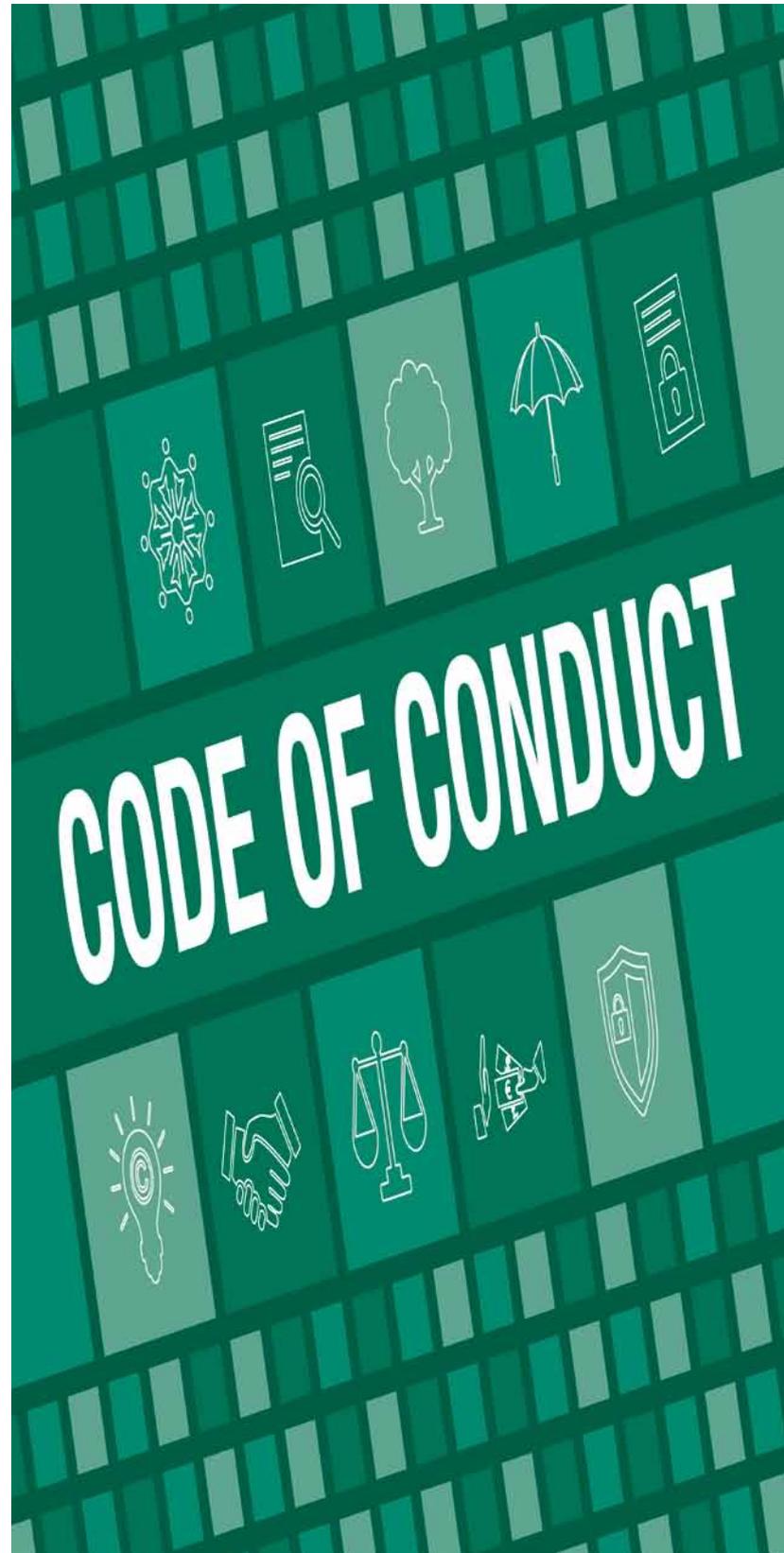


Code of Conduct  
**STAUFF**



Social Responsibility  
and Sustainability



Management Systems /  
Quality Assurance



Environmental Protection  
and Sustainability



Labour Law Principles



Business and  
Trade Secrets



Intellectual and Industrial  
Property Rights



Dealing with our business  
partners\* and third parties



Antitrust Laws



Anti-Bribery and  
Anti-Corruption Policy



IT Security Management  
and Data Protection





**YOUR ACTIONS.  
OUR SUCCESS.  
EVERY DAY.  
FOR EVERY DECISION.**



## LEGAL NOTICE

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## PREFACE AND PRINCIPLES

The Menshen family and LUKAD Holding:

together we stand for commitment, sustainability and reliability. The close association between the family owners and the organisation is reflected in the corporate philosophy.

In 2021, we completely revised our Code of Conduct. In the new version, we give an even clearer definition of the legal and internationally applicable regulations which form the framework for our values and commitments. The Code of Conduct sets out the demands we place on ourselves and the expectations we have of the people we work with. For each and every one of us, the Code of Conduct represents a promise made to our customers\*, suppliers, business

partners\* and other interested parties. We comply with the laws of the countries in which we operate. Every employee\* is responsible for complying with local laws.

This Code should ensure that by rising to meet the highest standards, we can meet the highest demands.

This Code and the values it conveys have been drawn up and formulated in collaboration with our employees\* from various locations and company divisions, in close cooperation with our compliance officers.

This Code reflects our commitment to our Company's values: Responsibility, integrity, adaptability and performance, but above all, esteem and respect for others\*!

We see our commitment to our shared values and the resulting actions as a prerequisite for our international success. Fully integrating this Code into our daily work is crucial for our global success.

This Code provides our customers\* with confidence in our products, our services and our promises. Through our commitment, we ensure that we can be proud of our achievements, safeguarding the perception that we are a responsible company with an international focus.

