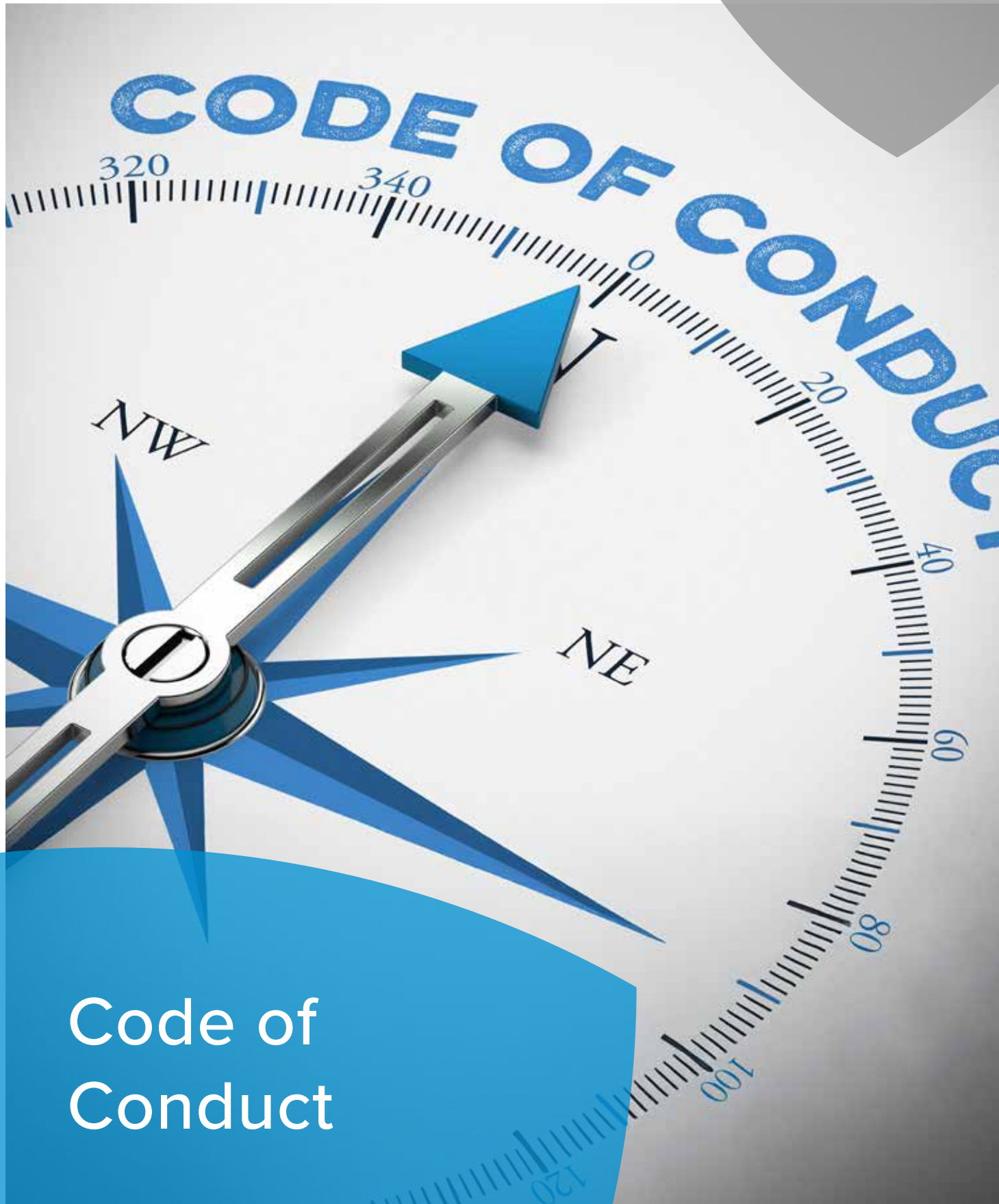




LISEGA

A BUHLMANN COMPANY



Code of Conduct

DEAR LISEGA EMPLOYEES,

Since its introduction, LISEGA's Code of Conduct has defined LISEGA's fundamental vision and values with regard to ethical conduct and transparency, and has clarified what we expect from everyone who works for and with LISEGA.

