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Code of Conduct – Lederer GmbH

as a component of the compliance management system.

Forward



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For over 50 years now, Lederer has been a responsible and family-run undertaking and one of the leading suppliers of high-quality fasteners and efficient C-parts management in Germany and around the world.

We are all collectively responsible for the reputation and the success of our company. As well as the high quality of our products and services, our customers and business partners expect to see conduct that is law-abiding and upright in every way. To fulfil these expectations, we have decided to introduce a compliance management system. In this way, we intend to further strengthen the trust in business relationships.

The crucial content and the overriding goal of compliance management systems is prevention. Risks involving potential dangers for the company should be identified at an early stage and assessed accurately. This is how we guarantee protection for our employees, prevent damage to ourselves and lay the foundation stone for sustainable success.

Although it does not fall directly within the scope of the Supply Chain Act (2021), Lederer has decided to apply and integrate it into its existing compliance management system.



Target group and scope



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This Code of Conduct defines the principles of Lederer GmbH and its employees, who take it into account every working day. At the same time, the Code of Conduct is also the basis for our suppliers with regard to their responsibility for their fellow man and the environment.

This Code of Conduct also sets out the principles of Lederer's compliance management system, which also integrates the due diligence obligations under the Supply Chain Act .



Basic principles (1/2)



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Adherence to laws, specifications and regulations

All Lederer employees undertake to abide by all legally valid rules and specifications of the countries in which their commercial activities are conducted.

This also includes the regulations mentioned in the Supply Chain Act .
As required by the Supply Chain Act , we also expect this from our suppliers and oblige them accordingly.

Data protection

All personal information about employees, customers, suppliers and other business partners are always treated as confidential and in compliance with the Federal Data Protection Act (BDSG). These basic principles shall also apply after the termination of employment and commercial relationships.

Protection of intellectual property

Employees of the company shall treat third-party intellectual property conscientiously and respectfully. This includes the task of doing everything necessary to protect the existing intellectual property of Lederer from attacks or losses.



Basic principles (2/2)



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Protection of business secrets and company property

Business-related data must be treated as confidential by employees of Lederer and must be protected from any receipt or inspection by unauthorised persons. Employees who are granted insight into business secrets are obliged to refrain from forwarding these to third parties. These shall also include persons from the respective circles of family and friends. Use for other purposes that go beyond the commercial sphere is impermissible.

Company property of Lederer is used solely for commercial activities. Every employee is urged to treat the company property that is provided with care and consideration and to protect it from loss, damage, theft and destruction. In the event of conspicuous violations of the aforementioned criteria, all employees have a duty to report such acts.



Culture and social conduct (Human rights risks within the meaning of the Supply Chain Act)

We treat all people with dignity and respect, regardless of their age, gender, national origin, race, political and religious beliefs, sexual orientation or other statutorily protected characteristics. Any form of discrimination at the workplace with regard to appointment, contract termination, remuneration, overtime, promotion and further/ongoing training is precluded. Similarly, no physical punishments, threats of violence or other forms of harassment are tolerated. Physical punishment, threats of violence or other forms of harassment are also prohibited.

Valid statutory provisions in with regard to working hours and minimum wages are complied with. We employ neither children nor persons who have not reached the minimum age and we do not use forced labour and/or slavery.

The employment relationship with our company is respectful, appreciative, loyal and fair at all hierarchical levels. Good cooperation is based on trust. That is why we have a great interest in employees being able to consult us at any time and without any resultant disadvantages.

We also expect this behaviour from our suppliers.

Responsibility and sustainability (2/4)



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Safety at work and health protection (1/2)

In due consideration of the statutory requirements and provisions, we apply appropriate measures for guaranteeing health and safety at the workplace for all of our employees and are certified for this task in accordance with BS OHSAS 18001: 2007 (Work and Health Protection Management). Thanks to medically-guided checks, regular site inspections and cooperation with external experts in the fields of safety at work, as well as internal company safety officers, we are able to recognise potential dangers in good time and respond to them. Every employee is co-responsible for safety at work and is obliged to report potential dangers without undue delay, as a result of which we can reduce these to a minimum.