If you have any questions or comments, please don't hesitate to contact our compliance officers, or the executive board.

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CEO LUKAD Group | CEO STAUFF Group

Lutz Menshen  
Managing Director LUKAD Holding GmbH & Co. KG

Dr. Matthias Papenfuß  
Managing Director | STAUFF Global

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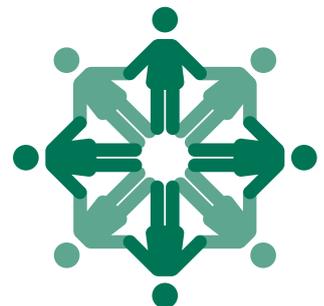
## SOCIAL RESPONSIBILITY AND SUSTAINABILITY

The success of our business is based on the principle of equal opportunities and diversity amongst our workforce. For us, it goes without saying that no one will be discriminated against because of their gender, race, ethnic or cultural background, religion or ideology, disability, age or sexual orientation. Nor will anyone be inhibited, belittled or harassed while exercising their freedom of action or choice.

Awareness of social responsibility is an indispensable element of our value-based corporate governance. We therefore expect our employees\* to live up to this responsibility, and to respect the dignity, the privacy and the personal rights of each and

every individual\*. Violations of this principle of our corporate culture pose a risk to the company's most important success factors, and will therefore not be tolerated.

We are mindful of the fact that our corporate actions have an impact on society and on the environment. We accept this responsibility and we recognise not only the positive but also the negative consequences of our actions when determining the principles for our decision making processes. In doing so, our goal is to continue to minimise any negative impact on society and the environment.





**MANAGEMENT SYSTEMS / QUALITY ASSURANCE**

Our global integrated management system is based on the idea of establishing identical and reproducible processes throughout the entire Group. In this way we guarantee that our customers\* can rely on the same high standards at each of the Group's locations.

Besides being absolutely committed to meeting our customers' needs in all respects, the Stauff Group has always placed a strong focus on complying with quality standards, proactively targeting workplace health and safety, protecting the environment and using energy resources responsibly.

