

# CODE OF CONDUCT

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

## Imprint

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## Preamble

The name of LUKAD Holding (the “Company”) derives from the names of its Menshen family owners as follows:

L (Lutz), U (Ursula), K (Knut), A (Arnold) and D (Dorle).

We stand for commitment, sustainability and reliability. The close relationship between the family owners and the Company is evident in the Company’s philosophy.

This Code of Conduct (this “Code”) summarizes the common values which guide the Company. It defines the principles which we implement in our daily work life and sets binding targets that determine our actions. This Code serves as a standard for ourselves and a promise from each of us to our customers, suppliers and business partners.

We are committed to the laws of the countries in which we operate. Each and every employee is responsible for complying with local laws.

This Code helps us satisfy the highest requirements and maintain the highest standards.

This Code and the Company’s common values have been created and formulated in collaboration with our employees from the various locations and divisions, as well as the employee representatives and in close cooperation with our compliance officers.

This Code reflects our commitment to our Company’s values: responsibility, integrity, ability to transform and perform, but above all, appreciation of and respect for everyone.

We see our commitment to our shared values and the resulting actions as a prerequisite for our international success. The full integration of this Code is crucial for our global success.

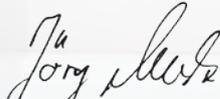
This Code provides our customers with confidence in our products, our services and our promises. Through our commitment, we can be proud of our achievements and our market’s perception as a responsible and internationally-oriented company.

We ask companies who work on behalf of the LUKAD Group and its subsidiaries to commit themselves to comply with this Code and its related policies as well.

Our managers are role models. Their task is to monitor and ensure compliance with this Code.



Lutz Menshen  
Shareholder



Jörg Deutz  
CEO LUKAD Group



Dr. Matthias Papenfuß  
General Manager STAUFF Group



Helmut Ahrens  
Managing Director Walter  
Stauffenberg GmbH & Co. KG



Monika Nork-Bobel  
Chief Compliance Officer



Our group is certified according to DIN EN ISO 9001, DIN EN ISO 14001 and OHSAS 18001.

Our clearly defined global organizational structures and processes ensure transparency, consistency and accountability in our collective global activities. With the method “Plan - Do - Check - Act”, we ensure that our high quality standards and management systems are continuously improved. Our national and international development consistently brings us forward into the future. In close dialogue with all stakeholders, we strive to exceed the expectations of our customers and the demands of tomorrow.



# MANAGEMENT SYSTEMS - QUALITY MANAGEMENT

Environmentally friendly and energy-efficient operation is a fundamental principle of the Company. Active environmental protection, prudent resource use and environmentally oriented product and application strategy are part of this responsibility. To meet these objectives, we apply the environmental management system DIN EN ISO 14001 and implemented the energy management system according to DIN EN ISO 50001.

