



# Our Code of Conduct

Doing the right thing.

Light Mobility Solutions GmbH

# Application of the Code of Conduct

The Code of Conduct is binding for all employees of LMS GmbH without exception. Regardless of their position in the hierarchy, all employees are personally responsible for their own compliance with the Code of Conduct. The executive board and the management make a particularly important contribution in this regard through their role model function and support employees in complying with these standards.



# Foreword



Daniel Lozano  
COO/ Co-CEO

Dear employees,

The Code of Conduct of Light Mobility Solutions GmbH is at the heart of our business and corporate philosophy. It embodies our corporate values and thus our own standards for our daily actions. With this Code of Conduct, we set the framework for our ethical, binding and legally compliant actions in the daily cooperation of our employees with each other and equally for a trusting and fair cooperation with our customers, suppliers and business partners.

The Code of Conduct of Light Mobility Solutions GmbH stands for our non-negotiable values and is linked to our clear expectation of each and every employee to identify with these values and to align their behaviour and actions in their professional environment with these values and standards.

Our shared values and compliance with them form the basis for a lasting successful relationship with our customers and the economic success of our company.

Obertshausen, 10.01.2023

Your Executive Leadership of LMS GmbH



Christian Rösch  
CFO/ Co-CEO

# Content

---

## 01

### Principles

---

Integrity, standards and conduct

Responsibility of Light Mobility Solutions GmbH

Compliance with the law

1

1

1

1

## 02

### Cooperation with business partners

---

Good and fair cooperation

2

2

## 03

### Avoiding conflicts of interest and integrity

---

Compliance with competition and antitrust law

Avoidance of acceptance of benefits, corruption and bribery

Presents, personal benefits and invitations

Donations and sponsoring

Avoidance of conflicts of interest

3

3

3

3

4

4

## 04

### Use of company resources and information

---

Use of company resources

Integrity of information

Protection of intellectual property, patents and copyrights

Confidential business information

5

5

5

5

5

## 05

### Cooperation

---

Personal rights of our employees

Equal opportunities and diversity

Leadership and responsibility

Our role model function

6

6

6

6

7

<b>06</b>	<b>Data protection</b>	<b>8</b>
<b>07</b>	<b>Quality standards and production safety</b>	<b>9</b>
<b>08</b>	<b>Ecological and social responsibility</b>	<b>10</b>
	Social responsibility and fair working conditions	10
	Occupational health and safety	10
	Environmental protection and sustainability	10
<b>09</b>	<b>Consequences of non-compliance with the Code of Conduct</b>	<b>11</b>
<b>10</b>	<b>Controlling one's own behaviour and decision-making</b>	<b>12</b>
	Guidelines for one's own behaviour and decision-making	12
	Contact for questions	12

# 1 Principles

## Integrity, standards and conduct

LMS bases its corporate philosophy on the principles of integrity. Trust, fairness and honesty are the highest standards. These standards form the cornerstones of our cooperation with our customers and business partners as well as in our public appearance.



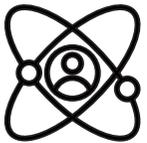
### Integrity:

We are committed to living our values and ideals with strong moral principles.



### Entrepreneurship:

We have the courage to question old structures and break new ground in order to find optimal solutions for our partners and our company



### Commitment:

Employees at all levels are committed to taking ownership and fully contributing their ideas to continuously improve our products, our processes and our company.



### Sustainability:

Sustainability is part of our DNA - our daily actions are determined by economic, ecological and social principles.

## Responsibility of Light Mobility Solutions GmbH

LMS is unconditionally committed to its responsibility as a company and as an employer.

This applies in particular to the great responsibility with regard to fair working conditions and requires a responsible and careful approach to the environment, resources and society.

In particular, LMS stands for the observance of human rights and compliance with legal and moral norms.

## Compliance with the law

LMS applies the standard of strict compliance with the legal framework and expects this equally from its business partners and suppliers. The requirement for the entire workforce clearly stands for exceptionless compliance with the applicable laws on a regional, national or international basis. Violations of these principles are not tolerable.

