



**Lindemann & Störmer**



**Müller & Schröder**



**Nöcker Drahtbearbeitung**

# **Code of conduct**

Stand 11/2024

**“For the possible to emerge, the impossible must be attempted again and again.”**

**(Herrmann Hesse)**

## **FOREWORD BY THE MANAGEMENT**

Dear employees

Dear business partners,

Lindemann & Störmer, together with its affiliated company Müller & Schröder, is a leading manufacturer of high-quality and precise cold heading wires. With Nöcker Drahtbearbeitung we are expanding our portfolio to include contract processing.

We offer innovative products and intelligent solutions to all major suppliers to the car and commercial vehicle industry and are number one in quality, innovation, application development and customer service. We rely on state-of-the-art processes and technologies in conjunction with the efficient and sustainable use of resources and are continuously developing ourselves, our products and our production processes. We work successfully and fairly in all markets and are a reliable partner for customers and suppliers.

Our company is geared towards compliance with a wide range of legal and cultural requirements and the successful handling of diversity. The basis of Lindemann & Störmer's success is that we all, including management, executives and every employee, work every day and with full commitment to realize our vision.

Our group of companies bears a social responsibility towards customers, employees, investors and the public.

Our business partners are also an important part of implementing our requirements and achieving our corporate goals. If our business partners and suppliers commission third parties (e.g. representatives, subcontractors, etc.) as part of their business relationships with our group of companies, we expect that these third parties also commit to the basic principles set out in this Code of Conduct for suppliers and business partners.

Only if we all pursue the same goals and values when working together can we act responsibly. Our success is equally dependent on whether we all adhere to the conduct guidelines described in this Code every day and everywhere. We therefore ask you to familiarize yourself with the content of the Code and to apply it consistently in your everyday work.

**The Management**

## 1. Introduction

Our social responsibility results in the obligation to comply with the law and all applicable laws. We therefore expect our business partners and suppliers to comply with the following basic principles.

In principle, our Code of Conduct is based on the principles of internationally recognized standards for responsible corporate governance. This also includes the UN Global Compact, the core labor standards of the International Labor Organization (ILO) and the Rio Declaration on Environment and Development.

More information about these standards can be found here:

General declaration of human rights:

[www.ohchr.org/EN/UDHR/Documents/UDHR\\_Translations/ger.pdf](http://www.ohchr.org/EN/UDHR/Documents/UDHR_Translations/ger.pdf)

Principles of UN Global Compact

[UN Global Compact Netzwerk Deutschland: Über uns](#)

ILO-Core labor standards

[Erklärung der IAO über grundlegende Prinzipien und Rechte bei der Arbeit \(1998\) | International Labour Organization \(www.ilo.org\)](#)

Rio-Declaration on Environment and Development

[n9283655.pdf](#)

## 2. Principles of social responsibility

### 2.1 Respect for human rights

The United Nations “Universal Declaration of Human Rights” concerns regulations for the protection of human rights, which are enforced, protected and respected by the group of companies. We expect the same from our business partners.

Our suppliers and business partners undertake to respect and support compliance with internationally recognized human rights.

In particular, they comply with human rights in accordance with the UN Charter of Human Rights (Universal Declaration of Human Rights, Resolution 217 A (III) of the General Assembly of December 10, 1948). These include in particular the 5 principles of the International Labor Organization (ILO for short): freedom of association, forced labor, child labor, discrimination and occupational safety.

The resulting 10 ILO core labor standards, which are intended to ensure social standards within the framework of the World Trade Organization regarding humane working conditions and adequate occupational safety, are listed here with the number of the associated international agreement:

1. ILO 29 Forced labor (1939)
2. ISO 87 Freedom of association and protection of the right to organize (1948)
3. ILO 98 Right to organize and collective bargaining (1949)
4. ILO 100 Equality of Pay (1951)
5. ILO 105 Abolition of forced labor (1957)
6. ILO 111 Discrimination (Work & Occupation) (1958)
7. ILO 138 Minimum age of employees (1973)
8. ILO 182 Prohibition of the dire consequences of child labor (1981)

9. ILO 155 Occupational safety and working environment (1981)
10. ILO 187 Promotion Framework for Occupational Safety (2006)

If a violation of the above points for the protection of human rights by our business partners is detected by our employees, they must report the violation to their supervisor, which then leads to the termination of the business relationship.

## **2.2 Non-discrimination and equal opportunities**

Our suppliers and business partners undertake not to discriminate against anyone on the basis of ethnic or national affiliation, race, gender, religion, belief, age, disability, sexual orientation or other legally protected characteristics. This also applies to the observance of women's rights, the promotion of diversity, equality and inclusion, and the observance of the rights of minorities and indigenous peoples, unless this is contrary to mandatory law.

