



CODE OF CONDUCT

LEIBER GROUP GMBH & CO. KG
LEIBER POLAND GMBH

2021

General Statement

With our two production sites in Germany and Poland, the LEIBER Group is one of the leading manufacturer of highly specialised aluminium parts and components in the niche and medium-series segment. The pillars of our sustainable success in recent years – and of our daily deeds and actions – is our corporate values:

Sustainability • Reliability • Independence • Commitment • Innovation

As a value-oriented and high-performing company, we set high standards for ourselves and are aware of our responsibilities towards our colleagues, business partners, society and the environment. This awareness and the actions derived from it represent our corporate philosophy and are therefore inseparable from our identity as a company.

Our aspiration is to be a “**squeaky clean operation**”. This also includes staying “clean” from a legal standpoint. With this in mind, this Code of Conduct contains our fundamental principles and sets out the framework that enables us to live up to these commitments and aspirations.

This Code of Conduct is addressed to all members of senior management, all line managers and all employees at all LEIBER Group locations. Its goal is to make it easier for all of you, to navigate a business environment that has become increasingly more complex in last few years.

Our business activities must always comply with all applicable legal requirements. For this reason, we also apply our internal ethical standards to our dealings with customers, suppliers, other business partners, competitors and public officials. In doing so, we aim to protect our employees, our customers and business partners, and ultimately the company itself.

Indeed, it is the conduct of every single LEIBER Group employee that determines – every day – whether we can live up to our own high standards. Therefore, I advise you not to underestimate the importance of this Code of Conduct. If you read it carefully, you will notice that each of our corporate values also has a legal context. Through your behaviour, I remind you to ensure that the LEIBER Group retains its excellent reputation in the future. Please familiarise yourself with the contents of our Code of Conduct and implement this one in your daily work. For any questions about the content, the Compliant Officer at the respective production site will be at your disposal.

Emmingen, 25 January 2021

Dr Rolf Leiber
Management Board

1. Compliance with laws and regulations

It goes without saying that we observe and comply with the laws and the legal system in which we operate, and that doing so corresponds to our fundamental values.

Compliance with the law is more important to us than profits of any size. We would rather to lose business and fail to achieve our internal targets than violate the law.

Even the appearance of unlawful conduct can lead to a loss of reputation and orders, thus jeopardising the interests of our company. Therefore, wherever possible be sure to clarify any legal doubts in advance with your line manager or our Compliance Officer to avoid even the suspicion of unlawful conduct.

Familiarise yourself with the laws, regulations and internal company rules that apply to your area of responsibility – and comply with them. Any conduct that engenders negative feelings and a bad conscience should be caused immediately. In other words, let your good feeling guide you. Avoid “grey areas” and only proceed if you are certain that your conduct is acceptable.

Please be aware that, even in a private capacity, we are also perceived as members and representatives of our company. Therefore, take care to safeguard the image and reputation of the LEIBER Group, especially in public and with regard to the media.

2. **RELIABILITY** and fairness in daily dealing with people

Respect, honesty and trust are the success factors of our daily actions. Each LEIBER employee and each LEIBER manager is a role model and must act responsibly in this respect.

We see the diversity of our employees and business partners as a valuable asset. We respect and protect the personal dignity and personal rights of every individual – without exception – and support international human rights.

We do not tolerate unequal treatment or discrimination on the basis of sexuality, nationality, ethnic origin, culture, religion or world view, sexual identity, age, physical constitution, appearance, or any other reasons according to the principle of non-discrimination under Article 14 of the European Convention on Human Rights. We provide equal opportunities.

We work together with our employees' representatives in a spirit of trust. This is an established pillar of our corporate policy.

The LEIBER Group vigilantly upholds the ban on all kinds of forced or child labour. All performances at LEIBER Group are performed voluntarily within the framework of mutual agreements. We expect the same from our business partners.

3. **AUTONOMY** in the market and prohibition of corruption

We prevail in the market due to our excellent performance and not through underhanded practices. We do not enter into any inadmissible agreements with competitors, in particular regarding prices, conditions, production costs, the “carving up” of customers or markets, or tendering or production strategies. We do not coordinate our behaviour in the market with our competitors. We do not exchange information with our competitors that is relevant to their or our future competitiveness. We are aware of the serious risks associated with such conduct. For this reason, we are already doing everything we can to avoid any appearance of anti-competitive actions in the future.

We are not for sale and do not buy the goodwill of others. We do not offer our business partners any inappropriate gifts, invitations or personal benefits when initiating, awarding or processing orders. We also do not accept hospitality or gifts to an unreasonable extent. Extremely strict rules apply when dealing with public officials and authorities. We therefore tread particularly lightly in these areas.

Even if the giving of gifts is part of the local custom or is socially accepted, we nevertheless remain very cautious. The symbolism of givings must always be declared. The gifts themselves must never give the impression that the recipient has been influenced in the making process. In cases of doubt, ask your line manager or the Compliance Officer in advance to avoid any risk of suspected corruption.

