

# CODE OF CONDUCT FOR BUSINESS PARTNERS

*MOVING*  
**SAFELY** ▲

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# Introduction

This Code of Conduct for Business Partners („Code of Conduct“) is based on the corporate values of us, LUIS Technology GmbH (hereinafter also referred to as „LUIS“). We, LUIS, have adopted this Code of Conduct as a minimum standard for all our business partners (hereinafter also referred to as „business partners“ or „LUIS business partners“) who do business with LUIS or with companies in the LUIS Group. The focus of this Code of Conduct is on anchoring the principles of behaviour with regard to our responsibility towards society, our business partners and our employees and thus minimising potential risks from dubious actions. In line with the principle of sustainability, we are aware of our responsibility for the economic, social and ecological impact of our actions.

Management and executives have a special and responsible role to play: they act as role models and must prevent irregular behaviour within the company, protect their employees and represent the company with integrity both internally and externally. This Code of Conduct is supplemented by national and international legal regulations, which we and our business partners naturally also comply with.

The principles of this Code of Conduct are in line with national and international laws, conventions and guidelines, such as the OECD Guidelines for Multinational Enterprises, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the conventions of the International Labour Organization (ILO) and, last but not least, the principles of the UN Global Compact Initiative, which essentially concerns the protection of international human rights, the abolition of forced and child labour, the elimination of discrimination and responsibility for the environment.

Business partners are all natural or legal persons who supply goods to LUIS or provide services for LUIS (in particular suppliers) or who purchase products or services from LUIS (customers), and also in particular commercial representatives, agents, intermediaries and consultants.

Non-compliance with the Code of Conduct can lead to considerable damage, not only for our company, but also for our employees, our business partners and other stakeholders. LUIS reserves the right to terminate a business relationship with a business partner who violates the principles of the Code of Conduct. The customer fails to comply with this Code of Conduct and thus makes it unreasonable for LUIS to continue, suspend or terminate the relationship for good cause.

By adhering to the principles of this Code of Conduct, we can ensure that our business relationship is based on sustainability, ethical behaviour, respect for human rights and compliance with all relevant laws and conventions.

**All business partners of LUIS must:**

- Conduct business with integrity, act in compliance with all applicable laws and implement the core values, principles and requirements set forth in this Code of Conduct; and
- ensure that this is also implemented throughout the entire supply chain of the respective business partner..

For reasons of better readability, this Code of Conduct does not use the language forms male, female and diverse (m/f/d) at the same time. We understand the generic masculine as a neutral grammatical expression which – unless otherwise stated – explicitly includes all genders.

Hamburg, August 2024



**Dr. Matthias S. G. Feistel**  
Managing Partner



**Martin Groschke**  
Managing Partner

# Assessment of business partners: Information and audit rights, taxes, accounting and financial reporting

## Information and audit rights

At LUIS, we care about the integrity of our business partners. To the extent permitted by law, our business partners are required to provide us with important information about their identity. This includes information on beneficial owners, shareholders, ownership structures and economically entitled individuals, as well as information on board members, managing directors and other compliance-related topics that affect the business partner's company, its affiliated companies (in particular subsidiaries), board members, managing directors and other managers.

LUIS reserves the right to review its business partners' compliance with this Code of Conduct, including all relevant laws and regulations. Such audits will be conducted in accordance with applicable laws and regulations, in particular those relating to data protection. Our business partners must co-operate with such audits by granting us reasonable access to facilities, records and employees. In addition, our business partners must provide evidence of compliance with this Code of Conduct at our request and submit appropriate documentation at our request.

LUIS also reserves the right to request appropriate information from a business partner about its compliance management system and the way in which violations are handled for evaluation purposes.

We firmly believe that transparency and ethical behaviour are the key to a successful business relationship and encourage all our business partners to adopt similar principles.

## Taxes, accounting and financial reporting

LUIS is committed to maintaining the highest standards of ethics and integrity in all its business affairs, particularly in relation to tax, accounting and financial reporting. We ensure compliance with tax regulations and maintain open and transparent communication with the tax authorities. We keep accurate records and provide up-to-date and transparent financial information. All business partners must behave equally and comply with all applicable laws and regulations relating to taxes, accounting and financial reporting.

