

The background of the top half of the page is an abstract, artistic composition. It features a dark blue, textured surface that resembles a road or a track, with white and light blue light trails or streaks that curve and flow across the scene, suggesting motion and connectivity. The overall color palette is dominated by various shades of blue, from deep navy to bright, glowing cyan.

LEONI Code of Conduct

The road to integrity

The Quality Connection

LEONI



„Trustworthiness, transparency, honesty and appreciation are for me integral parts of our corporate culture. We live up to these values in our day-to-day collaboration and they are essential for the sustainable success of LEONI.”

Aldo Kamper



„Our Code of Conduct requires all LEONI employees to behave with integrity and in compliance with the law. Compliance with the LEONI Code of Conduct is therefore an important element in averting financial disadvantages for LEONI.”

Ingrid Jägering

The road to integrity

Dear Employees,

At LEONI continuity and progress are closely connected. Since our founding in 1917, enduring values and the ability to change have served as the guide for reliable business and have been a core characteristic of our market-listed company. An instinctive feel for new market developments and the needs of customers, but also responsible and ethical behaviour in our dealings with employees, customers, suppliers and business partners, have made LEONI both a successful company and also a reliable and competent partner.

We combine successful business with responsible conduct to sustainably shape the future of the company. In a globalized world with increasingly complex conditions and interactions, this is becoming more and more challenging. In order to protect LEONI as an institution and you as an employee from any risks that may arise, compliance with statutory regulations is a top priority for us. It is also essential for ensuring the long-term competitiveness of the company. Even in areas that are not covered by law, it is important to act in accordance with our internal corporate values so that loopholes in the rules and regulations are not misinterpreted and to avoid the appearance of misconduct.

A corporate culture based on integrity provides a key guide in this respect.

Exactly what this means for LEONI, and for you as an employee, is set out in this binding Code of Conduct – the LEONI Code of Conduct: It outlines the values that the company stands for, shows how we adhere to existing regulations and guidelines, and details how we can proactively embrace LEONI corporate values. The Code therefore indicates conduct which is compliant with the law, as well as further guidance on conducting business with integrity.

A violation of the LEONI Code of Conduct may lead to financial and other disadvantages such as penalties, fines, claims for damages or exclusion from future procurements. Such violations harm the image of the company and can do irreparable damage to our reputation. For you as an employee, violations of statutory, contractual, or internal regulations can lead to both professional and personal disadvantages.

All employees and managers, as well as we, as members of the Board, are required to comply with the LEONI Code of Conduct, even if this means that contracts are foregone or personal goals cannot be achieved as a result. It is therefore very important that you take the time to familiarize yourself with the LEONI Code of Conduct and follow the road to integrity for the company and yourself personally.

We thank you for your cooperation, as your own personal conduct actively contributes to the long-term success of LEONI.


Aldo Kamper


Ingrid Jägering



» LEONI takes responsibility

Social responsibility
Environmental protection
Quality and safety



» Fair market behaviour

Behaviour in competition
Rejection of any form of bribery
or corruption



» Protecting company interests

Conflicts of interest
Handling of information
Insider information
Reporting and record keeping
Handling assets



» Embracing integrity

Guidelines
Guiding questions

LEONI

What integrity means at LEONI

At LEONI, integrity means that all employees worldwide comply with statutory and internal regulations and conduct themselves in a morally correct manner. The basis for this conduct is a common understanding of values

- » **In other words, integrity stands for fairness, loyalty and honesty.**
- » **Integrity stands for trustworthiness and incorruptibility.**
- » **Integrity stands for welfare and social responsibility.**
- » **Integrity demands the courage to do what's right.**



» In keeping with the corporate identity, LEONI takes responsibility for its employees, the quality of its products and its influence on the social and ecological environment.

LEONI takes responsibility

Social responsibility

Taking social responsibility and complying with fundamental rights and principles are indispensable elements of value-based management at LEONI.

As an employee, you are the company's most valuable asset, and should be supported and protected. In order to ensure high performance standards and high-quality work, LEONI relies on a high skill level among its employees. We also guarantee compliance with statutory working standards. We comply with the applicable national standards for a safe and hygienic working environment and take appropriate measures to guarantee occupational health and safety.

As an international company, LEONI operates in different cultures and countries where the statutory requirements vary. LEONI minimum standards are to be applied throughout the company. This prohibits any use of forced or compulsory labour. LEONI is responsible for ensuring that all employees are at least 15 years old and have also reached the local legal minimum working age applicable for the respective country. The remuneration and benefits that are paid or provided by LEONI for the working week must correspond at least with the respective national minimum standard. The right to freedom of association is guaranteed.

