



Code of Conduct

Code of Conduct of LISEGA Group

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Introduction

The LISEGA Group, with more than 1,000 employees, is the international market leader in the development and manufacture of piping systems for industrial plant construction. Continuous change with sustainable development - this is the best way to describe what began in 1964 and today defines the LISEGA Group: In over 50 years, a small regional manufacturer of pipe accessories has developed into the world's leading specialist for industrial pipe support systems.

The LISEGA Group has its own companies in the most important markets around the globe and is represented in seven other countries besides Germany. The LISEGA Group's consistent specialisation in pipe supports is thereby unique in the world. In this way, the LISEGA Group successfully meets the demands of a globalised economy at an international level.

With its outstanding position in the market, which is not only to be maintained but continually strengthened, the degree of responsibility assumed by the LISEGA Group

is increasing - towards our business partners, our employees, but also towards society.

In order to meet this requirement, even against the background of an increasingly difficult regulatory environment, this Code of Conduct, together with the Rules of Conduct based on it, is intended to provide not only legal but also ethical orientation. The Code of Conduct contains the fundamental and binding rules for our conduct within the LISEGA Group and towards our business partners, shareholders and the general public.

The management of the LISEGA Group therefore expects every employee and, in particular, its executives to comply consistently with the Code of Conduct in order to ensure the joint success of tomorrow.

Executive Board of LISEGA SE

I. Scope of Application and Responsibility

This Code of Conduct is binding for our daily actions and applies to all bodies, management, executives, employees and temporary workers, regardless of management level or function in the company. In the following, all these persons are referred to as "employees".

The Code of Conduct applies to all domestic companies within the LISEGA Group and all companies controlled or managed by the LISEGA Group. In joint ventures not solely controlled by the LISEGA Group, the LISEGA Group will seek to exert influence and encourage its partner companies to adopt the standards contained in the Code of Conduct. Companies not subject to German law shall apply this Code of Conduct in accordance with their national law.

Management and employees in leading positions have an obligation to set a good example, both in terms of their own compliance with the Code of Conduct and in ensuring compliance by others. Should difficulties or questions arise in the interpretation or application of the Code of Conduct, employees should contact their superiors or the Compliance Officer of the LISEGA Group.

Respectful and cooperative collaboration, as well as conscious awareness of social responsibility, form the basis for our long-term corporate success. This Code of Conduct summarises our essential principles and basic rules for our own actions and conduct towards our business partners, customers and the public. This Code of Conduct offers all employees a framework for orientation on topics such as compliance with the law, fairness, equal treatment, sustainability, data protection and much more.

II. Guidelines

1. Compliance with the Law

Compliance with applicable laws is a matter of course for us. This includes compliance with all laws and regulations affecting our business areas. We observe the prevailing legal prohibitions and obligations at all times, even if this entails short-term economic disadvantages or difficulties for the LISEGA Group or individual employees.

All managers are responsible for knowing the laws and rules in force within the scope of their duties and areas of responsibility and for ensuring that they are communicated to and implemented by their employees.

2. Data Protection and Information Security

The protection of personal data in general, but especially the data of employees, business partners, customers and suppliers, has very high priority for us. As a matter of principle, we collect and process personal data only in accordance with statutory provisions and only if this is necessary for fulfillment of the respective task or is prescribed by law. Otherwise, we process personal data only after obtaining the consent of the person concerned, which always complies with the regulations and principles laid down in the European Data Protection Regulation. In any event, we pay attention to data security, confidentiality and data minimisation. Personal data is only disclosed to authorised persons. All employees treat personal data as strictly confidential and store them securely so that they cannot be misused.

3. Equal Treatment and Non-Discrimination

The LISEGA Group encourages a culture of equal opportunities, mutual trust and mutual respect. We maintain an open dialogue at all levels, characterised by tolerance and respect; this applies both to the relationship between managers and employees and between employees and managers themselves. We do not tolerate discriminatory behaviour for any reason whatsoever.

We treat all employees equally. No one may be discriminated against or given preferential treatment because of their skin colour, gender, disability, ideology, culture, sexual orientation, age, religion, ethnic or social origin, nationality, appearance, marital status or political activity.