# Commitment to free and fair market behaviour

## Antitrust and competition law

LUIS upholds the principles of fair and free competition as an elementary component of the market economy and is committed to ethical principles. LUIS business partners are also required to comply with the rules of fair competition, particularly adhering to applicable national and international competition and antitrust laws.

### Above all, LUIS does not tolerate:

- Anti-competitive contracts, agreements or arrangements with actual or potential competitors, in particular agreements that lead to prices and premiums being set, the number or quality of products or services supplied being limited, offers being manipulated, customers being allocated or markets being divided up in breach of competition law;
- Abuse of a leading position in a particular market;
- Restrictions or contracts at vertical level (with business partners or customers) that are intended to or have the effect of preventing or restricting free and fair competition in violation of applicable laws.

# Promotion of ethical behaviour: Combating bribery and corruption, money laundering, conflicts of interest

## **Combating bribery and corruption**

LUIS has a zero-tolerance policy towards any form of corruption, bribery or business behaviour that could give the impression of undue influence or interference. This requirement applies regardless of local customs and must be adhered to by LUIS business partners.

When offering or accepting, promising or being promised gifts of money or other benefits, the legally permissible framework conditions must always be strictly observed and also complied with by our business partners. This applies both to public officials and in business dealings. Hospitality and gifts to employees of LUIS or other business partners or external third parties may not go beyond what is reasonable, taking into account the legitimate business interests, i.e. they must be of low value and in accordance with the law, including the regulations applicable to LUIS. To ensure compliance with applicable anti-corruption laws, LUIS business partners must establish monitoring, recording and enforcement procedures that document and ensure that no bribes are paid or accepted.

## **Money laundering**

Money laundering is the process of bringing assets from illegal sources or illegal business activities (e.g. drug smuggling, theft, tax offences, corruption, etc.) into legal, financial or economic circulation in order to conceal or disguise the improper origin of the assets. LUIS endeavours to combat money laundering and requires its business partners to do the same by taking appropriate measures to ensure compliance with applicable national and international standards and laws.

## **Conflicts of interest**

A conflict of interest exists when the personal interests of a company or individual interfere with their professional obligations and responsibilities. It is imperative that LUIS and LUIS business partners maintain a high level of integrity and avoid any situation that could lead to a conflict of interest. Business partners must disclose potential conflicts of interest affecting the LUIS supply chain to ensure that potential damage to the business relationship is mitigated and confidence in the integrity of that relationship is maintained.

## **Political representation of interests**

Neutrality in dealings with political parties and interest groups is a given for us. Undue influence on politics and legislation is not permitted. We expect the same from our business partners.

# Product compliance, export controls and sanctions, artificial intelligence and guiding principles

## Product compliance

LUIS is committed to manufacturing high-quality products that promote safety and comply with applicable laws, regulations and standards. LUIS complies with all applicable product safety regulations and requirements, in particular the legal requirements regarding the safety, labelling and packaging of products and the use of hazardous substances and materials. LUIS business partners owe the same high standard and will deliver fully compliant products of the same high quality and safety. LUIS will not tolerate any unlawful or unethical behaviour by its business partners in relation to the procurement, production, sale and distribution of their products. The business partner must also ensure that the products and services to be supplied or provided by it under the contract meet at least the minimum requirements for placing on the market in the European Union and the European Economic Area.

## Export controls and sanctions

LUIS requires its business partners to comply with all applicable international trade regulations without exception and to observe the rules and regulations for import and export controls as well as the applicable sanctions and embargoes.

## Artificial intelligence and guiding principles

LUIS is committed to the responsible use of AI as a key technology in its products and complies with the specific AI standards and laws for product development. LUIS complies with the regulations on the use of AI technology in business processes and has developed the following guiding principles for trustworthy AI and expects its business partners to comply with all of these requirements:

- **Fairness and bias:** It is of utmost importance to develop AI solutions that are fair and unbiased.
- **Transparency and explainability:** To create a trustworthy AI that fulfils customer expectations in a verifiable way, LUIS works transparently by providing relevant stakeholders with important information about the AI models and the training data used. In addition, LUIS helps customers to understand the factors that influence the thinking of the AI models in order to create a basis for explainable AI.
- **Data and quality management:** As the quality of an AI model depends on the quality of the data used for training and verification, LUIS focuses on sourcing the best domain-specific data. LUIS ensures that the data containing individuals is handled in accordance with GDPR regulations, which prescribe legally defined rules such as the use of the data and the time at which this data must be deleted.
- **Reliability and safety:** LUIS AI-based systems must run reliably and without interruption. LUIS always verifies the consistent and intended behaviour and the results of its AI solutions to create trustworthy products. This implies an organisational structure that ensures a reliable and secure workflow.
- **Security and robustness:** LUIS aims to develop robust AI systems that maintain their performance level within the customer's operational design areas. All steps in the modelling process must be protected against malicious attacks. In addition, the AI must be as robust as possible in order to be able to deal with adversarial attacks.



