



LANCOM Systems

Code of Conduct

SECURE. NETWORKS.

> Guidelines and Basic Principles at LANCOM Systems

LANCOM
Systems

Preface

Dear colleagues,

The values that determine the way we work together are firmly anchored in our corporate philosophy: We respect our co-workers, our customers and our environment.

Supported by our brand values – secure, reliable, and future-proof – we give our customers a solid quality and value proposition. Now and in the future.

This code of conduct for the first time collects all of the important basic principles here at LANCOM into one place and lays down fixed guidelines for our work. It serves as an aid to orientation, and applies to every single employee of LANCOM Systems, including the middle-management and management board. Our code of conduct is dynamic and will be augmented if necessary.

Our code of conduct expresses not only what we expect of ourselves; it is also a promise to our business partners, customers, employees, and our company. To observe any legal obligations and to comply with the law, to behave ethically and to observe social and ecological aspects.

Together, we are responsible for the reputation of LANCOM. Even a single instance of misconduct can damage us as a company. This is why we ask you to read the code of conduct carefully and to understand it as a firm guideline for our daily work at LANCOM.

The Management Board of LANCOM Systems


Ralf Koenzen


Stefan Herrlich

Preamble

Secure. Reliable. Future-proof.

With our brand values **secure**, **reliable** and **future-proof**, we make our customers and business partners a promise that emphasizes our responsibility. This promise includes both economic as well as ecological and social aspects of our entrepreneurial actions and is at the core of our corporate social responsibility (CSR) strategy.

Our organizational guidelines clearly formulate rules and regulations for individual situations and processes in the business environment. These guidelines apply unreservedly to all employees of LANCOM Systems. The code of conduct sums up the essential rules and principles of our actions and it represents the expectations that our business partners and customers have of us.

Rules of conduct

Principles

Compliance with law and order

The observance of rules and regulations is an essential principle of conducting business in a responsible manner. We observe the applicable legal obligations and requirements at all times and act according to ethical principles.

Integrity and respect

At LANCOM, we have a climate of mutual respect and mutual trust. Integrity is an indispensable requirement for trust. Private interests and personal advantages may not influence our business decisions.

Fair competition

We are committed to fair and open competition and interaction with business partners and third parties. We observe the applicable competition law at all times. In our external communication, we focus on our own values and strengths, and not on our competitors.

Business relationships

LANCOM stands for security, reliability, customer orientation and motivated, responsible employees. This is the basis of our reputation and sustainable economic success. We refrain from any form of corrupt behavior. Corruption will not be tolerated: We do not accept bribery or collusion as means of gaining any advantage. Infringements will not be tolerated and will lead to sanctions against the persons concerned.

The public sector in particular relies on the security and reliability of our company. We observe the regulations regarding tenders for public contracts and the rules for avoiding the unauthorized exertion of influence.

Prevention of money laundering

LANCOM observes its legal obligations regarding the prevention of money laundering and does not participate in money-laundering activities. In case of doubt, every employee is encouraged to have the accounting department examine any unusual financial transactions that may constitute money laundering.

Trade controls

We follow existing trade controls and fully observe the regulations for import and export controls, economic embargoes, and controls on dual-use goods.

Business gifts and donations

We limit the exchange of business gifts and donations between business partners to a value of € 44 (gross) according to the tax exemption limit for non-cash compensation (Sachbezugsfreigrenze) in Germany. Gifts and donations may not influence our business decisions or those of our business partners.

We have a tradition at LANCOM that our employees contribute business gifts or courtesies to charity drives held internally at our company (e.g. the "Christmas raffle").

Society

Equality and non-discrimination

A culture of equality, mutual trust and mutual respect is of great importance to us. At LANCOM we treat all employees, partners, and customers equally, regardless of their sex, age, skin color, culture, ethnic origin, sexual identity, disability, religion, or ideology.

We encourage equality of opportunity and prohibit discrimination in everyday work, recruiting, and in the provision of training and professional development.

Human and workers' rights

We respect internationally recognized human rights and support their observance. We strictly oppose any form of forced and child labor. We recognize the right to appropriate remuneration for all employees. Remuneration and any other benefits correspond at the least to those laid down in German law.

Occupational health and safety

Occupational health and safety are fundamental considerations from the outset of the technical, economic and social planning of all of our operational processes. All of our employees encourage health protection and safety in their working environments and adhere to the rules of occupational health and safety. All line managers are obliged to instruct and support their employees in exercising this responsibility.

Environmental and climate protection

Sustainable environmental and climate protection are important goals for us, as is the efficient use of resources. We take responsibility for our environment. We value environmental friendliness and energy efficiency in every aspect of our products' development, production, and packaging.

Every employee has the responsibility to treat natural resources with care and to contribute to environmental and climate protection through their individual behavior.

Donations

We see ourselves as an active member of society and we show commitment to our community. We provide donations, sponsorships and other forms of social engagement in the interests of our company and to encourage digital progress. Our commitment follows firm, transparent guidelines; a recognized charitable status and a relevance to digitalization are the basis for any donation.

Political advocacy

We are open and transparent about our political advocacy, and it relates exclusively to our company's purpose. We comply with the legal requirements of lobbying and we avoid taking unfair influence on policy and legislation under all circumstances.

Appearance and communication to the public

We respect the right to freedom of expression and the protection of personal rights and privacy. Every employee should be aware that, even in private life, they can be perceived as a representative and a part of LANCOM.

When voicing private opinions, we take care not to make any connection between any private opinion and any function or activity at LANCOM.

Information handling

Reporting

We value open and truthful reporting and communication about the business operations of the company to our shareholders, employees, customers, business partners, state institutions and the general public. Every employee shall ensure that internal and external reports, records and other documentation of the company are at all times in accordance with the applicable statutory rules and standards.

Data protection and information security

The protection of personal data, in particular of employees, customers, suppliers and partners, is of great importance to LANCOM. We collect or process personal data only if necessary or legally required for the fulfillment of the task at hand. We collect no personal data without the consent of the person concerned or legal admissibility. We comply with European regulations on data protection.

Responsible use of IT systems

The security of our information technology systems is crucial to our success. Every employee is trained in data security issues and is responsible for following our internal IT security policies.

Protection of company property

We make proper and responsible use of the property, resources and business data of the company and protect them from loss, theft, or misuse. The intellectual property of LANCOM represents a competitive advantage for our company and is thus a worthy asset that we defend against any unauthorized access by third parties.

Intellectual property and copyright

Just as we protect our own business information, we shall also undertake to respect the intellectual property of others and their proprietary information. Unless previously agreed upon contractually and in writing, we do not accept any confidential information from third parties and we make no use of it.

We do not use any materials or data protected by copyright or other means unless we are expressly authorized to do so.