

FOOT
WEED
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PLEASE READ THIS CODE OF
CONDUCT CAREFULLY.

IT SUPPORTS YOU IN YOUR
DAILY WORK.

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DEAR COLLEAGUES,

Since its foundation in 1929, the Lichtgitter Group has been family-owned and sees itself still today as a family company because of its core values like loyalty, safety and cohesion. We have agreed on a canon of values shaped by the image of a family company.

The present Code of Conduct and the "Golden Rules" bring together for the first time our important basic and principles in one document. These rules and principles are binding for us already today and in the future. This Code of Conduct forms us a standard at the same time, it is a promise of responsible behaviour towards our business partners and the public but also a standard how to deal with each other within the company. Therefore, we like to ask you, dear colleagues, to read this Code of Conduct carefully.

Your Management

Dr. Holger Artelt

Ass. jur Hermann Stengel

Heiko Abendroth



WITH US BOTH ARE STRONG:
COMMITMENT AND WELDING
SEAM

We are reliable and prove it
through our actions.

OUR GUIDLINES/
GOLDEN RULES

PREAMBLE

THIS CODE OF CONDUCT IS INTENDED AS A GUIDELINE FOR THE LICHTGITTER GROUP (HEREINAFTER REFERRED TO AS LICHTGITTER) AND SUMMARISES THE PRINCIPLES AND RULES OF OUR ACTIONS. ON THE ONE HAND, IT REPRESENTS THE REQUIREMENT FOR US TO ACT IN ACCORDANCE WITH THE VALUES AND PRINCIPLES LISTED IN THE CODE OF CONDUCT, AND ON THE OTHER HAND IT SENDS A SIGNAL TO THE OUTSIDE WORLD OF RESPONSIBLE BEHAVIOUR TOWARDS ALL OUR INTERNAL AND EXTERNAL STAKEHOLDERS. THE CODE OF CONDUCT OBLIGES LICHTGITTER TO ACT ECONOMICALLY, SOCIALLY AND ENVIRONMENTALLY AND TO CONDUCT ITS GLOBAL BUSINESS ACTIVITIES ON AN ETHICAL AND MORAL BASIS IN FAIRE COMPETITION.

THE LICHTGITTER FAMILY

Since foundation in 1929 Lichtgitter is family-owned and still sees itself as a family company today. All employees and shareholders are proud of this.

We are an internationally oriented family-owned company that is active in different cultures and see this diversity as an enrichment. We are one of the leading technological company in our segment. All affiliated national and international companies of the Lichtgitter Group are part of this family.

As a family-owned company, we represent the sustainable and long-term development of the company with high technological competence on cooperation with our employees, business partners and shareholders.

We stand by our social and societal responsibility. We respect human rights, the environment, act in accordance with the law and stand for fair competition. We strive for a value-oriented management culture and want to generate the ideas for the further development of our company together with our business partners and employees.

OUR VALUES

Focus on the customer

We are in constant dialogue with our customers, characterised by trust and appreciation. We focus on their individual requirements, needs and expectations and help them to strengthen their competitive position and performance. Our primary target is to build a long-term and stable relationship with all our business partners.

Focus on the employees

We take our social responsibility towards our employees and the society. We respect each other regardless of religion, ethnic origin, skin colour, age, gender, disability or sexual identity.

We train, develop and promote motivated, capable employees with integrity. We also challenge our employees and expect good leadership, initiative, teamwork and responsibility.

Our cooperation is based on our leadership model. It is characterised by our reliability, an open communication based on partnership, respectful interaction and by a fair and honest feedback. The responsible use of our resources and the competence of our employees contribute significantly to increasing the value of the family business.



THE MESH BRINGS LIGHT
INTO THE DARKNESS –
INFORMATION AS WELL

We cultivate and promote an open communication in partnership with each other.



**PEOPLE IN THE
LICHTGITTER-GROUP,
ACTING IN THE
SOCIAL ENVIRONMENT**

1.1 LAW AND LEGISLATION

For us, acting responsibly and economically always means to respect the rules and laws in the respective countries. To the best of our knowledge and belief we observe the applicable prohibitions and obligations, even if these are not easy for them company or for individual employees to fulfill.

National and international laws and regulations that contain more restrictive regulations than those of Lichtgitter are always applied with priority. We also expect this commitment from all our business partners and their stakeholders.

1.2 CONFLICTS OF INTEREST

Decisions on business processes are made exclusively in the interest of Lichtgitter and all stakeholders. Personal advantages or private interests that stand in contrast to the interests of the company must be decided and implemented in the sense of company. This applies in particular if relatives or other closely associated persons and/or organisations are involved.