For Stauff, these issues form part of our overall understanding of our corporate culture, and are therefore integral to it. It is only natural, therefore, that we decided early on to focus our endeavours for continual improvement on the systematic development of our management systems. We have already had these partially integrated management systems audited repeatedly by reputable, independent certification bodies. As a result, we have been successfully audited and certified to current standards, such as ISO 9001, ISO 14001, ISO 45001 and ISO 50001, at many of our sites.

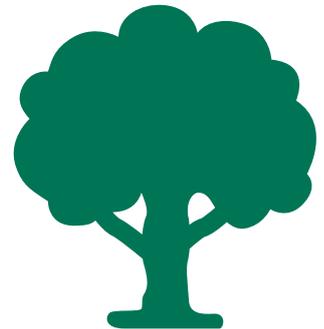




## ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

The standards we demand of ourselves – both as a company and for future generations – aimed at leaving behind an environment worth living in has already resulted in a range of projects being implemented by our employees within the Stauff Group. We will continue to work hard on these improvements going into the future. Of course, these activities do not stop at

our company boundaries. This means that when we are planning products, production plants and the fundamental development of our company, we involve our external partners – customers\*, system partners, suppliers and any other interested parties – very closely as equals.





## LABOUR LAW PRINCIPLES

### a. General

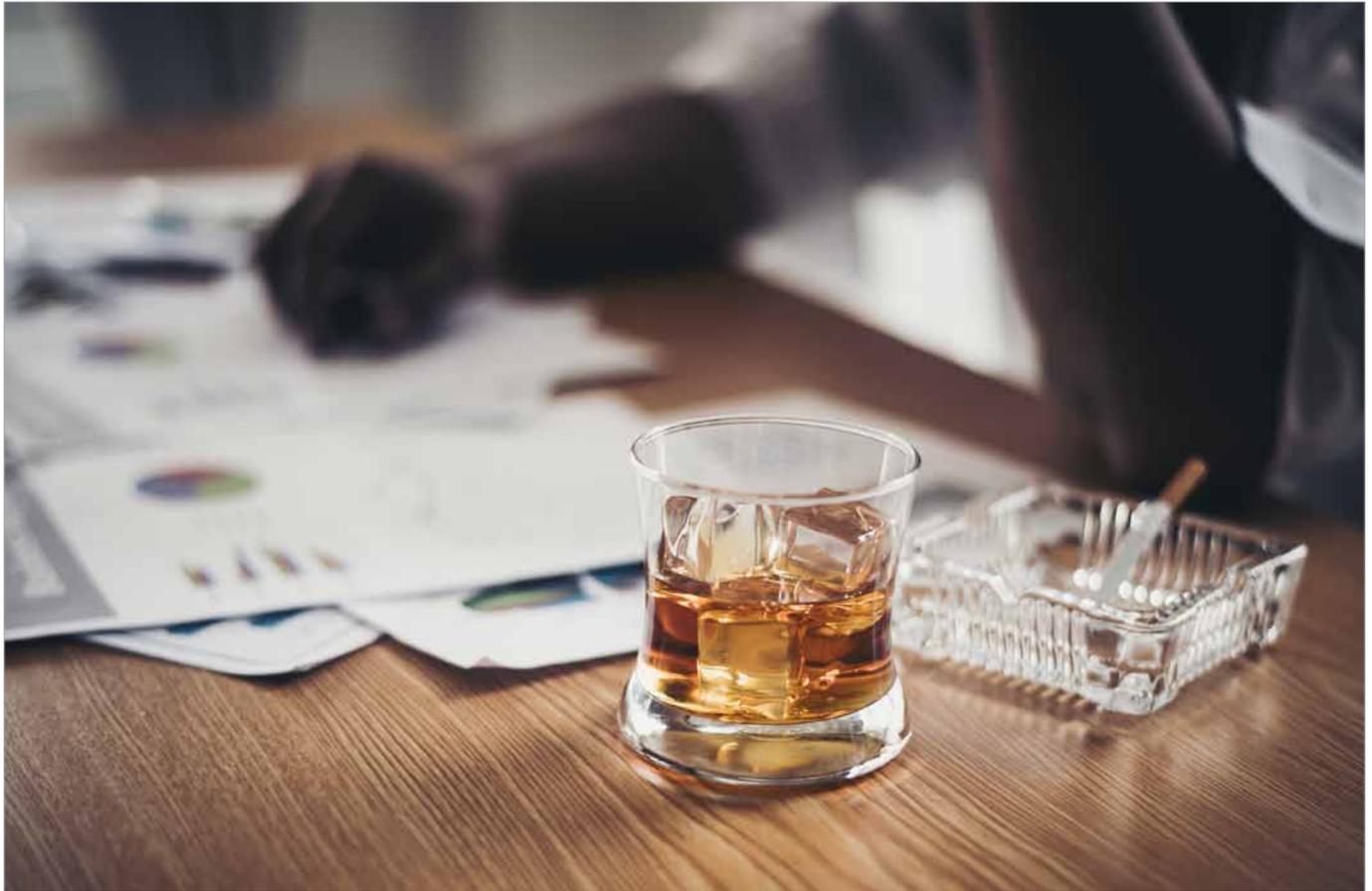
We ensure fair and safe working conditions. We uphold codetermination rights and actively encourage our employees\* to support us in these efforts.

