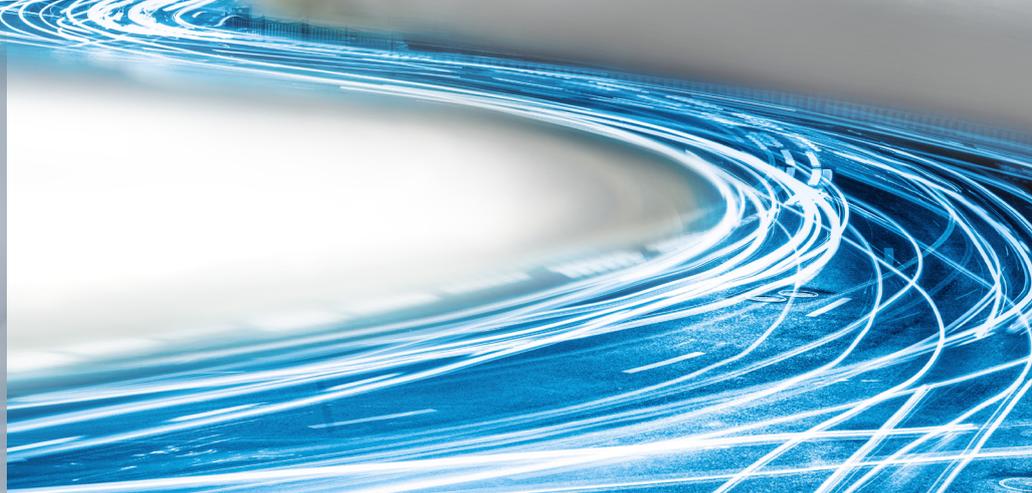


# LEONI *Code of Conduct*

## for Business Partners



### Contact

For questions and concerns, please contact LEONI AG, Ethics, Risk & Compliance, Marienstraße 7, 90402 Nuremberg, Germany, or the Compliance Helpdesk:

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### Preamble

LEONI combines successful business with responsible conduct to sustainably shape the future of the company. In a globalised world with increasingly complex conditions and interactions, this is becoming more and more challenging. For this reason, it is important for LEONI that its suppliers and business partners also commit to environmental and social responsibility, and the Ten Principles of the UN Global Compact.

This LEONI Code of Conduct for Business Partners sets out the fundamental requirements for a business relationship between LEONI and its business partners that is based on integrity and responsibility.

### Compliance with laws

LEONI expects its business partners to comply with all laws and regulations applicable to them within the framework of their business relationship with LEONI.

### Human rights and working conditions

LEONI complies with the UN Universal Declaration of Human Rights and does not tolerate any human rights violations. Business partners undertake to comply with national and international regulations for the protection of human rights, and must ensure that they themselves and their suppliers are not involved in any form of human rights violations.

Child labour is prohibited. Business partners must not allow the employment of children within their own company or at suppliers and business partners at any stage in the supply chain, and must comply with ILO minimum age conventions as a minimum requirement.



Forced labour together with all forms of modern slavery and human trafficking are prohibited. Employment relationships are formed solely on a voluntary basis and can be terminated in compliance with agreed periods of notification.

LEONI expects its business partners to maintain a zero-tolerance policy to any form of discrimination or harassment.

In accordance with applicable national laws and regulations, adequate compensation and working hours must be provided and observed, and employees must enjoy freedom of association and the right to form interest groups in order to represent common purposes and goals.

Business partners must not tolerate or be involved in illegal evictions, or unlawful deprivations or withdrawals in relation to land, forests or waters.

When commissioning or using security personnel, business partners must ensure that such persons are adequately instructed and monitored, and comply with applicable laws and regulations at all times.

As a minimum requirement, business partners must comply with applicable laws or relevant ILO conventions at all times.

### **Occupational safety and health**

As a minimum requirement, business partners confirm the appropriate implementation of all applicable legal requirements for occupational health and safety.

In addition, business partners confirm that occupational health and safety has been implemented in accordance with internationally recognised standards, such as the ISO 45001 standard or ILO conventions.

