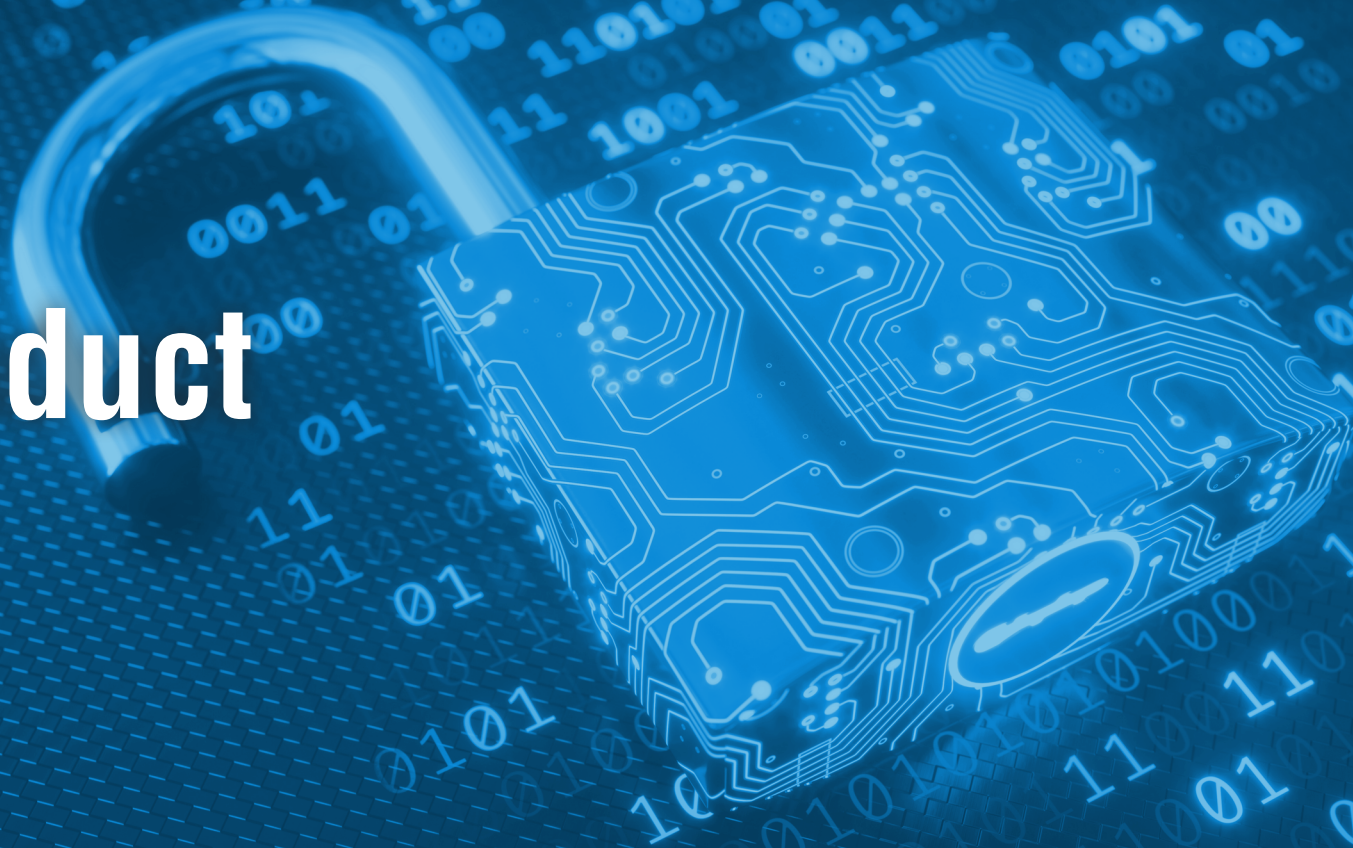


# Code of conduct





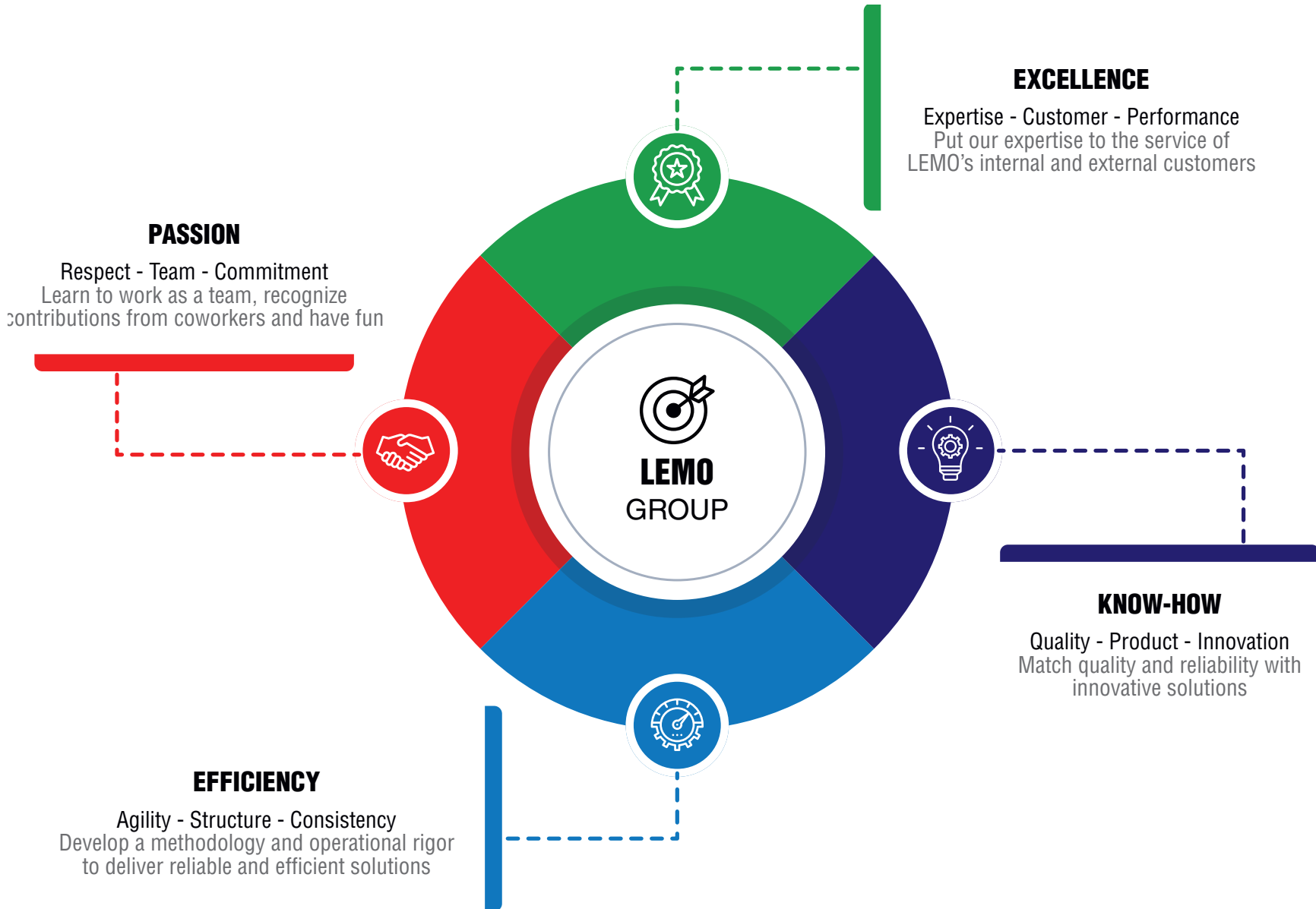
## MESSAGE FROM THE CEO



Ever since LEMO was founded in 1946, we have continuously strived to contribute to the sustainable development of innovative connection solutions. Our expertise in precision technologies has enabled us to create pioneering products that have subsequently become standards. However, our greatest asset is the diversity of LEMO employees who work every day in more than twenty countries to ensure the success of our company.

**Alexandre Pesci**  
CEO LEMO

# LEMO GROUP VALUES





# CONTENTS

## **BEHIND THE CODE** **4**

---

Why a Code of Conduct?  
What is expected of everyone?

