



Code of **Conduct**

The LEONI way: Inspired by values, led by integrity!

LEONI

Foreword



The LEONI way: Inspired by values, led by integrity!

Dear LEONI team,

LEONI is a company that stands for both, tradition and development, history and future. As such, our goal has always been to create a sustainable and solid business that is able to face new challenges and react to transformations in a global business environment.

We, as members of the Executive Board of the LEONI Group, truly believe that this can be reached when there is a clear and unwavering commitment – by the company itself and every employee – to act with integrity!

This LEONI Integrity Commitment can be seen as a common thread that runs through all of our company's decisions and actions.

Our Integrity Commitment means that all employees have a common understanding of what it means to behave in a morally correct manner and can rely on common and shared values as a basis for doing business.

Our Integrity Commitment and our common Corporate Values define what we, as a company, are living and achieving every day.

Integrity is embedded in our Corporate Values and we integrate the Corporate Values in our day-to-day work, by having them as a guideline and inspiration, what to do and what to refrain from.

Integrity and LEONI's understanding of integrity is the reason that our Corporate Values don't

just sound good but are also implemented and put into practice. Combined, they establish the boundaries within which we can act confidently.

In adopting this approach, we seek to ensure stability, secure the future of our company and contribute to the sustainable development of LEONI.

We are counting on every one of you to support us on our continuous journey to integrity, because every single employee matters.



Klaus Rinnerberger
Chief Executive Officer



Dr Harald Nippel
Chief Financial Officer



Ingo Spengler
Chief Operations Officer

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Values and Integrity

Being a global company with international focus, it is crucial for LEONI to live a common culture. We, as employees, are creating, shaping and changing the culture of the company every day.

The Integrity Commitment described in this Code of Conduct and represented by every single one of our Corporate Values builds the basis for trust – among us as employees from every part

of LEONI and with external stakeholders. Hence, following this commitment creates a strong foundation for our cooperation and success!

Embedding our understanding of integrity in our Corporate Values and being led by integrity will help us contribute both in an individual and companywide way to put the whole Integrity Commitment into practice!



Values

Our Corporate Values are:



Care

... means recognizing the needs of others and considering them in our actions.



Result Orientation

... means knowing and achieving goals and expected results.



Respect

... means treating each other as equals in an open manner while considering diversity.



Responsibility

... means accepting it, acting reliably, standing up for one's actions and being accountable for them.



Collaboration

... means working for a common cause based on trust and diversity of opinion.

1 Values and Integrity

How does the Integrity Commitment manifest itself within each of our Corporate Values?

Integrity and Care

At LEONI, we take care of each other and recognize the needs of each other and our stakeholders. For our Integrity Commitment, this means showing care in a morally and legally acceptable way by being honest, trustworthy and incorruptible. We care for our company's interests and assets.

Integrity and Result Orientation

At LEONI, we know our goals, work in a committed and result-oriented manner and focus on the important steps to reach these goals. For our Integrity Commitment, this means that we know the goals we are aiming at can only be reached when acting in full compliance with all applicable laws.

Integrity and Respect

At LEONI, we respect and support decisions made, while treating each other as equals with respect and openness. For our Integrity

Commitment, this means that we respect and treat every person with equity. We do not discriminate against anybody. We respect fundamental human rights and consider them in every decision.

Integrity and Responsibility

At LEONI, we understand our responsibilities, stay accountable, and act accordingly. For our Integrity Commitment, this means that we accept and also fully assume responsibility for the impact that we, as a company, have in society, like for the protection of the environment, the promotion of further sustainability topics and our social responsibilities with our employees.

Integrity and Collaboration

At LEONI, we collaborate based on trust and reliability, encouraging different opinions and celebrating our joint successes. For our Integrity Commitment, this means that we demand and promote reliable collaboration in all our premises. We provide a safe and healthy workplace and also support union cooperation and collaboration.



Inspired by values, led by integrity!

