designs, trade secrets, samples, models, and other industrial property rights and expertise. LÄPPLE does not buy products which violate the intellectual property rights of third parties (e.g. plagiarism).

What we have to consider day after day



- All of our employees are required to keep confidential any business and trade secrets that have been entrusted to them or otherwise become known to them in the course of their work. They must maintain confidentiality about work and issues (such as development or planning) that are essential for the LÄPPLE Group or its business partners and have not been publicly disclosed.
- All of our employees are required to seek advice and/or assistance from their supervisor or through the responsible departments within the company (customs and export control officers) if they have any suspicions or legal doubts regarding the existence of customs and foreign trade violations.
- If we see people on our premises or trying to enter our premises without authorization or without providing proper identification.
- If our cell phone, laptop or computer is lost, stolen or suddenly behaves differently.
- If we receive suspicious e-mails, messages or phone calls.
- If we discover vulnerabilities in our systems, processes or sites.
- If we purchase, procure, manufacture or place goods or services on the market, or when technologies are transferred or received, as well as in financial transactions. To this end, we check the requirement for official approvals before carrying out the respective action.

1.15. Fairness and respect at the workplace

“We act with respect and dignity”

The foundation of our actions



- All employees, regardless of the place of work, deserve a work environment that is free from harassment, intimidation, discrimination or threats of violence for any reason, including actions based on gender, sexual orientation or identity, ethnic affiliation, disability, national or ethnic origin, religious or cultural beliefs or nationality.
- We promote a work environment in which people are treated honestly and professionally and are valued for their unique ideas and differences. We also fully respect the rights to freedom of association and collective bargaining of our employees.
- Discrimination against employees on the basis of age, physical or mental limitations, ethnic origin, physical appearance, skin color, gender, pregnancy, sexual orientation, nationality, religion, marital status and other characteristics is not tolerated.
- We are committed to diversity and to women's rights to equal employment opportunities and equal pay for equal work. We uphold the same equal opportunities both when looking for new employees and during the employment relationship.

- We correctly inform potential employees about the nature of the work. We do not charge recruitment fees. At the beginning of the hiring process, applicants receive a written employment contract in a language they understand, which clearly states their rights and obligations. The potential employee is free to accept the employment or terminate the employment relationship, subject to reasonable notice.
- We remunerate our employees in line with their position in the company and the services they provide and in compliance with the applicable laws. Performance reviews are conducted on a regular basis.
- We promote professional development and training based on personal performance, individual abilities and personal aptitude.
- One of our core values is promoting a proactive work culture that includes a commitment to the health, safety and well-being of our employees and all those who work for us.

What is expected from all employees



- We respect our employees and treat them how we would like to be treated.
- We do not participate in conversations or send messages of any kind that contain offensive insults, jokes, slurs, stereotyping, blackmail or threats, and we do not show, make or share offensive images, caricatures, drawings or gestures.
- We actively listen to different points of view and evaluate them in a neutral manner.
- We take action against all incidents of harassment or inappropriate behavior and proactively protect our work environment.

What we have to consider day after day



- If we experience, witness or hear about bullying, ridicule or harassment of any kind.
- If we become aware of incidents of harassment, sexual harassment or discrimination of any kind that someone is involved in.



2. How to contact us

Sometimes it takes courage to speak up and share concerns. You can generally use the following reporting channels to do so:

- 1. HR or Compliance department
- 2. Management team
- 3. Board of Directors

If you feel uncomfortable discussing or reporting a problem with your supervisor or with the Compliance department, you can use the hotline at +49 800 3800 999 or the QR code, which is available to all employees, business partners and stakeholders.



The hotline is designed to protect the privacy of persons who report a concern and of persons who are the subject of a reported concern by providing a reporting channel operated by an independent company. All reports are treated confidentially and only a very limited number of people have access to them.

All reported concerns are taken seriously and are subject to fair and objective review. Anyone who violates the law, the Code of Conduct or a LÄPPLE guideline may be subject to disciplinary action, which may lead to termination of employment. Such violations can damage the reputation of LÄPPLE and lead to business losses. Violations of the law can result in fines, penalties, damages and, in some cases, imprisonment for LÄPPLE and even for the individual offenders.

It is important to know that we can all report suspicion of unethical or illegal behavior without fear of retaliation.

This Code of Conduct is published through the internal reporting channels, and managers will inform you about the principles of this Code of Conduct. Regular employee trainings are held on specific topics and hazardous areas, and this is appropriately documented.

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The LÄPPLE Group

