



Code of Conduct

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Preamble

Lankwitzer Lackfabrik GmbH (LANKWITZER for short) is a globally active company. As such a company, the Lankwitzer Group bears social responsibility towards customers, employees and the public. Compliance with and protection of human rights is our decisive basis for this. In line with this responsibility, all employees of the company undertake to comply with this Code of Conduct, which we as a company regard as the moral and ethical basis for our actions in all business areas.

Principles of human rights and social justice

► Commitment to human rights

The protection of human rights is a central element of our corporate responsibility. We base our commitment to respecting human rights on the United Nations Universal Declaration of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We are committed to respecting internationally recognised human rights and upholding them in our business activities and along our value chains.

In addition, we are guided by the UN Guiding Principles on Business and Human Rights.

► Child labour and forced labour

LANKWITZER respects and values the globally applicable regulations for the protection of human rights as fundamental and universally applicable requirements. This includes the fact that we and our business partners neither permit nor tolerate forced or child labour.

► Slavery

LANKWITZER does not tolerate slavery and prohibits any form of slavery in the context of its activities and business relationships.

► Forced eviction and the deployment of security forces

Forced evictions and the use of security forces are strictly prohibited if their use entails the risk of human rights being disregarded or restricted.

► Equal opportunities

We do not tolerate discrimination against employees on the basis of skin colour, ethnic origin, gender, age, nationality, social background, disability, sexual orientation, religion or ideology.

► Labour rights

LANKWITZER pays remuneration and social benefits that at least comply with national and local legal standards, regulations or agreements. The applicable regulations on working hours and holidays are complied with.

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▶ Freedom of assembly and collective bargaining

LANKWITZER is committed to recognising and respecting the right of employees to freedom of assembly and collective bargaining. Strengthening freedom of assembly and freedom of association in general is an important fundamental concern for us.

▶ Health and safety

Our employees are our most valuable resource. Health and safety, as well as a pleasant working environment, are therefore a key success factor for our corporate goals. For this reason, compliance with legal requirements for occupational health and safety and the improvement of working conditions are an integral part of our corporate philosophy.

Business principles

▶ Compliance with the law

We always comply with applicable national law. In cases where international human rights are restricted by local laws, we endeavour to promote the principles behind the international standards without coming into conflict with local laws. Where local laws go beyond international standards, we will comply with them.

LANKWITZER upholds the principle of strict legality for all actions, measures, contracts and other processes of the Lankwitzer Group. This includes, in particular, ensuring fair competition and compliance with antitrust law.

LANKWITZER sells its products in many countries around the world. As the delivery and use of our products takes place in different countries, several borders have to be crossed before reaching the destination, depending on the transport route. It must always be ensured that export and import laws, customs regulations and all other laws and regulations of the transit and destination country are complied with.

▶ Business ethics

LANKWITZER excludes any unethical behaviour in business dealings. In particular, LANKWITZER refrains from any form of corruption, extortion and bribery.

▶ Separation of corporate and private interests

All LANKWITZER employees make decisions on the basis of objective considerations and do not allow themselves to be unduly influenced by personal interests.

▶ Handling information and data protection

LANKWITZER complies with all applicable laws for the protection of personal data of employees, customers, suppliers and other data subjects. We respect the know-how, patents, trade and business secrets of ourselves and third parties and do not disclose such information to third parties without prior express written confirmation.

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Environmental principles

► Environmental protection: Committed to nature

Sustainable and responsible use of natural resources is a challenge for everyone, especially industry.

LANKWITZER supports internal and external endeavours to act in an environmentally friendly manner. We protect our environment and use natural resources sparingly. With this in mind, we are committed to the Minamata, POPs and Basel Conventions.

We see environmental protection as an important factor in improving the competitiveness of our company, also from an economic point of view. Through our environmental certification in accordance with ISO 14001, we promote the knowledge and motivation of our employees to adopt environmentally friendly behaviour.