## **WE RESPECT EACH OTHER** **5**

---

Diversity as a strength  
No discrimination  
Integrity  
Health & Safety  
Environment  
Human rights

## **WE KNOW THE RULES AND FOLLOW THEM** **8**

---

Compliance laws & internal policies  
We prohibit bribery & Corruption  
Gifts & Entertainment  
Fair competition  
Privacy & Data protection  
Money Laundering

## **WE SAFEGUARD OUR COMPANY'S INTERESTS** **12**

---

Protect LEMO's assets  
No Conflict of interest  
Ensure Confidentiality

## **WE USE INFORMATION & COMMUNICATION PROFESSIONALLY** **14**

---

Cyber security  
Use of Social media  
Representation

## **WE REPORT ANY BREACH OF THE CODE** **16**

---

We are all responsible  
How to report a breach

# BEHIND THE CODE

## Why a Code of Conduct?

Through this Code of Conduct (“the Code”), we would like to make LEMO staff aware of the consequences of some of our acts. It is indeed important to keep in mind that everything we do or say can have a direct or indirect impact on LEMO. Through our work and behavior, we contribute significantly to the positive impression LEMO creates and thus ultimately to its business success. Therefore, it is important to avoid any behavior that could harm LEMO’s interests.

## What is expected of everyone?

The Code provides an overview of some of the legal and ethical standards we expect of our employees and business partners to follow every day.

If ever in doubt about a particular course of conduct, ask yourself:

- Is it legal?
- Does it comply with the Code?
- Does it reflect our company values and ethics?
- Does it respect the rights of others?

If the answer is “No” to any of these questions, **don’t do it!**

If you are still uncertain, ask for guidance. The Code tries to capture many of the situations that employees may encounter, but cannot address every circumstance. You can seek help from your manager or write an e-mail to the following address: [codeofconduct@lemo.com](mailto:codeofconduct@lemo.com).

“We are ambassadors  
of our company.”

## WE RESPECT EACH OTHER

### Diversity as a strength

LEMO's employees come from many different countries and have multi-cultural backgrounds and it is precisely these differences that represent a collective strength and asset for LEMO. Every employee is deserving of respect, and it is essential that we help, support, and show respect for each other. Thus, together we will be able to actively create and foster an environment that is inclusive of all people and their unique abilities, strengths and differences, and promote diversity as a strategic and competitive business advantage for LEMO. Therefore, we value each other's contributions and believe that everyone should have an equal chance to succeed.

### No discrimination

We do not tolerate any discrimination based on age, disability, origin, nationality, sex, race, colour, religion, marital status, sexual orientation, political views or any other perceptible difference, including:

- unwelcome remarks, gestures or physical contact;
- the display or circulation of offensive, derogatory or sexually explicit pictures or other materials, including by email and on the Internet;
- offensive or derogatory jokes or comments (direct or by innuendo);
- verbal or physical abuse or threats.



“ One of my co-workers emailed an inappropriate joke to me and other colleagues. I find it offensive, but I don't know if I should approach my co-worker with my concern. What should I do?

An offensive behaviour such as an inappropriate joke is not acceptable. The offended person should discuss this directly with the author of the joke and explain why his or her joke is not appropriate. If you feel uncomfortable speaking with your co-worker directly, contact your manager or HR.

”

# WE RESPECT EACH OTHER

## **Integrity**

Integrity is a fundamental value of the LEMO Group. Integrity means doing what is right, with all the fundamental principles set out in this Code. By acting with integrity, we reflect positively on the values and reputation of LEMO and its brands in the over 20 countries where we operate.

The highest standards of integrity are expected in all business interactions. Compliance with applicable laws is an absolute requirement for LEMO.

## **Health & Safety**

We conduct business in accordance with applicable health and safety requirements and strive for continuous improvement in our health and safety policies and procedures.

We care about each other. In order to enhance workplace security, you must be familiar with and follow any work safety information and training provided to you.

All employees and business partners are expected to perform their work in compliance with applicable health and safety laws, regulations, policies and procedures and apply safe work practices at all times in all locations.

You are required to immediately report workplace injuries, illnesses or unsafe conditions, including “near-misses.”

