

LEM

Life Energy Motion

Code of conduct





Dear Colleagues,

In times of change and uncertainty, it is particularly important that we are finding a broad consensus on our values and the way we want to do business. The Code of Conduct has been established at LEM a long time ago, however, it was time to revisit, update, and re-enforce it.

I am pleased to introduce the new LEM Code of Conduct, which represents our commitment to upholding the principles of good corporate governance. At LEM, we understand the importance of responsibly addressing the needs and interests of our stakeholders, including shareholders, employees, customers, and the wider public. By adhering to robust corporate governance practices, we can further strengthen trust in our company.

What truly sets us apart is our way of working. LEM thrives on the expertise, talent, and leadership of our dedicated teams, who tirelessly strive to deliver the best solutions for our customers. We are fully aware that our collaborative approach with all stakeholders distinguishes us from our competitors and positions us to achieve our ambitious business objectives.

We firmly believe that sustainable and ethical practices generate long-term value for all members of society. They not only ensure the longevity of businesses but also inspire innovative solutions that drive progress. Our success is derived from operating within a clear value system, adhering to best-practice principles and standards, and closely monitoring key environmental, social, and governance indicators.

LEM Code of Conduct serves as a fundamental document guiding our responsibilities to society. It aligns with the principles of the United Nations Global Compact (UNGC), global environmental standards, and our core corporate values.

Ethics lie at the heart of our corporate culture, and it is our expectation that all employees and business partners uphold the standards outlined in our Code of Conduct, regardless of their location, cultural background, or position within the company. Should any employee have doubts about their conduct, or that of their colleagues or business partners, they are encouraged to reach out to their manager, the Human Resources Department, the Legal Department, or the Risk, Control, and Audit Department for guidance.

I know I can count on each of you to uphold our shared values and drive our company forward.

Sincerely,

Frank Rehfeld
CEO

BUSINESS INTEGRITY

COMPLIANCE WITH LAWS AND INTERNAL RULES:

LEM is committed to operating its activities in accordance with the laws and regulations of the countries in which LEM operates and expects its business partners to do the same. We comply with applicable export and import restrictions, public authorization requirements, as well as governing customs and tax regulations. We do not tolerate violations of any applicable law of the countries in which LEM operates or violations of this Code of Conduct or any other internal rule, guideline, or policy.

BRIBERY AND ANTI-CORRUPTION:

We are committed to making business free from bribery or corruption and expect the same from our business partners. We do not accept, offer, promise, or authorize any payment or gift or rendering of services with the intent to obtain or retain any business or improper advantage, or to influence the policy or decision of any government, government official or private organization. Where local laws allow for gifts of nominal or symbolic value, entertainment, or social invitations (depending on local customs), appropriate disclosure should be reported to the management to maintain good business ethics. Entertainment is only permissible if the hosting company representative is also present during the event.

RESPECT AND FAIRNESS:

When dealing with customers, we act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the quality and the reliability of our products. We demonstrate respect, fairness and honesty with our customers and business partners, and we expect them to behave in the same way when dealing with us. We select our business partners based on fair criteria such as price, quality, contractual terms, as well as business integrity.

FAIR COMPETITION AND ANTI-TRUST:

We compete fairly, openly, and independently to protect our customers and shareholders. We refrain from entering or carrying out anti-competitive agreements related to: prices fixing, collusive tenders (rigged bids) output restrictions or allocation of markets, customers, suppliers, or territories. We do not use third parties (including consultants, third-party sales representatives, or industry associations) to assist in or facilitate improper dealings with competitors.

ENVIRONMENT AND SUSTAINABILITY:

We are committed to contributing to economic, environmental, and social progress with a view to achieving sustainable development. LEM continually seeks to improve corporate environmental performance, at the level of the enterprise and of its supply chain. We exercise due diligence in relation to minerals and metals from conflict-affected and high-risk areas and in relation to child labor. We expect our business partners to take measures to limit the environmental impact of their operations, and to manage resources responsibly.