We follow the lead of integrity by working and behaving **responsibly**.
To fulfill our **Integrity Commitment** all employees¹ are obligated to work and behave within the boundaries set by this **Code of Conduct**.
We do not tolerate any unlawful and / or inappropriate conduct, which contradicts this Code of Conduct. All provisions in this Code are **binding** for all employees of the LEONI group.

¹ The terms "we" and "employees" includes members of managing bodies and managers of all levels.

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Integrity towards Society and Environment

2.1 Human Rights

At LEONI, we assume responsibility for respecting human rights and we strive to avoid human rights violations. Among others, we are deeply committed to the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD¹ Guidelines for Multinational Enterprises, as well as the ILO² Core Labor Standards and the principles of the United Nations Global Compact.

In accordance with our Human Rights and Working Conditions Policy, internal regulations and guidelines we are committed to preventing and mitigating adverse impacts on human rights within our business operations around the world, to the utmost extent. Our Human Rights and Working Conditions Policy defines our efforts for respecting human rights and establishes mandatory standards for all employees regarding our specific commitments and actions.

LEONI is promoting respect for human rights. We are strictly opposed to any form of child labor, in particular all worst forms of child labor such as dangerous work that may harm the health, safety or morals of children. We are

also strictly opposed to forced or compulsory labor of any kind in accordance with the ILO Core Labor Standards. We commit to avoid any unlawful eviction of resources which secure livelihood. We respect the rights of indigenous people and local communities.

2.2 Protection against Discrimination and Harassment; Equal Opportunities, Diversity and Inclusion

At LEONI, it is essential to avoid and prevent any form of discrimination or harassment. LEONI employees are always treated with dignity and respect. No one shall be discriminated against, given preferential treatment or harassed on the basis of characteristics such as national and ethnic origin, social origin, health status, gender, skin color, political opinion, religion or belief, disability, age, sexual orientation, marital status or union membership, veteran status or other characteristics protected by local laws. Our employees shall be protected from individual arbitrary actions from personnel.

We think that empowering women to participate fully in economic life in all sectors is essential to strengthening the national economy, achieving

internationally agreed development and sustainability goals, and improving the quality of life for women, men, families and communities.

We provide equal opportunities and equal treatment to our employees and refuse to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language and/or physical contact that is sexual, coercive, threatening, abusive or exploitative.

We promote diversity within our sphere of influence and strive to create programs for vulnerable groups in order to ensure equal treatment, inclusion and integration and prevent discrimination.

2.3 Decent Work and Working Conditions

At LEONI, we attach particular importance to the observance of human rights and good working conditions for our employees.

We commit to ensure health and safety in the workplace beyond the scope of applicable laws and to support the continuous improvement of working conditions with the aim of having no

¹ Organisation for Economic Co-operation and Development. ² International Labour Organisation.

2 Integrity towards Society and Environment



occupational accidents and illnesses across all our entities.

We adhere to all applicable wage and compensation regulations globally, including those relating to minimum wages, overtime and legally mandated benefits. The same applies to compliance with applicable collective labor agreements. LEONI is committed to paying fair wages that are at least equal to the minimum wage established under applicable law. LEONI explicitly adheres to the principle of “equal pay for equal work”.

At LEONI, we ensure a high standard of safe and healthy working conditions and guaranteed work breaks, appropriate limitations of working hours and regular, paid vacation in accordance with applicable local laws and collective labor agreements. We ensure compliance with the applicable standards on working hours which include at a minimum the standards of the relevant ILO conventions at the place of employment.

To enable a high level of performance and quality work, we promote the education and

development of all employees on the basis of equal opportunity, and we hire, train and promote employees on the basis of their individual skills.

At LEONI, we support the freedom of association and the right to collective bargaining. Employees have the right to form interest groups to represent common purposes and goals. They are neither favored nor disadvantaged if they belong or do not wish to belong to a trade union or employee representation. The rights of our workforce to choose to be a member of a trade union and to bargain collectively as permitted by local laws and regulations must not be interfered with or restricted. In situations or countries in which the rights regarding freedom of association and collective bargaining are restricted by law, parallel permissible means to enable freedom of association and collective bargaining, which may be legally non-binding, shall be considered and facilitated.