As we strive to strengthen our position in the market, our responsibility to society and the environment increases. The globalized economy presents complex challenges for the LISEGA Group, its suppliers, customers, and business partners. This Code of Conduct cannot cover every situation we may encounter, so if you are in doubt, please contact your supervisor or our Compliance Officer.

The reputation of our Group reflects the actions of each and every one of us every day and is one of our most valuable assets. The Executive Board and I therefore count on you to commit to our principles and inspire others to behave ethically and responsibly at all times, both internally and externally.

Jan-Oliver Buhlmann

Chairman of the Supervisory Board

Valid:	from 1 July 2025
Version	1.2
Approved on:	1 July 2025
Approved by:	Executive Board of LISEGA SE

TRADITION

We carry out our work in the best tradition of a successful family business, where mutual trust is the basis for our success.

RELATIONSHIPS

We develop long-term, respectful, and fair relationships with our customers and suppliers.

COOPERATION

We think and act globally by working with our co-workers, customers and suppliers around the world, respecting cultural differences and traditions.

FLEXIBILITY

We actively shape the future in accordance with the Company's Vision and break new ground for success by responding flexibly, quickly, and prudently.

FAMILY

As part of the BUHLMANN Group, we value the long-term, reliable, and successful commitment of the BUHLMANN family across generations and work together to contribute to sustainable and inclusive future success.

DEVELOPMENT

We invest in our continuous development, share our knowledge with our colleagues, and learn from our experiences.

QUALITY

We attach great importance to the high quality of our products and services and the professionalism of our employees.

OUR BASIC PRINCIPLES

Shared values based on international standards for the protection of human rights, labor standards, and fair business cooperation form the basis of our conduct and actions. The rules set out in this Code of Conduct are intended to reinforce and ensure compliance with these basic principles.

CODE OF CONDUCT

OF THE LISEGA GROUP

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SCOPE

The provisions of this Code of Conduct are fundamental aspects of our corporate culture. These guidelines for professional conduct apply to our daily activities and must be observed by all executives, managing directors, managers, employees, and temporary staff, regardless of their level of management or function within the Group.

We also expect our business partners to adhere to all principles and values set out in this Code of Conduct, both within their own organization and throughout their entire supply chain. If risks or violations are identified in a partner's supply chain, the LISEGA Group will take appropriate countermeasures, which may include termination of the business relationship.

COMPLIANCE WITH LAWS

The LISEGA Group operates worldwide and therefore treats the traditions and social norms of our partner countries with the utmost respect. This includes compliance with all applicable national and international laws and regulations.

Any unlawful conduct may result in a liability for us and our employees, not only in the country where the incident occurred, but also in other countries where the LISEGA Group operates.

Therefore, all managers are responsible for informing themselves about the laws and regulations applicable to their area of work and for ensuring that these are communicated to their employees and implemented by them.

The LISEGA Group maintains open and truthful reporting and communication about its business activities. All employees must ensure that both internal and external reports, information, and communications are complete, accurate, and comply with applicable laws.

PROHIBITION OF CORRUPTION

We are aware that the fight against corruption and bribery is an international issue of utmost importance. Therefore, the LISEGA Group does not tolerate corruption or bribery in any form. In particular, we do not directly or indirectly demand, accept, offer, or grant prohibited personal advantages or incentives to influ-

ence a business result. Above all, no advantages may be offered or granted to a domestic or foreign public official in order to influence or expedite an official act or to obtain an improper advantage.

We expect our business partners to adhere to these ethical standards and the legal provisions for combating corruption and bribery. In case of doubt, our employees must obtain the approval of their superiors and/or the Compliance Officer before offering or accepting any advantage. If there is any suspicion of bribery or corruption, the managing director or the Compliance Officer must be informed.

