



LENZKAMPER

Company Policy

Quality – Environment – Sustainability



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1. Environmental and Quality Policy

Law-abiding Conduct

For nearly 100 years, Lüdenscheid-based Lenz, Kämper GmbH & Co. KG has specialized in manufacturing bent-wire and spring molded components. This handbook sets out our environmental and quality policy, in keeping with our corporate responsibility to all social stakeholders, particularly our staff members, customers, business partners, suppliers, authorities, and even the next generations.

We firmly believe that consistent environmental protection is a key component of our long-term corporate success, and that the venture is trusted and respected by society. To fulfill this mission, we maintain a DIN EN ISO 14001-compliant environmental management system in addition to our existing quality management system, making environmental engagement an objective on a par with financial success and social responsibility.

Our actions are geared towards the following principles:

The prevention of environmental pollution, energy wastage, accidents and disease is a top priority in all processes. As a company, we are part of our social and natural environment and are thus dependent on its productivity. Compliance with environmental laws and other requirements for energy usage, energy consumption and energy efficiency is therefore a matter of course for us.

In addition to fulfilling legal requirements and regulations, we also commit to continuously and systematically improving our company's environmental performance. We examine the entire life cycle of all industrial activities and our products. This means minimizing the consumption of energy, water, and resources, reducing waste, emissions, and by-products, and supporting waste management to ensure waste products can be recycled. We also endeavor to minimize noise emissions where economically viable.

We strive to procure environmentally safe, socially fair, and energy-efficient products. We give preference to regional providers when their service is comparable with that of non-regional providers and take energy efficiency into account when purchasing new systems. We model our actions on the nature-based principle of a circular economy, in which all processes are in a closed loop.

Company Policy

Quality – Environment – Sustainability

1. Most of the waste generated by the production process is recycled.
2. Water is required for production.
3. When choosing our energy supplier, we make sure a large proportion of the energy comes from renewable sources.

We assess processes and develop energy-saving concepts based on systematic analyses of energy consumption and energy usage. By regularly maintaining our systems in accordance with a testing and maintenance plan, we lay the foundations for a high degree of operational reliability and availability among our systems, as well as robust plant management in keeping with our objectives for increasing energy efficiency.

We maintain open dialogue with all social stakeholders. Our teamwork is characterized by a sense of humanity, fairness, and responsibility. At the same time, staff members' environmental awareness is fostered, and they are actively involved in the implementation of environmental guidelines. The executive management substantiates its environmental and quality policy with objectives and establishes strategies for achieving its objectives. It provides the means necessary for applying the system and initiates optimization measures in the spirit of continuous improvement wherever possible. All areas of the company are responsible for upholding these principles.

2. Sustainability Policy

The company commits to its social responsibility worldwide. As part of its corporate activities, the company has a particular responsibility to itself, to its customers and suppliers along the value chain, to the environment, and to society. The company commits to upholding the following principles.

2.1 General Principles

Basic Understanding

The company recognizes its corporate and social responsibility and commits to fulfilling this in all business activities.

Complying with Laws

In all its business activities and decisions, the company commits to observing the applicable laws and other relevant regulations of the countries in which it operates. Business partners must be treated fairly. Contracts are upheld, with any changes to the framework conditions taken into account.

A Focus on Generally Applicable Values and Principles

The company gears its actions towards generally applicable ethical values and principles, particularly integrity, honesty, respect for human rights, and non-discrimination.

Company Policy

Quality – Environment – Sustainability

2.2 Principles of Corporate and Social Responsibility

Human Rights

The company respects and supports the observance of internationally recognized human rights. It particularly upholds human rights as per the UN Universal Declaration of Human Rights, Resolution 217 A (III) proclaimed by the UN General Assembly on 12/10/1948.

Ban on Discrimination

The company rejects any form of discrimination in accordance with the applicable rights and laws. This particularly relates to discrimination against staff members based on race, ethnic origin, gender, religion or world view, a disability, age, or sexual identity.

Health and Safety

The company guarantees occupational health and safety in accordance with national regulations. It supports continuous further development to improve working environments.

Working Conditions, Ban on Forced Labor and Child Labor

The company respects its staff members' right to freedom of association and assembly in accordance with the applicable rights and laws. It upholds working standards in terms of the maximum permitted working hours and remuneration, particularly regarding the remuneration amount, as per the applicable laws and regulations. Staff members must be protected against corporal punishment and physical, sexual, mental, and verbal harassment. Their privacy is respected.

