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Code of Conduct

(Anti-Corruption Policy)

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1. Principles

1.1 Compliance with laws, honest and fair conduct

OL employees comply with applicable laws. They are guided in their activities by honesty and fairness and use their judgment wisely. No employee may abuse their business position for personal gain, nor may they encourage actions that conflict with the OL rules for conduct.

In particular, immoral or corrupt practices by employees or business partners is not tolerated. OL strictly forbids any involvement in or toleration of bribery or any other form of corruption.

1.2 Responsibility for the reputation of OL

All OL employees are also representatives of the company and through their appearance, conduct and actions, significantly influence the reputation of the company. They therefore observe and respect the cultural characteristics of the respective country and orient themselves on these in all aspects of their operational tasks.

1.3 Dealing with colleagues and business partners

In their daily interactions with each other, all OL employees contribute to a corporate culture characterized by openness, honesty, appreciation and tolerance. OL creates an atmosphere that stands for safety and physical and psychological non-violence. In particular, this means that no form of sexualized violence, harassment or discrimination will be accepted, no insults, degradation or personal attacks will be tolerated, and it will not be tolerated if people are attacked instead of arguments. The personality and dignity of each individual is important and must be respected. OL employees are reliable business partners who treat their counterparts at eye level and with respect, maintain fair and open dealings and are characterized by their commitment. OL expects the same from the other person and demands this consistently.

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1.4 Leadership

All supervisors function as role models: They earn the respect of their employees through performance, respectful treatment as peers, fairness and openness, and they are a point of contact for both professional and private matters.

As part of their management duties, supervisors set clear, realistic goals. They encourage and require independent action and create the freedom necessary for that. Every manager has to fulfill organizational and supervisory duties. With the implementation of this task, all managerial employees and/or those entrusted with personnel management tasks have the special responsibility to ensure that the rules of conduct of OL are complied with. The supervisor also continues to bear responsibility when delegating tasks.

These obligations supplement the model for leadership and cooperation.

2. Collaborating with business partners

In the spirit of fair business relations with customers, suppliers, service providers or other contractual partners, OL expects superior performance from its employees and business partners in terms of quality, pricing and reliability.

Every confirmation or acceptance of deliveries and services as well as all payments must be in a justifiable relationship to the value of the delivered goods or services and must be traceable. All circumstances, bookings and payments related to these business transactions must be fully documented and show the purpose and relationship to the business transaction.

Compliance with legal regulations, such as compliance with applicable embargoes or the sanctions list check, is binding for OL.

2.1 Fair business conduct

OL conducts its business in the global markets in accordance with the highest ethical principles and complies with applicable competition laws. This includes in particular the

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observance of antitrust prohibitions, such as the prohibition of price fixing and the omission of other agreements and conduct that could negatively impact competition.

In the conviction that the interests of its business partners are best protected by fair competition, OL does not obtain unfair advantages over customers, suppliers or competitors.

2.2 Requesting and accepting advantages

All decisions in the company are made free of personal interests and on the basis of the business objectives. Business decisions serve exclusively to enhance customer benefit and to achieve sustainable business success.

To maintain their independence, employees may not request gifts or other benefits, personal services or favors from business partners. OL employees are prohibited from accepting benefits from business partners that would influence an objective and fair decision.

Gifts in kind or benefits exceeding a value of €100 may not be accepted. Gifts of money may not be accepted. In case of refusal, the respective business partner must be informed about the OL Code of Conduct. The management will be informed of exceptions in justified individual cases (e.g. if, in an international context, the rejection of a gift would be considered impolite and the acceptance does not lead to a conflict of interest). This provision regarding the acceptance of gifts in kind or money may not be circumvented by a third party obtaining these gifts.

The costs of expenses – particularly for entertainment and gifts where it is not possible to precisely separate business and private interests – must be borne by the employee himself.

Attempts by suppliers to influence OL employees in their decision by offering them unjustified advantages will lead, depending on the individual case, to the termination of the business relationship.

2.3 Offering and granting advantages to business partners and officials

No employee may directly or indirectly offer, promise or grant unjustified advantages to public officials or business partners, or approve such advantages. Any offer, promise, benefit or gift must comply with applicable laws and OL guidelines. Offers, promises, benefits and

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gifts may therefore not be made if they can be understood as an attempt to bribe a business partner or official in order to gain business advantages for OL. This provision regarding the offering or granting of benefits and services may not be circumvented by a third party obtaining these benefits.

2.4 Travel, invitations and hospitality

Trips must be planned without exception according to business needs and be approved by the supervisor and/or the management.

Invitations from business partners to business lunches or events may only be accepted if they are granted voluntarily, if the acceptance serves a legitimate business purpose and if they take place within the context of normal cooperation. The assumption of travel or accommodation costs by third parties is not permitted.

