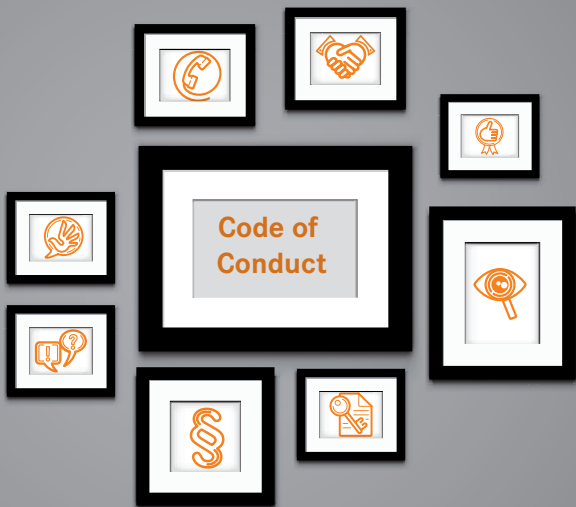




The Lapp Code of Conduct



LAPP GROUP

Customer oriented

Innovative



Success oriented

Family based

Customer oriented. Family based. Innovative. Success oriented. These are the values upon which the Lapp Group is built. Our clear values have made us strong as a company, and as a family business we know that it is only through our joint efforts – through teamwork within our company and with our business partners – that we will be successful. And the basis for this are our values.

If we align our behaviour with these values every day, if we treat each other and our business partners fairly and with respect, we will perpetuate the Lapp Group's success story as a leading manufacturer of system solutions for cabling and connection technology.

In this Code of Conduct, we try to describe more precisely what our values mean for our day-to-day work. We hope that this will be of help to you.

Board of Lapp Holding AG

1

Principles

> Lawful Conduct



We advocate the principle of legality in all acts, measures, contracts, and other transactions of the Lapp Group. All of our employees are personally responsible for adhering to the law within their own field of work. Managers throughout the world have an obligation to take appropriate action to ensure that employees have the up-to-date knowledge of legal regulations required in order to be able to act responsibly.

Responsibility for the reputation of the Lapp Group

All employees must pay due regard to the reputation of the Lapp Group when performing their duties.

2

Human Rights

- > Conduct towards employees
- > Child labour and forced labour
- > Safety at work, fire precautions, health and environmental protection
- > Qualification



On the basis of a value-oriented corporate management and in consideration of internationally recognised human rights, the basic principles of the International Labour Organisation (ILO) and the applicable laws in the various countries and locations, as well as in recognition of the various cultures, the following principles apply:

a. Conduct towards employees

We respect and protect the personal dignity of each individual. Discrimination and harassment will not be tolerated at any Lapp Group location.

b. Child labour and forced labour

Child labour and forced labour will not be tolerated and will be opposed without exception, even in the case of our business partners.



“The Code of Conduct
is the ethical compass of
the Lapp Group.”

Siegbert E. Lapp

c. Safety at work, fire precautions, health and environmental protection

It is the duty of all employees to avoid hazards to people and to the environment, to minimise the impact on the environment and to use resources sparingly. Substances that are harmful to health and the use of raw materials from conflict areas (conflict minerals) should be avoided.

d. Training and qualifications

In the Lapp Group, employees are always selected, hired and promoted on the basis of their function-specific qualifications, their skills and their personality.

3

Avoiding Conflicts of Interest



Secondary employment is only permissible with the prior written consent of the company. Employees will only be permitted to invest in or carry out side-line activities for competing firms, suppliers or customers if they have prior written approval from the respective local subsidiary or regional holding company.

Engaging business partners for private purposes

Employees may only engage a business partner of the Lapp Group for private purposes with the prior written consent of the respective local subsidiary or regional holding company.

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Dealing with Information

- > Reporting
- > Confidentiality
- > Data protection and information security



Reporting

All of our records, reports and statements must be accurate and truthful. The generally accepted accounting principles should be adhered to; in accordance with these, data and other records must be complete, correct, timely, and organised.