## **Environment**

The company is committed to operating in an environmentally responsible manner, from the provision of products and services, to the operation of its offices and facilities, selection of suppliers and other business activities.

The company complies with all applicable environmental laws and regulations as well as self-directed commitments to sustainable practices and environmental protection.

“We are committed to fair employment practices everywhere we operate.”



## WE RESPECT EACH OTHER

### Human rights

As a company, we respect the rights of every individual and abide by the employment laws in the countries where we operate. We support the principles established under the United Nations Universal Declaration of Human Rights and do not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labor), physical punishment, forced or prison labor or human trafficking.

Furthermore, we do not directly or indirectly finance or benefit armed groups through mining or mineral trading in the Democratic Republic of Congo and adjoining countries.

“Respect & integrity are the key to success.”



## WE KNOW THE RULES AND FOLLOW THEM

### Compliance laws & internal policies

All our activities are governed by local and international laws and regulations. We comply with all laws, rules and regulations of the countries in which we operate. Furthermore, we follow all internal rules & policies to which we have committed.

If you are aware of any unlawful conduct or potential fraud, you shall immediately report the case to [codeofconduct@lemo.com](mailto:codeofconduct@lemo.com).

### We prohibit Bribery & Corruption

We all work honestly and with integrity. Therefore, do not offer or accept bribes or let others bribe for you. On the contrary, do everything you can to prevent bribery by others who conduct business on our behalf—as a company, we're not only responsible for your actions, but also the actions of any third party who represents us.

We and our business partners may neither grant nor promise any indirect or direct unfair advantages to individuals, officials or organizations nor may we request or accept such unfair advantages. We do not tolerate the grant or promise of unfair advantages even if this is done independently of any specific decision and no return service is required.

We must always be conscious of the fact that the perception by third parties and/or the recipient also plays a significant role. The conduct may be perceived to constitute bribery or the grant of unfair advantages even if that was not the intention. As a rule, any impression of bribery or the grant of unfair advantages needs to be avoided.

In exceptional cases, we are entitled to accept isolated minor or customary courtesy gifts or invitations. In doing so, however, we always comply with the applicable laws & our internal guidelines.



### KNOW A BRIBE WHEN YOU SEE ONE

- Follow the laws and requirements of the countries where you work. Avoid even the appearance of something inappropriate.
- Set clear expectations and actively monitor the work of third parties doing business on our behalf.
- Be accurate and complete in recording payments and expenses.
- Don't pay any kind of "facilitating or grease payment" (ex: obtain routine services from a government employee).
- Speak up if you see or suspect a bribe.

# WE KNOW THE RULES AND FOLLOW THEM

## Gifts & Entertainment

A gift or favour should not be accepted or given if it might create a sense of obligation, compromise your professional judgment or create the appearance of doing so. In deciding whether a gift is appropriate, you should consider its value and whether public disclosure of the gift would embarrass you or LEMO.

### **In any case, it is forbidden to give or receive a gift of money.**

Specific rules may apply depending on local law & regulation. Please refer to your local policy.

## BASIC RULES

- Always use common sense.
- Reject any offer if it is being given to influence a decision or if it would give the appearance of something improper, even if it is within the value limits that may be acceptable to the company. Report this situation to the legal department.
- Don't give anything of value to a government official without receiving approval in advance. from the legal department.
- Gifts or entertainment given or received should:
  - > be nominal in value;
  - > be infrequent;
  - > satisfy a reasonable business purpose;
  - > be consistent with acceptable business practices, given the industry and the geographic location.:
  - > be permitted by law and the policies of both the giver and receiver;
  - > not reflect poorly on—or embarrass—LEMO;
  - > never be cash or a gift card, check, loan or stock.



### “ May I accept a business meal from a supplier? ”

In most circumstances, reasonable business meals may be accepted if these are directly linked to a business meeting. However, whenever a supplier pays for a meal, always consider the specific circumstances and whether your impartiality could be compromised or appear to others to be compromised, especially in the middle of contract negotiations. Talk with your manager if you are unsure.

## WE KNOW THE RULES AND FOLLOW THEM

### **Fair competition**

Fair competition laws are intended to promote vigorous competition in a free market. We never settle oral or written agreements with competitors or suppliers that restrict competition. In particular, we never:

- discuss pricing, production or markets with competitors;
- set resale prices with business partners;
- act in a manner that could be seen as an attempt to exclude current or potential competitors or to control market prices;
- manipulate the bidding process.