This includes determining potential hazards and stresses in combination with adequate protective measures. In addition, business partners also apply the principle of continuous improvement in relation to occupational health and safety.

### **Environmental protection and climate action**

LEONI expects its business partners to ensure adequate environmental management and to identify environmental aspects within their sphere of responsibility. Partners are also expected to reduce environmental impacts in their own production processes by means of preventive measures according to the principle of continuous improvement, and to consider environmental aspects in the supply chain and raw material procurement.

Business partners undertake to implement all statutory environmental protection requirements and internationally recognised company environmental protection standards, such as ISO 14001, in an appropriate manner.

LEONI has committed itself to upholding the Paris Agreement and to aligning its emission reduction targets with science-based targets. Business partners are expected to implement measures aimed at reducing their environmental impact. A (non-exhaustive) list of key measures to implement includes the following:

- Reducing greenhouse gas emissions that arise from their own operations and throughout their entire value chain
- Collecting, calculating and analysing relevant greenhouse gas data in accordance with international standards, and providing such data on request
- Increasing energy efficiency and the use of renewable energy
- Improving air quality and emission management
- Supporting waste reduction by methods that include reuse and recycling, and the provisioning of sustainable materials
- Improving water quality and consumption management
- Taking steps to avoid noise emissions
- Preventing harmful soil changes
- Responsible handling of the chemicals used in factories and products



## Responsible raw material procurement and transparency

The trade and extraction of certain raw materials, such as tin, tungsten, tantalum and gold, are increasingly associated with human rights violations and environmental damage.

Business partners undertake to comply with their due diligence obligations in relation to relevant raw materials and to comply with all applicable regulations on conflict minerals, such as section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act as well as the Regulation (EU) 2017/821 (3TG) and applicable regulations connected thereto. In order to identify and minimise sustainability risks, LEONI expects its business partners to introduce due diligence processes and to provide the necessary information along the entire supply chain.

## Prohibited materials

Business partners must comply with all applicable laws and regulations relating to the restriction, registration and, as necessary, the authorisation or reporting of chemicals contained in the final product or production process, insofar as these apply to the relevant market – such as REACH for the European Union.

## Corruption prevention

LEONI is committed to combating all forms of corruption and bribery, and therefore expects its business partners to comply with all anti-corruption and anti-bribery laws and to maintain a zero-tolerance policy towards corruption and bribery in business transactions.

## Conflicts of interest

LEONI and its business partners take steps to ensure that their employees make business decisions solely on the basis of objective considerations. LEONI expects its business partners to refrain from involving employees or third parties in business decisions where they are exposed to a clear conflict of interest. Business partners strive to avoid even the suggestion of considerations that are anything but objective.

## Fair market behaviour

Business partners undertake to respect fair competition, and to comply with competition and antitrust laws. Collusion with competitors and other activities that obstruct a free and fair market are prohibited.

## Handling of information

The exchange and handling of sensitive information is an integral part of any cooperation with business partners. LEONI expects partners to exercise particular care here, and to use appropriate technical and organisational measures to protect such information. In particular, safeguards must be provided for confidential and personal information to ensure it is processed only as intended, and to prevent access by unauthorised third parties.

## Implementation in the supply chain

LEONI expects its business partners to comply with the principles in this document, to agree to a potential audit of such compliance, and to inform the suppliers and business partners in their supply chain of these principles. Compliance with these principles must be required from these suppliers and business partners. The supply chain in this context is understood to mean all of a company's products and services, and therefore all steps in a domestic and international context that are required to manufacture these products and to provide these services.

## Reports and notifications

LEONI actively seeks to prevent any and all types of unlawful or criminal activity within its own sphere of influence. LEONI therefore expects its employees and business partners to report any indications of possible misconduct without undue delay. An electronic reporting channel, the 'Integrity Platform', has been set up for this purpose:

<https://leoni.integrityplatform.org>.

LEONI expects its business partners to have also implemented a process for reporting misconduct within their sphere of influence and to inform LEONI in the event of violations of the provisions of the LEONI Code of Conduct for Business Partners. This notification process serves to uncover individual and structural misconduct, and forms the basis for a constructive dialogue aimed at improving standards in the supply chain.