

Compliance Guidelines

Lohmann Gleit- und Wälzlagertechnik GmbH & Co. KG

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1.0 Preamble

We are aware of our role as a responsible member of society and therefore of our responsibility towards employees, customers, and business partners. We want to fulfil this responsibility. We are therefore committed to principles of behaviour that are consistently derived from this awareness. These principles form the framework for our corporate and social behaviour.

The actions of the company management and our employees are governed by the principles of personal responsibility, honesty, loyalty and respect for others and the environment. The management bears particular responsibility for upholding these principles.

Together with the employees, the management strives for the company's success. In line with our principles as a medium-sized company, we want to generate a sustainable return on our business activities that corresponds to our entrepreneurial potential. We want to build on the strengths and competitive advantages we have built up over the years and always measure our quality and service standards against the highest possible benchmarks.

On the way to a successful future for our company, we are building on the following:

- Promoting the skills, strength, and commitment of our employees
- Managing our organisation in a responsible and exemplary manner
- Creating a reliable social and political framework
- Providing opportunities for scientific and technological progress.

This Code of Conduct is intended to encourage all members of our company to act conscientiously and responsibly. The following explanations are intended as a point of orientation.

2.0 Scope of application and basic principles

The Code of Conduct applies to our company, including all areas.

Through its actions, our company pursues the goal of disseminating the principles set out in the Code of Conduct. Companies that have a business relationship with our company are encouraged to voluntarily adhere to the rules of the Code of Conduct.

The Code of Conduct is the basis for further company regulations, which can take into account both industry-specific and country-specific particularities, provided that these correspond to the principles set out here. It extends to official company matters and to all areas in which employees are perceived as representatives of our company.

The Management Board and all other executives set a good example regarding compliance with the Code of Conduct. They are obliged to work towards compliance with the regulations in their area of responsibility. Violations of the Code of Conduct are not accepted. Particularly strict standards apply when assessing the behaviour of managers and team leaders.

3.0 Lawful behaviour

3.1 General principles

Integrity determines our actions. Compliance with law and order is a top priority for our company. Every employee must observe the legal regulations relevant to their work. This applies to every legal system within which they act.

Each employee is responsible for informing themselves about which legal regulations must be observed in the course of their work. In addition, our company will do everything in its power to inform its employees about the regulations that affect them and to advise them on how to comply with them.

The framework for entrepreneurial behaviour is not only formed by international or national law, but also by a multitude of social, cultural, and corporate rules. Our company also incorporates these often-unwritten rules into its decision-making and assessment processes and endeavours to act in accordance with them.

3.2 Information on the company

To a certain extent, developments in our company are also of public interest. Also employees are interested in the key developments of our company. For this reason, we provide internal and external target groups with information on various occasions. As a company, we want to always fulfil this information requirement in an appropriate manner.

Our company is committed to accurate and truthful reporting, in particular:

- To our employees
- To our business partners and interested parties
- To the public

4.0 External relations

4.1 General principles

Our company conducts its business in a legally and ethically sound manner. This is what management expects from every employee.

Our company also insists that its business partners, suppliers, and customers comply with the principle of legally and ethically impeccable behaviour.

The private interests of employees and the interests of the company must be strictly separated. A conflict of interest exists if the private interests collide in any way with the interests of the company or if this appears to be the case.

4.2 Benefits

An employee may not demand or accept monetary benefits from third parties, nor offer or grant them. This applies without exception and in particular to public officials, including those of foreign governments or international organisations.

Other types of benefits from suppliers, customers or other business partners may not be requested. Occasional gifts, hospitality or other benefits may only be accepted within the framework of generally recognised business practices and if they are not likely to influence business decisions. Such benefits may only be permitted in the context of normal business partner relationships, provided they are not to be regarded as undue influence.

Particular caution is required in the following situations:

- A gift has a high value.
- Frequent, repeated gifts to the same recipient.
- The recipient is offered a private gift.
- Activities do not involve other Lohmann representatives.
- The event involves family members, relatives, or friends.
- The event takes place during the same period as the business negotiations with the recipient they represent.
- The gift is a personalised gift for the recipient.
- A hidden benefit has not been authorised by Lohmann's managing director.
- Events or other contributions deviate from basic ethical principles.
- The recipient occupies a sensitive position in the company, e.g. Purchasing.
- The recipient proposes the business event or contribution.

4.3 Behaviour towards customers

Our company offers its customers a wide range of products and services. Our guiding principle is to endeavour to fulfil the needs of our customers with suitable and efficient solutions. This includes constantly reviewing the service portfolio and adapting it proactively to new market requirements. Our company endeavours to ensure that all customers are treated fairly.

4.4 Behaviour towards proprietors

Our company regards its capital as a prerequisite and essential basis for its entrepreneurial activities. The preservation of corporate values and the realisation of a return in line with the market as well as transparency and responsibility towards the proprietor are therefore key objectives of our company.

4.5 Behaviour towards suppliers

In our relationships with suppliers, we ensure compliance with the provisions of the Code of Conduct. We maintain cooperative business relationships with suppliers and do not maintain business relationships with suppliers that are publicly known to conflict with the basic principles of our Code.

4.6 Behaviour towards consultants

We only conclude consultancy agreements with individuals or companies whose qualifications make a verifiable contribution to the development of our company. The level of remuneration must be commensurate with the value of the service provided and the personal qualifications of the consultant.

