Code of Conduct for Business Partners

Lindner

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01. Introduction/Preamble

The Lindner Group is committed to ecologically and socially responsible corporate governance. We expect the same behavior from all our business partners. We also expect our employees to observe the principles of ecological, social and ethical behavior and to integrate them into the corporate culture. Furthermore, we strive to continuously optimize our entrepreneurial activities and our products and services in terms of sustainability and ask our business partners to contribute to this in terms of a holistic approach.

For the cooperation, the contractual partners agree on the validity of the following regulations for this Code of Conduct. This agreement shall apply as the basis for all future deliveries and services. The contractual partners undertake to comply with the principles and requirements of the Code of Conduct and to endeavor to contractually oblige their subcontractors to comply with the standards and regulations set out in this document. This agreement becomes effective upon signature. A breach of this Code of Conduct may ultimately be grounds and cause for the company to terminate the business relationship, including all associated supply contracts.

The contents of this code are part of the Lindner Group's basic stance on respecting human rights, which is described in our declaration of principles and is based on the human rights framework contained therein. The declaration of principles is accessible to all employees and can be viewed publicly on our website.

02. Requirements for business partners

02.1 Social responsibility

02.1.1 Exclusion of forced labor

No forced labor, slave labor, or work comparable in this way may be used. All work must be voluntary and without threat of punishment. 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, and humiliation. The hiring or use of security guards must be refrained from if, during their use, persons are treated or injured in an inhumane or degrading manner or if freedom of association is impaired.

02.1.2 Prohibition of child labor

Child labor may not be used in any phase of production or service. The business partners are requested to adhere to the recommendation from the ILO conventions on the minimum age for the employment of children. According to this, the age should not be less than the age at which compulsory schooling ends according to the law of the place of employment and in any case not less than 15 years. If children are found at work, the business partner shall document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers shall be protected and special protective regulations shall be observed.

02.1.3 Fair remuneration

The remuneration for regular working hours and overtime must correspond to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. In any case, the remuneration for overtime must exceed the remuneration for regular hours. Insofar as the remuneration is not sufficient to cover the costs of ordinary living and to build up a minimum level of reserves, the business partner shall be obliged to increase the remuneration accordingly. Employees shall be provided with all benefits prescribed by law. Wage deductions as punitive measures are not permitted. The business partner shall ensure that employees receive clear, detailed and regular written information on the composition of their remuneration.

02.1.4 Fair working time

Working hours must comply with applicable laws or industry standards. Overtime is permitted only if it is performed on a voluntary basis and does not exceed 12 hours per week, while employees must be granted at least one day off after six consecutive working days. Weekly working hours may not regularly exceed 48 hours.

02.1.5 Freedom of association

The right of employees to form and join organizations of their choice and to bargain collectively shall be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative means of independent and free association of employees for the purpose of collective bargaining shall be provided. Employee representatives shall be protected against discrimination. Employees shall not be discriminated against on the grounds of formation, affiliation or membership in such an organization. Their employee representatives shall be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

02.1.6 Prohibition of discrimination

Discrimination, unequal treatment of employees in any form is inadmissible, unless it is justified in the requirements of employment. This applies, for example, to discrimination based on gender, race, caste, national, ethnic or social origin, skin color, disability, health status, political conviction, origin ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

02.1.7 Health protection, safety at work

The business partner 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 arise in connection with the activity. In addition, employees are regularly informed and trained on applicable health and safety standards and measures. Employees are provided with access to drinking water in sufficient quantities and access to clean sanitary facilities.

02.1.8 Preservation of natural resources

The business partner shall not, in violation of legitimate rights, deprive land, forests or waters, the use of which secures the livelihood of persons. The business partner shall refrain from harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this harms the health of persons or biodiversity, significantly impairs the natural basis for the production of food or prevents the access of persons to safe drinking water or sanitary facilities.

02.1.9 Complaint mechanisms

The business partner is responsible at the operational level for establishing an effective grievance mechanism for individuals and communities who may be affected by adverse impacts. The grievance mechanism must be accessible to employees while maintaining confidentiality of identity and effective protection against discrimination.