### b. Workplace Health and Safety

We guarantee the implementation of and compliance with applicable health and safety regulations in order to protect the health and safety of our employees\*.

We do not tolerate alcohol or drug abuse. To ensure the safety of all employees\*, staff\* may not be under the influence of substances that negatively impact the performance of their work or their ability to act responsibly. This applies both when starting work and during working hours.





## LABOUR LAW PRINCIPLES

### c. Smoking Ban and Prevention of Addiction

Smoking is strictly prohibited at the Stauff Group's business and factory premises.

Treating addictive disorders poses considerable challenges for the people involved. We have decided that we will actively support the efforts of staff\* who come to us with this issue to treat their addiction by means of therapy. For sufferers

of addictive disorders, it is important that after completing their therapy they are not left on their own, but instead are integrated back into the working community in order to give their lives the security and stability they need to succeed. As a company we see this as our responsibility, and we stand by this responsibility.





## LABOUR LAW PRINCIPLES

### d. Employment of Family Members and Relatives

Our decisions regarding employment and employee development\* are fair and objective. Disclosure of any potential conflict of interest arising from family connections, relationships or close friendships must be made prior to hiring, promotion, transfer or assignment of duties. In these cases, the immediate superior in the reporting line must be involved in the decision making process in order to meet our requirement of fairness and objectivity.

### e. Employment of Foreign Nationals\*

When employing foreign workers, the Company verifies whether the required residence permits and / or visas have been obtained and whether any restrictions on employment – in terms of time or other conditions – imposed by the immigration authorities need to be observed.





## LABOUR LAW PRINCIPLES

### f. Child Labour

The exploitation of children is one of the worst atrocities of our time and is condemned by us in the strongest possible terms. We are expressly committed to the Convention on the Rights of the Child, and with our actions we undertake to eliminate the abhorrent practice of child labour.

If a country imposes national legislation concerning child labour that is more stringent than the United Nations Convention, the Company will comply with this more stringent legislation as a priority.





## LABOUR LAW PRINCIPLES

### g. Forced Labour

Human rights violations in global supply chains can occur in various forms.

