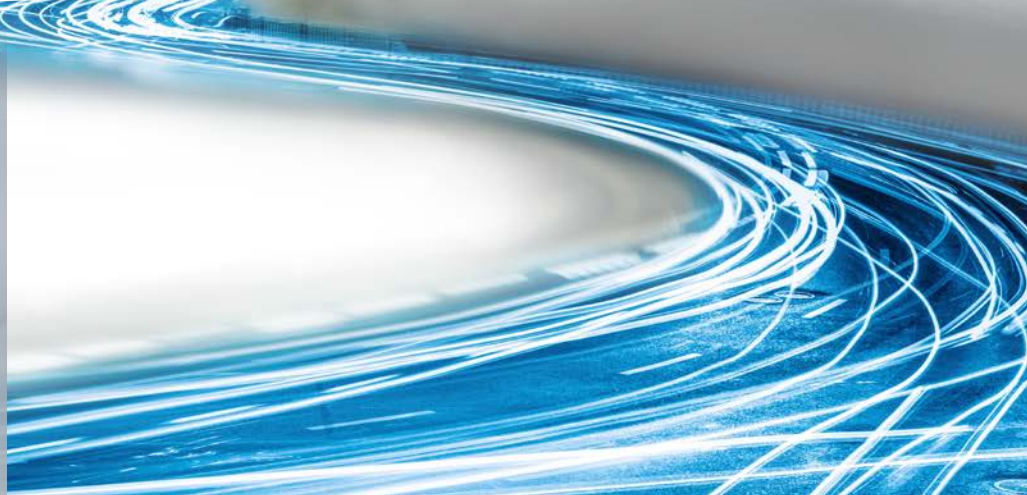


LEONI *Code of Conduct*

for Business Partners



Contact

For questions and concerns, please contact LEONI AG, Corporate Compliance, Marienstraße 7, 90402 Nürnberg, Germany, or the Corporate Compliance Helpdesk:

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Preamble

LEONI combines successful business with responsible conduct to sustainably shape the future of the company. In a globalised world with increasingly complex conditions and interactions, this is becoming more and more challenging. The basis for this responsible behaviour is the corporate value of integrity, which is anchored in the LEONI Code of Conduct for Employees. For LEONI, integrity means that all employees worldwide comply with statutory and internal regulations and conduct themselves in a morally correct manner. LEONI also expects its business partners to conduct themselves with integrity.

The basic requirements for an honest and responsible business relationship between LEONI and all its business partners are laid down herein, in the "LEONI Code of Conduct for Business Partners".

Compliance with laws

LEONI expects its business partners to comply with all applicable laws and regulations within the framework of their business relationship with LEONI.

Respect for human rights

LEONI does not tolerate human rights abuses. Business Partners commit to comply with national and international regulations for the protection of human rights.

Labor Standards

LEONI expects its business partners not to tolerate any form of discrimination, not to permit child or forced labour and to provide adequate remuneration, working hours and safe working conditions.



LEONI expects its business partners to respect freedom of association and the right to form interest groups to represent common purposes and goals, in accordance with the applicable national and state laws and regulations.

Fair Market behaviour

Business Partners agree to respect fair competition and to comply with competition and antitrust laws. Agreements with competitors or any other behaviour that may hinder the free market are prohibited.

Procurement of Raw Materials

Business partners agree to comply with all applicable conflict minerals regulations, for example, Section 1502 of the U.S. Dodd-Frank Act. When using conflict minerals, LEONI expects its business partners to disclose all information along the supply chain using the corresponding templates, as necessary.

Prohibition of Corruption

LEONI is committed in the fight against all forms of corruption and therefore expects its business partners to comply with all anti-corruption laws and not to tolerate any corrupt behavior in their business dealings.

Conflicts of Interests

LEONI and its business partners ensure that their employees make decisions solely on the basis of objective and business-related considerations. LEONI expects its business partners not to involve any employees or third parties subject to a conflict of interests in the corresponding business decisions. Business partners agree to avoid even the appearance of extraneous or personal considerations.

Environmental Protection

Business partners agree to implement all statutory environmental protection requirements and the internationally recognised standards of corporate environmental protection in accordance with their intended purpose, such as ISO 14001. LEONI expects its business partners to provide adequate environmental management and to identify all environmental aspects within their area of responsibility. In addition, LEONI expects its business partners to reduce their environmental impact in their own production process through preventive measures based on the principle of continuous improvement as well as the consideration of environmental aspects in the supply chain and the procurement of raw materials.

Occupational Safety and Health Protection

Business partners shall ensure that all applicable occupational health and safety requirements have been implemented in accordance with their intended purpose, and that occupational health and safety measures have been implemented in accordance with internationally recognized standards, such as OSHA or ILO standards.

This includes the identification of potential hazards and stresses combined with adequate protective measures. In addition, business partners adhere to the principle of continuous improvement in the areas of occupational health and safety.

Handling Information

The exchange and handling of sensitive information is an integral part of any cooperation with business partners. LEONI expects its business partners to exercise due diligence and the application of appropriate technical and organisational measures to protect the information. In particular, confidential and personal information must be protected in such a way that no unauthorised third party has access to it and that it is only processed as intended.

Implementation in the supply chain

LEONI expects its business partners to convey the principles of this LEONI Code of Conduct for Business Partners to their own supply chain business partners, to commit them accordingly and to ensure compliance with these principles.

Incident Reporting

LEONI strives to prevent any form of illegal or even criminal activity within its own sphere of influence. LEONI expects its business partners to immediately report any incidents of possible misconduct. The digital reporting channel "LEONI Integrity Platform" should be used for this purpose:
<https://leoni.integrityplatform.org>