



## ETHICAL GUIDELINES



### APPLICABILITY

These guidelines apply to all LÜLING employees as well as all those persons who act on behalf of LÜLING.

We expect a high degree of honesty, fairness and integrity from our employees and representatives when dealing with colleagues, customers, suppliers and any external parties.

Our employees and representatives are required to raise the issue of any departures from our ethical guidelines and we constantly strive to ensure that the following guidelines are also met and practiced by our suppliers and sub-contractors.



### ALCOHOL AND DRUGS

LÜLING stipulates that the work environment be alcohol and drug free.

The misuse of alcohol and drugs can lead to dangerous situations, both on and off the premises.

Any infringements will be dealt with forthwith with disciplinary measures, which can lead to the dismissal of the employee.

LÜLING is committed to support those employees who seek assistance in overcoming their alcohol or drug addiction.



### MEDIA COVERAGE

We do not permit false, misleading or misappropriated facts about our company to be published.

Any press reports to the media or to the public authorities will be given only upon consultation with management or the executive board respectively.



### EQUAL OPPORTUNITY

All employees are treated with respect and dignity. Likewise, the company ensures that no employee is in any way discriminated against, on the basis of their sex, ethnic background, religion, sexual orientation, handicap or their political views.

LÜLING will take disciplinary measures against any form of harassment, abuse or discrimination.



### OBSERVING THE LAW

Current laws provide the foundation for our ethics policy.

All our employees and representatives are bound to follow and comply with all applicable laws and regulations.

Should there be any uncertainty about any legal issues, management or the HR department will be called in to help reach a decision.



### WAGES

LÜLING is aware that wages have to cover the basic needs and undertakes to pay its employees at least the minimal wage or the standard industrial wage.



### OCCUPATIONAL SAFETY, HEALTH AND ENVIRONMENTAL PROTECTION

LÜLING provides a safe and healthy working environment for all its employees.

Each of our employees contributes towards maintaining and promoting their own health and safety.

We continually use resources sparingly and efficiently and make sure that no illegal chemicals or other substances are used.

All chemicals and other substances are disposed of according to current regulations.



### INTEGRITY

Our employees refrain from carrying out interests and activities outside their working environment that could lead to a potential conflict of interest. This includes, in particular, employment or consultancy relationships with our competition or for our customers or suppliers.

Each of our employees undertakes to uphold and protect our know-how and that of our business associates.



## CORRUPTION

LÜLING does not tolerate any form of corruption.

We conduct our business according to legal and proper commercial principles. We neither accept nor offer bribes or gratuities that can be seen to be bribes.

Nor do we engage in improper lobbying.



## RESOURCES

Our employees shall not use any working time, the premises, the material and LÜLING'S know-how for their personal gain.

Using the above-mentioned for charitable or personal purposes must be cleared with management.

The corporate values must be nurtured and protected.



## DONATIONS

LÜLING only supports charitable causes and non-profit organisations and institutions that work in the public interest or help people in need.



## DEALING WITH GIFTS AND INVITATIONS

Our employees are forbidden to accept or give monetary gifts.

All other gifts may not exceed the value of 100 Euros per recipient and year.

Invitations may only then be accepted or extended when the occasion is work-connected and the nature and scale is appropriate. The reason for the event must be made crystal clear i.e. the occasion and the participants must be registered and documented ahead of time.



## FREEDOM OF ASSEMBLY AND TARIFF-NEGOTIATIONS

LÜLING accepts the right of its employees to the freedom of assembly and to tariff-negotiations.



## FORCED LABOUR AND CHILD LABOUR

LÜLING does not tolerate forced labour or child labour or any other form of exploitation of vulnerable workers.

No person under the age of 15 or under the age of compulsory schooling may be employed. The only exception thereof is work experience within the framework of the school curriculum.