2.4 Society, Environment and Sustainability

At LEONI, thinking and acting in an environmentally conscious manner are among the forward-looking factors for successful

2 Integrity towards Society and Environment

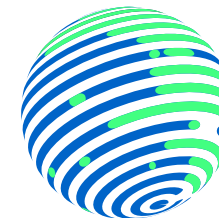


development. We have created our ReWire sustainability programme with its focus areas **climate protection, material efficiency and resource conservation** as well as **decent work**.

Beyond this, we are also doing our best effort to make an impact for the protection of natural ecosystems, in particular the protection of endangered habitats of wild animals, and the sustainable use of natural resources. We take care to protect biodiversity in relation to legal deforestation and conversion of other natural ecosystems and to eliminate legal deforestation and ecosystem conversion in our value chain.

We have implemented activities aimed at reducing our environmental impact, including reducing greenhouse gas emissions generated in our own operations as well as throughout our value chain, collecting, calculating and evaluating relevant greenhouse gas data according to international standards, and making the data available on demand, increasing energy efficiency and the use of renewable energies, improving air quality and emissions management, supporting waste reduction,

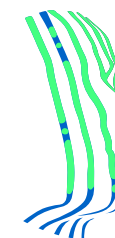
including through reuse and recycling and the provision of sustainable materials, improving water quality and consumption management, preventing deforestation and conversion of natural ecosystems, the prevention of noise emissions, avoiding harmful soil degradation and the responsible handling of chemicals used in operations and products. We have also implemented engagement for the society, which includes active support for the development of communities where LEONI is located.



REWIRE CLIMATE



REWIRE RESOURCES



REWIRE PEOPLE

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Integrity in the Workplace

3.1 Safety, Health and Environment

At LEONI, we ensure health and safety in the workplace beyond the scope of applicable laws and support the continuous improvement of working conditions with the aim of having no occupational accidents and illnesses. In addition, we comply with good working conditions. Particular consideration is given to persons in need of protection, such as pregnant women, persons with physical impairments and young workers. The introduction of a management system for safety and health at work according to ISO 45001 is recommended.

We comply with the applicable occupational health and safety regulations and provide the necessary protective equipment depending on the safety risk. We train our employees on the relevant safety risks related to their work and the environment in which they work.

At LEONI, occupational safety, health and the environment at our workplace are part of our overall sustainability strategy. Our goal is to reconcile all the requirements that arise in these three areas. With internationally recognized management systems, we ensure compliance with the applicable standards at all LEONI locations worldwide.



At LEONI, the health and safety of our employees is very important to us. We ensure safe workplaces, carry out occupational health care and, if necessary, provide suitable protective equipment. We integrate every employee into the occupational safety system. We are expressly requested to continuously support occupational safety within the scope of our possibilities and responsibilities.

We are committed to continuously improving the environmental performance of the company. That includes defining sustainable goals, determining measures and their implementation. To this end, we use internationally recognized management systems.

3 Integrity in the Workplace

3.2 Company Assets and Company Resources

At LEONI, we care for our company's assets and company resources, whether tangible or intangible. We handle all company property in a careful and responsible manner and also sustainably. We do so because of our social and environmental responsibility and because we understand that safeguarding assets and resources is vital for the success of our company.

We also make sure that the company's devices, intellectual property, licenses, assets and all other resources are used only for official business purposes, unless private use is explicitly permitted. We ensure that our use is responsible and economical.

At LEONI, we are keen on securing our advantage over our competitors by being innovative. Therefore, our trade secrets and intellectual property (e.g. inventions, new products, patents, etc.) are essential assets. We use the highest levels of protection for this information. We comply with laws and internal regulations related to respecting the trade secrets of our customers, business partners and competitors. We also

ensure to prevent the unauthorized use of any third-party intellectual property.