4. Prohibition of Corruption

Corruption, i.e. bribery, corruptibility, the granting of advantages and the acceptance of benefits, has devastating effects worldwide. Therefore, we do not accept any form of corruption. This also applies to preliminary stages of acts of corruption. Any appearance of a conflict of interest when granting or accepting benefits must be avoided.

5. Environmental and Climate Protection

Sustainable environmental and climate protection, as well as resource efficiency, are among our key objectives. We comply with environmentally relevant laws and regulations and strive to act in a sustainable and environmentally friendly manner. Violations can lead to fines and claims for damages by third parties against the LISEGA Group and can damage the public image of the LISEGA Group.

6. Fair Competition

The LISEGA Group stands for competence, innovative strength, customer orientation and motivated employees who act responsibly. This is the basis of our sustainable economic success.

Bribery, corruption or breaches of competition threaten this success - and are not tolerated by us. We act fairly and transparently towards our business partners, customers and suppliers and do not make false or misleading statements. The LISEGA Group complies with the applicable regulations of competition law. This includes in particular the observance of prohibitions under antitrust law, such as the prohibition of price agreements restricting competition in tenders or unfair sales techniques that impair fair competition.

We resolutely reject corruption and conduct detrimental to the company or unfair business practices among employees or third parties. This means that no employee of the LISEGA Group may, in connection with his/her business activities, offer, promise or accept any inducements, benefits, privileges or other advantages designed to influence fair, objective and proper decisions or which only aim to create this appearance. Further details are set out in our Compliance Guideline, which must be observed by all employees in conjunction with this Code of Conduct.

In cases of doubt, all employees are obliged to seek advice from their respective supervisor or the Compliance Officer.

7. Human and Labour Rights

We respect internationally recognised human rights, dignity and personal rights and are committed to upholding them. We are committed to fair working conditions, including remuneration, regulation of working hours and protection of privacy. The labour law and the resulting agreements are to be observed.

8. Occupational Health and Safety

We ensure a healthy and hazard-free working environment for our employees. All employees are jointly responsible for occupational safety and health protection in their area. Occupational health and safety regulations must be strictly adhered to. The high safety requirements of the LISEGA Group are also taken into account when awarding subcontracts and when looking for suitable business partners.

9. Confidentiality of Information / Publicity

Company and business secrets, as well as information that becomes known to us in the course of our activities and is not public, are subject to strictest confidentiality. It is irrelevant whether this is internal company information or information from business partners. Such information will not be disclosed externally or to employees who are not involved in the specific business transaction.

10. Reporting

Reliability, honesty, credibility and integrity are among our common values. For this reason, the LISEGA Group operates open and truthful reporting and communication on the individual business transactions of the respective companies and towards business partners, customers, employees, the general public and official institutions. All employees must ensure that both internal and external reports, information and communications are complete and accurate and comply with applicable laws.

11. Protection of Company Property

All employees are obliged to use the property and resources of the LISEGA Group of Companies properly and carefully and to protect them from loss, theft or misuse. The intellectual property of our companies represents a competitive advantage and thus an asset worthy of protection, which we defend against any unauthorised access by third parties.

The tangible and intangible property of the LISEGA Group is always used by us for business purposes, unless private use has been expressly permitted. In the case of business trips and other company-related expenses, we are also committed to the principle of economic efficiency and thus to an appropriate relationship between the costs and the type and scope of the event.

12. Nuclear Safety Culture

A major industrial segment of the LISEGA Group is subcontracting in nuclear power generation. LISEGA's top priority is to successfully translate nuclear safety requirements into the design and manufacture of our products that will be part of nuclear facilities. In addition to the specific technological and manufacturing requirements, our Nuclear Safety Culture is a major contributor to nuclear safety. The goal is for a positive Nuclear Safety Culture to be developed and lived by the entire organization, starting with the Executive Board and all employees involved in the development and manufacturing process.

III. Implementation of the Code of Conduct

1. Obligation to Comply

Management, authorised signatories, executives, employees, temporary workers and consultants are obliged to comply with the laws and regulations as well as the internal rules affecting their working environment and to base their actions on the values and principles of conduct of the LISEGA Group.

2. Conduct in Conflict Situations

As a matter of principle, we expect all employees to be familiar with the laws and rules governing their field of work. In addition, there is no substitute for personal integrity, sensitivity and sound common sense. This applies to all employees in our daily work.