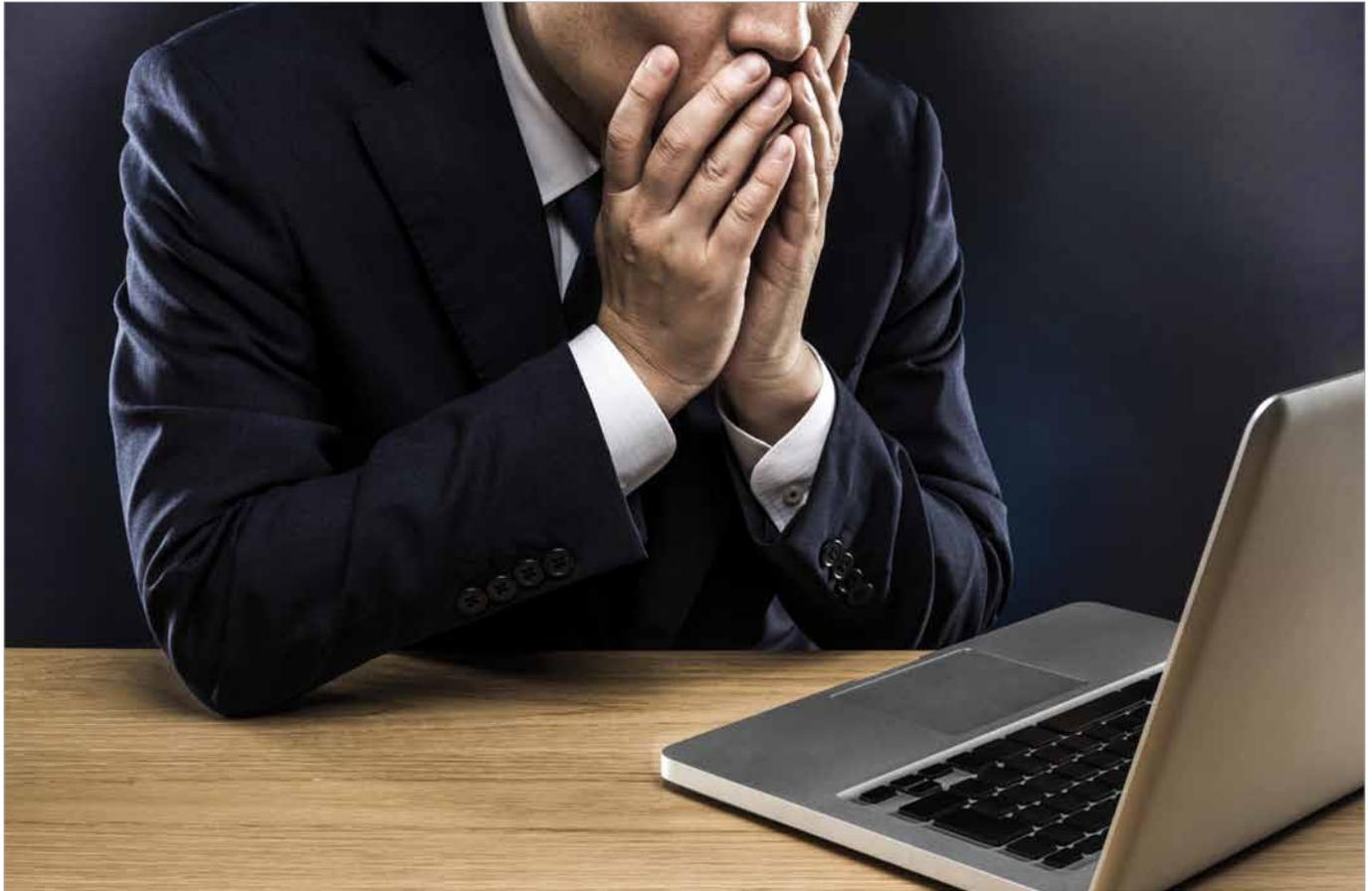
We are also committed to respecting human rights and acknowledging social concerns at our suppliers' premises.

We respect the Convention No. 105 of the International Labour Organization concerning the Abolition of Forced Labour.

This Convention provides that all necessary measures shall be taken to prevent compulsory or forced labour from developing into conditions tantamount to slavery.

