

# CODE of CONDUCT

EHLEBRACHT Ethics and Principles



# EHLEBRACHT GRUPPE

Kunststoff-Technik

Licht- und Funktions-Technik

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**EHLEBRACHT**  
Holding Aktiengesellschaft



# VORWORT

Dear Colleagues,  
Dear Readers,

Ever since it was founded in 1964, the EHLEBRACHT Group has exemplified customer focus, quality awareness, strategic action, performance, and innovation.

As partners to renowned industrial enterprises, we manufacture products and system solutions for the entire world in our Plastics Technology Division and Light and Functional Technology Division. Fully aware of our corporate social responsibility, we always strive to ensure that our business activities are conducted in ways that are lawful, ethical, impeccable, and ethically correct.

Accordingly, our values-driven behavior is characterized by integrity, respect, transparency and reliability. We placed the highest priority on open communication, fairness, and helpfulness in all situations and domains.



Everyone who works for the EHLEBRACHT Group actively practices the Group's values every day and shares the same conviction: namely, that lasting business success always means doing what is right, whether at our headquarters in East Westphalia, Germany, or in our worldwide business activities.

The present Code of Conduct serves as the foundation of our organization and system of values. As a binding set of principles, it informs our decision-making in all our activities and day-to-day work at all times and in all places.

A handwritten signature in blue ink, appearing to read 'M. Delius'.

Matthias Delius, Executive Board

# PREAMBLE



The present Code of Conduct is intended to achieve several general goals. Essentially, we want to promote respect for our planet and respectful treatment of all people, emphasize the importance of complying with all applicable legal, technological, and economic standards, and drive the continuous development of these standards.

The present Code of Conduct therefore serves multiple purposes. On the one hand, it is an ethical code of conduct for internal use, and on the other hand it defines the principles we follow in dealing with our external partners. It defines the rights and obligations of our employees and serves as a public proclamation of our values.

Finally, our Code of Conduct represents our commitment to various known public works on different dimensions of sustainability, including the Sustainable Development Goals (SDGs) of the United Nations and the Global Goals of the International Labor Organization (ILO).

Our corporate values are summarized as follows:

- + We are respectful in our conduct towards and communication with each other and our business partners.
- + We want to conduct sustainable business, take a long-term view of our activities, and achieve growth as much as possible.
- + Our shared interest is to ensure the longevity of our group on the basis of far-sighted business strategies and responsible management in the interest of our employees and their jobs as well as the group's success.
- + In particular, we focus on offering our business partners an increasing number of sustainable solutions to meet their needs.
- + The EHLEBRACHT management philosophy is to set ambitious but realistic goals on the basis of mutual respect. For that we will devise tailored solutions and make prompt decisions.

+ Notwithstanding our international activities and global reach, we feel connected to our region, not least of all because of our customers and service providers whom we view as long-term partners.

The business ethics set out in the present Code of Conduct define the fundamental principles governing our activities. The Code of Conduct must therefore be observed by everyone who works for the EHLEBRACHT Group, both internally and externally. We expect a comparable basic understanding on the part of our business partners.



# PEOPLE AT EHLEBRACHT



We see our employees as a valuable resource and strive to assist and support them in the best ways possible. That is because we are convinced that satisfied and motivated employees are the key to our company's success. We give each and every individual the opportunity to realize his or her full potential through continuous development, with the goal of long-term success for everyone.

We view our people as a single team, and we strive to create a work environment where everyone feels comfortable and appreciated. It is important to the EHLEBRACHT Group to create space for feedback and the free expression of opinions, where everyone's opinion matters and everyone is treated respectfully as an equal partner.

We care deeply about the health and safety of our people. We provide everything needed to ensure a safe and satisfactory workplace.

We accept no compromises in matters of occupational safety and act in accordance with the maxim "All accidents can be prevented" by implementing appropriate measures in the area of Quality, Safety, Health, and Environment (QSHE).

With this goal in mind, we empower our people by giving appropriate instructions and reminding them to eliminate any and all potential hazards, even if they lie outside of an individual's own area of work.

Each and every employee is called upon to promote safety in their own workplace and throughout the company.

Based on collective wage agreements, we establish a framework governing the rights and obligations of employer and employees. By this means, we ensure that all legal requirements are met in everything we do. These regulations govern matters like compensation, work hours, vacation entitlement, and work conditions. It is important to us to create work conditions for our employees that protect them and ensure compliance with applicable laws and regulations.