# Security and data protection: Dealing with information security, data protection, IT security, physical and personal security, intellectual property

## Confidential information

Confidential information of any kind (e.g. business secrets, inventions, designs, sketches, technical or commercial data, expertise, etc.) must be kept secret and may only be published or disseminated in accordance with the applicable contractual and legal requirements. When collecting, recording, processing, utilising and storing personal data, we and our business partners take the utmost care and strictly comply with applicable data protection laws and regulations. Personal data must be protected in accordance with the applicable laws in all business processes in order to prevent data breaches and cyber security attacks.

## IT and data security

In today's business environment, where sensitive data is increasingly vulnerable to cyber threats, the importance of IT and data security cannot be overstated.

LUIS has established strict security measures and policies to protect sensitive information and systems. Our business partners must also have up-to-date and effective security procedures and policies in place that comply with all relevant laws and regulations related to IT and data security, including data protection laws, cyber security regulations and industry-specific regulations. LUIS business partners must also have a disaster recovery plan in place. The company must also have a security breach response plan and a business continuity and data recovery plan in place to ensure that IT systems and data can be restored in the event of a disruption.

## Intellectual property

Intellectual property is an important aspect of our business activities that we take very seriously. We recognise the importance of respecting intellectual property rights and expect the same from our business partners. We therefore require our business partners not to use or reproduce any copyrighted materials, designs, trademarks, patents, trade secrets or any other proprietary information or rights of LUIS or third parties without appropriate authorisation.

# Protection of others

LUIS is committed to respecting globally recognised human rights as set out in the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. We respect the rights defined in the International Bill of Human Rights and the law on commercial due diligence (LkSG) of 16 July 2021 and the fundamental labour standards of the International Labour Organization (ILO).

LUIS business partners must also observe these principles and ensure that they and their suppliers comply with these obligations.

## **Ban on child labour**

We are committed to the effective abolition of child labour and observe the legal requirements. We observe the respective legal minimum age for admission to employment or work. As part of the recruitment process, suitable mechanisms for determining age should prevent child labour. If child labour is detected, the necessary measures for remedial action and social reintegration are to be initiated, focusing on the welfare and protection of the child. Young people over the age of 16 should only be employed if the nature or conditions of the work they perform do not jeopardise the life, health, safety and morals of the young people concerned and they receive appropriate, relevant instruction or vocational training in the relevant sector. The LUIS business partners must also comply with these requirements.

## **Ban on forced labour and modern slavery**

Economic activity based on forced or compulsory labour, debt bondage or servitude is not accepted by LUIS. This includes any type of labour or service that is demanded of a person under threat of punishment and for which they have not voluntarily made themselves available.

## **Freedom of association and the right to collective bargaining**

LUIS respects and upholds the freedom of association of its employees and recognises their right to form employee representative bodies and to form, join and become members of a trade union and to bargain collectively. LUIS is committed to working together with employee representatives in an open, trusting and constructive manner and to striving for a fair balance of interests. LUIS expects all business partners to adhere to these principles and to ensure that employees can exercise such rights without fear of discrimination or retaliation.

## **Right to occupational health and safety**

The physical and mental health and safety of employees and other persons affected by LUIS's business activities is a top priority for LUIS. LUIS ensures that all locally applicable laws and regulations are complied with, particularly with regard to emergency preparedness, occupational health and safety, accident incident management, fire safety and workplace ergonomics. LUIS ensures a safe workplace, the necessary equipment and the provision of protective equipment for its employees. LUIS business partners must comply with corresponding regulations and standards.