Successful work goes hand in hand with constructive and open communication and a working atmosphere where employees feel appreciated. We pay particular attention to ensuring that every employee is guaranteed equal opportunities and equal treatment and do not discriminate on the basis of ethnic origin, skin colour, gender, religion, nationality, sexual orientation, physical or mental disability, social background, or any other legally protected characteristics. LEONI does not tolerate any form of discrimination, harassment, bullying, or intimidation.

As a LEONI employee, you are the company's most valuable asset, and should be supported and protected.

LEONI is committed to the sustainable management of natural resources.



..... Environmental protection

LEONI regards environmental protection as a central corporate purpose. Compliance with all statutory environmental obligations is a matter of course for us.

The relevant national standards are our minimum requirements. Our approach to environmental management is geared toward ensuring that the environmental impact of our products and processes is kept to an absolute minimum. To do this, we make use of the best available technology that is economically viable.

In addition, we also commit to continuously improving the environmental performance of our company. This includes the definition of sustainable goals and the specification and implementation of suitable measures. LEONI uses appropriate management systems for this purpose.

As an employee, you are jointly responsible for the economical and careful use of all resources. Everyone contributes towards reducing energy and water consumption, greenhouse gas emissions, and waste. This helps to prevent or minimize pressure on the environment, climate, and nature.

Quality and safety

Our customers' satisfaction is the basis for LEONI's corporate success. The quality and safety of our products is an essential aspect for this.

All production locations comply in general with ISO 9001 and some are also certified in accordance with additional industry-specific quality management standards. We strive to continuously improve our quality and safety standards in order to offer our customers the best possible quality.

As an employee, you are crucial to achieving this goal: the provision of your knowledge, capabilities, and commitment are an indispensable component of an evolving and successful culture of improvement. Contribute your ideas and suggestions, and communicate openly about errors. This not only lets LEONI develop as a company, but also helps to ensure the highest quality and safety standards for our customers in the long term.



FAIR PLAY



Fair market behaviour

» An important aspect for ensuring LEONI's competitiveness is honest and fair competition with respect to business partners and third parties.

Behaviour in competition

Fair competition is an important prerequisite for functioning free markets. It also benefits society and contributes to LEONI's sustainable success.

Almost all countries have laws to protect fair competition and prohibit anti-competitive practices. As an employee, you are obliged to adhere to applicable regulations under competition and antitrust law.

Agreements and collusion between companies that could prevent, limit, or distort competition are prohibited. This applies, in particular, to agreements on prices or other conditions, as

well as arrangements that aim to allocate customers, markets, products, or personnel. Any exchange of this type of information with competitors is also prohibited. LEONI also conducts itself fairly toward its suppliers, customers, and distributors and does not unlawfully restrict them in their market presence. The dominant position held by LEONI in specific markets should never be abused.



LEONI commits to the principles of fair and undistorted competition.



We do not tolerate
any improper business
procedures or
unauthorised inter-
ference.

Rejection of any form of bribery or corruption

In our shared business dealings, we reject any illicit means, and rely solely on our competence, price and quality. LEONI does not tolerate any form of bribery, corruption or other improper influence.

As a LEONI employee, you may not offer, request, accept, grant, promise, or receive assurance of any advantages in order to influence business procedures in an improper manner. You should always conduct yourself to avoid even the impression of improper influence. We also do not tolerate such conduct by third parties or companies that operate in the name of or on behalf of LEONI.

In everyday business, meal invitations, small gifts, or invitations to events are considered normal. However, it is easy to exceed the limits of normal business practices where these gifts may then be seen as gifts that improperly influence a business partner.

For this reason, employees may only grant or accept gifts if they are appropriate. The impression must not be created that the gift is aimed at encouraging improper dealings by the recipient. Gifts are only to be given by LEONI employees in a transparent manner.



We may only grant or accept gifts to business partners if they are appropriate.



Our
values

» We support, promote and protect the interests of LEONI.



Protecting company interests

Conflicts of interest

As an employee, LEONI expects that you remain loyal to the company and make all business decisions in the interest of the company.

Business transactions or decisions that are influenced by personal or private interests may conflict with company interests. This includes financial investments that you or persons closely associated with you have in competitors and business partners.

Secondary employment can also lead to conflicts of interest.

In order to protect yourself and LEONI, you must disclose such conflicts in advance.

We handle any possible conflicts of interest openly.