# ENVIRONMENTAL PROTECTION / ENERGY MANAGEMENT SYSTEM

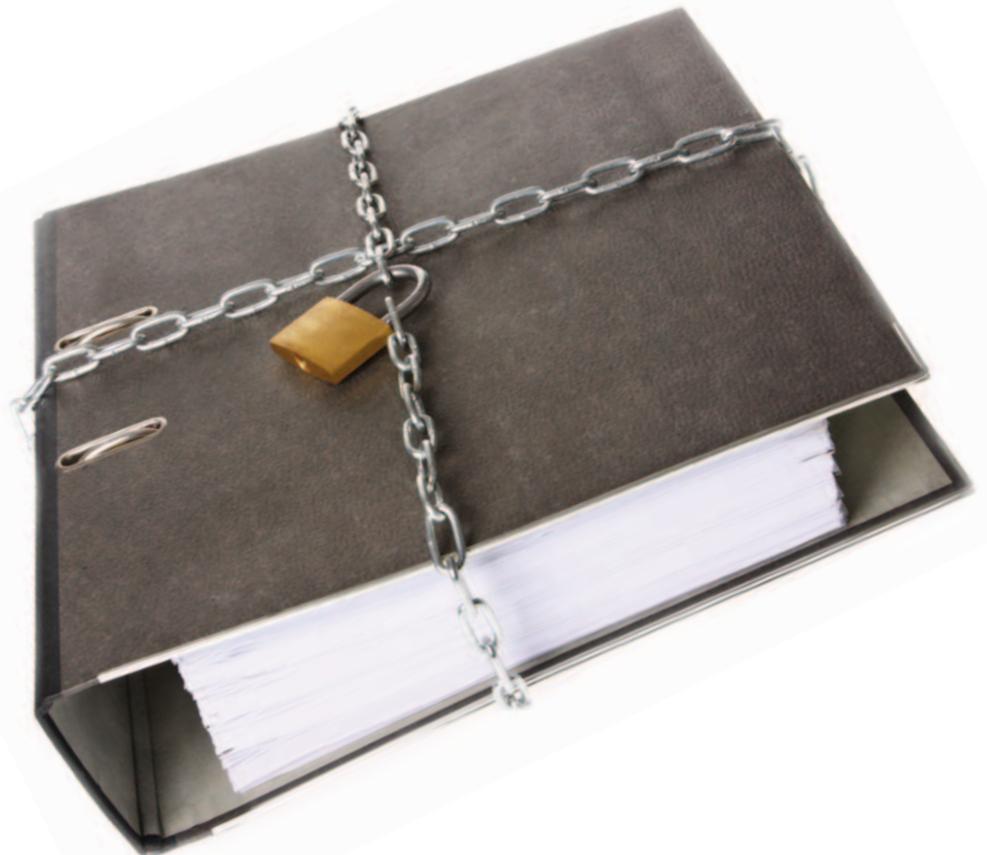


We are committed to ensuring the confidentiality of our sensitive information, such as trade and business secrets and confidential internal affairs. This also applies to any confidential information about our customers and business partners.

Innovation, technical know-how and our experience are 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 imitation.

All production methods are to be protected against access by third parties.

# BUSINESS AND TRADE SECRETS





# COPYRIGHT AND INTELLECTUAL PROPERTY RIGHTS

We uphold all applicable copyright and intellectual property rights. All relevant laws and this Code must be respected and adhered to by our employees in order to protect the Company.

## a. General

We ensure fair and safe working conditions. We respect the rights of workers' participation.

## b. Occupational 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. Therefore, STAUFF is certified according to OHSAS 18001.

The Company does not tolerate alcohol or drug abuse. Employees must not be under the influence of any substance which could endanger their own safety or performance, or that of their colleagues, during working hours.

# LABOR LAW PRINCIPLES



# LABOR LAW PRINCIPLES



## c. Smoking and Addiction Prevention

Smoking is not allowed in the workplace.

In addition, the human resources department will offer a prevention program with all of the necessary measures to provide advice and support related to addiction therapy. The goal of this program is the prevention of addiction and the promotion of individual well-being.

#### d. Employment of Family Members and Relatives

Our decisions regarding employment and employee development are fair and objective. All potential conflicts of interest through family connection, kinship or close friendship must be notified prior to hiring, promotion, transfer or assignment.



## e. Employment of Foreigners

When employing foreign workers, the Company verifies whether the required residence permits and/or visas have been obtained and whether substantive or temporal restrictions on employment must be considered by the immigration authorities.



## f. Child Labor

We comply with the provisions of the United Nations Convention on the Rights of the Child. We are especially committed to compliance with the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor.

If a country imposes national legislation concerning child labor that is stricter than that outlined by the United Nations, the Company will note this as a priority.



LABOR LAW PRINCIPLES

## g. Forced Labor

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

We undertake efforts to work with suppliers who demonstrate respect for human rights and acknowledge social aspects in the country of origin of the products.

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

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

# DEALING WITH BUSINESS PARTNERS AND THIRD PARTIES



Dealing with our business partners and third parties is characterized by fairness and openness.

Employees of our Company are not allowed to aim for personal benefits in connection with their business activity. They are not allowed to ask, accept, offer or grant any inappropriate benefit. The appearance of inappropriate influence must not be caused.

This statement applies to the preparation, award or settlement of a contract. It is irrelevant whether the grantor or recipient 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 type commonly usual in commercial transactions (i. e. small tokens)
- Worth less than 40 Euro
- Excluded from any business decisions and interests

All gifts and / or benefits must be reported to a supervisor, even if such a gift falls within those outlined above. The compliance officer shall advise as to the appropriateness of a gift if there is ever any doubt. Gifts and entertainment that are personal in nature (e. g. if a gift certificate is sent to an employee's home address or is directed to the employee's family), may be neither granted nor accepted. Gifts of cash or gift certificates are strictly prohibited. The details of the treatment and handling of gifts and invitations are also outlined outside of this Code in a separate policy.