In order to avoid such conflicts of interest, honest and transparent communication within the company is imperative. Potential conflicts of interest are discussed openly and resolved in accordance with the Code of Conduct.

1.3 FAIRNESS AND COMPETITION

Lichtgitter proves itself in the market through innovative, state-of-the-art technology, customer-oriented service, legally compliant products and approvals as well as quality and competence. We convince our business partners of the total Lichtgitter package. Precisely these attributes are decisive for the long-term success of our company. Corruption, bribery, blackmail or the payment of bribes are not means for us to obtain an order. Lichtgitter refrains

from orders that are only obtained with the help of violations of the valid law. Antitrust violations such as price or territorial agreements endanger not only fair competition but also the company. We also observe the valid regulations on transfer pricing. At Lichtgitter, incidents of this kind are pursued without compromise and are punished with the appropriate consequences.

1.4 PREVENTION OF MONEY LAUNDERING

Any employee who has doubts about payment activities regarding money laundering activities is obliged to ask the Finance Department to investigate the transaction. This applies in particular to cash payments or the settlement

of invoices from dubious financial accounts. Lichtgitter complies with the legal requirements for the prevention of money laundering.

1.5 TAXES AND SUBSIDIES

Lichtgitter neither commits tax evasion nor subsidy fraud, nor does it aid such fraud. Every employee must be aware that the risk of detection in the case of tax offences is particularly high due to the regular and careful audits by the tax authorities. Paying taxes is a social responsibility. They are the precondition that the state can fulfill its obligations towards the community.

Should customers or suppliers be involved in cases of tax evasion or subsidy fraud, control notifications are sent to the relevant tax authority and vice versa. The assessment of facts under tax or subsidy law is often difficult. In cases of doubt, specialists appointed by the company or external consulting firms such as auditors, should be consulted.



BEARING AND CROSS BAR

BELONG INSEPARABLY

TOGETHER

We are united by
respectful treatment.

OUR GUIDELINES /
GOLDEN RULES

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PEOPLE IN THE LICHTGITTER GROUP, COLLEAGUES AND EMPLOYEES

2.1 ANTI-DISCRIMINATION AND EQUAL TREATMENT

Any form of discrimination, bullying or insulting behaviour is prohibited without exception. Equal opportunities and anti-discrimination form the pillars for respectful, unprejudiced, tolerant and open interaction with each other. Lichtgitter does not discriminate against anyone on the basis of gender, skin colour, age, sexual identity, ethnic origin, disabilities,

ideology, religious affiliation or other characteristics protected by law. Everyone receives equal opportunities in education, employment, further training or promotion, even when leaving the company. Lichtgitter does not tolerate any behaviour that contradicts this principle. Violations in this regard – no matter by whom and in what form – will not be tolerated and will be punished accordingly.

2.2 HUMAN RIGHTS/ EMPLOYEE RIGHTS

We are committed to the Universal Declaration of Human Rights of the United Nations and to the European Convention for the Protection of Human Rights and support their observance. Lichtgitter condemns all forms of child labour. The protection and well-being of the child must always come first. Within the scope of its possibilities, Lichtgitter continues to ensure that neither forced labour nor human trafficking takes place in the company or among its business partners. No person may be forced to work by intimidation, violence or threats of violence. We buy our primary products only from responsible manufacturers who also observe and live by

these principles. We accept our responsibility within the framework of the supply chain law. We respect the right of all employees to form trade unions and employee representation on a democratic basis within the framework of national regulations. The right to appropriate remuneration is recognized for all employees. The remuneration and other benefits are at least in line with the respective national and local legal requirements, such as the minimum wage or the level of the economic sectors/industries and regions.

2.3 TRADE UNIONS AND EMPLOYEE REPRESENTATIVES

A close and constructive cooperation with the trade unions and the employee associations is self-evident for Lichtgitter and is firmly anchored in the company policy.

2.4 OCCUPATIONAL SAFETY AND HEALTH PROTECTION

Health is the most valuable asset in life. Lichtgitter pursues the goal of protecting and maintaining the health and safety of its employees and to provide them with an appropriate working environment. Occupational safety and health protection are therefore a firm part of our entire operating procedure and are already included in the planning and technical implementation of processes.

Within the framework of the analysis of workflows and processes, potential for increasing of safety and preventing of health risks are identified and protective measures are taken. This is a continuous improvement process that never ends. Exactly these improvements we expect from our business partners as well.



PRAISE AND CONSTRUCTIVE
CRITICISM NOT ONLY GET
OUR STEEL MOVING

We give an open
and honest feedback.