## **2.3 Right to freedom of association and assembly**

Employees must be granted the right to freedom of association and assembly in accordance with the applicable rights and laws.

## **2.4 Occupational safety and health protection**

Our suppliers and business partners undertake to ensure occupational health and safety at work within the framework of national regulations. This includes mandatory compliance with the relevant regulations of the Occupational Safety and Health Act (ASchG), the Occupational Safety Act (ASiG), the Working Hours Act (ArbZG), the sub-legal regulations (e.g. technical rules) and trade association regulations (e.g. DGUV, ASR). The company supports constant development to improve occupational health and safety.

## **2.5 Environmental protection and climate change**

We are all committed to the goal of protecting the natural foundations of life for current and future generations. Laws and regulations issued to protect the environment must be observed.

If there is a risk of pollutant contamination in water, soil and air in connection with business activities, appropriate reduction and prevention measures must be implemented. Waste and hazardous substances must be labeled with safety-relevant information that identifies the risk of danger.

Handling, storage, transport and disposal of waste and hazardous substances must not have any harmful effects on the air, soil, water or the health of employees and must be carried out by qualified people. Explosions, ignitions and other sudden dangerous events must be prevented. The supplier must take measures to avoid and reduce waste.

In addition, increased consideration or integration of the transition to a sustainable economy, efforts to save energy and CO<sub>2</sub> and limit global warming to 1.5° C in accordance with the Paris Agreement in company management and the decision-making processes for company policies and goals and programs.

## **2.6 Communication**

Our suppliers and business partners communicate openly and in a dialogue-oriented manner about the requirements of this CoC and its implementation towards employees, customers, suppliers and other interest and stakeholder groups. All employees in the company are regularly made aware of the CoC and appropriate information events are held.

## **2.7 Money laundering**

Our suppliers must comply with applicable laws for the prevention of money laundering and terrorist financing.

## **3. Principles of fair competition**

### **3.1 Prohibition of corruption**

We expect our suppliers and business partners to fundamentally reject corruption and bribery and to strictly separate the interests of the company and the private interests of employees on both sides, even when dealing with business partners and government institutions. Decisions are made free of extraneous considerations and personal interests. The applicable criminal corruption laws must be adhered to. Among other things, the following should be noted:

The granting of personal advantages by the company and its employees to domestic or foreign officials (such as civil servants or employees in the public service) with the aim of obtaining advantages for the company or themselves or third parties is not permitted.

Monetary personal benefits in return for unfair favoritism in business transactions between companies may not be offered, promised, granted or approved. Likewise, when dealing with business partners, personal advantages of value for unfair favoritism in business transactions may neither be demanded nor accepted.

Management and employees of the company may not offer, promise, demand, grant or accept gifts, payments, invitations or services in business transactions that are given with the intention of unfairly influencing a business relationship or that pose a risk of jeopardizing professional independence of the business partner. This is generally not the case with gifts and invitations that are within the scope of normal business hospitality, custom and politeness.

### **3.2 Behavior towards competitors**

Our suppliers and business partners are committed to respecting fair competition. You will comply with applicable laws that protect and promote competition, in particular applicable antitrust laws and other laws regulating competition.

When dealing with competitors, these regulations in particular prohibit agreements and other activities that unfairly influence prices or conditions, illegally allocate sales territories or customers or impermissibly hinder free and open competition.

Furthermore, these regulations prohibit unfair agreements between customers and suppliers, which are intended to restrict customers' freedom to autonomously determine their prices and other conditions for resale (price and condition determination).

In view of the fact that the distinction between prohibited cartels and permitted cooperation can be problematic, it must be ensured that a contact person is named for employees who can be contacted in case of doubts.

### 3.3 Trade Secrets

Our suppliers and business partners respect and protect other people's trade and business secrets. Confidential information and confidential documents may not be passed on to third parties without authorization or made accessible in any other way, unless authorization has been granted, it is publicly accessible information or an enforceable decision by an authority or court requires this.

## 4. Scope


This CoC is a voluntary commitment of our group of companies and applies to all of our companies and business units.

This Code of Conduct (CoC) together with our corporate philosophy form central elements of our corporate culture. The CoC is therefore binding for all employees and helps us to realize our visions.

We expect the direct suppliers of our group of companies (i.e. with whom we have business relationships within the framework of contracts) to comply with this Code of Conduct. In addition, they are required to promote and follow compliance with the Code of Conduct among their employees and suppliers (upstream suppliers) as best as possible and to request that they also follow it. Our group of companies reserves the right to randomly check the application and effectiveness of this CoC at its direct suppliers in the supply chain as part of the management processes (e.g. through company visits, audits or surveys).

Arnsberg, November 2024

**Lindemann & Störmer GmbH & Co KG**  
**Müller & Schröder Nachf. GmbH & Co. KG**  
**Nöcker Drahtbearbeitung GmbH**



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Director