

LUTZ

ELEVATORS

CODE OF CONDUCT OF THE LUTZ GROUP

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1 PREFACE

We at LUTZ Elevators share the same values. Reliability and honesty, credibility and integrity. These values determined our behaviour in the past and shape our company now and in the future. The following Code of Conduct reflects these values. It sets a standard for ourselves and is at the same time a promise to the outside world for responsible behaviour towards business partners, the public and also within the companies of LUTZ Elevators in their dealings with each other. It applies equally to the management and to every employee, as well as to our customers, suppliers and service providers.



At LUTZ Elevators, we ensure compliance with this Code of Conduct and expect all employees and third parties to do the same.

Your sincerely Hans Martin Lutz

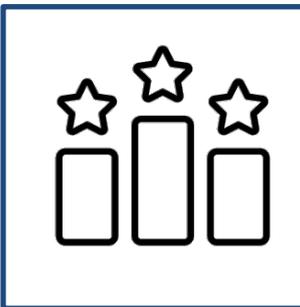
2. CODE OF CONDUCT

2.1 Compliance with the law



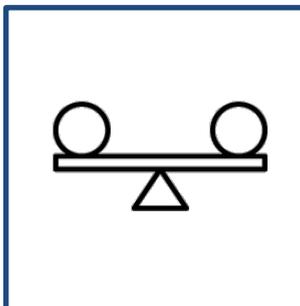
For us, compliance with laws and regulations is an essential basic principle of economically responsible action. We observe the applicable legal prohibitions and obligations at all times, even if this entails economic disadvantages or difficulties for the company or individuals. The protection of personal data, in particular of employees, customers and suppliers, is of particular importance to us, as is compliance with contractual requirements for confidentiality and information security.

2.2 Fair Competition



Lutz stands for technological competence, innovative strength, customer orientation and motivated employees who act responsibly. This is the basis for our high reputation and the sustainable economic success of the group of companies. Corruption, bribery and cartel violations threaten these guarantors of success and will not be tolerated (zero tolerance). We do not consider bribes, facilitation payments or cartel agreements to be a means of obtaining a contract.

2.3 Equal treatment and non-discrimination



A culture of equal opportunity, mutual trust and mutual respect is of great importance to us at Lutz. We promote equal opportunities and prevent discrimination in the hiring of employees as well as in the promotion or granting of training and development measures, and in everyday work. At Lutz, we treat each other with dignity, respect and equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religious affiliation or world view. We respect internationally recognized human rights and support their observance. We reject any form of forced labor and child labor. We recognize the right of all employees to form trade unions and employee representatives on a democratic basis within the framework of national regulations. The right to adequate remuneration is recognized for all employees. Remuneration and other benefits in the group of companies correspond at least to the respective national and local legal standards or the level of the national economic sectors/industries and regions. We respect the right to freedom of expression and the protection of personal rights and privacy of every employee.

2.4 Occupational health and safety



The safety and health of our employees are, next to the quality of our products and the economic success, an equally high corporate objective of the Lutz group of companies. Occupational safety and health protection are an integral part of all operational processes and are included in the technical, economic and social considerations from the very beginning - already in the planning phase. Each of our employees promotes health and safety in his or her work environment and complies with occupational health and safety regulations.

Every manager is obliged to instruct and support his or her employees in fulfilling this responsibility. Employees of subcontractors working on behalf of Lutz are subject to the same safety standards as our employees. This is taken into account in the selection and cooperation.

2.5 Sustainable environmental and climate protection



Sustainable environmental and climate protection and resource efficiency are indispensable corporate goals for us. Both in the development of new products and services and in the operation of production facilities, we ensure that any impact they may have on the environment and climate is kept as low as possible. We strive to ensure that our products make a positive contribution to environmental and climate protection for our customers. Each employee has a responsibility to use natural resources sparingly and to contribute to the protection

of the environment and climate through his or her individual behavior. In the development, manufacture and testing of products, we exercise due diligence with regard to quality and sustainability and strive for continuous improvements to minimize adverse effects on the environment.

3. CONTACT

- If you would like to ask questions about this Code of Conduct or report violations of the Code of Conduct or Compliance Guidelines, seek discussion with:
 - - Your supervisor,
 - - management,
 - - the human resources department
 - - the works council,
 - Or reach out to coc@lutz-aufzuege.de.

The contact points are available to both employees and third parties.