OUR GUIDELINES /
GOLDEN RULES

3 PEOPLE IN THE LICHTGITTER GROUP, APPEARING IN PUBLIC

3.1 DONATIONS

We see ourselves as an active member of the society and are therefore committed to selected charitable institutions and causes in a variety of ways. Donations and other forms of social commitment are made for the sole purpose of supporting the beneficiary organisation in achieving its goals. We do not make financial

contributions, in particular donations and sponsorings measures to political parties in Germany and abroad, party affiliated or party-similar organisations, individual elected officials or candidates for political offices.

3.2 PROPER HANDLING OF INVITATIONS OR GIFTS

The acceptance or granting of gifts, hospitality, invitations is only permissible with the approval of the supervisor or compliance officer and only on the condition that the gifts or invitations do not violate any laws or guidelines and are within reasonable bounds. In no case it is allowed that

gifts, hispitality or invitations influence decision in a dishonest manner. The question of whether gifts are appropriate is based on normal business practice, taking into account any special country-specific features or guidelines of the companies.

3.3 POLITICAL REPRESENTATION OF INTERESTS

We exercise political interest representation centrally, openly and transparently, and mainly through the membership in national and international associations.

We comply with the legal requirements on lobbying and avoid undue influence on politics and legislation.

3.4 PUBLIC APPEARANCE AND COMMUNICATION

We respect the right to freedom of expression and the protection of personal rights and privacy. Every employee should be aware that he or she can be perceived as a part and representative of Lichtgitter in private as well and is therefore called upon, through his or her behaviour and appearance in the in public, in social media, to protect the repulation of the company.

In the case of private expressions of opinion, wie take care not to associate the respective function of activity within the Lichtgitter Group with the private statement.

4

RESPONSIBILITY FOR THE ENVIRONMENT

4.1 ENVIRONMENT AND CLIMATE PROTECTION

Environmental and climate protection as well as resource efficiency are among the greatest challenges of our time and are important corporate goals for us. Both in the development of new products, establishment of new services, the operation of production facilities and the introduction of new technologies we comply with all legal requirements concerning environmental protection. We

strive to ensure that all the effects of our activities on the activities on the environment and climate are kept as low as possible and that our products make a positive contribution to environmental and climate protection for our customers. Every employee has a responsibility to use natural resources and to contribute to the protection of the environment and climate.

4.2 COMPLIANCE WITH LEGAL REGULATIONS ON ENVIRONMENTAL PROTECTION/CERTIFICATION

Lichtgitter complies with all statutory regulations, instructions and standards on environmental protection. This concerns in particular – but not exclusively – the areas of emissions, waste disposal, handling of hazardous substances and chemicals, resource-saving production processes and energy efficiency.

Country-specific laws and regulations are also applied. Where possible and appropriate, Lichtgitter demonstrates compliance with regulations/standards by regular renewal of certificates.

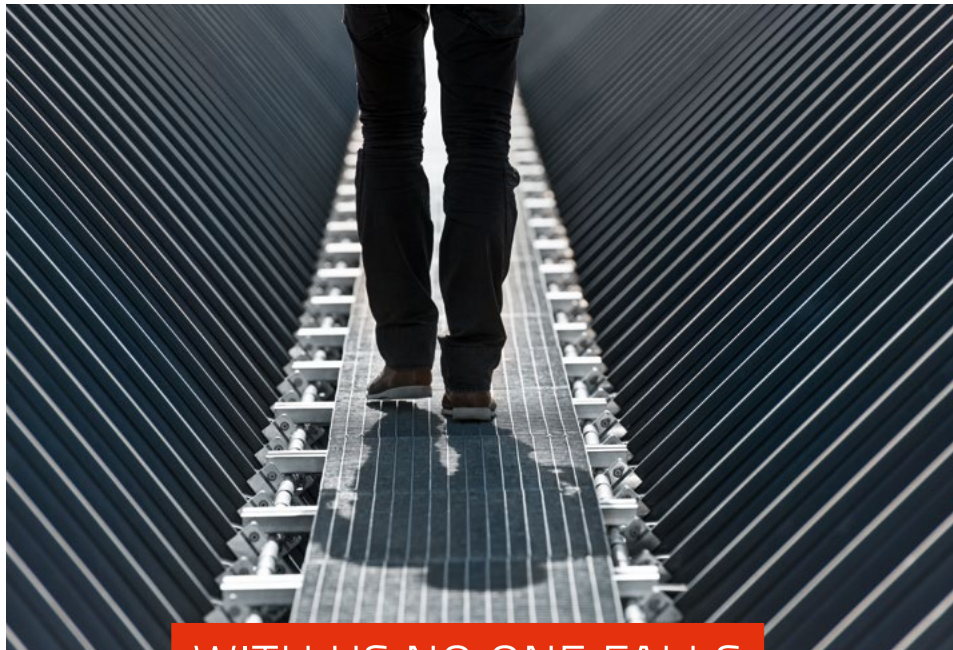
5

INFORMATION AND DATA PROTECTION

5.1 COMMUNICATION AND REPORTING

Values such as reliability and honesty, credibility and integrity are further cornerstones of Lichtgitter's corporate philosophy. We therefore attach great importance on open and truthful reporting and communication regarding business and communication with regard to the company's business of the company vis-à-vis all our stakeholders the public in general and government institutions in particular.