2.5 Awarding contracts

Every offer is reviewed fairly and impartially. Employees who are involved in the awarding of contracts must observe the following rules in particular:

- Suppliers are treated equally when competing for contracts.
- Employees must report to their supervisor any conflict of interest* that arises in connection with the performance of their job.
- Employees who are related by blood or marriage to the owners of supply companies may not make any decisions, either directly or indirectly, regarding the awarding of contracts to these companies.
- Management must be informed if contracts are to be awarded to companies in which OL employees are involved.

* See “Avoiding conflicts of interest”

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- No employee may have private orders carried out by companies with which the employee has business contacts if this could result in advantages for the employee. This is especially true if the employee could influence these suppliers directly or indirectly by placing orders with them.

3. Avoiding conflicts of interest

OL places great importance on ensuring that employees avoid conflicts of interest or loyalty in the course of their work. These may occur if an employee works for or has an interest in another company. Employees must immediately inform their supervisor or the management if such a conflict arises.

3.1 Secondary employment

Employees are obliged to register a secondary activity with Human Resources. Operating as well as directly or indirectly participating in a business must also be reported to Human Resources in writing and requires prior notice. Purchases of shares for investment purposes are excluded from this rule.

Exercising a secondary job may be prohibited if the secondary job conflicts with the legitimate interests of the company, leads to an impairment of work performance, conflicts with the employee's duties in the company, if there is a risk of a conflict of interest, or if a violation of laws regarding working hours can be expected.

3.2 Social commitment and political activities

OL supports the social commitment of its employees in associations and organizations as well as in public positions on the local as well as supraregional level. Supervisors grant the necessary freedom to their coworkers for these commitments, particularly for participating in IHK committees, as lay judges or in organizations staffed by volunteers. All employees of

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OL must ensure their personal commitments do not damage the reputation or image of the company.

3.3 Freedom of association and opinion

OL respects the right to freedom of association and assembly of its employees. The company also recognizes the basic right of employees to form employee representative bodies and trade unions, to join them and to engage in collective bargaining and wage negotiations, provided that this is legally possible in the respective country.
The right to freedom of opinion and freedom of expression are provided special protection at OL and are granted to employees without exception and at all times.

4. Handling information and other assets

Information is one of the company's most valuable assets. An open, targeted and effective transfer of information is crucial for business success. The information of OL is confidential or legally protected, however, which is why the applicable confidentiality obligations must be observed in accordance with the employment contract.

4.1 Confidentiality in corporate matters

The corporate matters of OL are to be kept confidential. Employees who, due to their affiliation with the company, receive information that is not publicly known must treat this information confidentially. They may only disclose this information to employees or contractual partners who are authorized to receive such information due to their duties.

4.2 Protection of Information

In the interest of the company, all employees must protect confidential company information intended only for a limited group of people from being accessed by unauthorized persons.

4.3 Data protection

OL strictly observes the regulations for the protection of personal data.

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OL handles all personal information about employees, customers, business partners and suppliers carefully, confidentially and in compliance with all data protection laws. Protecting this information is of utmost importance to maintaining mutual trust.

Personal data may only be collected, processed or used if this is necessary and if there is an appropriate legal basis or if the data subject has granted consent. The use of data must be transparent for the data subject. Their rights to information and correction as well as, if applicable, to objection, blocking and deletion must be respected.

An appropriate standard that reflects the state of the art must be maintained for technical protection against unauthorized access to data and information.

Information to investigating authorities will be provided by the management or by the external data protection officer only if there is a legal obligation to do so. The works council must be notified.

4.4 Responsible handling of assets

It is the duty of every employee to responsibly handle company property (e.g. furniture, equipment, company vehicles), to treat it with care and to protect it against loss, damage, misuse, theft, embezzlement or destruction. This rule also applies to intellectual property such as trademarks, patents, copyrights and know-how. Included here are business and corporate plans, technical knowledge, databases, product samples, designs, business papers and reports. The preparation of private work in the company and the use of company facilities for private purposes are prohibited. Exceptions are governed by works agreements or require management approval.

4.5 Careful handling of strictly confidential business documents

All employees who have access to strictly confidential information regarding OL must exercise special care when handling business documents and information in accordance with their duty of confidentiality. This includes the handling of plans and reports as well as the handling of information about new products or processes, mergers, acquisitions or divestitures, negotiations, contracts, business relationships, litigation, business development or key financial figures.

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4.6 Reporting

All financial statements and annual reports in either electronic or printed form must fully reflect transactions and operations and comply with the company's internal requirements and accounting policies. Inaccurate reporting within the company or to external organizations or persons is strictly prohibited.

5. Fairness and diversity

5.1 Fair hiring practices and diversity

The diversity of our employees is decisive for our business success. OL strives to recruit, train, retain and promote the most competent employees. Professional advancement at OL is based on skills and performance. OL is committed to equal opportunity as well as to fair hiring practices and compliance with anti-discrimination laws.