The EHLEBRACHT Group, including all its companies and their employees, is committed to upholding the fundamental principles of the International Labor Organization (ILO) and especially the core labor standards of the Ten Fundamental Conventions.





The prohibition of child labor is one of these standards. We only employ people who are not required to attend school under locally applicable laws and regulations, and we only employ them to perform appropriate activities. Every employee is aware of the increased protection requirements for any minor-age person employed by the company.

Every company in the EHLEBRACHT Group also complies with the prohibition against forced labor of all kinds, specifically including all forms of forced child labor and generally any form of domination. We guarantee the rights of freedom of association and collective bargaining for all employees.

This also includes protection from discrimination due to any employee's affiliation with a labor union. In general, we do not tolerate any form of discrimination, prohibit all types of improper behavior, and guarantee equal opportunity.

It is irrelevant for us whether it is age, national or ethnic origin, gender, skin colour, disability, religion, health, sexual orientation, social origin or other personal characteristics. No discrimination or unequal treatment will be tolerated.

Nor is any form of harassment at the workplace or in connection with work for any of the group companies tolerated.

# SUSTAINABILITY



The term “sustainability” has been used often in the past years, and it is used even more today to denote a not yet clearly defined concept of responsible long-term thinking and environmental compatibility.

Many entities including commercial enterprises, non-governmental organizations (NGOs), national governments, international and supranational organizations use different variants of this term, sometimes with different meanings, and give the concept other names like ESG (Environment, Social, Governance) and corporate social responsibility.

At the EHLEBRACHT Group, we therefore see a pressing need to define and publicly communicate our understanding of sustainability so that every employee, current business partner, and potential business partner will know exactly what we mean when we use this term.

**” As we understand it, sustainability means finding an enduring balance between environmental protection, social justice, and profitability. In this context, we are committed to supporting the UN’s Sustainable Development Goals and respecting human rights. ”**

## USE OF RESOURCES

As a corporate group active in the segments of plastics and lighting technology, we want to take a clear position on certain specific topics, including recycling in particular. The willingness to process recycled materials in production represents the future of our industry. To this end, we continually analyze new materials to make sure that they can be easily processed in our machines. We aim to channel as much of our production waste as possible to post-industrial recycling. The recyclability of our products is also becoming an important factor in our product development work.

Another important topic, especially in plastics processing, is energy use and energy management. We identify and implement energy-saving measures. Every kilowatt-hour that we do not use means that it does not need to be generated in the first place.

Another key aspect of energy management is generating our own electricity, especially by means of a photovoltaics system.

Finally, we are convinced that we should use all resources available to us to make our operations and related infrastructure more environmentally friendly as quickly as possible. As a medium-sized enterprise, we prefer to advance a genuine internal transformation instead of relying on cost-intensive, non-transparent CO2 compensation measures.

Naturally, while these topics are prominent, they are not the only issues to consider. In the future we will address these and other related issues in our Sustainability Code, a guideline with the goal of dealing more specifically with all areas of sustainability.

## **SUSTAINABILITY MANAGEMENT AT THE EHLEBRACHT GROUP**

We understand sustainability to be a topic with great potential. We are steadily developing expertise in this area. We believe that a sustainable transformation of our production and business practices is extremely important for our planet and its ecosystems and its human, animal, and plant inhabitants, as well as for the continued survival of our company in a fast-changing market and legal environment.

To give this sustainability transformation a strong boost, we have introduced a sustainability management program at the Group level, and we have already seen some early changes. The direct reporting line to our Executive Board and especially the organizational embedment of sustainability at the level of all managing directors and members of the Executive Board by the Group Sustainability Board ensure that this issue receives constant attention.



We are currently in the process of developing actionable targets, which we will communicate in a future sustainability report. Developing a greenhouse gas accounting system is the first step of more to come, that will enable us to evaluate our future measures and measure target attainment. In order to fully achieve our sustainability transformation with the full support of the entire staff, we have provided relevant internal communications and training courses and will continue to do so in the future. We are convinced that each and every individual can make a valuable contribution to our sustainability transformation.

### **IMPACTS OF PRODUCTION, ESPECIALLY CONFLICT MINERALS**

Given the nature of our products and production processes, the EHLEBRACHT Group can assure the public that we do not cause any detrimental soil changes, noise emissions, or water or air pollution, and that our production processes do not entail excessive water consumption. Furthermore, we comply with all applicable prohibitions on exporting and importing hazardous waste.