### **Privacy & Data protection**

We take the protection of personal data seriously. We respect the privacy of our customers, our coworkers and others with whom we conduct business, and we handle their personal information with care. Personal data may only be collected, processed or used in accordance with the local laws and only to the extent required for the defined, unambiguous and lawful purpose. Apart from that, personal data must be stored in a safe way and may only be transferred with the required safety measures in place. With regard to data quality and technical protection against unauthorized access, a high standard needs to be guaranteed. The use of personal data needs to be transparent for the data subjects; their right to access such data and, where relevant, their right to objection, blocking and deletion must be maintained.

**For further information, please refer to “LEMO Data & Privacy policy”.**



“Do not enter into any agreement with competitors that deprives customers of the benefits of competition.”



## WE KNOW THE RULES AND FOLLOW THEM

### Money Laundering

The company complies with anti-money laundering laws. Money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their criminal origin.

We never knowingly facilitate money laundering or terrorist financing, and we take steps to prevent inadvertent use of the company's business activities for these purposes.



**YOU ARE REQUIRED TO IMMEDIATELY REPORT ANY UNUSUAL OR SUSPICIOUS ACTIVITIES OR TRANSACTIONS, SUCH AS:**

- attempted payments in cash or from an unusual financing source;
- arrangements that involve the transfer of funds to or from countries or entities not related to the transaction or customer;
- unusually complex deals that don't reflect a real business purpose;
- attempts to evade record-keeping or reporting requirements.



# WE SAFEGUARD OUR COMPANY'S INTERESTS

## Protect LEMO's assets

LEMO's assets include everything that our company owns or uses to do business. We do everything to protect LEMO's assets against any loss, damage, theft, waste and improper use. This applies among others to our reputation, intellectual property rights, information and products. We will not tolerate any fraudulent or other illegal act directed against the assets.

We respect the intellectual property rights of third parties and observe the restrictions that apply in relation to the use or reproduction of works that are subject to copyright. Vice versa we make sure that the intellectual property of LEMO is suitably protected and respected by third parties.

## No Conflict of interest

We all must avoid conflicts of interest. A conflict of interest exists when a personal interest or activity interferes or appears to interfere with LEMO's interests. We can avoid conflicts of interest if we are aware of the challenge and take the necessary action. It isn't possible to list every situation that could present a conflict, but there are certain situations where conflicts typically arise, such as:

- supervise or conduct business with someone with whom you have a close personal relationship;
- invest in one of our suppliers, customers, business partners or competitors;
- work for, or provide any services to competitors, customers or suppliers.

If you are not sure whether a situation represents a conflict, ask the legal department.

Disclose to your manager and the legal department any actual or potential conflict of interest.



**I have a relative I'd like to hire to do some work at LEMO. Since it is a legitimate project that needs to be done, and my relative is trained to do this type of work, is it okay if I hire him?**

Although the work is legitimate, this situation creates the appearance of a conflict. The circumstances of this situation should be raised with an HR Business partner so that an independent review can be done prior to committing to a contract. This will help protect you, your relative and LEMO if the relationship ever comes into question.



## WE SAFEGUARD OUR COMPANY'S INTERESTS

### Ensure Confidentiality

Information is also a critical asset. Confidential information and intellectual property represent the outcome of significant company investment and years of hard work. Trade secrets, patents, copyrights, trademarks, business plans, engineering ideas, databases, customer lists—when you help protect these assets, you help protect our competitive advantage. Therefore, DO NOT share any information related to LEMO with third parties, except in specific cases such as Non disclosure agreements.

During the course of employment at LEMO, we gain some knowledge and information that is non-public and belongs to LEMO. We are trusted with maintaining the confidentiality of such valuable information.

Confidential materials should:

- be stored in a secure place and should not be left out where others can see them;
- be clearly marked as confidential;
- not be sent to any unattended e-mail address;
- not be discussed where others may hear.



“ I often work on my computer or take calls during my train ride to work. Is this a problem?