## 2 Cooperation with business partners

### **Good and fair cooperation**

LMS stands for transparent and sustainable business practices as well as fair and healthy competition along moral and legal guidelines.

For us, this standard forms the basis for successful, long-term cooperation based on trust with our customers and business partners in all our transactions.

In particular, LMS is clearly committed to compliance with existing economic embargoes and trade regulations.



# 3 Avoiding conflicts of interest and integrity

## **Compliance with competition and antitrust law**

LMS clearly stands for strict compliance with competition and antitrust law. Any illegal agreements with our business partners are strictly prohibited in accordance with our Code of Conduct.

## **Avoidance of acceptance of benefits, corruption and bribery**

The LMS Code of Conduct prohibits any kind of acceptance or granting of advantages. Corruption and bribery are in no way compatible with our values and are strictly prohibited. Our conduct aims at fair competition based on good morals and fairness.

## **Presents, personal benefits and invitations**

The granting of valuable gifts, any kind of monetary gifts or other financial benefits to employees, representatives of other companies or office or mandate holders is strictly prohibited.

The principle of absolute proportionality and exception applies to the granting of attention.

The value is aligned to the principle of adequacy and the

non-expectation or acceptance of compensatory measures. Offering gifts to public officials and elected representatives requires special sensitivity. In particular, different legal regulations in different countries are urgently needed. Therefore, any gifts, presents or invitations to public officials, elected representatives, civil servants or employees in the public service must be approved by the management before they are granted. Irrespective of this approval, the principle of absolute proportionality and honesty applies at all times. Any gifts, presents or invitations may not be granted at any time in connection with a consideration or with the expectation that a consideration of any kind will be granted at a later date.

Employees of LMS may not accept gifts, benefits or invitations, e.g. trips, admission tickets, the use of vehicles, holiday facilities, valuable goods, discounts, etc. from third parties which exceed a value of € 35. Acceptance is permitted if it is only occasional, occasion-related and of proportionate value.

The acceptance of monetary gifts is strictly prohibited.

Excluded from the aforementioned regulation are invitations from third parties in the context of business and work lunches, e.g. restaurant visits. Here, the value limits of € 35 do not apply. However, the principle of proportionality also applies here.

Employees of LMS are strictly prohibited from demanding personal benefits from customers, business partners or suppliers or accepting the promise of receiving a service in return. This also applies to gifts, benefits and invitations for spouses, partners, relatives or other related persons or companies.

### **Donations and sponsoring**

Any granting of donations and sponsoring requires the approval of the Executive Board.

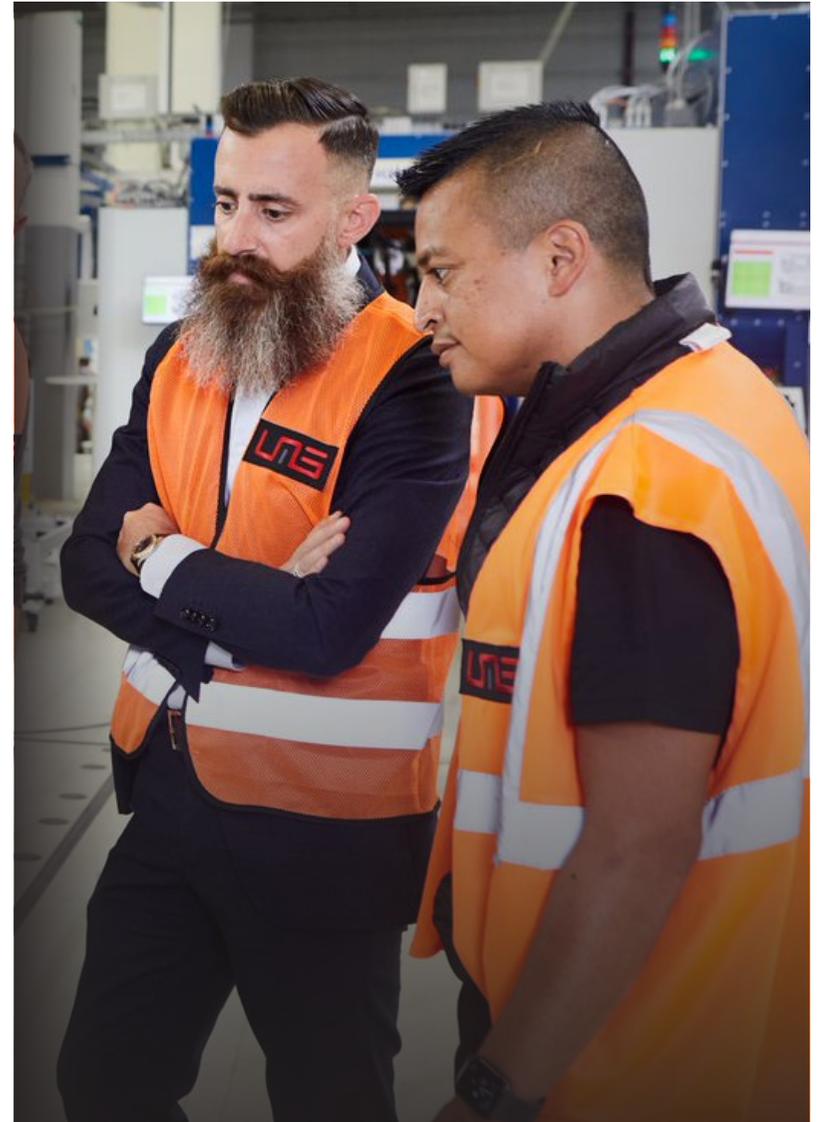
When granting donations, LMS addresses non-profit organisations, associations and charities with which LMS does not maintain a business relationship.