One area of our production operations where we specifically need to be aware of the use of conflict minerals is in the tin we use to solder our lights. In this area, we are exposed to a substantial risk of supporting human rights violations in our supply chain. As we are well aware of this risk, we purchase our soldering tin exclusively from RMI-certified suppliers to ensure the greatest possible protection from potential human rights violations. We conduct regular risk assessments and adopt action plans focused on results as part of our risk management and supplier management activities.

We also comply with the prohibition on unlawful forced evictions and unlawful denial of access to land, forest resources, or water sources of all kinds. And of course, we never misuse private or public security forces for illegal purposes or to restrict the rights of third parties.



# TRANSPARENCY



We always strive to be transparent in our corporate communications. Our communications with colleagues are always characterized by openness and honesty so as to establish trust and foster our people's identification with the company. We are convinced that open and transparent communication has a positive effect on both the morale and productivity of our people. We encourage our employees to provide honest and constructive feedback in order to continuously improve our corporate culture and foster the personal growth of every employee.

We create space to allow a “culture of mistakes” in our everyday work and actively promote it in our internal meetings. This means that people are willing to admit their mistakes, learn from them, and develop new solutions. The same principle applies to our dealings with customers and business partners. Open and transparent communication creates an environment where people can work together as equal partners. For the EHLEBRACHT Group, honest feedback is an essential ingredient of long-term partnerships. Open, transparent, and honest communication allows us to convey our potential and high quality standards to our business partners.



# QUALITY AND PRODUCT SAFETY



We develop and produce products according to high quality standards. Continuous improvement of our products and the market standard is the foundation of our work as we pursue the goal of supplying high-quality products to our customers that will also meet the latest standards in the future. We place a high priority on flexibility so that we can provide the best solutions possible to meet the needs of our customers. We also place a high priority on providing comprehensive advice in close collaboration with our customers and business partners. We regularly test and audit our products to ensure that they meet our quality standards.

We guarantee our customers' satisfaction by maintaining ISO 9001 certification. We're already operating on the basis of clearly defined processes designed in accordance with the most common standards. That is how we ensure that our products meet the highest possible safety standards and fulfill all the legal requirements for product safety.

# COMPLIANCE



## LAW ABIDANCE

We place the highest priority on law abidance in everything we do. Unfailing compliance with applicable laws and regulations and our own internal regulations lay the foundation for our national and international business activities and always takes the highest priority. If and when the local laws and regulations are less developed than or not as strict as our present Code of Conduct or other internal regulations, we always apply the stricter regulations.

## FAIR AND FREE COMPETITION

Anti-competitive conduct can not only cause considerable harm to our reputation; it can also lead to substantial fines and penalties. Fair and free competition is the only way to ensure functioning markets and continuous progress for the benefit of all market participants. Compliance with applicable competition and antitrust laws ensures that competition is not prevented, restricted, or distorted by unfair agreements or practices.

These agreements and coordinated practices are especially prohibited between competitors if they are intended to prevent or restrict free competition or actually have that effect. Among other things, illegal information-sharing, price-fixing, and divisions of territory between or with competitors and suppliers are unlawful. It is also unlawful to abuse a dominant market position by treating customers differently without an objective reason or by enforcing inappropriate buying or selling prices, for example.

We will never participate in unfair practices, and we strictly reject unethical and unlawful conduct of any kind. We always conduct our business in compliance with the law and on the basis of market principles.

## ANTI-CORRUPTION

We are convinced that any form of bribery or corruption and any other kind of inappropriate influence on business activities are detrimental to competition and seriously undermine trust with customers, business partners, and the general public.





Accordingly, the EHLEBRACHT Group applies a zero-tolerance policy with respect to any kind of bribery or other forms of improper influence. We do not pay, offer, or accept bribes, just as we do not offer, grant, or accept any other advantages or objects of value.

In making or accepting the gifts that are common and customary in business relationships, for example, invitations, gifts, and entertainment, we always take care to ensure that they are appropriate and socially accepted.

In our dealings with officials and governmental organizations, we always consider their special status and related risks and apply the appropriate diligence and propriety.

The EHLEBRACHT Group and all employees are committed to comply with all applicable laws and regulations as well as our own internal regulations in order to prevent bribery and corruption. In addition, we always strive to be transparent in the way we conduct our business.



## AVOIDANCE OF CONFLICTS OF INTEREST

Conflicts of interest arise when the private interests of our employees conflict with their work activities or the interests of the EHLEBRACHT Group, whether as a result of sideline activities or by selecting family members, friends, or acquaintances as potential business partners. Although not every such conflict of interest is problematic, it can nonetheless entail adverse consequences for employees and for the EHLEBRACHT Group if it is not reported and handled properly. For that reason, we seek to avoid conflicts between private and business interests or even the appearance of conflicts of interest, and we always disclose them. Business decisions must always be made on the basis of business objectives; they may not be influenced by any other personal or business interests.

