

Lenze Guideline

Code of Conduct

Internal Lenze Document

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Version: 4.0

Code of Conduct

OID: 14255

Date: 2022/12/15

Creation: Küppers, Dr Kathrin

Release: Schiefke, Dr Almuth

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1 Aim and Purpose

Our business partners¹, employees, managers, the owner family and the society expect our company and us to act **responsibly and lawfully** in every respect. Each individual employee and each individual manager of Lenze SE and subsidiaries ("Lenze Group") is obliged to live up to this expectation. This means that all actions are to be aligned at all times with existing legal standards, and violations of the law are to be strictly avoided.

This Code of Conduct offers a **frame of reference** intended to help us uphold our responsibility. It codifies the basic requirements for legally compliant and ethical behaviour of employees and managers of the Lenze Group. The Code of Conduct does not seek to answer in detail all questions that confront us in our daily work. It represents the self-conception of the Lenze Group and is supplemented by relevant laws and internal guidelines and instructions.

Please note in this context that laws applicable in each case (also in other legal systems) take precedence over the principles spelled out in this Code of Conduct, to the extent that legal regulations establish stricter **behavioural requirements**.

2 Scope of Application

This Code of Conduct is valid for all employees, managers and managing directors ("employees and managers") of the Lenze Group.

3 Behavioural Requirements

Described below are the requirements that the Executive Board of Lenze SE places on employees and managers of the Lenze Group.

3.1 Basic Behavioural Requirements

The Code of Conduct and the behavioural requirements associated with it are not intended to leave to the compliance structures of the company the responsibility for acting or refraining from acting with respect to legality. The Lenze Group builds on a strong **corporate culture** in which reliability, personal responsibility and integrity play an important role. Every employee and every manager is obliged within his respective **area of responsibility** to uphold existing laws, rules and internal instructions, and to stay informed of these matters on a regular basis.

3.2 Prohibition of Corruption and Bribery

Corruption and bribery prevent "fair play" and do not conform to the company values of the Lenze Group, which stands for **openness and transparency**.

That is why the Executive Board of Lenze SE tolerates **no corruption and bribery**. In connection with business activities of any kind, no employee and no manager is allowed within the scope of work behaviour to use his own position or function and the latitude associated with it to unlawfully demand, allow himself to be promised or to accept personal gains for himself or for third parties.

Internal corporate rules are to be complied with in respect to offering, promising or granting benefits to third parties, as well as donations and sponsorship.

¹ For reasons of better legibility, we have limited the wording to male designations (business partners, employees, superiors, job titles, etc.).

In addition, and to provide greater detail, the Lenze Guideline "[Anti-Corruption](#)" shall apply.

3.3 Combating Money Laundering

The Lenze Group places value on cooperation with respectable business partners who operate within the scope of legal rules and do not use any illegal financial means. The Executive Board of the Lenze Group expects that employees and managers of the Lenze Group shall comply with respective **laws against money laundering** and to immediately report any suspicious facts indicating money laundering to the local individual responsible for bookkeeping and to the Compliance Officer.

3.4 Behaviour towards Competitors

The Lenze Group is committed to free and fair competition as a cornerstone of our corporate activities and follows the national and international regulations of **competition and anti-cartel law**. The company rejects prohibited arrangements on pricing or conditions, arrangements with competitors concerning non-competition, and the submission of fake proposals or arrangements for the purpose of dividing up customers, territories, product lines or capacities. This also applies to informal discussions, so-called "gentlemen's agreements" or "concerted actions" intended to restrict or actually restricting competition. These rules are to be taken into account by employees and managers of the Lenze Group and in association work.

In addition, and to provide greater detail, the Lenze Guideline "[Anti-Cartel](#)" shall apply.

3.5 Avoidance of Conflicts of Interest

If situations arise in daily business in which a best-possible decision for the company stands in conflict to personal interests, whether they be of a professional, private or financial nature, this represents a conflict of interest. Conflicts of interest can lead to, or create the appearance of decisions no longer being taken in an unbiased manner in the interest of the company. All employees and managers of the Lenze Group are therefore obliged to avoid actual or possible **conflicts of interest**, to disclose them within the scope of the duties specified in their appointment agreement and to bring about an expedient clarification.

In addition, and to provide greater detail, the Lenze Guideline "[Anti-Corruption](#)" shall apply.

3.6 Foreign Trade Law and Export Controls

As a company operating internationally, the Lenze Group is committed to the legal standards of national and international law relevant to **export controls**. Employees and managers are expected to adhere to approval requirements within the scope of exporting our products and to observe the export and support prohibitions relevant in each case. The **customs regulations** relevant in each case are to be complied with in both the exporting and importing of goods.