A grant is always made on the basis of non-profit character and is clearly distinguished from sponsoring.

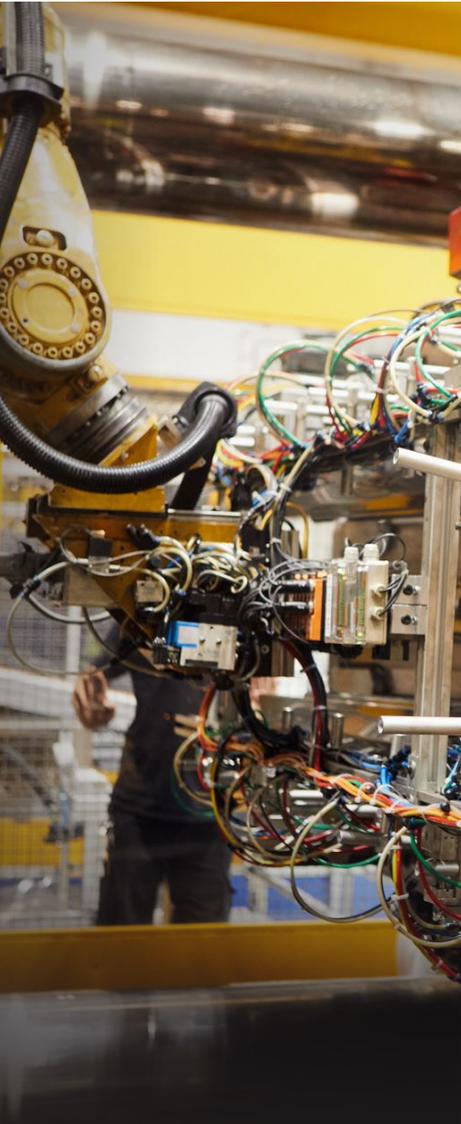
### **Avoidance of conflicts of interest**

Avoiding conflicts of interest for LMS employees is a top priority.

Existing conflicts of interest make the employees concerned vulnerable. In the event of potential or actual conflicts of interest, these must be disclosed immediately to the respective plant manager or the local HR department.



## 4 Use of company resources and information



### **Use of company resources**

We expect our employees to handle all company resources responsibly and carefully. This includes all items and resources provided to employees in the course of their employment, such as products, tools, software, data, brands, logos and other resources such as intellectual property and working time. All these objects and resources may only be used for business purposes. Exceptions are subject to approval.

### **Integrity of the information**

LMS places the highest value on binding information. On this basis, LMS will not tolerate incorrect, untrue or inappropriate information in internal or external information communication such as e.g. product brochures, presentations, financial reports, accounting documents or internal information.