### **Physical and personnel security measures**

We expect our business partners to observe the following principles and to comply with the physical security measures described below:

- Access control: Only authorised personnel have access to security-relevant systems and defined security areas;
- Asset protection: Appropriate measures are taken to protect physical assets from theft and damage;
- Employee protection: Appropriate measures are taken to protect employees from hazards, particularly during their work at the workplace, business trips, assignments abroad or in the event of individual hazards (duty of care);
- Personnel security: Awareness of security-sensitive functions of employees and management bodies and implementation of suitable precautionary measures, e.g. background checks;
- Security incident, emergency and crisis management: Employees with incident, emergency and crisis management responsibilities are prepared to respond to unexpected and critical events in order to protect people and assets.
- Reporting of incidents: LUIS will be informed immediately of security incidents that affect LUIS interests.

By prioritising physical and personnel security, we can create a culture of security and trust that benefits everyone involved in our business relationships.

### **Prohibition of discrimination in employment and occupation**

The principle of equal treatment applies at LUIS. We are committed to tolerance and diversity. We neither discriminate against nor favour people on the basis of ethnic origin, skin colour, gender, religion, political opinion, national origin and social background. We see it as our corporate duty to uphold and protect this legally enshrined right. Furthermore, we apply the principle of equal pay for male and female employees for work of equal value. Our business partners are also committed to these principles.

### **Fair working conditions, further training**

The rules of national labour law must be complied with. Employees should be provided with comprehensible information on the main working conditions, including working hours, remuneration and payment and settlement modalities. The rights of employees must be protected and relevant cancellation regulations and deadlines must be observed.

State or collectively agreed minimum wages must not be undercut. In countries without a collectively agreed or statutory wage framework, it must be ensured that wages for regular full-time work are sufficient to meet the basic needs of employees. Wages should not be withheld and should be paid regularly in a form suitable for the employee. Deductions from wages are only permitted within the legal or collectively agreed framework and must be reported. Employees should be regularly informed about the composition of their pay.

LUIS also expects all business partners to comply with statutory working time regulations and to compensate overtime.

Furthermore, the professional qualification of employees is to be promoted.

LUIS business partners must ensure compliance with the above requirements by their appointed subcontractors as well. In the event of a violation of these requirements, the LUIS business partner shall indemnify LUIS against all claims from third parties, regardless of fault, including claims from their own employees, employees of subcontractors, as well as claims from social security agencies, tax authorities, and the Federal Employment Agency.

**Use of private or public security forces**

When deploying private or public security forces to protect the safety of persons, facilities and legitimate interests in connection with its business activities, LUIS respects internationally recognised human rights and expects its business partners to do the same.

# Preserving the planet and protecting others: Sustainability

## **Circular economy, waste and hazardous substances**

LUIS is aware of the risks to people and nature associated with the provision and use of materials. As an industrial company, LUIS bears responsibility for the environmental compatibility and sustainability of its products and sites and strives to prioritise sustainable materials, optimise the use of resources, eliminate waste and rethink value creation. LUIS expects business partners to endeavour to reduce the use of materials, separate and ideally reuse or recycle valuable materials, use recycled/renewable materials, contribute to closed material and product cycles and promote circularity within their value chain. Hazardous substances and chemicals must be labelled and their safe handling, transport, storage and reuse must be ensured.

## **Environmental management**

LUIS is aware of its responsibility towards the environment and supports the transition to a climate-neutral and sustainability-orientated economy. LUIS expects business partners to comply with applicable national energy and environmental laws. In addition, business partners are expected to take effective measures to reduce their direct and indirect emissions (in particular CO<sub>2</sub> emissions) that pose a risk to people and the environment (especially air and water) and to work continuously on improvements in this regard. The consumption of raw materials should be reduced wherever possible, and attention should be paid to the sustainable use of energy and water resources in particular.

## **Dealing with conflict minerals and critical raw materials**

For conflict minerals (tin, tungsten, tantalum and gold) and other critical raw materials from conflict-affected and high-risk areas such as the Democratic Republic of Congo (DRC), business partners of LUIS must implement special due diligence processes in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. In addition, LUIS expects business partners to provide complete and truthful information on their value chains for these processes upon request.

## **Biodiversity**

The activities of LUIS and its value chain depend on and influence biodiversity. LUIS complies with the legal requirements for the protection of biodiversity and expects the same from its business partners. LUIS expects business partners to analyse the relationship between their dependencies and impacts on nature and to set an appropriate level of ambition for their business in order to support the goals of not contributing to deforestation or destruction of natural forests and to include the conservation of ecosystems or species protection.