We also expect to avoid situations in which employees' business and private interests overlap and so come into conflict. All employees are therefore required to separate their private interests separate from those of the company.

In doubtful situations, it is of particular importance, for one's own protection and that of the LISEGA Group, that every decision is made in accordance with the law, rules of procedure, guidelines and our Code of Conduct. The employee concerned should ask himself or herself in such cases:

- Is my action legal and in accordance with the relevant laws and company rules?
- Is my decision free of personal interests and can I reconcile it with my conscience?
- Is my decision consistent with this Code of Conduct?
- Do my actions easily stand up to public scrutiny? How would my actions appear if they became public?
- Are my actions likely to enhance the good reputation of the LISEGA Group?

If all questions can be answered in the affirmative, there is a strong indication that the employee's action or decision is correct and justifiable. If employees are confronted with a difficult situation and are unsure how to act, they must contact their supervisor or the Compliance Officer.

The managers of the LISEGA Group have a special role to play in this context. They are responsible for ensuring that all employees in their area of responsibility are familiar with the Code of Conduct and the company's internal guidelines and comply with them. Managers have the task of creating a positive environment of trust in which all employees have the opportunity to openly ask for help or address grievances. Only in such an

environment is it possible to ensure that all employees act lawfully in the long term and that everyone is effectively protected from violations.

3. Reporting and Investigating Indications of Malpractice

All employees are required to report violations or suspected violations of the laws in force, this Code of Conduct or the Compliance Policy. To this end, we will set up and operate an internal reporting system that complies with the prevailing legal requirements and adequately protects whistle blowers. This is not intended to create a climate of mistrust. Compliance with the law, the Code of Conduct and the Compliance Guideline is an essential cornerstone for a successful common future and is therefore in the interest of all employees.

We therefore promote a climate of fear-free dialogue. If an employee brings criticism or misconduct to our attention, intimidation or reprisals will not be tolerated, regardless of the party involved.

Once a violation or suspicion has been reported, an initial assessment will be made to determine the scope of the investigation. The employee will be informed of the outcome of the assessment and, if necessary, asked to participate in further interviews to obtain further information from him/her.

The employee will be kept informed of the progress of the investigation to the extent permitted for reasons of confidentiality. All information relating to the investigation must be treated confidentially.

It goes without saying that the desired result cannot always be guaranteed. However, the LISEGA Group assures that any report of possible compliance violations will be treated fairly and appropriately. All employees can help to achieve this by complying with this Code of Conduct.

4. Sensitization and Training

All employees shall be made familiar with the Code of Conduct in an appropriate manner. Managers shall ensure sensitization through preventive measures and through a joint exchange on any weak spots that may exist. In addition, training courses shall be offered, if required, in order to strengthen the compliance awareness of the employees.

5. Your Contact Persons

If you still have questions or need support in doubtful situations, your superiors, the management of the respective company and the Compliance Officer are available to you at any time. Any contact from an em-

ployee will be taken seriously.

If you have any further questions about our Code of Conduct or our principles, the Compliance Officer is your neutral contact. He or she will investigate all reported indications and, if necessary, initiate appropriate measures. All data, information and tips will be treated with strict confidentiality and respect at all times.

In addition to the possibility of contacting the Compliance Officer, there is also the option of contacting the (external) ombudsman of the LISEGA Group in the event of reportable violations.

The (external) attorney appointed as ombudsman receives the information in strict confidence, examines it in advance and forwards it to the Compliance Officer with the consent of the whistle blower, anonymously if desired.

Contacts:

Compliance Officer:
Uli Zimmermann
e-mail: compliance@de.lisega.com

Ombudsman:
Attorney Markus Klindwort
Deputy: Attorney Johannes Kolb
e-mail: LISEGA-Ombudsmann@rmk-partner.de
tel.: + 49 421 / 333 922 65

IV. Entry into Force

This Code of Conduct shall enter into force immediately for all employees on 1st January, 2023. The current version of this Code of Conduct will be published via the means of communication used in the company.

Gültigkeit: ab 1. September 2024
Version: 1.0
Freigabe am: 15. August 2024
Freigabe durch: Vorstand der LISEGA SE



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