

Code of Conduct – Verhaltenskodex der Luban Präzisionszerspanung GmbH

1 Preamble

The trust of our business partners, customers and the public in the responsible and lawful conduct of all employees is of great importance for the reputation and success of our company. This Code of Conduct illustrates the requirements for our conduct, both externally and internally, in the fulfillment of our tasks. The Code of Conduct takes account of an essential component of the German Supply Chain Duty of Care Act (LkSG).

2 Obligations to protect human rights and the environment as well as basic rules of conduct / complaints mechanism

Luban Präzisionszerspanung GmbH expects that the human rights and environmental protection and basic rules of conduct listed under points 3, 4 and 5 of this Code will not be violated.

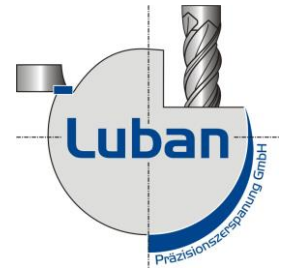
This Code applies to all employees. A breach of the Code of Conduct may result in labor law measures for employees and managers. The company management ensures that the principles and values of this Code are communicated to all employees in an appropriate manner.

Reference is made at this point to our complaints system. At beschwerde@luban-pz.de, every employee and supplier has the opportunity to report violations. This can also be done anonymously for our employees via our info box in the hallway/entrance area or in person. This complaint will be processed by Ms. Luban-Kiewitt or Ms. Bauer. This information is treated in strict confidence. There will be no disadvantages or penalties for the complainant. The management will review the complaint and determine appropriate measures to remedy the violation.

A violation of the Code of Conduct can lead to measures under labor law for all employees, i.e. also for managers. The company management ensures that the principles and ethical values of this Code of Conduct are communicated to all employees of the company in an appropriate manner and on a regular basis.

The Code of Conduct is available for download on the Luban Präzisionszerspanung GmbH website (www.luban-pz.de) in the currently valid version. In addition, it is displayed in paper form in the recreation room or can be printed out and made available for personal use. If you have any questions, please contact Ms. Bauer at any time.

Code of Conduct – Verhaltenskodex der Luban Präzisionszerpannung GmbH



3 Human rights-related protected goods

3.1 Fair working conditions

All employees must be informed about the rights and conditions of their employment (remuneration, working hours, vacation entitlements, etc.). National regulations and laws must be complied with. Appropriate remuneration and statutory social benefits must be paid on time, regularly and in full. Care must also be taken to ensure that employees are not subjected to inhuman or degrading treatment, physical punishment, sexual harassment, psychological or physical coercion, abuse or verbal abuse in the workplace.

3.2 Freedom of association and collective bargaining

The right to form and join trade unions and to bargain collectively in a free and democratic manner must always be respected. Trade unions must be allowed to operate freely and in accordance with the law of the place of employment; this also applies to the right to strike.

3.3 Prohibition of discrimination

Any form of discrimination against employees must be actively prevented. In particular, no one may be discriminated against on the basis of gender, skin color, religion or ideology, age, social background, health, ethnic origin, nationality, membership in labor organizations, political membership/opinion or sexual identity. This also applies to the recruitment, training, promotion and remuneration of employees.

3.4 Prohibition of child labor

The minimum age of a child for admission to employment must be above the age at which compulsory schooling ends. The age of employment may not fall below 15 years unless one of the exceptions recognized by the ILO applies (see ILO Convention No. 138). However, this is also permissible if local law also provides for it.

3.5 Prohibition of forced labor and slavery

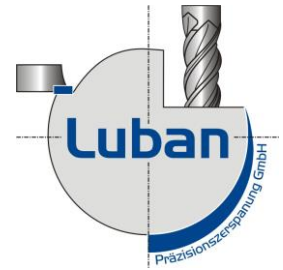
Employment in forced labor is prohibited. This includes any work or service that is demanded of a person under threat of punishment and for which they have not voluntarily made themselves available. All forms of slavery are also prohibited.

3.6 Occupational health and safety

Occupational health and safety obligations must always be complied with. Ensure that appropriate and adequate systems are in place to identify, assess, prevent and control potential risks to the health and safety of employees. Effective measures must be taken to prevent accidents, in particular by

1. adequate safety standards in the provision and maintenance of the workplace and work equipment
2. suitable protective measures to prevent exposure to chemical, physical or biological substances
3. measures to prevent excessive physical or mental fatigue (working hours, rest breaks, etc.)
4. instruction of employees and documentation of these measures.