3.3 Information Security and Data Protection

At LEONI, we take all necessary steps to protect the information that is entrusted to us. We protect all data that is under our control in accordance with applicable laws, regulations and industry expectations. Ensuring confidentiality, availability and integrity of information is key to LEONI's operations.

At LEONI, we respect and uphold the rights of data protection. Personal data is used and processed only to the extent allowed under the applicable laws, regulations and our internal policies. We ensure the protection against loss, unauthorized modification and use or disclosure by appropriate technical and organizational measures. We acknowledge data protection as a personal right and process and use data only if and to the extent permitted by applicable laws and regulations.

Ensuring the security of all information that is stored, controlled or processed by LEONI is an

important part of LEONI's strategy. By applying and using the information security rules and regulations, we take responsibility for the information that we handle.



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Integrity and Compliance



At LEONI, we are convinced that reaching our goals is only possible when we act in compliance with all applicable laws and also all rules that we have set for ourselves.

4.1 Antitrust Law and Fair Competition

At LEONI, we believe that success can only be achieved in well-functioning, fair and free markets with undistorted competition. Thus, we are committed to ensuring fair competition in our business practices and follow all applicable antitrust and competition laws. We conduct ourselves fairly towards our suppliers, customers and distributors and do not unlawfully restrict their market presence.

We see the principle of fair competition as a benefit for all market players, where our customers, suppliers and LEONI should behave vigorously but fairly, while competing and doing business in an open and independent way.

4.2 Corruption Prevention and Gifts and Benefits

At LEONI, results or success will never be based on any form of bribery or corruption. We do not tolerate corrupt behavior from any of our employees, business partners or customers and we are committed to avoiding even the mere appearance of undue influence. This especially applies when dealing with govern-

ment agencies or any other public officials. Therefore, we have strict guidelines in place and offer our employees respective training and support.

We base our decisions on integrity and never accept or grant inappropriate gifts or benefits, to maintain objective decision-making. The same applies and is expected from our customers and business partners.

4.3 Donations and Sponsorships

At LEONI, we strive to harmonize economic success with our entrepreneurial responsibility for sustainable development in relation to

4 Integrity and Compliance

people, society and the environment. Granting donations and engaging in sponsorships are appropriate measures to support this task. We thereby follow the laws and our internal guidelines governing donations and sponsorships.

4.4 Anti-Money Laundering, Economic Sanctions and Export Controls

At LEONI, being a global business means complying with national and international economic sanctions and supporting the fight against money laundering and against financing terrorism by complying with all requirements in these areas. Relevant employees are trained regularly on these topics and are required to always keep up to date on current sanctions lists.

Strict compliance with export controls under foreign trade legislation is a basic principle for all our LEONI entities. We always abide by these regulations when exporting or importing products and services.

Our business processes are designed in a manner to prevent any form of financial crime, including, but not limited to export control checks, cash bans, sanctions, embargoes, etc.

4.5 Taxes, Customs and Financial Compliance

At LEONI, we deem correct and timely declaration of our taxes as a basic principle. We conduct sustainable tax planning by creating stable processes to ensure compliance with tax and customs laws, which include regulations on corporate tax, income tax, value-added tax as well as customs duties and excise tax to be paid in the import of goods.

We follow the statutory provisions for proper accounting, financial reporting and record keeping. We ensure that all documents kept or published as part of our official business are accurate and complete.

4.6 Conflicts of Interests

At LEONI, employees care for the company and have a duty to protect its interests at the same time that the company cares for our employees and their interests.

Therefore, we handle any potential conflict of interests openly. Every employee has to make sure that personal and private financial interests do not influence business decisions. We avoid

situations where such conflicts might be expected. If such conflicts arise, we disclose them and adhere to the solution established according to our company policies to protect our company.

4.7 Product and Quality Requirements

At LEONI, we see compliance with product and safety requirements as a top priority. We take into account all relevant laws and regu-

lations as well as state-of-the-art science and technology. We, as employees of LEONI, know the regulations that affect our area of responsibility and ensure that our knowledge is up to date. We openly address potential risks as an integral part of our contributing role.



