



## **Code of Conduct**

of

**Lübke & Vogt GmbH & Co. KG**, Hüstener Straße 43-45, D-59846 Sundern, Germany

### Preliminary mark:

The Code of Conduct of Lübke & Vogt GmbH & Co. KG is explained below:

### **§ 1**

#### **General information**

At Lübke & Vogt, we are aware of our social and societal responsibility and act accordingly. We regard compliance with laws and regulations as an essential basic principle of economically responsible action and respect the principle of legality. Integrity and respect for the rights of third parties as well as ethical behavior determine our interactions with our employees, business partners and the social environment.

The following requirements specify the actions and expectations of Lübke & Vogt and provide guidelines for conduct with regard to key environmental and social aspects. The requirements are the basis for successful relationships between Lübke & Vogt and its partners. <sup>\*8,9,17</sup>

### **§ 2**

#### **Waste and recycling**

Waste prevention, reuse, recycling and the environmentally friendly disposal of residual waste are taken into account during the development and manufacture of products and in other activities. <sup>\*15</sup>

### **§ 3**

#### **Occupational health and safety**

The business partners shall at least comply with the respective national standards for a safe and hygienic working environment. Within this framework, appropriate measures are taken to ensure health and safety in the workplace in order to guarantee healthy working conditions. <sup>\*3</sup>



#### **§ 4** **Working hours**

The working hours correspond at least to the perspective national legal requirements or the minimum standards of the perspective national economic sectors.\*<sup>8</sup>

#### **§ 5** **Data protection, information security, plagiarism and intellectual property**

The protection of personal data, in particular of employees, customers and suppliers and the security of business data and documents, is of particular importance of Lübke & Vogt. When collecting or processing personal data, we observe the legal and contractual requirements. Each of our employees is obliged to secure personal, confidential and internal, non-public information and to protect both this and business documents from access and inspection by third parties in an appropriate way. Business partners shall ensure that the risk of introducing/ incorporating counterfeit parts into end products is absolutely minimized. The same attention shall be paid to the task of recognizing counterfeit parts in preliminary products.

#### **§ 6** **Discrimination**

Equal opportunities and equal treatment are guaranteed regardless of ethnic origin, skin color, gender, religion, nationality, sexual orientation, social background or political views, insofar as these are based on democratic principles and tolerance towards those who think differently. Employees are selected, recruited and promoted on the basis of their qualifications and skills.\*<sup>5,16</sup>

#### **§ 7** **Legal requirement, financial responsibility and export control law**

Ensuring legal conformity is controlled and monitored for all relevant areas, including export control law and economic sanctions monitoring, via the management system/ legal register installed in the company.

The business partners book incoming and outgoing payments directly to the corresponding services. They must also ensure that no applicable legal provisions against money laundering or terrorist financing are injured.\*<sup>9,17</sup>

#### **§ 8** **Child labor**

Lübke & Vogt rejects any knowingly use of child labor.\*<sup>4</sup>



## **§ 9**

### **Corruption, conflicts of interest and fair competitions**

Our business relationships are conducted objectively, fairly and free of unfair methods. Every employee is obliged to comply with the rules of fair competition and, in particular, the provisions of cartel law. Violations of competition and cartel law, in particular the exchange of competition-sensitive information with competitors, are not permitted and will not be tolerated by Lübke & Vogt.

Lübke & Vogt expects to ensure that potential conflicts between personal and business interests are avoided as far as possible. Decisions by business partners or their employees are to be made exclusively on the basis of objective criteria.

We are convinced that corruption distorts competition and destroys the trust of our business partners and the public. No employee may – directly or indirectly – offer or grant unauthorized advantages to others in connection with business activities (bribery) or demand or accept such advantages (corruptibility).

This prohibition applies to all national and international business transactions, both in dealings with public officials and with companies and individuals in the private sector in Germany and abroad.<sup>\*17</sup>

## **§ 10**

### **Qualification of staff**

Employees are motivated, informed and trained according to their tasks.<sup>\*4</sup>

## **§ 11**

### **Procurement of raw materials**

Raw materials are procured avoiding sources or sourcing areas with a negative impact on aspects of human rights or the environment.

## **§ 12**

### **Greenhouse gas emissions, noise emissions and air quality**

The recording and continuous reduction of greenhouse gas emissions (Scope 1 to 3) is an integral part of our corporate philosophy.

Noise emissions are to be regarded as emissions and are part of the official permits. Lübke & Vogt undertakes to comply with the requirements for the protection of the environment and the neighborhood.

Environmental impacts such as emissions must be minimized and continuously improved.<sup>\*11,13,15</sup>



### **§ 13**

#### **Environmental and health damage**

Impacts on the environment and the health of employees are avoided or kept as low as possible in all activities. The economical use of energy, water or raw materials, the minimization of greenhouse gases, the minimization and technically feasible purification of emissions, the use of closed circuits for process water, the use of renewable resources (energy management to control energy efficiency) and the minimization of environmental and health damages are taken into account in the development and manufacture of products and in other activities. A chemical management controls the selection and use of the substances required for the production process. <sup>\*3,6,7,12</sup>

### **§ 14**

#### **Environmental challenge**

Environmental challenges are dealt with prudently and foresightful. Measures are taken to ensure a responsible approach to the environment. We work towards the development and dissemination of environmentally friendly technologies. <sup>\*13</sup>

### **§ 15**

#### **Environmental management systems**

Environmental orientation is one of the primary objectives of our corporate policy. Emissions are identified, recorded and, if relevant, monitored as part of the company's own environmental management system.

Lübke & Vogt therefore expects all partners with production sites to have a suitable environmental management system and, for relevant main suppliers in addition, a certified environmental management system in accordance with the international standard DIN EN ISO 14001 or EMAS.

### **§ 16**

#### **Freedom of association and employee representation**

All business partners are openly committed to working with employee representatives in a trusting, fair and transparent way.

### **§ 17**

#### **Remuneration and performance**

The remuneration and benefits paid or provided for a normal working week correspond at least to the legally valid and guaranteed minimum. If there are no statutory or collectively agreed regulations, they are based on the industry-specific, local collectively agreed remuneration and benefits that ensure a reasonable standard of living for employees and their families. <sup>\*8</sup>



## **§ 18**

### **Forced labor**

Lübke & Vogt rejects any knowing use of forced or compulsory labor, including involuntary prison labor.<sup>\*3,16</sup>

## **§ 19**

### **Contact point for violations and escalation procedures**

Violations of the principles set out here must be reported immediately and in full extent. Depending on the severity of the offense, the supervisor or top management can be approached first. In the case of particularly serious offenses or in case of confidential sender data, the external contact point for reports (whistleblowing)

[verhaltenskodex@luebke-vogt.eu](mailto:verhaltenskodex@luebke-vogt.eu)

or an approach to the authorities can and should be used.

Global Goals for Sustainable Development: Asterisks (\*) in the chapters indicate the reference to the 17 Sustainable Development Goals. (SDGs of the United Nations)