In many countries, the involvement of intermediaries, agents, and consultants (hereinafter uniformly referred to as "intermediaries") is an essential and indispensable means of ensuring a successful market presence. On the other hand, the involvement of such third parties can be used to conceal illegal payments and circumvent the ban on corruption.

When concluding contracts with intermediaries, the mere impression of malpractice must be avoided. The following principles must be observed when selecting and commissioning intermediaries:

- Agency agreements are only concluded with individuals or companies whose qualifications enable them to make a verifiable contribution to the development of specific projects.
- Agency agreements must be in writing and must describe the agreed services in detail.
- The amount of remuneration must be proportionate to the value of the service.
- Payments to intermediaries are made cashless and generally only after the agreed (partial) services have been provided.

4.7 Behaviour towards the public

All communications from our company are complete, simple, correct, and comprehensible in terms of content and timing. Our company respects the professional independence of journalists and the media. We therefore do not pay for editorial content. Only authorised persons are entitled to pass on information about our company or existing subsidiaries to the public, the media or other third parties.

4.8 Behaviour towards politics

Our company is politically neutral and does not donate to political parties or to organisations or foundations that have a close relationship with political parties. We do not employ any staff who hold public office or public mandates on a full-time basis. We also do not enter into consultancy agreements or similar remuneration agreements with representatives of these groups.

At the same time, our company expressly recognises its shared responsibility for promoting the common good. We therefore welcome the civil, political, democratic, and social – especially charitable and social – commitment of our employees. Employees who work in this context are acting as private individuals. Our company does not pursue any corporate interests if its employees act in the contexts described above.

4.9 Commitment to social responsibility

Taking responsibility towards society and the environment is a key factor in the sustainable success of our company. With its products and services, its investments and its role as an employer, our company fulfils an essential structural and economically significant task. It acts responsibly at international, national, regional, and local level and as a living part of the respective communities.

Our company considers itself to have a special responsibility to promote social developments, particularly at regional and local level – be it by providing training places beyond its own requirements, through initiatives, particularly in the social, ecological, and cultural fields, through the voluntary commitment of our employees or through other suitable means. For this reason, our company welcomes the social commitment of its employees, provided this appears appropriate in the respective circumstances and there is no conflict with operational concerns.

4.10 Sponsorship and initiatives to promote the common good

Our company considers sponsorship and initiatives for the development of regions and local communities to be important social responsibility practices. In essence, it is about providing substantive and financial support for public welfare issues that are fundamentally intended for the public. Sponsorship must not be linked to the expectation of mutual benefit.

5.0 Internal relations

5.1 Occupational and plant safety, health protection

Our company works continuously to improve occupational and plant safety as well as health protection. Every employee shares responsibility for the protection of people and the environment in their workplace. All relevant laws and regulations must be observed. Every manager is obliged to instruct and support their employees in fulfilling this responsibility. In the event of violations or accidents, the responsible authorities must be informed immediately.

5.2 Equal opportunities and mutual co-operation

We respect the dignity and personality of every employee. Our dealings with one another are characterised by mutual respect, fairness, team spirit, professionalism, and openness. Managers act as role models and prove to be competent contact persons, especially in conflict situations.

We promote equal opportunities and diversity within the company. Both are considered essential prerequisites for a good reputation and the company's success. No employee or applicant is discriminated against based on gender, race, nationality, age, religion, sexual orientation, or disability. Decisions on the selection, training and promotion of employees are based exclusively on job-related criteria.

Outstanding performance is a prerequisite for the company's success. For this reason, we particularly promote talented individuals within the company who contribute to the company's long-term success through both their professional expertise and their social skills.

We offer our employees opportunities for professional and personal development and encourage them to take advantage of these opportunities.

In our company, we are committed to ensuring that our employees are given the opportunity to harmonise business interests with their private lives. Particular attention is paid to the compatibility of family and career.

5.3 Significant financial investments

A material financial interest is any direct or indirect economic investment of more than 1 % in a company. An employee's material financial interest in a competitor, customer, or supplier of our company or in another company with which the employee communicates directly in the course of their work must be disclosed immediately.

5.4 Parallel activities for competitors and ancillary activities

Any direct or indirect activity by a member of our company on behalf of a company that competes directly or indirectly with our company is prohibited. In exceptional cases, the management may authorise such activities before they begin.

As a member of the company, employees are not permitted to take advantage of business opportunities that arise for the company for their own benefit or for the benefit of third parties.

Ancillary activity means the exercise of another activity, in particular as a member of a governing body or managing director, as a member of a supervisory, administrative or advisory board, as an employee or in any other function (e.g. as a consultant) at a company outside the company.

Unless otherwise permitted, taking up ancillary activities with a customer or supplier or another company with which the employee is in contact in the course of their work for our company is only permitted with the prior consent of the management. In all other cases, the employer must be informed of the commencement of any ancillary activity.

6.0 Compliance with the Code of Conduct / Reporting

6.1 General principles

Every employee receives a copy of the Code of Conduct. In this way, the Code shall be promoted so that it becomes the living reality of our company and thus part of the everyday working life of all employees.

Managers in particular are required to actively promote compliance with the Code. This also includes ensuring that all employees assigned to them are familiar with the Code of Conduct.

If employees have any questions about this Code and its regulations, they should first contact their line manager or the relevant departments.

6.2 Information for the proprietor

The managers will inform the proprietor annually and on their own initiative about the implementation of the Code of Conduct.

Kirchlengern,



Lohmann Gleit- und Wälzlagertechnik GmbH & Co. KG