Business partners should protect ecosystems and in particular important biodiversity areas affected by their business, avoid illegal deforestation and minimise land use in accordance with international biodiversity regulations. Where appropriate, business partners should monitor and control their impact on soil quality to prevent soil erosion, nutrient depletion, subsidence and contamination.

# Implementation of the requirements of this Code of Conduct

Business partners must establish suitable and appropriate processes and responsibilities and take measures to ensure compliance with the standards set out in this Code of Conduct in their own business area and along their value chain.

If business partners become aware of circumstances that indicate a risk of or a violation of the standards set out in this Code of Conduct in their own business area or that of their business partners, they must take immediate action to eliminate, prevent or minimise such risks or breaches as much as possible and, where appropriate, develop a remediation plan.

Business partners must inform LUIS about such violations in their own business area or at their business partners as well as about investigations initiated by the authorities and also about measures taken or remedial concepts developed and implemented, insofar as these violations are related to the contractual relationship with LUIS or could have a negative impact on the reputation of LUIS.

If the business partner concerned cannot or will not end the violation of the standards defined in this Code of Conduct in the foreseeable future, LUIS will develop and implement a remedial concept together with the business partner. The business partner shall support LUIS in this endeavour to the best of its ability.

If LUIS becomes aware of a violation of the standards defined in this Code of Conduct, in particular human rights and/or environmental standards in the business area of a business partner or in its value chain, through notification by a business partner or in any other way, the business partner concerned is obliged to cooperate in a complete investigation of the facts.

When requesting information, LUIS takes into account the legitimate confidentiality interests of its business partners as well as applicable legal requirements (in particular with regard to information security, data protection and antitrust law).

## Escalation procedure and right of cancellation

LUIS may take legal action if a business partner violates the standards defined in the Code of Conduct. This also applies if business partners do not cooperate appropriately in implementing the standards or remedying violations or do not take necessary or agreed measures.

The LUIS escalation programme comprises four defined escalation levels:

- **Level 0** Business partner has problems
- **Level 1** Business partner is not successful in solving these problems
- **Level 2** Business partner requires external help/support
- **Level 3** Business partner is not suitable for LUIS (new business on hold)

In the case of categorisations in Level 0-1, the business partner is under special observation and is requested to implement measures that lead to the achievement of the agreed targets. If the agreements and targets are still not met, the business partner is escalated to Level 2.

After being categorised as Level 2, the business partner is invited to LUIS for remedial discussions and must present a detailed action plan to resolve the problems in a timely manner. LUIS decides together with the business partner whether the business partner has been able to demonstrate the implemented measures in a comprehensible manner and eliminate the problems or whether escalation to the next level is necessary. De-escalation to the next lower escalation level can only take place in the event of a demonstrable improvement in performance, presentation of the measures and after a positive assessment by LUIS.

Categorisation in Level 3 results in a „new business on hold“ in addition to Level 2. The business partner will not be considered for enquiries from LUIS. De-escalation from Level 3 can only take place every six months, meaning that no new enquiries are sent to the business partner during this period. To prepare for the remedial dialogue, LUIS requires a presentation from the business partner in the form specified by LUIS. In the presentation, the business partner must describe the problem-solving process, the measures implemented and the expected results.

The presentation template or the specified form of presentation is sent to the business partner with the invitation to the meeting. Business partners who do not adhere to the required presentation format cannot be de-escalated.

In justified individual cases, LUIS reserves the right to categorise the business partner directly in the Level 3 escalation process. In the event of serious violations, LUIS shall be entitled to terminate the contractual relationship with the business partner without notice at the expense of the business partner, if necessary also for good cause, and to stop ongoing orders or other business processes if the continuation of the business relationship is unreasonable for LUIS due to the violation.

# We are here for you: Further assistance and support

## **Whistleblower protection**

LUIS expects its business partners to report any legal or ethical violations that could have an impact on LUIS.

Reports can be made anonymously via the link <https://luis-technology.personiowhistleblowing.com/>.

LUIS business partners must also have appropriate systems and controls in place to ensure that unethical and illegal business practices within their own organisation can be reported. LUIS does not tolerate retaliation against individuals who report possible violations in good faith and expects the same from its business partners.

## **Contact us**

If you have any questions about this Code of Conduct and its implementation, business partners can get in touch directly with the contact persons known to them.

Business partner

Place, date

Name and position

Signature and stamp