You must be careful not to discuss or show on your computer non-public company information in public places where others may overhear you or see on your computer, such as public transportations, conferences and trade shows. When it is necessary to work in a public place, be mindful of your surroundings.

”

# WE USE INFORMATION & COMMUNICATION PROFESSIONALLY

## Cyber security

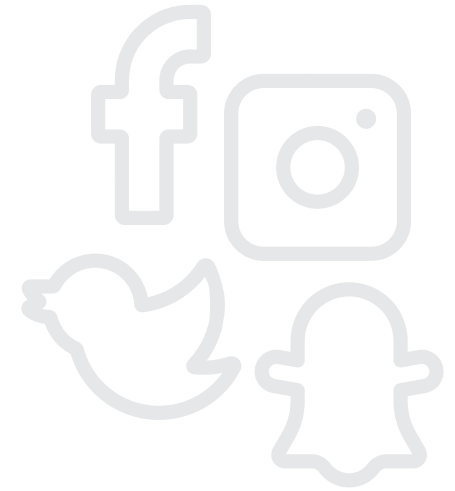
IT tools have become essential equipment to keep developing innovative solutions. We are using these tools on a daily basis for work and we should be aware of dangers posed by cyber risks which are gaining in importance in the everyday business world. The loss of data and IT disruptions can have enormous financial implications for us.

Therefore, make sure you follow the processes and practices we have in place to protect our networks, computers, programs and data from attack, damage or unauthorized access.

## Use of Social media

Everyone must be aware that any communication, regardless of the communication channel (for instance, via email or social media) can be regarded as a statement made by LEMO.

We must therefore exercise care not to transmit any information which is of a sensitive business nature, is controversial or which could have unintended contractual or other legal consequences for LEMO.



### WHEN USING SOCIAL MEDIA

- Clearly state that any opinions you express about our company are your own and do not reflect those of LEMO.
- Don't disclose confidential business information about our company or our customers, business partners or suppliers.
- Don't post anything that is confidential business information, discriminatory or would constitute a threat, intimidation, harassment or bullying.



# WE USE INFORMATION & COMMUNICATION PROFESSIONALLY

## Representation

**We make sure that information shared about our company is consistent, accurate and complete.**

When you consider the power of words, the number of ways that words can be shared and the impact those words can have on a trusted company like ours, you begin to understand the value of sending one clear message.

In order to ensure that accurate and complete information is conveyed to the public, to regulatory authorities and to others, we have designated individuals to serve as our official company spokespersons.

Unless you are authorized to do so, do not make any public statements on LEMO's behalf.

## BASIC RULES

- Refer all requests for financial information to the Financial Department.
- Refer all media inquiries and public requests for information to the Corporate Communications Department.
- Refer all public requests for information and inquiries from government and regulatory agencies to the Legal Department.

“Don't speak on behalf of our company.”

## WE REPORT ANY BREACH OF THE CODE

### **We are all responsible**

The rules set forth in this Code of Conduct are central to LEMO's business culture and sense of responsibility. It is essential that these rules be followed uniformly throughout the Group. We are all responsible for the adherence to this Code of Conduct. We are **obliged** to notify any violations of the law, this Code of Conduct or of corporate guidelines to a representative of the legal or HR department.

### **How to report a breach**

All reports of misconduct will be treated in confidence. Retaliation against employees who report misconduct in good faith will not be tolerated and be subject to disciplinary action. It is the individual responsibility of every employee to ensure that his or her own conduct, and that of those reporting to him or her, is entirely compliant with applicable legislation, this Code of Conduct and company directives. LEMO does not tolerate any violation of its rules and will take appropriate disciplinary action, up to and including termination of employment, against employees who violate the law, this Code of Conduct or company policies.

Employees who report potential Code of Conduct violations in good faith may report possible Code of Conduct violations anonymously, e.g. by means of the Mailbox on LEMO Intranet?. LEMO, however, encourages Whistleblowers to voluntarily indicate their name, allowing LEMO to contact them in order to further clarify the issue. For any breach report, please send an e-mail to [codeofconduct@lemo.com](mailto:codeofconduct@lemo.com).

**If you have any questions, please contact a representative of the legal department.**

“We trust you to keep  
this code in action.”





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