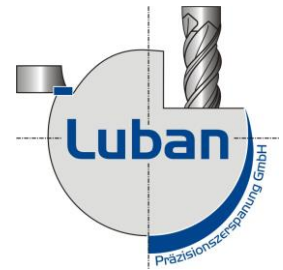


Supplier Code of Conduct – Luban Präzisionszerspanung GmbH



1 Preamble

For more than 60 years, we have been manufacturing for a wide range of industries and offer you complete production of ready-to-install individual and series parts according to drawings or samples with the help of state-of-the-art CNC machine tools. We are the right partner for you, from material procurement to specific machining technologies, including heat or surface treatment, through to finishing and, on request, the creation of quality reports using state-of-the-art Zeiss measuring machines. Luban Präzisionszerspanung GmbH offers precision at the highest level.

With our Code of Conduct, we adhere to principles such as protecting human rights and the environment and observing basic rules of conduct. In the same way, we expect our suppliers to comply with applicable laws and regulations as well as social and environmental values and that these are part of the corporate culture and guiding principles of corporate management. Also along their own supply chains.

By including the Supplier Code of Conduct in the contractual relationships, described in more detail on our orders, we oblige you to ensure environmental, human rights and occupational health and safety requirements as the basis of the joint business relationship and to ensure compliance with them along your supply chain. It is clarified that compliance with the requirements of this Supplier Code of Conduct does not release the supplier from the obligation to fulfill any further requirements that may arise for him from the relevant applicable legal provisions.

The Supplier Code of Conduct is available for download on the Luban Präzisionszerspanung GmbH website (www.luban-pz.de) in the currently valid version.

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

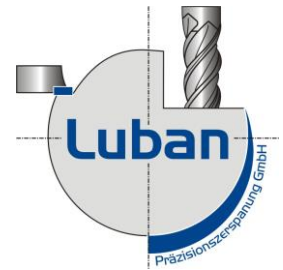
Luban Präzisionszerspanung GmbH expects its suppliers not to violate the human rights and environmental protection obligations and basic rules of conduct listed under points 3, 4 and 5 of this Supplier Code of Conduct. The supplier undertakes to uphold the human rights and environmental protection standards in its own business area and to comply with the requirements. It must inform its employees about the contents of this Supplier Code of Conduct and, if necessary, provide training. The supplier is obliged to report any violations of the rules committed by third parties, sub-suppliers, employees or representatives of Luban Präzisionszerspanung GmbH using the following options:

Anonymously at beschwerde@luban-pz.de. This e-mail will be processed by Ms. Bauer and Ms. Luban-Kiewitt and the sender will be treated confidentially.

Or by post to:

Luban Präzisionszerspanung GmbH
Complaint
Lindenstrasse 2
15757 Halbe

Supplier Code of Conduct – Luban Präzisionszerspanung GmbH



Or by telephone under:
033765-9700 and Ms. Luban-Kiewitt or Ms. Bauer.

The supplier shall inform its employees and suppliers of the availability and anonymous use of the complaints system of Luban Präzisionszerspanung GmbH and request them to pass on the information along the supply chain.

There will be no disadvantages or penalties for the complainant. The management will review the complaint and determine appropriate measures to remedy the violation.

If the supplier violates or is about to violate its obligations under the Supplier Code of Conduct, appropriate remedial action must be taken immediately to ensure fulfillment of its obligations. To prevent or end the violation or to minimize the extent of the violation. To this end, a binding schedule will be drawn up together with Luban Präzisionszerspanung GmbH.

Luban Präzisionszerspanung GmbH may suspend the business relationship until the supplier has ended the breach. If the supplier does not implement the requirements despite a reminder and expiry of a reasonable deadline or refuses to cooperate, the contractual relationship may be terminated by either party for good cause with immediate effect.

The supplier is obliged to indemnify Luban Präzisionszerspanung GmbH against all consequences of violations of this Supplier Code of Conduct for which he is responsible, in particular fines, penalties and claims by third parties or authorities, in addition to the right to compensation.

3 Human rights-related protected goods

3.1 Fair working conditions

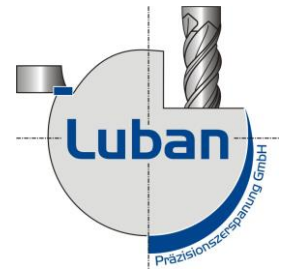
All employees must be informed about the rights and conditions of their employment (remuneration, working hours, vacation entitlements, etc.). National regulations and laws must be complied with. Appropriate remuneration and statutory social benefits must be paid on time, regularly and in full. Care 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.

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.

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. 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.

Supplier Code of Conduct – Luban Präzisionszerpanung GmbH



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.

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