## DATA PROTECTION AND INFORMATION SECURITY

We are well aware of the need to protect the personal data we process, and we take appropriate measures to always ensure that this protection is assured and the corresponding legal requirements are met.



Accordingly, we place a high priority on protecting the personal data of our employees and all other individuals with whom we maintain business relationships, and on ensuring the security of all business information.

We collect, process, store, and use personal data only in accordance with the legal requirements for legitimate, clearly defined purposes, and only to the necessary extent and for the necessary duration. We handle all data with the utmost care and attach great importance to the conscientious, trustworthy handling of data.

That is also why information security at the EHLEBRACHT Group is not limited to digital information and the use of our IT systems. We have implemented suitable and appropriate technical and organizational measures to ensure the security of all our data.

### **PROTECTION OF INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION**

The EHLEBRACHT Group manufactures patented, award-winning products and possesses extensive technical expertise and business secrets. We go to great lengths to protect this confidential information because of its high economic value to us and its fundamental importance to our business success. Any unauthorized disclosure or transfer of confidential information could cause considerable damage, which is why we never fail to apply the requisite care and diligence in handling it.

We always observe the applicable laws and regulations for protecting business secrets, and we respect, acknowledge, and always seek to avoid infringing on the intellectual property of others.

### **MONEY LAUNDERING AND EXPORT CONTROL**

We only enter into business relationships with serious customers, suppliers, and other business partners who act in accordance with the law, and we do not participate in money laundering or terrorist financing.

Money laundering refers to activities aimed at channeling illegally acquired money or assets into the legal financial and economic system. We fulfill our legal obligations to prevent money laundering and do not participate in transactions that serve the purpose of concealing or integrating criminal or illegally acquired assets.

We are also committed to fulfilling the relevant legal export control requirements (including permit requirements and export and import bans in particular) in the shipment and exportation of our products.

# ASSURANCE OF COMPLIANCE



Every company in the EHLEBRACHT Group undertakes appropriate measures to ensure that the present Code of Conduct is known to and observed by all employees. To this end, we openly communicate all expectations to those who are directly affected by them, including our business partners and the general public.

Compliance with our Code of Conduct ensures that we conduct our business activities in accordance with all applicable laws and regulations and protect the EHLEBRACHT Group from any adverse consequences.

We understand that non-observance of the Code of Conduct and its core principles and violations of laws and regulations can have far-reaching consequences for our company and those who fail to observe them or violate them.

If we ever have doubts about whether our activities conform with the values and requirements of the present Code of Conduct, or if we are uncertain about how we should align our activities with the

principles of the Code of Conduct, we will work together to take appropriate steps to clear up these doubts and uncertainties and make the right decision in the given situation.

In these cases, we speak with our senior managers and ask the relevant specialist departments for advice. If necessary, we elicit the support of our Human Resources Department and employee representatives.

If anyone notices or suspects non-observance or violations of the aforementioned requirements, values, or other principles set forth in the Code of Conduct, these may also be reported to the senior managers. If someone would prefer not to inform a senior manager because that manager is involved in the matter in question, or they wish to remain anonymous, that person can submit a report through our whistleblower system at

**[ehlebracht.reporting-channel.com](https://ehlebracht.reporting-channel.com)**


When that happens, an appropriate action plan to remedy the non-observance or violation will be set up as quickly as possible so that it can be implemented.



# CODE OF CONDUCT

Failing to report a suspected or actual violation also constitutes a violation of the present Code of Conduct. Whistleblowers have no reason to fear retaliatory action. If the report is submitted in good faith, the whistleblower will be protected from discrimination. However, this does not apply to reports submitted in bad faith with the aim of harming other employees by falsely accusing them.

No rights in favor of third parties may be derived from the present document.

A world map with a light blue background and white landmasses. Five location pins are placed on the map, each containing the company logo. The pins are located in Germany (Enger), Slovakia (Košice), and China (Suzhou, Nanjing, and Shenzhen).

ENGER, DE  
Headquarter

KOŠICE, SK

SUZHOU, CN

NANJING, CN

SHENZHEN, CN

The logo for Ehlebracht Gruppe, consisting of a white circle with a diagonal line through it, creating a stylized 'E' shape.

**EHLEBRACHT GRUPPE**

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