However, it is considered in the normal course of business to pay for or accept occasional business meals, and they are even beneficial for the cultivation of a business relationship based on friendship and trust.



# ANTITRUST

We are committed to open markets and fair competition. 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, cutthroat competition, the obligation to purchase entire product ranges, or discrimination.

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

- Straightforward and transparent documentation of transactions, including all major procurement steps.
- Compliance with this Code, the rules for dealing with gifts and other benefits, as well as the operating agreements for all transactions.
- Suppliers must be recognized and approved by the Company.
- The award procedure is set before the selection of suppliers.
- No assignment of unsecured loans or trade credit to suppliers.
- Regular monitoring of compliance with the Code by audits.
- Tracking of violations.
- Digital archiving of contracts and documents for supplier selection and regular backups of the archive.

# PREVENTION OF CORRUPTION

- Examination of tender and calculation documents for adequacy of prices, plausibility check.
- Examination of the completeness of contract documentation and supplements to contracts (necessity, price, abnormalities, penalties regime, liquidated damages, guarantees, etc.).
- Audit (correct treatment, with audit opinions, measurement, clear expenses and compliance with internal responsibilities).
- Awareness-raising and training of employees.
- Guidelines for the preparation and storage of documentation and signature authority.
- On-going review.
- Completion Reports (Reporting).



# IT SECURITY AND DATA PROTECTION



The details of IT security and data protection are governed by the IT security policy, the e-mail policy and telecommunications policy of the Company.

Operating and individual agreements supplement these guidelines, which are binding upon all employees and independent contractors. Personal data 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.



We are committed to equal opportunity 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 action or freedom of choice be impaired, degraded or disturbed.

We expect all employees to respect the dignity, privacy and personal rights of each individual. Violations will not be tolerated.



# SOCIAL RESPONSIBILITY



# REPORTING OF VIOLATIONS



The Company has an appointed Compliance Officer, from whom employees can seek advice or to whom employees can report violations of this Code. Employees are encouraged to immediately seek help as needed and to report any identified violation. Any supervisor or manager can advise employees or refer them to the appropriate person.

In addition, our compliance policies and principles will be made available to all employees and can also be retrieved from all supervisors.

Information about violations can also be reported by sending an e-mail 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 his or her supervisor or the Human Resources Department.

All incoming messages will be checked in due course and kept confidential.

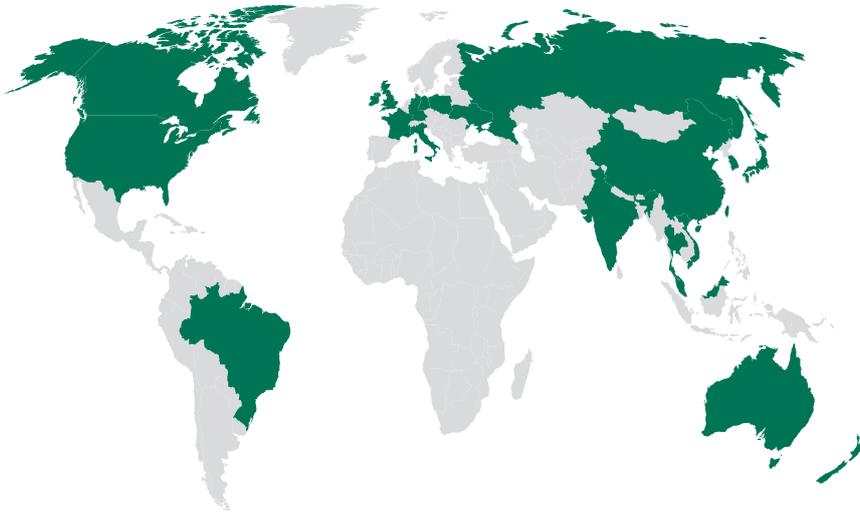
Retributory actions against whistleblowers for reporting violations are prohibited. This applies even if a reported violation is proven to be inaccurate, as long as such reporting was in good faith.

## Closing 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 sustainable business success of the Company, the preservation of jobs and the future of the Company.



Local Solutions For Individual Customers Worldwide



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