Safety at work and health protection (2/2)

Causing harmful soil change, water pollution, air pollution, harmful noise emission or excessive water consumption, which significantly affects the natural basis for the preservation and production of food, denying a person access to safe drinking water, impeding or destroying a person's access to sanitary facilities or harming a person's health is prohibited. Unlawful eviction and the unlawful taking of land, forests and waters in the course of acquisition, development or other use of land, forests and waters, the use of which secures a person's livelihood, are also prohibited.

We expect our suppliers to take appropriate measures, also taking into account country-specific framework conditions.



Responsibility and sustainability (4/4)



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Environment and resources

We undertake to comply with provisions of environmental law and to adhere to international standards for the protection of our environment. At the same time, we have an effective environmental management system in accordance with ISO 14001:2015. Our concern is to search for alternatives in order to preserve natural resources and energy sources and to counteract the use of environmentally hazardous substances in order to minimise negative effects on the environment.

We expect our suppliers to take appropriate compliance measures, also taking into account country-specific framework conditions.



Dealing with business partners (1/2)



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Prohibition of corruption and bribery

Lederer is opposed to corruption and bribery and does not tolerate any methods in which business activities are conducted using impermissible means. Giving and receiving benefits to or from business partners is not permitted because these can lead to the impairment of an objective and fair commercial decision. Occasion-specific and advertising gifts, as well as presents that correspond to the customs and politeness of other cultures, are subject to the generally valid exemption clause.



Dealing with business partners (2/2)



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Fair competition

We are interested in fair and authentic competition accompanied by strict adherence to competition law and antitrust law. We therefore do not participate in activities that damage our business partner or benefit ourselves in some impermissible manner. We conduct no talks with competitors in which prices, performances or other arrangements that influence market behaviour are agreed on. likewise impermissible is the dividing-up of customers or business areas, as well as collusion among business partners or third parties with regard to non-competition.



Scope and implementation of the Code of Conduct

All line managers who have disciplinary responsibility and an exemplary function have the task of bringing the Code of Conduct into the company and supervising adherence to the rules. All executive staff are responsible for communicating the contents of the Code of Conduct and the associated rules in an understandable way.

Any violations of the rules are sanctioned and can have legal consequences for employees. Furthermore, every employee is entitled, and even urged, to report violations of the Code of Conduct. This can be done anonymously or officially. No employee will be treated disadvantageously if he reports an actual or possible.

No employee will be made responsible for any commercial disadvantages that arise on the basis of the existing Code of Conduct.

Compliance-Management-System



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In 2017, Lederer GmbH decided to set up a compliance management system (CMS) and, in this context, created an organisational structure and process organisation that correspond to the size and complexity of its business activities. The CMS was revised and adapted in 2022 to implement the requirements of the Supply Chain Act

At Lederer GmbH, the CMS is designed as a continuous process with the aim of implementing our due diligence obligations appropriately. In this context, a risk management system with clear responsibilities has been set up to regularly identify, assess and prioritise risks, in particular those mentioned by name in the Supply Chain Act, and to prevent, terminate or at least minimise them if termination is not possible or would involve disproportionate effort.

Part of the CMS is the anchoring of appropriate preventive measures. This includes the communication and implementation of our values and human rights strategies within Lederer GmbH and with our suppliers. Through the development and implementation of suitable procurement strategies and purchasing practices and training in the relevant business areas, identified risks are to be prevented or minimised. By carrying out risk-based control measures, we check compliance with our principles laid down in this Code of Conduct on a regular basis or on an ad hoc basis.

In order to meet the requirements of the Supply Chain Act, Lederer GmbH has also anchored appropriate preventive measures (selection, contractual assurance, training, and control mechanisms) with regard to its direct suppliers.

A complaints procedure has been set up to enable people to point out risks and violations of obligations. It is possible to provide corresponding information via the following email address: compliance@lederer-online.com.