Furthermore, the Convention provides for the abolition of slavery, the slave trade, slavery-like institutions and practices, as well as the complete abolition of debt bondage and serfdom.





## BUSINESS AND TRADE SECRETS

We are committed to ensuring the confidentiality of our sensitive information, such as trade and business secrets and confidential internal matters, and we always adhere to this. This commitment also applies to any confidential information concerning our customers\* and business partners\*.

Innovation, technical know-how and our experience form the basis for the development and production of our high-quality

products. In order to ensure our competitive edge, we must protect our innovations and capabilities against plagiarism as best we can.

Sensitive corporate areas are protected against unauthorised access by third parties.





## INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS

We uphold all applicable international copyrights and intellectual / industrial property rights. All relevant and legally applicable regulations, as well as this supplementary code, must be adhered to by our employees\* in order to protect the Company.





## DEALING WITH OUR BUSINESS PARTNERS\* AND THIRD PARTIES

Our dealings with our business partners\* and third parties are based on fairness and openness.

Company staff\* are forbidden to derive personal advantages from business activities. They are not allowed to ask for, accept, offer or grant any inappropriate benefit. There must be no conduct that causes an appearance of inappropriate influence.

Our staff\* are not allowed to accept any promises or offers of benefits, and are forbidden from accepting such benefits, if such conduct gives or might give a business partner\* the impression that our staff\* would thereby be influenced in their decisions.

This statement applies to the preparation, award or settlement of contracts. It is irrelevant whether the person involved is an individual, business partner\* or public official\*.

It is forbidden to demand, accept or be promised rewards or gifts, whether directly or indirectly related to the employment relationship. The only exceptions are if the gift:

- is of the sort generally accepted in business circles (small token gifts)
- does not in any way impact on business decisions or interests

The Compliance Officer\* will advise if any clarification is required. Gifts and invitations offered to employees\* as private individuals (e.g. when a gift, gift voucher, etc. is sent to an employee's home address or is for the employee's\* family) may only be accepted with the agreement of the line manager\* or the Compliance Officer\*. Gifts of cash or gift certificates are strictly prohibited.

Details on how to handle gifts and invitations are also outlined in a separate policy outside of this Code. However, it is considered usual in the normal course of business to pay for or accept occasional business meals. This may even be beneficial for cultivating a business relationship based on friendship and trust.





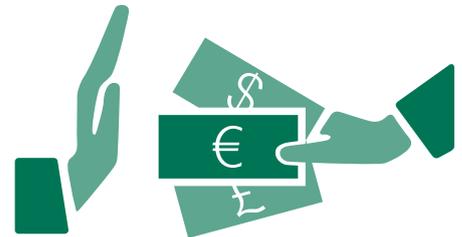
## ANTITRUST LAWS

We are committed to open markets and fair competition in all business dealings. All employees\* are required to comply with applicable antitrust laws.

In particular, the following are prohibited: price fixing; the exchange of sensitive information between competitors;

market sharing in the form of territorial or customer agreements and quotas; boycotts of suppliers or customers\*; abuse of dominance or strong market positions through refusal to supply, cut-throat competition, the obligation to purchase entire product ranges, or discrimination.