Responsible use of resources such as water and energy is also a fundamental concern of our company. This is why LANKWITZER has set itself the goal of continuously scrutinising the energy efficiency and water consumption of its processes. On the one hand to ensure competitiveness and on the other to make our own contribution to environmental and climate protection.

Requirements for suppliers

► Supply chain

As part of our supply chain management, we want to ensure that our suppliers also operate in accordance with our requirements. Cooperation based on trust will help us to develop further together.

We therefore also expect our suppliers and other business partners to commit to complying with the principles set out here and to implement appropriate processes to respect human rights.

This also includes actively promoting compliance and implementation among their suppliers.

Furthermore, we expect them to provide information on how the aforementioned principles are complied with upon request.

Any violation of the principles set out in this Code of Conduct constitutes an impairment of the business relationship between LANKWITZER and the supplier.

Procedures for realising our corporate due diligence obligations

To fulfil our commitment to respect human rights, we are working to implement or further develop appropriate due diligence processes to identify and mitigate risks or impacts. We will adapt our policy statement accordingly over time. Some of the implemented processes are listed below (e.g. occupational health and safety, environmental protection, supplier commitment/selection).

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► Priority risks

As a company in the chemical and pharmaceutical industry, we have the opportunity to strengthen the protection of human rights in a variety of ways. However, we are also aware of the human rights risks that can be associated with our business activities.

We strive to gradually and regularly analyse, document and better understand our risks and their specific connection to our company through structured risk assessments in our own business activities, the supply chain and in relation to our products and services.

► Preventive measures

We incorporate the results of our risk analyses into relevant business processes, in particular into our supplier management system. Where risks exist, we implement suitable preventative measures, e.g.

Supplier selection and evaluation:

We take human rights and selected environmental criteria into account when selecting and evaluating our suppliers and implement appropriate control measures.

Training courses:

We organise training courses in the relevant business areas, for example as part of the onboarding process for new employees or sales training.

Health and safety measures for own employees:

The health and safety of our employees is our top priority. By implementing uniformly high standards at our sites on the basis of various legal requirements (e.g. Occupational Health and Safety Act, Industrial Safety Ordinance, Occupational Safety Act, Chemicals Act, Hazardous Substances Ordinance, REACH, etc.), we are continuously working to create a safe and healthy working environment. Our employees take part in regular training courses (at least once a year) to promote safety-conscious behaviour.

Product safety measures:

As part of our development process, we continuously review the safety of our products with regard to health and environmental risks, taking REACH and the CLP Regulation into account.

► Remedial measures

In cases where we cause or contribute to actual human rights abuses through our business activities, we are committed to implementing effective remediation measures.

We also actively seek redress for negative impacts that we have caused or contributed to.

► Complaint process

Possible compliance violations or human rights violations can be reported via our designated complaints channel

<https://whistleblowersoftware.com/secure/lankwitzerhinweisgeberschutz>

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As part of our complaints process, we guarantee complete anonymity.

► Governance

Responsibility for compliance with the human rights obligations set out here lies with the Executive Board. It is also responsible for the operational implementation of our human rights strategy.

Important applicable guidelines from international organisations

- **Principles of the United Nations Universal Declaration of Human Rights**
- **Children's Rights and Business Principles**
- **Women's Empowerment Principles**
- **International Labour Standards (ILO) • United Nations Global Compact**
- **OECD Guidelines for multinational enterprises**
- **Core labour standards of the International Labour Organisation (ILO)**
- **ILO Indigenous and Tribal Peoples Convention C169**
- **UN Convention on the Rights of the Child**
- **United Nations Sustainable Development Goals (SDGs)**
- **Responsible Care Global Charter**
- **Human Rights Guidelines for Pharmaceutical Companies in relation to Access to Medicines**
- **Declaration of Helsinki**

This Code of Conduct came into force on 01.01.2016 by the management of Lankwitzer Lackfabrik GmbH. (Supplementary status: 17 November 2023)

Dr. Leo Rokeach – Managing Director of Lankwitzer Lackfabrik GmbH

A handwritten signature in blue ink, appearing to read "Leo Rokeach", is placed over a light blue rectangular background.