5.2 Fair pay

OL respects the right to fair pay based on the applicable collective agreement provisions, legally guaranteed minimum wages, the performance of employees, and the respective job market. All employees receive pay that is adequate for their work and in line with the collective agreement.

5.3 Mutual respect: discrimination and harassment are prohibited

OL respects human rights and facilitates their observance. The company recognizes that human rights should be considered fundamental and universal, based on accepted international laws and procedures including the United Nations Declaration of Human Rights. OL rejects all forms of forced and child labor in the company and its business partners and promotes a work climate that allows for diversity. Differences between employees are therefore valued and respected. Discrimination, harassment or intimidation of any kind based on race, sex, color, religion, nationality, age, marital status, sexual orientation, ancestry, social status or physical disability is prohibited because it is

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inconsistent with the goal of respectful and fair treatment. In particular, any kind of mental or physical violence is condemned in the strongest possible terms.

Employees are therefore not allowed to use the electronic systems of OL to transmit or receive images or texts that constitute harassment in the sense of the attributes stated above. If employees believe they have been the subject of discrimination or harassment, or if they observe such behavior or become aware of it, they should report this to their supervisor, the compliance officer or the management.

OL will investigate any evidence of harassment or discrimination and will take appropriate action in accordance with local legal provisions.

5.4 Core labor standards of the International Labor Organization

OL complies with the following core labor standards of the International Labor Organization (ILO):

- ILO Convention No. 138 of 1973 and ILO Convention No. 182 of 1999 (Minimum age for employment and prohibition of child labor)
- ILO Convention No. 29 of 1930 and ILO Convention No. 105 of 1957 (Prohibition of forced and compulsory labor)
- ILO Convention No. 100 of 1951
  (Equal pay for work of equal value for male and female workers)
- ILO Convention No. 87 of 1948 and ILO Convention No. 98 of 1949 (Right of association and right to collective bargaining)
- ILO Convention No. 111 of 1958
  (Elimination of discrimination in employment and occupation)

6. Responsibility in the workplace

6.1 Safety in the workplace

The safety of employees in the workplace is an extremely important concern of OL. All international and site-specific health and safety regulations, as well as the respective

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national laws on working hours, must therefore be observed on the basis of the applicable national laws. OL supports ongoing development to improve the work environment.

6.2 Occupational safety, health and fire protection

OL considers itself responsible for ensuring a work environment that is safe and that supports good health in order to avoid accidents and, in particular, personal injury. Applicable legal requirements as well as ILO Convention 155, which specifies that all measures of occupational health and safety must be free of charge for employees, are observed.

Additional services and measures which OL carries out as part of its responsibility for health, occupational safety and fire protection, include:

- A process established in the company for continuous and sustainable reduction of work-related health hazards
- Regular information provided to employees about identified potential hazards and measures adopted to minimize risks
- Monitoring of identified potential hazards and of the effectiveness of adopted measures
- Ensured access to emergency plans, fire protection and first aid equipment for all employees
- Presentation of sufficiently marked emergency exits, escape routes and assembly points

6.3 Alcohol and drug-free workplace

To fulfill our responsibility to employees and business partners for a healthy and productive work environment, the use and carrying of alcohol, drugs and other addictive substances or intoxicants (e. g. cannabis) is prohibited in the company. The same applies to drugs (substances banned by law) and alcohol. In addition, employees and visitors must not be under the influence of these substances. The applicable works agreements regarding this must be observed.

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7. Quality and environmental protection

7.1 Quality

Highest quality and continuous improvement of quality are essential for the growth and success of the company. All employees are required to meet the expectations of both internal and external customers and to constantly improve the quality of our products and services.

7.2 Environmental protection

Through appropriate management responsibility and the dedicated effort of its employees, OL aims to conduct its business in an environmentally friendly manner and is continuously working to improve its environmental efficiency. The management and employees of OL work to ensure compliance with the law and with the company's own high standards. Environmentally friendly design, technical safety and health protection are already established as targets in the development phase.

All employees must contribute to achieving these goals in a sustainable manner through their own conduct.

8. Donations and sponsorships

The management decides on donations and sponsorships. These may not be used to indirectly obtain unfair advantages from business partners.

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9. Preventing money laundering and funding of terrorism

OL has established risk-appropriate precautionary measures to prevent money laundering and the funding of international terrorism in accordance with the legal provisions and the requirements of the supervisory authorities.

Acceptance of cash payments is prohibited. Cash payments in an amount of up to EUR 250.00 can be made only in exceptional cases.

10. Compliance with the OL Code of Conduct

Compliance with this Code of Conduct and other applicable instructions is binding for all employees. Any conduct to the contrary will not be tolerated by the company and may result in legal measures.

All supervisors are responsible for ensuring the employees assigned to them are aware of and comply with the OL Code of Conduct.