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Leading with Integrity

5.1 Complying with the Code of Conduct

This Code of Conduct is mandatory for all LEONI employees. We are all required to familiarize ourselves with the Code of Conduct and comply with its provisions.

At LEONI, we know that a business cannot be run responsibly and with integrity without its managers also behaving responsibly and with integrity. Therefore, we expect managers to fully observe the principles set forth in this Code of Conduct and lead with integrity acting as role models for their team members and other employees.

Anyone who does not share the principles described in this Code, cannot do business with us. We have also developed a Code of Conduct for our Business Partners to specifically address the way we expect our business partners to conduct themselves and their partners along the supply chain.

5.2 Guidance and Support

As pointed out in this Code of Conduct, acting the LEONI way means being inspired by the

Corporate Values while always being led by integrity. On a daily basis, the right way to integrity might not be easy to choose or find. The Integrity Commitment set forth in this Code of Conduct gives us a common understanding of what it means to behave in a morally correct manner while relying on common and shared values as a basis for doing business. While this does not provide us with specific answers to every question and situation, it is essential to remember that we can all rely on different ways to get guidance, support and information:

- We can always reach out to the Chief Compliance Officer and to the compliance organization:

Email: compliance@leoni.com

Phone: +49 911 / 2023-184

- LEONI also provides us with a Compliance Management Dashboard, where we can find relevant compliance tools and information as well as manage specific requests.

- The LEONI documents (i.e. frameworks, policies and other material) contain more detailed

guidance and information to help us navigate these important topics.

- We can also contact the responsible departments, which can provide us with guidance regarding their topics of expertise.

- We can always seek guidance from our human resources representatives and our supervisors, who will provide support and direct us towards the right path.

- Where available, we can also rely on our employee representatives and their bodies.

- We can also refer to the questions established in our Integrity Test Board (see chapter 6) whenever we are unsure whether our behavior complies with the principles and values set forth in this Code of Conduct.

5.3 Treatment of Potential Violations and Reporting via the Integrity Platform (Whistleblower System)

At LEONI, trust and credibility are of the utmost importance. The Integrity Commitment and our commitment to follow the rules of this Code and

5 Leading with Integrity



all applicable laws, is crucial for our business. However much effort we may put on preventing violations, these may still occur in individual cases. A timely detection of these violations is paramount for LEONI to prevent or minimize potential harm against us as a company, us as employees, or our business partners.

We as employees, are obligated to raise our concerns and identify possible violations. LEONI promotes a culture where employees can report concerns, potential violations or inappropriate behavior in good faith without fear of retaliation. We as employees have a duty to report such potential violations while being confident that any form of retaliation against a report made in good faith is expressly prohibited.

LEONI offers an easy way to report any possible violation via the [Integrity Platform](#).

The Integrity Platform is open to all employees, business partners and any third party that may wish to report a violation of rules or regulations (internal or external). If we deem the behavior of one of our colleagues as a violation of the

principles established in this Code of Conduct or any other relevant regulations, we can report it using the Integrity Platform in a confidential and, if so required, anonymous manner. Reports can also be made via the abovementioned contact information. Each case will be examined carefully and individually, and will be treated fairly!

6



Integrity Test Board

If, at any time, we are unsure whether our behavior complies with the principles and values set out in this Code of Conduct, we should ask ourselves the following questions, using them as an Integrity Test Board:

- Am I confident that my behavior and my decision is within the boundaries of internal and external requirements (e.g. company policies and regulations)?
- Would I be able to stand by my decision and behavior under third-party scrutiny?
- Would my decision and behavior be seen as a role model's if it were to be done companywide?
- Would I or my company be able to justify my decision in public?
- Would I accept my decision if I was the affected party?
- Would I tell my family about the decision and would they also support it?



If we can answer all those questions with a clear "yes", then our behavior is very likely to be compliant with LEONI's Integrity Commitment. When in doubt, we can always get in touch with the contact points mentioned in chapter 5.

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led by integrity!

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