



Code of Conduct of LAP Group companies

LAP Group companies commit themselves to the fundamental principles and values regarding its interactions with employees, customers, suppliers, society and the environment set out in this Code of Conduct.

Legal Compliance

- We comply with the laws and regulations of the applicable legal systems.

Respect for the basic human rights of employees

- We promote equal opportunities for and treatment of our employees irrespective of skin color, ethnic origin, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age;
- We respect the personal dignity, privacy and personal rights of each individual;
- We refuse to employ or make anyone work against his will;
- We refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual and personal harassment or discrimination;
- We do not tolerate behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
- We provide fair remuneration and we warrant the applicable national statutory minimum wage;
- We comply with the maximum number of working hours laid down in the applicable laws. This applies both to the countries of our locations and to the countries where our employees work for us;
- We recognize, as far as legally possible, the right of free association of employees and neither favor nor discriminate against members of employee organizations or trade unions.

Prohibition of child labor

- We employ no employees under the age of 15.

Health and safety of employees

- We take responsibility for the health and safety in the work environment of our employees;
- We control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;
- We provide training and ensure that employees are educated in health and safety issues;
- We set up and use an occupational health & safety management system.

Environmental protection

- We act in accordance with the applicable statutory and international standards regarding environmental protection;



- We minimize environmental pollution and make continuous improvements in environmental protection;
- We set up and use a reasonable environmental management system.

Prohibition of corruption and bribery

- We do not tolerate and will not engage in any form of corruption or bribery, including but not limited to any payment or other form of benefit conferred on any government official or on a counterparty in the private sector for the purpose of influencing decision making in violation of law.

Fair competition and anti-trust laws

- We act in accordance with national and international competition laws and do not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.

Conflicts of interest

- We avoid conflicts between private and business interests or even the appearance of such conflict;
- We make our decisions exclusively on the basis of objective criteria and do not allow ourselves to be swayed by personal interests and relationships.

Confidentiality and data protection

- We process personal data only in accordance with the applicable data protection laws and provisions and ensure that personal data is used only for legitimate purposes;
- We keep trade secrets confidential and protect them from unauthorized disclosure.

Export control

- Export control can impose prohibitions, restrictions, approval requirements or other monitoring measures on cross-border transactions. We comply with all applicable provisions for importing and exporting of goods, services and information;
- We do not deal with persons or companies that are on sanctions lists applicable to us.

Responsible sourcing

- We take reasonable efforts to avoid using raw materials that originate from conflict and high-risk areas and contribute to human rights abuses, corruption or the financing of terrorism.

Supply chain

- We use reasonable efforts to promote among our suppliers compliance with this Code of Conduct;
- We comply with the principles of non-discrimination regarding supplier selection and treatment.



Whistleblower system

- We have a whistleblower system that can be used at any time to report suspected violations of rules and laws (also anonymously);
- We will follow up and investigate every incoming tip.

We reserve the right to change the requirements of this Code of Conduct due to changes of the LAP Compliance Program.

November 5, 2021