RESPONSIBLE BUSINESS CONDUCT:

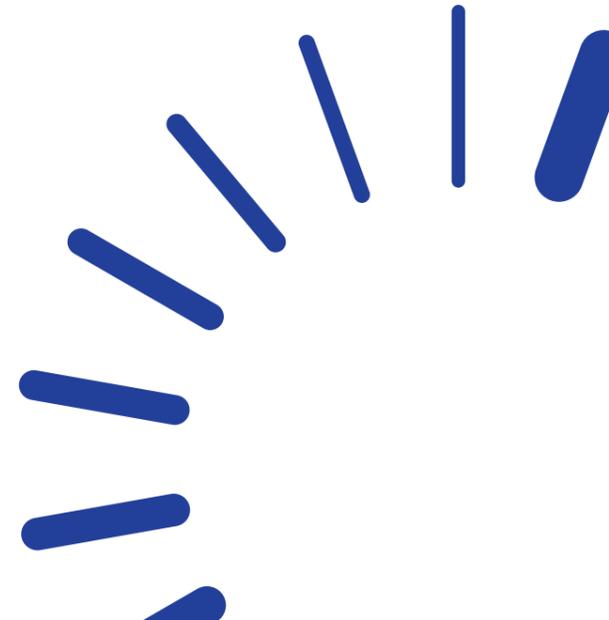
We promote awareness and compliance by our employees of the company policies through appropriate communication and training programs. We carry out risk-based due diligence, through our enterprise risk management systems, to identify, prevent and mitigate actual and potential adverse impacts on matters covered by this Code of Conduct and account for how these impacts are addressed. Furthermore, we expect our business partners, including suppliers and sub-contractors, to apply principles of a responsible business conduct compatible with this Code of Conduct.

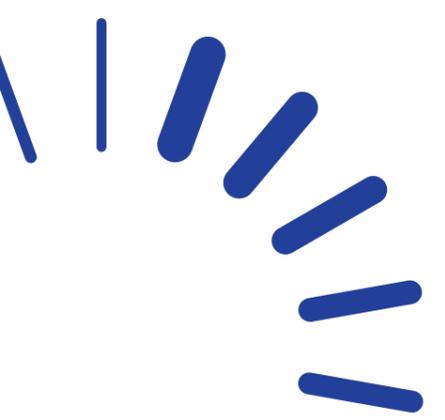
DATA PROTECTION:

We use lawful means to access, collect, use, share, transfer or store the personal information, and use it solely for legitimate business purposes. Do not collect, use, access or share personal information except as necessary for your job and the jobs of those with whom you share information. We take reasonable measures to ensure the security of data (including personal data) that we process and to prevent unauthorized access.

TRANSPARENCY AND INVESTOR RELATIONS:

The LEM group is listed on the SIX Swiss Stock Exchange. Consequently, we ensure that timely and accurate information is disclosed on all material matters regarding the activities, structure, financial situation, performance, ownership, and governance of the company, with due regard of business confidentiality and regulatory obligations. Sharing information about LEM's financial, social or environmental performance, or any other information via a public statement, through mass media or press inquiries is reserved for the Chairman of the Board, the Chief Executive Officer, the Chief Financial Officer and certain employees only after approval by appropriate management in accordance with internal policies. Any breach of these rules and regulations can damage our reputation and destroy the trust and confidence in LEM.





PERSONAL INTEGRITY

RECORDS / ACCOUNTING PRACTICES:

We apply high quality standards for accounting, financial as well as non-financial information, including environmental and social reporting, where they exist.

INSIDER TRADING:

Using material non-public information for personal financial gain, or sharing it with others for their financial gain, is prohibited and potentially illegal. You should never use or disclose material non-public information prior to its official public release. "Material non-public information" about LEM means any information that a reasonable shareholder would consider important in making a decision to buy or sell stock, such as yet-to-be-announced financial or company performance information, mergers or acquisitions, supplier or customer relationships, or changes in senior executive management.

CONFLICT OF INTEREST:

A conflict of interest occurs when an individual's personal interests – family, friendships, financial, or social factors – may influence his or her judgment, decisions, or actions in the workplace. A conflict of interest can create a situation where an employee acts in his/her own interests instead of the interests of LEM. You should disclose promptly any personal interest that might be in conflict with the interests of LEM or create the appearance of a conflict of interest. We don't give preferential treatment to any business partner for private reasons.

COMMUNICATION AND SOCIAL MEDIA:

We use social media responsibly and carefully in a respectful manner without offensive or demeaning language. We refrain from using social media during work hours, except for business purposes. Since we are listed on the SIX Swiss Stock Exchange, we do not disclose confidential information, including financial, business information, or any intellectual property, through social media. We respect competitors, customers or other stakeholders and do not bring LEM into disrepute.

COMPANY ASSETS:

We commit to using LEM's resources and assets to serve LEM's best interests and not for external or personal interests. If a limited personal use is authorized by LEM, it is only occasionally with minimal interference with our job, no harm to LEM's assets and in accordance with LEM policies. We use these resources in a responsible way and protect them against loss, theft, or misuse.