### **Protection of intellectual property, patents and copyrights**

LMS stands behind the interest in protecting all intellectual property. This includes, in particular, trademarks & brand rights, logos, product designs, production layouts, production processes, suggestions for improvement,

technologies, details of business relationships, offer designs, customer relationships and all other information requiring special protection.

LMS requires its employees to comply with any internal confidentiality obligations and any protection regulations.

### **Confidential business information**

LMS handles confidential business information in an absolutely responsible manner. Such information may not be used in any way for personal advantage or the advantage of third parties.

This requirement continues beyond any end of employment.

In this context, LMS undertakes to treat the information provided to its customers and business partners with absolute confidentiality.

# 5 Cooperation

## Personal rights of our employees

LMS stands for cooperation with its employees based on trust and fairness. In this context, LMS protects the personal rights of its employees and stands up for them wherever they are violated or attacked.

## Equal opportunities and diversity

LMS strongly supports a working environment based on commitment, equal opportunities and tolerance. It strictly rejects any form of discrimination, insult, disadvantage, intimidation or bullying. LMS is committed to protecting its employees from any form of sexual harassment or violence.

The company appreciates the opportunities behind diversification in the company and the associated equal opportunities in all aspects for all employees without exception.

## Leadership and responsibility

LMS stands for values that are lived together. This means that our understanding of values is a common one and that these values are to be lived and respected equally by management, employees, trainees and temporary workers.

Values lived together are a factor in the quality of our cooperation. We shape this cooperation by promoting and recognizing performance and talent.

We promote an open exchange and a straightforward and honest communication culture within the company. This includes open and comprehensive information of our employees about situations and business developments.

The management style and the information and communication culture of our managers are based on the principles of openness, trust and appreciation.

Managers and employees act in an exemplary manner and in strict compliance with our common code of conduct.

Managers place trust in their employees, agree on ambitious yet realistic goals, give constructive feedback and delegate responsibility and tasks according to the principle of „encourage and challenge“.



LMS promotes the principle of „open door, open ear“. This gives every employee the opportunity to approach contact persons in the company with problems and concerns of any kind, whether of a professional or private nature, even across the hierarchy. Within the framework of this principle, every employee is free to address problems directly to the respective personnel or plant management or directly to the management or to other managers. The exclusion of the employee’s own manager must not result in any disadvantage for the employee.

### **Our role model function**

A successful company also lives from its good reputation. All employees help by promote and maintain a positive image of LMS internally and externally through their exemplary, professional and lawful conduct.

## 6 Data protection

LMS acts strictly in accordance with the requirements of the national and European data protection directives and sdata protection regulations.

In the context of this, LMS processes and stores personal data and information in accordance with the principles of these standards and exclusively to the extent necessary and within the scope of permissibility.

This data is only transferred to third parties within the framework of legal or contractual requirements or with the consent of the employee. LMS attaches great importance to the confidentiality, integrity and security of stored personal data.