LABOR RIGHTS

The LISEGA Group complies with internationally recognized human, labor, and personal rights. We are committed to fair working conditions, particularly with regard to remuneration, working time regulations, and the protection of privacy.

Our actions are guided in particular by the universal principles of the International Labor Organization (ILO). There is no place in our company for modern slavery or human trafficking or for any form of discrimination or harassment.

We guarantee fair treatment of our employees, strive for better wage standards, and offer appropriate salaries that meet local and industry standards.

All forms of forced and child labor are strictly prohibited. All business partners in our supply chain are obliged to comply with these principles not only within their own organizations but also in their supply chains by implementing appropriate measures and control processes.

Any violation of the above principles or labor rights must be reported to the LISEGA Group immediately.

EQUAL TREATMENT AND PROHIBITION OF DISCRIMINATION

The LISEGA Group promotes a culture of equal opportunity, mutual trust, and mutual respect. We condemn discriminatory practices in employment and occupation and do not tolerate discriminatory behavior for any reason. Furthermore, gender equality plays an important role in our corporate policy.

We expect our business partners to adhere to the principles of equal treatment and to treat employees with respect, and to ensure this within their supply chain.

PROMOTION OF OUR EMPLOYEES

The success of the LISEGA Group depends on the skills and expertise of our employees. We promote a working environment characterized by mutual support, teamwork, and open communication, in which motivated employees can share and develop their skills and knowledge. The LISEGA Group offers internal and external training courses to support the professional development of its employees.

CONFLICT OF INTEREST

Our employees act in the best interests of the Group and not on the basis of personal interests. We expect our employees to avoid any situation that could lead to a conflict between personal interests and the interests of the company.

Particular caution is required in cases of:

- Business relationships with companies in which a relative or personal friend is an employee, owner, or direct or indirect shareholder;
- Gifts and hospitality or other benefits that could improperly influence business decisions;
- possible disclosure of confidential information;
- any secondary employment. Such activities must be approved in advance by the Board of Directors. Private secondary employment that could compromise integrity or loyalty to the company will not be approved.

OCCUPATIONAL HEALTH AND SAFETY

The LISEGA Group is committed to providing its employees with a healthy and safe working environment. In addition, it is the fundamental duty of every employee at all Group locations to create and maintain safe and healthy working conditions in order to protect their own safety and that of their working environment. All accidents, incidents, and other dangerous conditions must be reported to the occupational safety specialist.

We work in accordance with the recognized management systems ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018 and safety regulations of local countries.

The high safety requirements of the LISEGA Group are taken into account when assessing suitable business partners.

ENVIRONMENTAL

Protecting the environment and conserving resources are key objectives of the LISEGA Group. We comply with all laws and regulations relevant to environmental protection and strive to act in a sustainable and environmentally friendly manner.

FAIR COMPETITION

The LISEGA Group and its employees are unreservedly committed to the principles of fair competition and comply with the applicable antitrust and competition laws.

We behave fairly and transparently toward our business partners, customers, and suppliers and do not make any false or misleading statements. Prohibited agreements with competitors and concerted practices that restrict or limit competition, in particular agreements on prices, offers, sales quotas, and the allocation of customers, markets, and programs, are prohibited. This applies not only to formal agreements, but also to concerted practices resulting from informal discussions.

Employees may only participate in association meetings that are held for legitimate business purposes. If participants from competitors make statements at such events that raise competition concerns, employees must leave the meeting immediately and inform the Executive Board or the Compliance Officer.

PROTECTION OF ASSETS (CONFIDENTIALITY)

All employees are responsible for protecting the Group's tangible (sites, facilities, products, vehicles, documents) and intangible (know-how, software, property rights, trade secrets) assets within their area of responsibility. All assets must always be used for business purposes unless private use has been expressly permitted.

