

Code of Conduct

LEADERSHIP & SUSTAINABILITY, as the prime sustainability management consultant and solution provider, believes in responsible social and ethical behavior. The company has a responsibility to the people serving the company worldwide. People whose work contributes to the company's success should not be deprived of their basic human rights or be forced to suffer physically or mentally from their work. Furthermore, LEADERSHIP & SUSTAINABILITY and its employees have an obligation to all stakeholders¹⁾ to observe high standards of integrity and fair dealing.

This is the foundation for and the reason that LEADERSHIP & SUSTAINABILITY has created this document, Our Code of Conduct. Our Code of Conduct will be distributed to, and complied with, by all employees.

If any of the content herein is in conflict with local legislation, then local legislation will supersede. Situations may occur for which there are no specific guidelines. In such cases behavior in the spirit of the Code should be maintained. In case of uncertainty, concern, complaint, or a report of violation, an employee's immediate manager, the person nominated for the local mechanism for referral, or if there is no such local function, the nominated person for the Code of Conduct at LEADERSHIP & SUSTAINABILITY headquarters should be contacted. As much as possible, an employee's information will be treated confidentially, and no employee will be discriminated against for reporting in good faith, violations of the policy.

LEADERSHIP & SUSTAINABILITY will follow up and monitor the implementation of the Code of Conduct to ensure compliance.

Neunkirchen am Brand, October 10, 2016

Karin Ekberg
President and CEO

1) These include customers and end users, owners and investors, fellow employees, partners and suppliers, governments and authorities, neighbors and local communities, interest groups and the media.

Workers' rights, human rights, consumer interests and community outreach

Child labor

LEADERSHIP & SUSTAINABILITY recognizes the rights of every child to be protected from economic exploitation and from doing work that is likely to be hazardous to the child's physical, mental or spiritual health, harmful to their moral or social development, or interfere with their education. A child in this context is a person younger than 15 years of age.

Forced or bonded labor

LEADERSHIP & SUSTAINABILITY does not employ nor accept any form of forced or bonded labor, prisoners or illegal workers.

Freedom of association and collective bargaining

LEADERSHIP & SUSTAINABILITY accepts the freedom for employees to join an association of free choice, to organize and to bargain collectively or individually.

Working hours, overtime and overtime compensation

LEADERSHIP & SUSTAINABILITY complies with local laws and regulations regarding working hours, including overtime and overtime compensation. Salaries should be paid regularly and comply with the relevant local legislation and the local market situation. Employees are entitled to a minimum of one day off in seven and to take national and local holidays. Employees should be granted the stipulated annual leave, sick leave and maternity/paternity leave.

Discrimination, harassment, equal opportunities, gender balance and diversity

LEADERSHIP & SUSTAINABILITY rejects any form of discrimination or harassment in the workplace due to race, ethnicity, sexual orientation, gender, religion, political opinion or nationality. Gender balance and diversity are important to the prosperity of the company and its stakeholders.

Employee privacy

E-mail correspondence: Company e-mail and internet functions should be used only for company purposes and therefore all traffic is company property.

Employment and medical records: Employment records are kept confidential and are only disclosed for legitimate reasons. Employees' medical records are confidential and private, kept separately from all other employee records in locked cabinets or the equivalent. These records will not be released to any person unless required by law or with the signed, written consent of the employee concerned.

Alcohol and/or drug abuse

LEADERSHIP & SUSTAINABILITY expects all employees to refrain from any alcohol and/or drug abuse that may affect their work.

Community outreach

LEADERSHIP & SUSTAINABILITY acts as a good corporate citizen wherever it operates and whenever possible supports local, regional and global communities in appropriate ways.

Environment, health & safety issues

Environment

- LEADERSHIP & SUSTAINABILITY continuously develops strategies to reduce consumption of resources, prevent pollution and improve the overall environmental impact from its operations and products along the value chain.
- LEADERSHIP & SUSTAINABILITY continuously seeks ways to improve the work environment to reduce risks that can cause accidents and pollution.

All LEADERSHIP & SUSTAINABILITY employees are responsible for the Company's environmental performance. Everyone must make sure that the effects of any possible environmental impact are minimized and that the facilities are equipped to meet legislative requirements.

Health & Safety

Working environment: It is important for the wellbeing of all employees and for the quality of work that we maintain a good working environment.

Business Ethics

LEADERSHIP & SUSTAINABILITY respects the laws and regulations of the countries in which it operates and requires that its suppliers and partners do the same.

Bribes

LEADERSHIP & SUSTAINABILITY does not accept bribes in any form.

Entertainment, gifts, gratuities and donations

When employees are involved in supply management activities, representing the Company, all decisions shall be made with integrity. Therefore neither LEADERSHIP & SUSTAINABILITY nor its employees should give or accept any gifts, gratuities or entertainment offers that could influence the company's or customers' decision making. However, small gifts are sometimes a part of business culture.

Records and reports

The integrity of LEADERSHIP & SUSTAINABILITY's record-keeping and reporting systems is of utmost importance. Employees must use special care to make sure that records are accurately and completely prepared and reviewed, whether they are for internal or external use.

Conflict of interest

Conflict of interest between the employee and the company must be avoided. Should such conflict occur, the employee is required to discuss the matter with the immediate manager. Some obvious situations of conflict include:

- Outside business activities
- Personal financial interest
- Using inside information for personal gain
- Employment of close relatives
- Using confidential information for personal gain

Contact

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