

Code of Ethics

Foreword

This Code of Ethics is very important for achieving our common goal – quality for your success.

Our success lies in a company-wide corporate culture characterised by integrity, mutual respect and individual responsibility. We place our long-term economic success – with the greatest possible benefit for our customers – at the centre of our actions.

This Code of Ethics is intended to serve as a guide to conduct for our managers and employees. It contains values, fundamental attitudes and rules of conduct by which managers and employees are to be guided in their dealings with our business partners, customers, competitors and authorities.

1. General principles: Lawful conduct

1.1 Compliance with laws and regulations

In all business activities and decisions, we undertake to comply with the applicable laws, rules and regulations and other relevant provisions of the countries in which we operate. To ensure this, we have established a comprehensive internal control system and compliance management systems (including tax compliance).

1.2 Prevention / Combating money laundering, terrorist financing and corruption

Concerning money laundering prevention and the fight against terrorist financing and corruption, our company's goal is to identify (and prevent) all transactions with a potentially illicit motive. We comply with the relevant obligations under the Money Laundering Act (GwG) and the regulations set out by the competent supervisory authorities, e.g. BaFin, on measures to combat and prevent money laundering, terrorist financing and corruption. To this end, we employ internal safeguards and monitoring measures that are geared to the potential risk, and are documented in each case. Regular checks are carried out by the money laundering officer and the internal audit department, to be able to take any necessary countermeasures at an early stage. In addition, managers and employees are regularly trained to prevent and fight against money laundering, terrorist financing and corruption.

1.3 Compliance with data protection

The personal data of our business partners, customers and employees is protected against unauthorised access and unlawful use by way of security measures. We have implemented the requirements of the European Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG, as amended) in our company since 25.5.2018, and have implemented a functioning data protection management system. Our data protection officer monitors the correct handling of personal data and compliance with the relevant laws at regular intervals. Our employees receive regular training on data protection issues. Business partners, if they have access to personal data via us, are obligated to comply with the legal requirements.

1.4 Fair competition

We comply with applicable anti-trust laws and regulations to protect fair competition. In particular, agreements such as price fixing that affect free and fair competition are prohibited.

We gain a competitive advantage through our performance – best-in-class solutions – and not through unlawful business practices. We do not offer (or accept) inappropriate gifts or favours to business partners, customers or public officials.

2. Principles for treating each other

2.1 Mission statement of LHI

Our dealings with each other are characterised by the following values and basic attitudes: mutual respect, loyalty, reliability and commitment, correctness and fairness, authenticity, performance orientation and discretion. Our actions should be as transparent as possible. More details on “What we do”, “How we do it”, and “How we lead” can be found in our mission statement.

2.2 Avoidance of conflicts of interest

We are committed to avoiding situations where personal and/or financial interests conflict with those of our company. We disclose remunerated secondary activities that could lead to conflicts of interest and harm our company or clients, and will not include them without consent.

Gifts, hospitality, invitations or other types of benefit must comply with customary business and market practices and be considered appropriate and socially adequate concerning the benefit's occasion and the recipient's position.

3. Principles for dealings with business partners and customers

3.1 Business relations

Our business relationships are characterised by the following values and rules of conduct: professionalism, reliability, discretion, transparency and correctness. We advise and support our business partners and customers or potential business partners/customers respectfully and personally.

3.2 Confidential handling of information

We undertake to maintain the confidentiality of our business partners and customers at all times within the framework of governing statutory provisions. Company and business secrets are treated confidentially.

3.3 Completeness of information

We inform our business partners and customers in a competent manner regarding the products and services offered. We communicate in a binding, open-minded and clear way. The information we provide is complete and comprehensible in itself to offer business partners and potential business partners a basis for a long-term and successful business relationship.

3.4 Quality

Our products and services are characterised by the highest quality standards and their continuous adaptation to market developments and customer needs. We follow new developments as soon as we have recognised the corresponding benefits – without abandoning tried-and-tested solutions.

Continuous training and the development of our employees round off the requirements for our quality standards.

4. Principles of sustainability

4.1 Corporate responsibility

For us, sustainability is both a matter of course and a corporate concept for the benefit of all stakeholders of LHI and future generations. We operate in accordance with material and recognised industry, national and international standards on sustainability, and comply with regulatory disclosure requirements applicable to us.

The management team and all employees are actively involved in suitable organisational structures to ensure the central, transparent and company-wide management of all implementation and control efforts regarding our activities from a sustainability perspective. Voluntary community and social engagement are adequately supported at all times.

4.2 Ecological responsibility

We are committed to ensuring that the CO₂ emissions generated by our business operations are in line with the EU's holistic approach to de-carbonisation, and can, therefore, be considered "Paris Aligned". Unavoidable CO₂ emissions are more than just offset by the purchase of climate protection certificates.

To reduce our energy consumption and our carbon footprint, we are constantly improving the energy standard of our company's premises; we use green electricity or generate it ourselves using photovoltaic systems, we promote electromobility with the installation of e-charging stations and with electrically powered company cars, as well as the use of environmentally friendly means of transport and mobile working solutions. Our outdoor facilities are maintained according to ecological standards and are home to several bee colonies.

Ecological standards also apply to the selection of contractors and business partners, as well as to the purchase of labour and food.

4.3 Social and societal responsibility

We observe the prohibition of discrimination and the observance of human rights. As an employer, we promote diversity and equal opportunities, provide performance-based remuneration, and ensure occupational health and safety at all times.

We are aware of our social responsibility. We behave in a manner that reflects the responsibilities of our company within society. We are socially committed, e.g. by means of donations, to charitable or social institutions or memberships that represent a form of sponsorship by nature.

Signed The Management Board of LHI Leasing GmbH