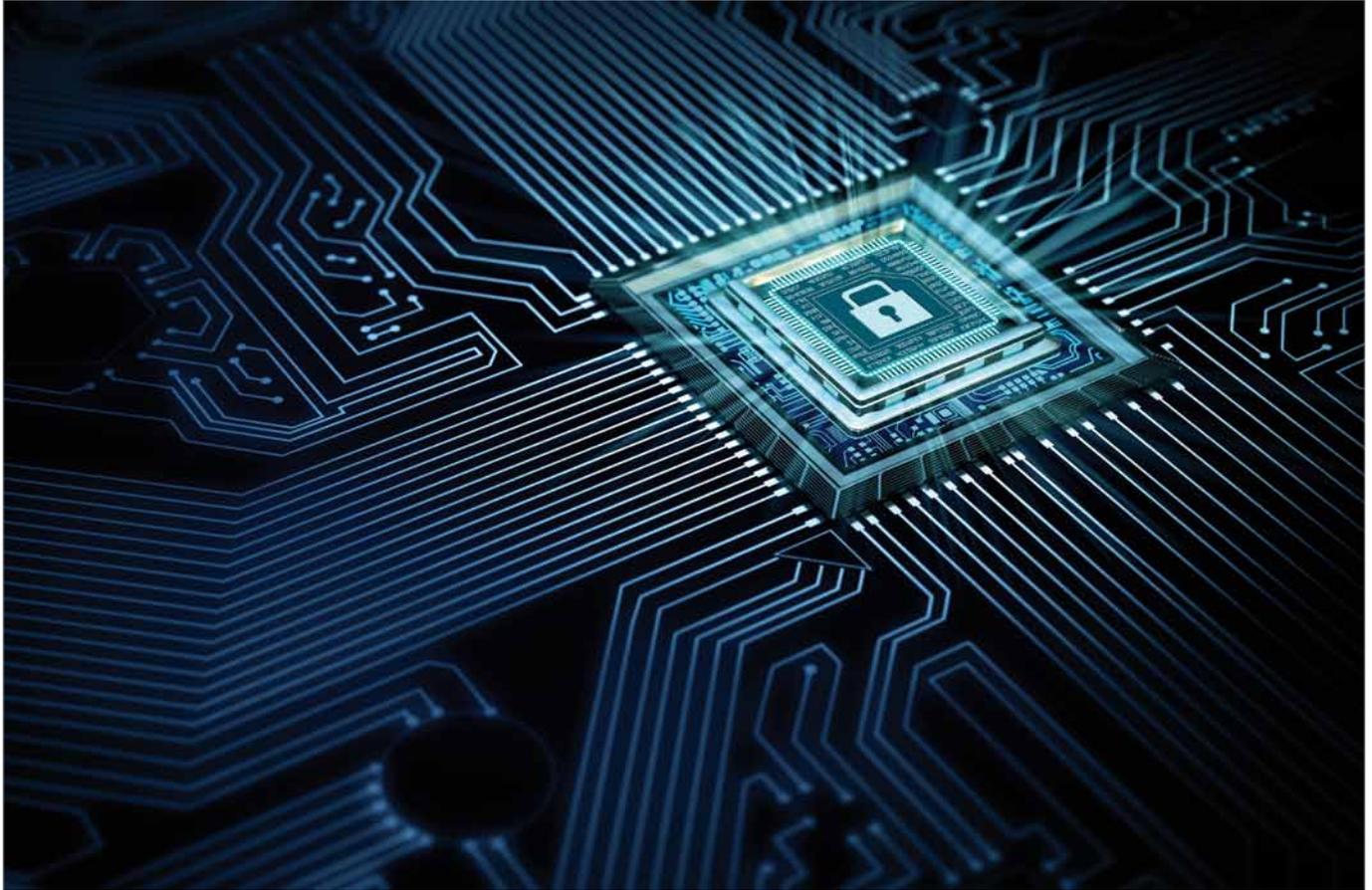


## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

All forms of corruption are strictly prohibited. The Company has established internal processes and procedures designed to identify risks and establish clear standards. These include:

- straightforward and transparent documentation of transactions, including all essential steps in the awarding of contracts
- compliance with this Code, the rules for dealing with gifts and other benefits as well as the works agreements in relation to all business processes
- only suppliers recognised and approved by the Company may be commissioned
- the award procedure is established prior to the selection of a supplier
- no granting of unsecured loans or trade credits to suppliers
- regular monitoring of compliance with the Code through audits
- investigation of violations
- digital archiving of the contracts and documents used in the supplier selection and regular backups of the archive
- scrutiny of tender and costing documentation to ascertain fair pricing, plausibility checks
- examination of the completeness of contract documentation and supplements to contracts (necessity, price, abnormalities, contractual penalty provisions, lump-sum claims for damages, guarantees)
- accounting audits (correct bookkeeping, with statutory audit opinions, transparent expenses and compliance with internal responsibilities)
- awareness-raising and training of employees\*
- guidelines for the preparation and storage of documentation and for authorised signatories
- ongoing reviews
- Completion Reports (reporting)





## IT SECURITY MANAGEMENT AND DATA PROTECTION

Details of IT security and data protection are governed by the corporate Group's IT security guidelines, the email guidelines and the telecommunications guidelines.