Each employee shall ensure that both internal and external reports, records and other documents of the entire Lichtgitter Group comply with the applicable legal regulations and standards, are always complete and correct, and are made in a timely manner and in accordance with the system.



WITH US NO ONE FALLS
TROUGH THE GRATING

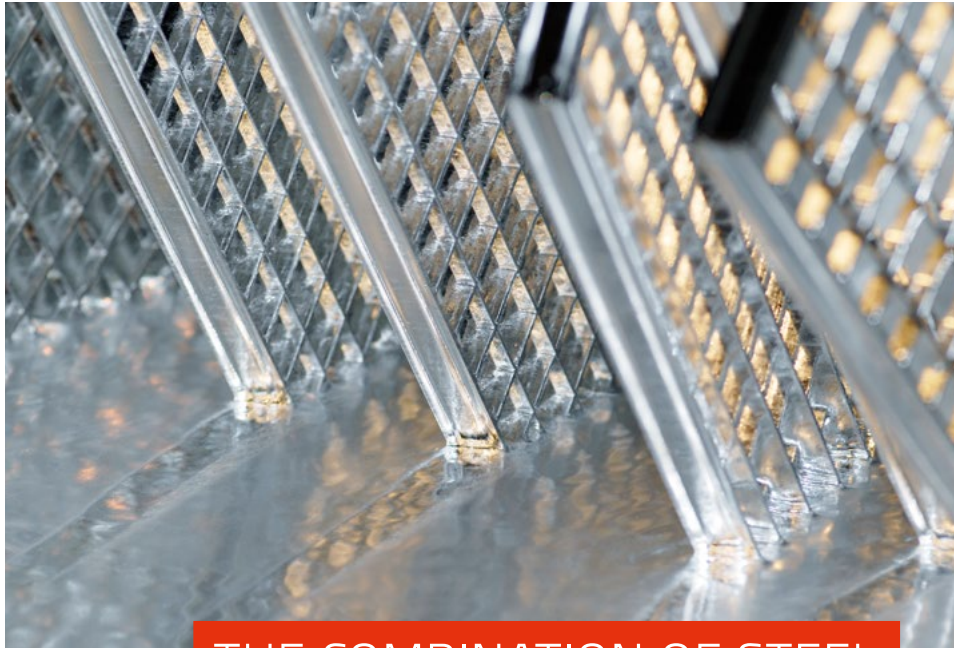
We promote and challenge through
trust and responsibility.

OUR GUIDELINS /
GOLDEN RULES

5.2 DATA PROTECTION

In the age of digitalization, the protection of personal data, especially the data of employees, customers and suppliers is of particular importance for Lichtgitter. No personal data may be processed, collected or handled without consent of

the person concerned. All data will be handled in accordance with the DSGVO. In cases of doubt, the Lichtgitter data protection officer can be contacted.



THE COMBINATION OF STEEL
AND ZINC CREATES SHINE

We shine through exemplary
behaviour with professional
competence.

OUR GUIDELINES /
GOLDEN RULES

6

OWNERSHIP OF THE COMPANY

6.1 USE AND PROTECTION

Tangible and intangible property of the company and its resources are used exclusively for company purposes and not for noncompany purposes, unless expressly permitted. The Lichtgitter employees handle the property properly and carefully, and they protect it against loss, theft or misuse.

Our employees, together with their supervisors, bear responsibility for ensuring that the nature and extent of business travel are always in proportion to the purpose of the trip and that they are planned and carried out economically, taking into account time and cost aspects.

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RESPONSIBILITIES AND CONTACT PERSONS

7.1 IMPLEMENTATION

Lichtgitter and all Group companies actively promote the communication of the Code of Conduct underlying the Group guidelines and agreements. The individual companies implement these and ensure that complying or agreements of the guidelines does not result in any disadvantage for any employee. Violations against behavioural requirements, legal regulations, internal guidelines and regulations will not be tolerated and sanctioned.

If you have any questions about the Lichtgitter Code of Conduct, you are of course welcome to get in touch with us.

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EVERYTHING FROM A SINGLE SOURCE:
Forge-welded gratings, pressure-locked gratings,
perforated metal planks, GRP gratings, com-
bi-deck, chequer plates, spiral staircases, stair
treads, ladder rungs,
hot dip galvanizing, steel service

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