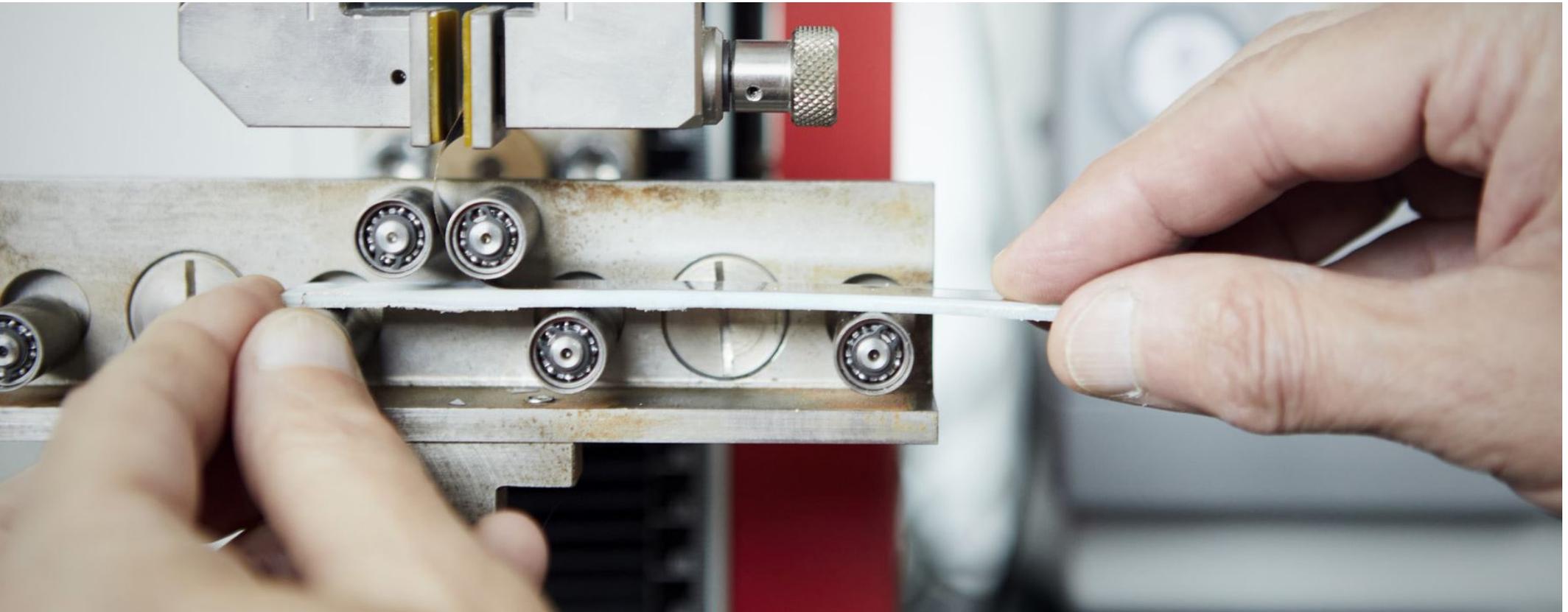


## 7 Quality standards and production safety

For LMS, but also for its customers, the excellent quality and safety of its products are the cornerstone of economic success and a successful, sustainable partnership.

To this end, LMS closely orients itself to the expectations of its customers and partners and, within the framework of this, works in partnership to continuously improve quality and safety standards.

For this purpose, LMS also internally sets the highest standards for quality, processes and management.



# 8 Ecological and social responsibility

## Occupational health and safety

The health and health promotion of employees is a high priority for LMS. LMS pursues a „Vision Zero“ with regard to occupational accidents and work-related illnesses and attaches great importance to compliance with occupational safety standards in the companies and supports and promotes measures for continuous improvement and accident analyses.

## Environmental protection and sustainability

LMS is clearly committed to its ecological responsibility with the clear goal of continuously improving the environmental balance of its operations.

The focus here is on continuously improving energy management, the use of raw materials and the carbon footprint, as well as on minimizing the use of environmentally harmful substances and the disposal in an environmentally friendly and fair manner.

It goes without saying that LMS complies with or exceeds national and international legal regulations and standards on environmental protection.

The preservation of biodiversity - including the production and processing of raw materials - is an important principle for LMS. Protecting natural ecosystems and preventing negative impacts on soil quality and plant growth is only part of this principle. Among other things, this segment also includes the prevention of unlawful forced clearing, deforestation, alteration or degradation of forests and areas.

For LMS, it is a matter of course that it complies with national and international legal provisions and standards of environmental law, also with regard to land, forest and water rights.

## Social responsibility and fair working conditions

LMS stands for social responsibility and acts in accordance with generally binding CSR standards. This requirement also applies to our business partners.