02.1.10 Dealing with conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the business partner establishes processes in accordance with the Organisation for Economic Cooperation and Development (OECD) Guiding Principles on Due Diligence to Promote Responsible Supply Chains for Minerals from Conflict and High-Risk Areas (CAHRAS under Regulation EU 2017/821).

02.2 Ecological responsibility

02.2.1 Treatment and discharge of industrial wastewater

Wastewater from operations, manufacturing processes, and sanitary facilities should be typed, monitored, inspected, and treated as necessary prior to discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

02.2.2 Dealing with air emission

General emissions from operations (air and noise emissions) as well as greenhouse gas emissions shall be typed, routinely monitored, verified, and treated as necessary prior to their release. The Business Partner is also responsible for monitoring its emission control systems and is required to find economic solutions to minimize any emissions.

02.2.3 Handling waste and hazardous substances

The Business Partner follows a systematic approach to identify, handle, reduce, and responsibly dispose of or recycle solid waste. The prohibitions on the export of hazardous wastes in the Basel Convention of March 22, 1989, as amended, shall be observed. Chemicals or other materials that pose a hazard when released into the environment shall be identified and handled in a manner that ensures safety during their handling, transport, storage, use, recycling or reuse, and disposal. Mercury shall be used in accordance with the prohibitions of the Minimata Convention of October 10, 2013, and persistent organic pollutants in accordance with the Stockholm Convention of May 23, 2001, as amended.

02.2.4 Reduce 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, for example by changing production and maintenance processes or procedures in the company, by using alternative materials, by savings, by recycling or with the help of the reuse of materials.

02.2.5 Dealing with energy

Energy consumption is to be monitored and documented. Economic solutions must be found to improve energy efficiency, minimize energy consumption or to use renewable energies.

02.3 Ethical business conduct

02.3.1 Fair competition

The standards of fair business, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which in particular prohibit agreements and other activities that influence prices or conditions in dealings with competitors. Furthermore, these regulations prohibit agreements between customers and business partners aimed at restricting customers' freedom to determine their prices and other conditions autonomously when reselling. Legal regulations on export controls as well as economic sanctions must be complied with.

02.3.2 Confidentiality/data protection

The business partner undertakes to meet the reasonable expectations of its principal, suppliers, customers, consumers and employees with regard to the protection of private information. The business partner shall comply with data protection and information security laws and government regulations when collecting, storing, processing, transmitting and disclosing personal information.

02.3.3 Intellectual property

Intellectual property rights shall be respected; technology and know-how transfers shall be made in a manner that protects intellectual property rights and customer information. Theft of intellectual property from others is strictly prohibited.

02.3.4 Integrity/Bribery, acceptance of advantages/conflicts of interest

The highest standards of integrity, as well as the principles of proper accounting (financial responsibility) must be applied in all business activities. The Business Partner shall have a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement.

Procedures for monitoring and enforcing standards shall be in place to ensure compliance with anti-corruption laws. The business partner should avoid conflicts of interest by not taking business actions creating incentives for themselves.

03. Implementation of the requirements

We expect our business partners to identify risks within supply chains and to take appropriate measures. In case of suspected violations as well as to safeguard supply chains with increased risks, the business partner will inform Lindner promptly and, if necessary, regularly about the identified violations and risks as well as the measures taken.

The Lindner Group verifies compliance with the standards and regulations listed in this document with the help of a self-assessment questionnaire as well as risk-based audits at production/company locations or operating sites of the business partners.

The business partner agrees that the client may carry out such audits on a regular basis or for specific reasons to verify compliance with the Code during normal business hours after reasonable advance notice by persons appointed by the client and the business partner will disclose operationally relevant information in this context.

The business partner may object to individual audit measures if these would violate mandatory data protection regulations. The business partner may object to individual audit measures if these would violate mandatory data protection regulations.

04. Acknowledgement and consent of the business partner

By signing this document, the business partner undertakes to act responsibly and to comply with the principles/requirements listed. The Business Partner undertakes to communicate the contents of this Code to its employees, agents and partners in a manner that is comprehensible to them and to take all necessary precautions for the implementation of the requirements.

place, date

signature business partner

To simplify readability, the formulations are written exclusively in the masculine form. To simplify readability, the formulations are written exclusively in the masculine form. It goes without saying that m/f/d have equal rights throughout the entire document.