These guidelines, which are binding for all employees\* and independent contractors, are supplemented by operating

agreements and individual agreements. Personal data, in particular belonging to employees\*, shall only be collected, stored and used when necessary for specific, explicit and legitimate purposes. Data will always be used only for the purpose for which it was collected.





## THE CODE OF CONDUCT IN PRACTICE

The Company has appointed Compliance Officers from whom employees\* can seek advice or to whom employees can report violations of this Code. Employees\* are encouraged to seek help immediately where needed, and, in their own interests, to report any violations they may identify. The employee's\* supervisor\* or a manager\* can advise the employee or refer them to the appropriate person.

In addition, our compliance policies and principles will be made available to all employees\*. The information and

training material relating to these policies is available to all employees,\* and can also be retrieved from their respective supervisors\*.

Notifications/reports of irregularities, suggestions and feedback to improve or optimise the Code/regulations and /or information/notification of a suspected violation of laws /regulations and our internal Code of Conduct can be communicated via the usual channels. To do this, send an email to the following address: [compliance@stauff.com](mailto:compliance@stauff.com)

Every employee\* reporting a violation has the fundamental right to remain anonymous! Information can also be sent informally to the Compliance Officer\*. Every employee\* is also free to contact their supervisor or the Human Resources Department.

All incoming messages will be checked in due course and will be kept confidential. Retributory actions against whistleblowers\* for reporting violations are prohibited, provided that the whistleblowers have not acted illegally.



## FINAL REMARKS

Through our personal actions and the choices we make every day in our workplace, we all take responsibility for compliance with this Code, thus ensuring the ongoing business success of the Company, the preservation of jobs and the future of the Company.



## WHAT THE ASTERISKS \* MEAN

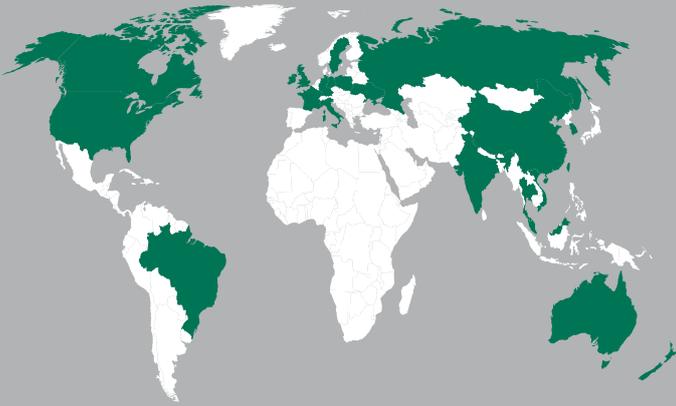
Note on the use of individual gender-specific designations

For reasons of simplified readability, we refrain from using individual gender-specific designations in media and documents that are printed or published in digital form. Of course, all designations always apply equally to all sexes and gender identities. We are committed to equal opportunities and diversity. No one will be discriminated against because of his

or her gender, race, ethnic or cultural origin, religion or belief, disability, age or sexual orientation. Nor will anyone's freedom of action or choice be impaired, degraded or disturbed.

We expect all employees\* and external partners to respect the dignity, privacy and personal rights of each and every one\* of us.





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STAUFF products and services are available globally through wholly-owned subsidiaries and a tight network of authorised distributors and representatives in all major industrial regions of the world.

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