3.7 Equal Treatment

The Lenze Group is consciously committed to **individual and cultural diversity**. Behaviour that is fair and in a spirit of partnership is expected of all employees and managers when dealing with one another and towards third parties. Racial discrimination or discrimination for reasons of ethnic origin, gender, religion, worldview, a physical disability, age or sexual identity is prohibited. This applies in particular to interaction with colleagues, employees and business partners, as well as in the hiring, promotion and dismissal of employees.

3.8 Data Protection and Use of IT Resources

Personal data are collected, processed or used by the Lenze Group only in compliance with applicable **data protection regulations**. All employees and managers are to comply with definitive data protection regulations.

The **protection of all IT resources** is an integral part of all activities in the IT department. In order to safeguard a high level of protection, the Lenze Group has established a security standard in the form of comprehensive rules for security IT use. These are to be complied with by all employees and managers.

In addition, and to provide greater detail, the Lenze Guidelines "[IT Security](#)" and "[Data Protection](#)" shall apply.

3.9 Occupational Safety

The Lenze Group creates safer working conditions and integrates **occupational safety and health protection** into all company routines. All employees and managers alike are responsible for unequivocally upholding the security rules of the Lenze Group and to immediately report any abuses or to stop them in their own area of responsibility. All employees and managers of the Lenze Group are obliged to undertake necessary measures to safeguard the protection of health or safety risks in the workplace.

3.10 Sustainability and Environmental Protection

According to our understanding, sustainable economic value creation is the resource-friendly and responsible use of, among other things, raw materials, the environment and the climate. In the development, production and sale of its own products as well as towards business partners, the Lenze Group therefore attaches high importance to **sustainability** and compliance with the relevant regulations and standards of **environmental protection**.

3.11 Child Labour and Forced Working Conditions

The Lenze Group rejects all forms of forced labour, in particular child labour. Employees and managers of the Lenze Group take care to ensure that business partners also uphold this principle.

3.12 Non-Disclosure and Communication

With respect to **operational and business secrets**, employees are obliged to maintain confidentiality. They are allowed to be disclosed neither to internal nor to external third parties. Among other items, this includes reports, agreements, financial data, personnel information, evaluations or new business or product plans, independent of whether they exist in paper form, digitally or in any other form. As a general rule, the Executive Board of Lenze SE, the country managers within their local responsibility and the corporate communication department of Lenze SE are solely responsible for the release of company information via the Lenze Group to the media.

3.13 Transparent Reporting

Both within the company and towards the public at large, the Lenze Group places value on ethical, precise and cogent **reporting and communication**. Business transactions are to be documented by all employees and managers, in compliance with legal and internal regulations. All employees and managers are obliged within the scope of their work behaviour to provide reporting within the company group at a level sufficient to comply with the aforementioned requirements. This also applies above all to employees and managers who are required to report to public authorities, auditors or to the press.

4 Applicable Documents

Among the specified regulations, additional instructions are to be observed, including in particular:

- Lenze Guideline "[Anti-Corruption](#)"
- Lenze Guideline "[Anti-Cartel](#)"
- Lenze Guideline "[IT Security](#)"
- Lenze Guideline "[Data Protection](#)"

5 Communication of the Code of Conduct

The Lenze Group shall inform its employees concerning the applicability of the Code of Conduct. The Lenze Group expects its managers to instruct all employees within their area of responsibility on the contents of the Code of Conduct, including the guidelines (Section 4) to which they refer. A portal is available to the employees on the intranet containing the Code of Conduct and the directives. The portal also contains a list of contact persons to whom employees and managers may turn in case of questions concerning the Code of Conduct. For employees having no access to the intranet, the personnel department or the secretarial offices of the Lenze Group's managing directors shall ensure that access to the above-mentioned documents is made available in suitable places.

6 Compliance with the Code of Conduct

All employees and managers of the Lenze Group are obliged, within their areas of responsibility, to ensure compliance with the provisions of our Code of Conduct. Employees and managers of the Lenze Group are required to immediately report any impairment, malfunction or damage in their own area of work or responsibility to the Compliance Officer. Depending upon the specific situation, the direct superior, the personnel department or the managing directors of the subsidiaries may also be suitable contact persons. The Code of Conduct should not restrict responsible action and areas of latitude within the permissible scope - on the contrary: it is intended to provide clarity and certainty in the observance of responsible action.

7 Contact

Should you determine violations of the Code of Conduct and have questions or suggestions concerning the topic of compliance that cannot be handled at the local level, please consult the designated Compliance Officer without delay (central e-mail address: compliance@lenze.com). All enquiries and remarks are naturally treated respectfully and confidentially.

8 Document Owner and Updating Service

The document owner of this document is the legal department. Providing updates of the document is the responsibility of that department. Document release is provided by the legal department.

Version	Date	Author	Remarks
1.0	2020/01/01	Dr Kathrin Küppers	New version
2.0	2020/11/05	Dr Kathrin Küppers	Terminology adapted
3.0	2021/08/01	Dr Kathrin Küppers	Contentual supplement
4.0	2022/12/15	Dr. Kathrin Küppers	Adaption contact

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