Confidentiality

Confidential information belonging to the company must be kept secret. This obligation will continue to apply even after the termination of the employment relationship.

Data protection and information security

When developing and processing all (IT-supported) business processes, the right to privacy and to a private life must be protected and information security guaranteed, on the basis of and in compliance with the applicable statutory requirements regarding data protection and IT and data security.

If, in connection with business processes, personal data (pertaining to customers, suppliers, employees or other affected persons) is collected, processed or transmitted, the following data protection principles in particular must be observed within the EU (European Union) and the EEA (European Economic Area):

- **Prohibition subject to authorisation:** Personal data may not be collected, processed or transmitted unless this is permitted by an express, statutory regulation or an explicit, voluntary and informed declaration of consent by the party concerned.
- **Specified purpose and necessity:** Personal data may only ever be processed for the purpose, for which it was collected, and any collection, processing or transmission of data must be limited to the data which is necessary for this predetermined purpose.

- **Transparency:** Data should always be collected directly from the party concerned, who should be informed when the data is collected of the purpose of this collection, the identity of the collecting/responsible body (data controller) and whether this data will be passed on to any third parties.

- **Permissibility under domestic data protection legislation:** data must only be collected, processed and/or transmitted by a Lapp Group company, particularly outside the EU or the EEA, to the extent that this is permitted under the applicable domestic data protection legislation. Compliance with domestic data protection regulations will be monitored by the data protection officer or the management of the respective Lapp Group company.

Data and IT-system security (information security) must be ensured for all business processes by means of suitable and appropriate technical and organisational measures.

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Conduct Toward Business Partners and Third Parties

- > Relationships with suppliers and customers
- > Bribery, corruption and other inducements
- > Donations

All employees have a duty to observe the rules of fair competition as defined by applicable law.

a. Relationships with suppliers and customers

Agreements with customers and suppliers must be concluded solely in the interests of the company. All employees must comply with the company's internal control regulations (e.g. dual control).

b. Bribery, corruption and other inducements

Agreements or side agreements referring to the acceptance of an advantage or the preferential treatment of individual persons in connection with the brokering, award, delivery, settlement, or payment of orders are prohibited.

Any attempts by suppliers or customers to exert an unfair influence on the decisions of Lapp employees must be reported to the managers responsible. The payment of benefits is prohibited if it can be assumed that such benefits are intended, in whole or in part, as payments of bribes.

c. Donations

Lapp Group companies make monetary donations and donations in kind in the fields of education, science, culture and social concerns. The awarding of such donations is decided upon solely by the managing directors and the Board of Lapp Holding AG.

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Product Quality and
Safety



“Success through quality” is one of the guiding principles of our business policy. We aim to satisfy the high quality and safety requirements of our customers, and the improvements we make to ensure this are thorough and designed to last.

If defects arise despite our best efforts, we take action to eliminate them in compliance with statutory provisions and contractual obligations, and with the clear priority of preventing injury or loss of life.

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Reporting Irregularities



This Code of Conduct is a central component of the Lapp values that we work by. It is vital that these values are observed uniformly throughout the Group – each employee is responsible for ensuring this.

Managers have the special responsibility of communicating the content of this Code of Conduct to employees by setting an example.

If you are in any doubt as to how you should behave in a given situation or if you would like to report a breach of this Code of Conduct, please feel free to call the following dedicated number: **+49 711 7838 8888**, or email us at **compliance@lappgroup.com**

Additional useful information can be found on our **[Website](#)**.

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Monitoring



Each company is responsible for ensuring that the rules contained within this Code of Conduct as well as any other internal regulations within its area of responsibility are complied with.

The Internal Audit department has an unrestricted right to obtain information and carry out audits, unless statutory regulations oppose this. When carrying out audits, the Internal Audit department pays attention to compliance with the Code of Conduct and includes its regulations in its test criteria.

Lapp Holding AG

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LAPP GROUP