Business and trade secrets, as well as information that becomes known to us in the course of our activities and is not publicly available, are subject to the strictest confidentiality. Such information shall not be disclosed to third parties or to employees who are not involved in the specific business transaction.

All of the above duties of care also apply to all assets or confidential information of our business partners. Conversely, we expect our business partners to protect all confidential information or assets that come into their possession.

NUCLEAR SAFETY CULTURE

A key business area of the LISEGA Group is the supply of products in the nuclear power generation segment. It is a top priority for LISEGA to meet the special nuclear safety requirements for products that will be used in nuclear power plants. In addition to these requirements, our nuclear safety culture also contributes significantly to nuclear safety. The aim is to develop and maintain a positive nuclear safety culture throughout the entire organization, from the Executive Board to all employees involved with nuclear contracts.

DATA

The protection of personal data in general, and in particular the data of employees, business partners, customers, and suppliers, is of great importance to us. We collect and process personal data only in accordance with the statutory provisions and only to the extent necessary to fulfill the respective task or as required by law. Otherwise, we process personal data only with the consent of the person concerned and always in accordance with the rules and principles of the applicable statutory provisions, in particular the European General Data Protection Regulation.

In any case, we ensure data security, confidentiality, and data minimization. Personal data will only be passed on to authorized persons. All employees treat personal data as strictly confidential and store it securely so that it cannot be misused.

COMPLIANCE WITH INTERNATIONAL TRADE LAWS AND EXPORT CONTROL REGULATIONS

As a global company, the LISEGA Group complies with all applicable customs and export control regulations. We expect our business partners to cooperate with us, provide us with all necessary information, and comply with export control regulations in order to avoid trade with sanctioned goods, persons, or companies.

AWARENESS AND TRAINING

All employees of the LISEGA Group must be made familiar with this Code of Conduct in an appropriate manner. Managers must ensure awareness through preventive measures and through a joint exchange of information on any weaknesses that may exist. In addition, training courses are offered as required to strengthen compliance awareness among employees.

PUBLIC RELATIONS

Statements made on behalf of the LISEGA Group must be approved by the Executive Board. Questions or interview requests from the media in general (e.g., newspapers, radio stations, blogs) must also be forwarded to the Executive Board.

We trust that our employees will use social media responsibly in their private lives, never jeopardize the reputation or business interests of the LISEGA Group, and avoid any confusion between the opinion of an employee and the position of LISEGA Group as a company.

SOCIAL COMMITMENT

Out of a sense of social and moral responsibility, the LISEGA Group and its shareholders have been involved in social projects, charitable organizations, and associations for many years.

From sponsoring children's and youth sports teams to supporting volunteer aid programs and regional projects, it is part of our corporate philosophy to work for the common good and social cohesion. This is the only way to create the conditions for peaceful, fair, and humane coexistence, which is a prerequisite for a sustainable world.

Not only the company as a whole, but also the employees themselves are encouraged and supported to get involved in the community on an individual basis. In addition, the LISEGA Group approaches customers and partners on a project-by-project basis to generate synergy effects that increase the reach of its support.

REPORTING

All employees are required to report any violations or suspected violations of applicable laws or this Code of Conduct to either the Executive Board or the Compliance Officer.

The LISEGA Group promotes a climate of open dialogue. If an employee brings criticism or misconduct to our attention, intimidation or retaliation will not be tolerated, regardless of who is involved. All data, information, and reports received will be treated with strict confidentiality and respect at all times.

Once a violation or suspicion has been reported, an initial assessment will be made to determine the scope of the investigation. The employee will be informed of the outcome of the assessment and the progress of the investigation, to the extent that confidentiality requirements permit. The LISEGA Group ensures that every report of a possible compliance violation is treated fairly and appropriately.

Our Compliance Officer can be reached at compliance@de.lisega.com. Reports can also be made confidentially at any time to the LISEGA Group Ombudsman, Mr. Markus Klindwort, at LISEGA-Ombudsmann@rmk-partner.de

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