**We protect all
information belong-
ing to LEONI and our
business partners.**

..... Handling of information

We handle information and data belonging to LEONI, its business partners and LEONI employees with care.

As a LEONI employee, you are responsible for adequately protecting information about the company and our business partners within your realm of authority. You must ensure that information is only made accessible to persons who need it for business purposes (need-to-know principle). Information must be stored and processes must be configured in such a manner that it is available when needed. It must not be possible for data to be changed without this being notified.

The protection of personal data of employees is especially important at LEONI. LEONI therefore ensures that the legal requirements for the handling of personal information are observed.

Insider information

LEONI AG is a market-listed company and subject to the obligations of capital market law. This includes the ban on insider trading.

LEONI employees who have specific information about non-public circumstances that could significantly influence the market price of LEONI AG shares are considered to be "insiders". Non-public, value-influencing information about the company is to be treated as strictly confidential and may not be disclosed or used to gain personal advantages. In particular, insiders may not be active on the capital market and use this information for the purchase or sale of shares.





LEONI is committed
to truthful and timely
reporting.

Reporting and record keeping

Correct and timely reporting is a matter of course at LEONI.

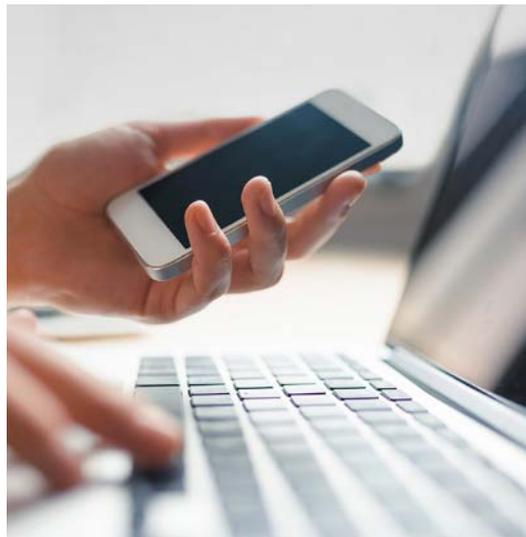
This includes reporting to investors, employees, customers, and business partners as well as to public and government agencies.

As a LEONI employee, you are required to ensure correct reporting. The documents and records kept as part of your official business must be correct and complete. The applicable standards and specifications must be observed – this also applies to documents prepared by third parties that fall under your responsibility.

Handling assets

Tangible and intangible assets are also part of the LEONI corporate values which must be protected.

This includes all facilities and plants as well as patents, licenses and company expertise. As an employee, you may only use these assets for the business purposes of LEONI unless private use is explicitly permitted.



We handle company property in a careful and responsible manner.



INTEGRITY

» We are committed to implementing and embracing this LEONI Code of Conduct and the values it promotes at all levels of the company.

Embracing
integrity



Guidelines

Guidelines assist us in anchoring the LEONI Code of Conduct and its values in our daily life at LEONI.

The LEONI Living Code provides detailed information on every subject area, such as examples, checklists, forms, contacts and direct access to the relevant LEONI guidelines. Furthermore, you as an employee will be assisted to understand, internalize and act in accordance with the LEONI Code of Conduct by attending online and classroom training, as well as workshops.

The management teams in our company make the content of the LEONI Code of Conduct known in their field of responsibility, ensure compliance with it, and lead by example according to LEONI values. If you have any questions, suggestions or com-

ments, you can get in touch with the contact person listed in the LEONI Living Code at any time.

If you suspect that the LEONI Code of Conduct has been violated, LEONI expects you to report this possible misconduct. All reports of potential violations are followed up and sanctions are applied where violations are established.

As an employee, you are urged to proactively establish the LEONI Code of Conduct within the company and to embrace integrity.

Managers act as role models and promote compliance with the LEONI Code of Conduct.



Guiding questions

The following guiding questions serve as orientation as to whether your conduct complies with the LEONI corporate values as set out in the LEONI Code of Conduct. If you can answer yes to the questions, you are on the road to integrity.

- › Is my behaviour in compliance with LEONI basic values?
- › Does my conduct positively reinforce LEONI's reputation?
- › Am I acting in accordance with the company interests?
- › Am I following the LEONI Code of Conduct, even in the event of resistance or difficulties?
- › Am I acting as a role model?
- › Is my conduct consistent with my good conscience?
- › Would my conduct stand up to scrutiny from a third party?



???

right

right

wrong

Guiding questions help
us make decisions and
help us act with integrity.

right

wrong

right

wrong

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Corporate Compliance

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