Dealers, intermediaries and consultants only receive commissions and remuneration from the LEIBER Group for authorised and actually rendered services. These payments must be proportionate to the respective services, which must always be comprehensively documented and stored.

4. Conflicts of interest and donations

We respect the personal interests and privacy lives of our colleagues. Nevertheless, we put focus on the importance to the avoidance of conflicts between our employees' private and business interests – or even the appearance of such conflicts. In particular, conflicts of interest may arise as a result of secondary employment. Failure to disclose a conflict of interest may result in damage to the LEIBER Group and consequences under labour law for the employee concerned.

For this reason, every LEIBER employee is obliged to report any sideline business activities to the Human Resources department. These will only be authorised if they do not conflict with the legitimate interests of the company. The aforementioned duty of disclosure applies in particular to any secondary employment undertaken with – and/or any financial interests held in – our competitors, customers and suppliers. If an employee's close family members carry out such activities and/or hold any such interests, must also be also reported to the HR department.

Our business and private interests must be kept strictly separate. LEIBER employees do not use their work for the LEIBER Group to obtain personal benefits. Our business partners must not be granted preferential treatment for personal reasons.

Donations from the LEIBER Group are always directed to charitable, humanitarian, cultural and scientific causes. Sponsoring activities by the LEIBER Group and business-related memberships in organisations are only permitted if they are in the company's interests.

5. Trade controls, taxes and subsidies

We comply with the applicable regulations for cross-border trade. This includes observing existing import or export restrictions, obtaining any necessary permits and paying any stipulated duties and taxes.

We do not aid and abet tax evasion or subsidy fraud, and comply with all legal requirements in this regard.

Compliance with tax or subsidy laws is often difficult to assess. In case of doubt, always clarify the matter in advance with the relevant manager or the Compliance Officer.

6. **SUSTAINABILITY**: Occupational health, safety and environmental protection

The health of our employees is more than important to the LEIBER Group. We provide a safe working environment and continuously review the respective measures in terms of their effectiveness. We comply with the applicable occupational health and safety regulations.

All accidents are reported immediately and their causes investigated. Should you become aware of any abuses, hazards or contaminants, remedy them yourself if possible and in all cases inform the responsible manager.

By including sustainability among our corporate values, we are not merely paying lip service to this concept. On the contrary, we attach great importance to protecting the environment and ensuring efficient use of our resources. We also take this into account both when developing new products and in the operation of our plants.

For us, avoiding a negative impact on the environment always takes precedence over merely reducing one. In turn, we place a higher priority on reducing our carbon footprint than offsetting them.

7. **COMMITMENT** and product safety

We do our utmost to ensure that our products are safe and having an outstanding quality level. Our products are the flagship and are subjected to the highest quality standards.

All LEIBER employees must ensure that all processes comply with the company's internal quality specifications, which are in turn based on international and local laws and regulations, among other items.

Our products are subject to thorough and consistent quality controls. If potential hazards emanating from our products become known, we inform our customers accordingly and take remedial action.

8. **INNOVATION and preservation of the company's property and business secrets**

One of the keys to the success of the LEIBER Group is our ability to consistently act as a technical pioneer, whose innovative ideas are then adopted by much larger companies for mass production. We therefore pay special attention to protecting our inventions, intellectual property and know-how. The careful handling of our business secrets by all employees is extremely important to us. Internal confidential or proprietary information, as well as company and business secrets of the LEIBER Group, must never be disclosed to unauthorised third parties. The same applies to confidential information that we receive from our business partners.

The LEIBER Group's tangible property must also be treated carefully, responsibly and with a view to preserving its value. Company property may not be used for private purposes or removed from the company location without express permission. This applies in particular to equipment and tools, but also to information and communication equipment, unless there is a regulation to the contrary. Company property assigned to individual employees must be returned to the LEIBER Group at the end of their employment.

9. Reporting and data protection

We place a strong emphasis on ensuring open and truthful reporting and communications about the company's business transactions vis-à-vis our employees, customers, business partners and government institutions. Every employee must ensure that all reports, records and other documents created by the LEIBER Group comply with the applicable statutory regulations and standards, and are therefore always complete, correct, timely, and meet the respective system requirements. Compliance with the principles of proper accounting is mandatory. Business secrets must always be protected and treated confidentially.

All declarations associated with the levying of charges, fees, taxes, contributions, etc. must be made properly and completely to the best of our knowledge and belief. Any resulting payments due must be paid to the relevant parties in full and on time.

Any documents that may be required for ongoing or expected internal investigations or official enquiries must not be destroyed, removed or altered.

Closing remarks

If you suspect that a violation of this Code of Conduct has occurred in your daily work environment, you should contact either the Compliance Officer of the relevant production site or your line manager – in writing, by e-mail or by telephone.

All reports should be made in your own name. However, at your request the Compliance Officer will pass on your information in anonymised form. Every report will also be treated confidentially within the agreement of the statutory regulations. The LEIBER Group will ensure that whistleblowers do not suffer any unjustified disadvantages as a result of speaking up.

Please also contact your line manager or the Compliance Officer if you have any questions about this Code of Conduct.



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