The ban on any kind of forced labor is enforced. The 1930 Forced Labor Convention (Convention 29 of the International Labor Organization) and the 1957 Abolition of Forced Labor Convention (Convention 105 of the International Labor Organization) are upheld in particular.

The company observes the regulations on the ban on child labor, particularly the 1973 Minimum Age Convention (Convention 138 of the International Labor Organization) and the 1999 Worst Forms of Child Labor Convention (Convention 182 of the International Labor Organization). If a national regulation on child labor stipulates stricter standards, these must be given preference.

Environmental Protection

The company has a long-term commitment to its aim of protecting the natural bases of existence for current and future generations. Laws and regulations enacted to protect the environment must be upheld.

Company Policy

Quality – Environment – Sustainability

2.3 Communication and Information

Internal Communication

The measures and successes of the management system are regularly and actively communicated internally. This includes signs and circulars. All managers are informed of the latest changes to all internal and external (legal) regulations regarding environmental law and Occupational Health and Safety by the Environmental Management Officer/Quality Management Officer and by the Health and Safety Officer. They will also run special training sessions where necessary.

External Communication

We pursue an open policy of information for all interested parties. External requests or complaints are accepted and forwarded to the relevant areas. We maintain an open relationship with the various authority representatives and other external supervisory authorities (e.g. professional associations, insurance companies, banks, environment agency). The managing director is the internal contact person for this.

Upon request, our contractual partners are provided with copies of the environmental and quality management handbook for their perusal. The environmental aspects and potential environmental impacts are not communicated externally.

2.4 The Principles of Fair Competition

Ban on Corruption

The company rejects all forms of corruption and bribery. In dealings with business partners and government institutions, the company's interests and private interests of staff members are kept strictly separate on both sides. Decisions are made free from any irrelevant considerations or personal interests. The applicable criminal law on corruption must be upheld.

The following must be respected:

The company and its staff are not permitted to grant personal privileges to domestic or foreign officials (such as civil servants or public officials) with a view to securing advantages for the company, themselves, or third parties.

Monetary personal privileges in return for unfair favoritism in business dealings between companies must not be offered, promised, granted, or approved. Likewise, valuable personal privileges in return for unfair favoritism in business dealings must not be requested or accepted in dealings with business partners. The company's executive management and staff must not, in their business dealings, offer, promise, request, grant, or accept any gifts, payments, invitations, or services with a view to unfairly influencing a business relationship or which run the risk of jeopardizing the business partner's professional independence. This is generally not the case for gifts and invitations extended or accepted as part of customary business hospitality, conventions, or courtesy.

Company Policy

Quality – Environment – Sustainability

Conduct with Competitors

The company respects fair competition. It therefore upholds the applicable laws that protect and encourage competition, particularly the applicable antitrust laws and other laws governing competition. In dealings with competitors, these regulations particularly prohibit agreements and other activities that unfairly influence prices or conditions, illegally allocate sales territories or customers, or impede free and open competition in an inadmissible way. Furthermore, these regulations prohibit unfair agreements between customers and suppliers aimed at limiting the customers' freedom to independently set prices and other conditions in the event of resale (definition of prices and conditions). Given that distinguishing between prohibited cartels and permitted cooperation can be problematic, the company must appoint a contact person for its staff, whom they can consult in cases of doubt.

Business Secrets

The company respects and protects other parties' trade and business secrets. Confidential information and documents must not be illegally shared with third parties or otherwise made accessible, unless this has been authorized, involves publicly accessible information, or is necessary as a result of an enforceable decision made by an authority or court.

2.5 Scope, Implementation, Suppliers

Scope

This Code of Conduct applies to all of the company's branch offices and business units.

Implementation and Compliance

The company will advise its employees of the content established in this Code of Conduct as well as the resulting obligations. It will take suitable measures to ensure the Code of Conduct is complied with.

Suppliers

The company should communicate the principles to its direct suppliers, encourage them to uphold these principles as far as possible, and ask them to similarly follow the Code of Conduct. The company should additionally advise its direct suppliers to ask their suppliers to adhere to the Code of Conduct.