

### <u>Lenord + Bauer - Code of Conduct</u>

#### 1 Preface

From the Code of Conduct (CoC) of the German Railway Industry Association VDB

"The economic and political discussion is increasingly dominated by the escalating globalisation of business activities and the worldwide scale of competition, which imply that the growth in international trade and the cross-border exchange of capital, labour and knowledge will lead to a progressive integration of national economies.

Against this background, the establishment of ethical business practices and the awareness of social responsibility are becoming ever more relevant for companies of the railway industry. Many companies are therefore demanding, and rightly so, that their suppliers and business partners also adopt ethical business practices and be aware of their social responsibility. These suppliers and business partners are therefore confronted with a multitude of different prerequisites for implementing social responsibility and ethical business practices."

The requirement of Lenord + Bauer that all business be conducted in a totally ethical and lawful manner is inseparable from the manner in which we conduct in our day-to-day work.

Lenord + Bauer responds to this international challenge by establishing a code of conduct of its own, which is based on the Global Compact of the United Nations.

### 2 Integrity and corporate management

Lenord + Bauer is assuming responsibility as its management is mindful of universal ethical values and principles, in particular integrity and honesty and the respect of human dignity, and takes into account the economic, technological as well as social and ecological consequences of its decisions and actions on behalf of the company.

# 3 Corruption

We reject any illegal transactions, such as corruption, bribery or kickbacks. We agree to transparency in making and receiving gifts and invitations, and are thus ensuring compliance with corporate guidelines, industry standards and applicable law.

# 4 Human rights

We respect and protect human rights as integral part of our corporate culture and categorically reject child labour and forced labour. We do not maintain business relations with companies, which are not respecting these principles.



#### 5 Employee rights / discrimination

We treat each other in a respectful and trusting manner. Applicable provisions regarding level of remuneration and working hours are respected. We see to it that the working environment is free of discrimination, harassment or mobbing. The right of our employees to freedom of coalition, freedom of assembly and to collective bargaining and pay negotiations is respected.

### 6 Social responsibility / environmental protection

We consider environmental protection, health and occupational safety as an essential part of our social responsibility. We develop and produce safe products and services for our customers. Within its possibilities and boundaries of action, Lenord + Bauer is contributing to sustainable social development at its locations.

#### 7 Compliance with applicable law

We comply with applicable law at the local, national and international levels and maintain above-board and lawful relations with all government and regulatory agencies. We are committed to compliance with the applicable anti-trust and competition law.

#### 8 Corporate property / documentation of business transactions

We use the IT systems made available by our company in order to carry out our tasks and are involved in protecting these systems and devices from internal and external abuse. We protect any confidential information regarding the company, employees and business partners, products and services as well as other sensitive data from unauthorised disclosure and abuse.

# 9 Implementation / monitoring

Lenord + Bauer makes all appropriate and reasonable efforts to continuously implement and apply the principles and values laid down in this CoC. We communicate frankly and open to dialogue with employees, customers, suppliers and other interest and stakeholder groups as to the requirements and the implementation of this CoC.

We promote the idea of the Global Compact by working primarily with suppliers who subscribe to our Code of Conduct or who have implemented a CoC of their own within their company.