For compliance with social standards, LMS attaches great importance to, for example:

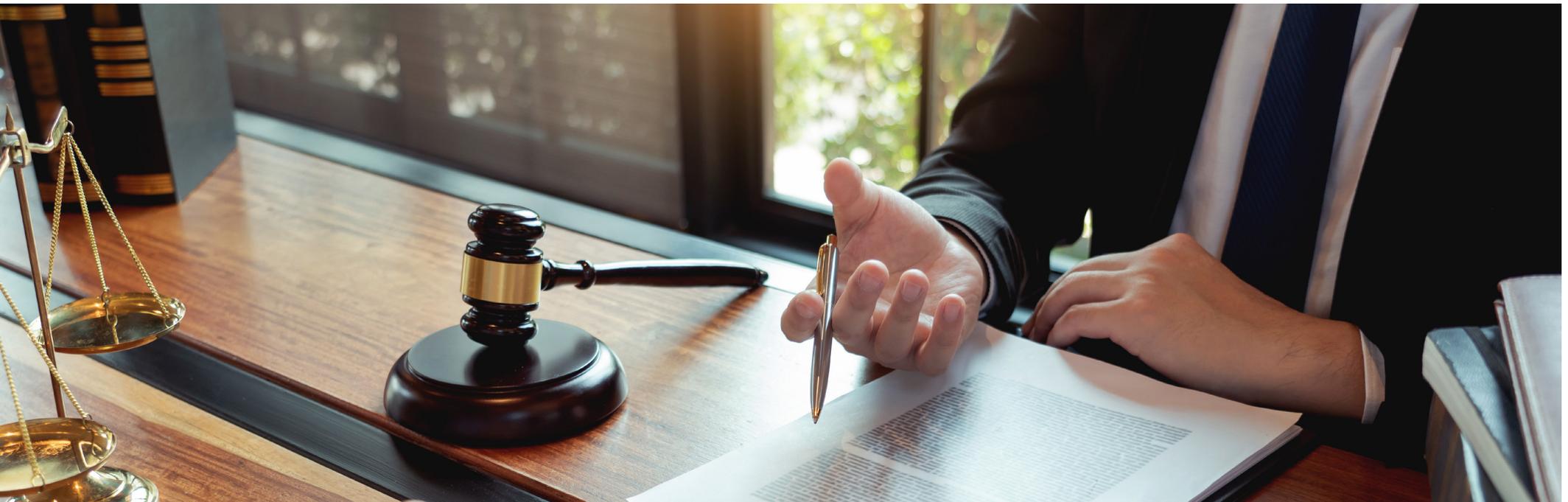
- Highest standards in occupational health and safety
- Compliance with the United Nations Declaration of Human Rights
- prohibition of modern slavery (i.e. slavery, servitude and forced or compulsory labor, and human trafficking)
- strict compliance with the Convention on the Rights of the Child and the Youth Employment Protection Act
- strict prohibition of child labor
- High standards in workplace and working time design
- Compliance with legal requirements for occupational health and safety and compliance with the Working Hours Act (e.g. EU Directive 2003/88/EC)
- Fair pay and compliance with the minimum wage law
- The right to freedom of association and collective bargaining

## 9 Consequences of non-compliance with the Code of Conduct

This Code of Conduct of LMS is based on the applicable legal and operational provisions. All employees are obliged to comply with the principles and provisions set out in this Code of Conduct. In the event of serious violations, termination of the employment relationship may be the last resort.

We apply the same standards to the conduct of our business partners and suppliers. In the event of serious violations of our Code of Conduct, it may also be necessary to consider terminating business relationships with third parties.

Some rules of the Code of Conduct are also based on legal standards and regulations, the non-observance of which also constitute violations of existing laws and threaten fines or imprisonment regardless of disciplinary consequences. In individual cases, it may always be useful to ensure that a decision or action is.



# 10 Controlling one's own behaviour and decision-making

## Guidelines for one's own behaviour and decision-making

In case of doubt, the following questions can help to guide the correct behaviour or decision-making:

- Is the decision lawful and in the best interest of the LMS
- Does it comply with our corporate principles and the standards of the Code of Conduct and does it live up to LMS's good reputation and own standards?
- Is the decision free of personal interests and does not bring personal (private) benefits?
- Can the decision be made public without causing problems and would the decision be viewed positively by management, executives, business partners or the public
- Does the decision reflect your own moral or ethical values?

All these questions must be answered with a definite „yes“. If not, consult with your manager or Human Resources.

## Contact for questions

If you have any questions about the Code of Conduct or compliance with it, or any doubts, please contact:

- Your direct superior
- The responsible HR department
- The plant manager of your location