Code of Conduct – Verhaltenskodex der Luban Präzisionszerpannung GmbH



The minimum requirements also include adequate lighting, temperature control and ventilation, provision of drinking water, adequate sanitary facilities and regular occupational health care. An employee must be appointed to ensure compliance with occupational health and safety obligations.

4. Environmental protection goods

4.1 Consumption of resources, avoidance of environmental pollution

In addition to applicable local environmental laws, international environmental standards must also be complied with.

Negative environmental impacts due to resource and energy consumption, emissions of greenhouse gases and air pollutants, water consumption, land and water spills and waste are to be avoided or reduced as far as possible, biodiversity preserved and the circular economy promoted.

4.2 Dealing with waste

Appropriate measures must be taken to ensure that waste containing persistent organic pollutants is disposed of in an environmentally sound manner in accordance with the POPs Convention (Stockholm Convention). Furthermore, waste must be collected separately and disposed of properly on a regular basis.

4.3 Environmental permits

All necessary environmental permits and approvals must be obtained, kept up to date at all times and complied with.

4.4 Climate protection

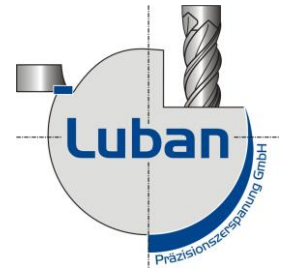
Economic solutions shall be found to improve energy efficiency and minimize energy consumption and greenhouse gas emissions in accordance with the agreed goals of the UN Climate Change Conference in Paris and the Intergovernmental Panel on Climate Change (IPCC). The protection of forests and other valuable ecosystems plays a central role in mitigating climate change and preserving biodiversity.

4.5 Hazardous substances and product safety

Hazardous materials, chemicals and substances must be labeled and their safe handling, storage and disposal must be ensured. All applicable laws and regulations must be strictly adhered to. All employees and especially employees in key positions must receive regular training.

4.6 More environmentally friendly packaging

Where possible, packaging must be avoided, reduced or improved in terms of its environmental impact. Packaging is considered more environmentally friendly if it is reusable, uses as little material as possible and is recyclable.



Code of Conduct – Verhaltenskodex der Luban Präzisionszerpannung GmbH

5 Basic rules of conduct

5.1 Fair competition

The purpose of antitrust law is to ensure free and undistorted competition in the interests of all market participants. In particular, it prohibits agreements between competitors on prices, territory allocation, production volumes and customer groups as well as the abuse of a dominant market position.

5.2 Prohibition of corruption and granting of advantages

Corruption and the granting of advantages are not tolerated. No personal advantages may be demanded, accepted or offered in connection with our business activities. General promotional gifts may be accepted.

5.3 Data protection

The protection of personal data of our customers and employees is strictly observed and adhered to. Unlawful use by unauthorized third parties is prevented.

5.4 Insider knowledge

Insider law prohibits the exploitation of insider information to gain a personal advantage.

5.5 Lawful, complete and truthful accounting and taxes

All entries must be made in full and in accordance with the general accounting regulations. Tax laws must be complied with.

5.6 Protection of company property and business secrets

Company property may only be used for business purposes. Each of us is obliged to protect it from loss, damage or theft.

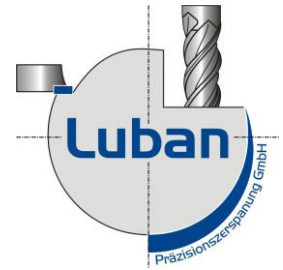
Business secrets and other sensitive information must be treated confidentially and protected from unauthorized access.

5.7 Protection of intellectual property

Everyone is responsible for protecting existing intellectual property, such as know-how, from attacks or loss. This also includes refraining from behavior that could damage the reputation of the company.

5.8 Avoiding conflicts of interest - private activity

A conflict of interest is a situation in which personal interests are incompatible with the interests of the company. These pose a risk to business integrity and should therefore be recognized and avoided. Conflicts of interest must be reported immediately to the line manager.



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6 Business integrity

Our business activities are honest and characterized by ethical and moral principles. Business integrity is fundamental to building and maintaining the trust of our customers, employees, suppliers and public authorities.

We implement this by:

- Acting honestly, fairly and transparently
- Promote a culture of openness in which we respect each other and can say if something doesn't seem right
- Taking responsibility for our actions and decisions

Robert Luban - Managing Director

Signature

Halbe, 26.07.2024