Code of Conduct for Suppliers LEUCO // Ledermann GmbH&Co.KG

Preamble

LEUCO assumes responsibility for lawful, honest, and sustainable conduct. This includes respect for internationally recognised human rights, the protection of the environment and responsible corporate governance.

Our actions are guided by applicable law, the principles of fair competition, the rejection of all forms of corruption and the requirements of international trade in goods. In addition, we take into account recognised ethical and human rights standards, in particular the principles of the UN Global Compact, relevant conventions of the International Labour Organization, the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

We expect our suppliers to commit to the requirements described in this Code and to observe them in their cooperation with LEUCO. In this way, responsibility for social, ecological, and corporate concerns within the supply and value chains is to be shared responsibility.

The following principles apply to suppliers worldwide. Direct suppliers are also required to act appropriately to ensure that their own suppliers and service providers also comply with comparable requirements.

Social Responsibility

I. Human rights

The Supplier respects internationally recognised human rights and aligns its business activities with relevant guidelines and conventions. These include, in particular, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Convention on the Rights of the Child, the Convention on the Elimination of All Forms of Discrimination against Women, as well as the core labour standards and fundamental principles of the International Labour Organization.

II. Exclusion of forced labour and child labour

The supplier does not tolerate slavery, forced labour, child labour or comparable exploitative practices. It undertakes to effectively counteract such risks in its own business area as well as in the operations of its suppliers.

III. Discrimination

The supplier shall take action against any discrimination within the framework of the applicable legal system. This includes, in particular, unequal treatment based on gender, skin colour, ethnic or cultural origin, disability, religion or belief, age, language, origin, or sexual orientation.

The supplier supports equal opportunities for all employees and ensures a respectful, trustworthy, and safe working environment.

IV. Working conditions

The supplier remunerates its employees in accordance with the applicable legal or collective bargaining requirements. This applies to minimum wages, appropriate remuneration, overtime regulations, and legally prescribed social benefits.

Remuneration owed must be paid in full and on time; inadmissible withholdings are excluded.

V. Freedom of association

The supplier respects the employees' rights to freedom of association, trade union activity, employee representation, works council work and collective bargaining under local law. No influence, disadvantage, intimidation, or harassment in connection with the exercise of these rights is to be observed.

VI. Employee health and safety

The supplier ensures occupational health and safety in accordance with the applicable national and regional requirements. Employees must be protected as best as possible against work-related risks such as accidents, hazardous substances and excessive physical or mental stress.

The aim is to avoid or reduce as far as accidents at work, absences due to illness and work-related illnesses.

VII. Handling metals and minerals from conflict-affected and high-risk areas

For metals and minerals from conflict-affected or high-risk areas, in particular tin, tungsten, tantalum, and gold, as well as other raw materials such as cobalt, suppliers are required to comply with EU Regulation 2017/821 and the recommendations of the OECD guideline.

The supply chain policy published on the LEUCO website describes the relevant expectations and framework conditions. Suppliers of such materials undertake to introduce comparable processes, implement effective due diligence obligations, and promote responsible supply chains for minerals from conflict-affected and high-risk areas.

Smelters and refineries without appropriate and verified due diligence processes will not be accepted by LEUCO. Information on the origin of metals and minerals must be provided by the supplier in a complete, correct, and comprehensible manner.

Ecological responsibility

VIII. Environmental and climate protection

The supplier complies with environmental requirements in accordance with applicable law as well as relevant local and international standards. Impacts on the environment and climate are to be reduced; a continuous improvement in environmental and climate protection performance is expected.

Environmental protection includes the careful use of natural resources and the continuous reduction of energy and water consumption. Renewable energies are to be used as far as possible and waste and emissions into air, water and soil are to be monitored and reduced.

Corporate Responsibility

The Supplier shall comply with the applicable legislation of the countries in which it operates in all its business activities and decisions.

IX. Corruption

In its dealings with business partners and public authorities, the supplier strictly separates the interests of the employees, legal representatives and agents involved from private or extraneous interests. Business decisions may not be influenced by impermissible advantages. The applicable criminal law on corruption must be complied with.

- It is prohibited to offer, promise, grant, demand, accept or be assured of money, gifts, or other benefits to third parties or by third parties.
- Low-value gifts and invitations may be excluded if they are within the framework of customary business courtesy and appropriate hospitality.
- The ban applies worldwide and includes so-called acceleration payments.

X. Safeguarding fair competition

The supplier is committed to fair competition and complies with the applicable antitrust and competition regulations.

In particular, agreements or concerted practices with competitors that unlawfully influence prices, conditions, sales territories, customer relationships or free competition are not permitted.

XI. Responsible sourcing and combating money laundering

The supplier carefully selects its own suppliers and service providers. It ensures that materials do not contain conflict minerals and that delivered goods are neither illegally procured nor mislabelled.

Cooperation with organizations or companies that are attributable to organized crime is excluded. The Supplier does not participate in money laundering and maintains suitable procedures to detect and prevent money laundering.

XII. Handling of confidential information

The supplier respects and protects the intellectual property rights of LEUCO AG as well as the corresponding rights of third parties.

Intellectual property rights of LEUCO may only be used with prior written consent and exclusively in connection with the business cooperation with LEUCO.

Due diligence obligations

LEUCO expects the supplier to establish a process for fulfilling human rights and environmental due diligence obligations that is appropriate to the scope and circumstances of its business activities. The aim is to identify, avoid, reduce, or end corresponding risks and violations of the law.

The Supplier shall provide LEUCO with appropriate support in fulfilling its own due diligence obligations if there are no legal restrictions to the contrary.

Upon request, the supplier shall explain how it counters actual or possible adverse effects of its activities and the activities of its suppliers on human and environmental rights. This can be done, for example, by means of self-disclosures, certificates, evidence, or reports. LEUCO reserves the right to carry out supplier audits.

If there are risks regarding compliance with this Code, regarding internationally recognised human and environmental rights, LEUCO expects the supplier to take appropriate preventive measures to prevent violations of the law.

If risks have already occurred or violations have been identified, LEUCO expects appropriate and effective measures to mitigate and remedy them. In the event of particularly serious violations that are not adequately addressed, LEUCO reserves the right to suspend the business relationship or terminate it as a last resort.

Indications of misconduct

Unlawful or irregular behaviour within LEUCO is to be identified, processed and remedied. It enables all stakeholders to report indications of misconduct securely, confidentially and, if desired, anonymously.

Reports and complaints on human rights issues that affect LEUCO or other parties along the supply chain can be directed to LEUCO: governance@LEUCO.com.

Suppliers can also contact their respective LEUCO contact person.

Acknowledgment and Consent

We confirm receipt of the Code of Conduct for LEUCO Suppliers as of 28.10.2026. In addition to the obligations arising from existing supply contracts with LEUCO, we undertake to comply with the principles and requirements described therein.

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Date Supplier Name legally binding signature

Contact for further questions

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This Code applies to all suppliers who supply materials, products, and/or services to a company of the LEUCO Group.

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