INTELLECTUAL PROPERTY AND BUSINESS INFORMATION:

We use LEM's intellectual property and information in the company's best interests. All employees have a duty to secure and protect information and intellectual property, and to maintain confidentiality by only sharing information when appropriate. We are committed to protecting information entrusted to us by our customers and partners and we respect their intellectual property.

PEOPLE INTEGRITY

HUMAN RIGHTS:

We support the principles contained within the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labor Organization (ILO) Conventions, the principles of the UN Global Compact and other similar laws and principles. We respect human rights, and we seek ways to prevent or mitigate adverse human rights impacts that are directly linked to our business operations, products and services. We expect our suppliers, contractors, and other business partners to do the same in those areas where human rights issues are at stake, such as working hours and conditions, freedom of association, discrimination and equality, child labor, fair wages, compulsory or forced labor and modern slavery.

HEALTH & SAFETY:

We are committed to providing safe and healthy working conditions to our employees, co-workers and other contractors and we expect our business partners to apply the same principles. We take measures to ensure health and safety in operations and we commit to protecting our employees and colleagues against harassment and any kind of sexual, physical, psychological abuse or threats in the workplace. Employees must work in a condition fit to perform their duties, free from any substance that could impair their judgment or interfere with effective and responsible professional performance.

DISCRIMINATION:

We follow the applicable employment and labor laws where we do business, including wages and working hours, immigration, collective bargaining, anti-discrimination, and similar employment rules. We are guided by the principle of equal opportunity and treatment in employment. We treat individuals equally and fairly based on the principle of non-discrimination, with respect and dignity, regardless of religion, race, age gender, nationality, political opinion, sexual orientation, physical challenges, or other characteristics.

EDUCATION AND TRAINING:

We aim at being an attractive working environment that opens up opportunities for development and that encourages new ways of thinking, personal growth, and continuous learning.

CHILD LABOR:

We adhere to the legal minimum age requirements in all countries where we operate, and we uphold the effective abolition of child labor in accordance with the principles set forth in the ILO conventions.

FORCED LABOR:

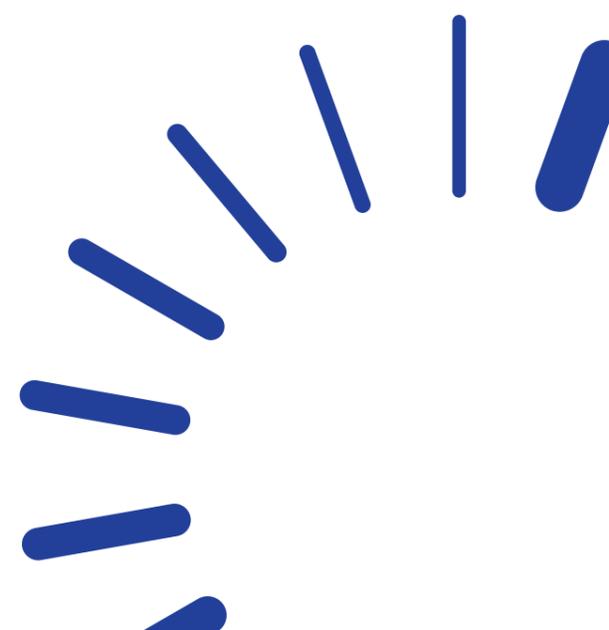
We uphold the elimination of all forms of forced or compulsory labor. We only employ individuals who are working of their own free will. Any individual is free to terminate employment with LEM in accordance with the applicable notice requirements and regulation.

RIGHT TO ORGANIZATION:

We respect the right for the employees to join, or form a labor union without fear of reprisal, intimidation or harassment. Accordingly, LEM respects the right to be represented by trade unions and other employee organizations.

PRIVACY:

We process personal data of our employees and business partners in accordance with applicable laws and expect our suppliers and business partners to do the same. Our activities at work are not private in nature, consequently we may access records and networks for monitoring purposes as permitted by applicable laws.



RAISING CONCERNS

SPEAK UP:

If you know or suspect a violation of this Code of Conduct or any LEM policy, it is your responsibility to promptly report it. Usually, your manager is the best person to address such a concern. Alternatively, you may address concerns to the Human Resources Department, the Legal Department or the Risk, Control and Audit Department. Any concern raised in good faith shall be taken seriously. If you feel uncomfortable sharing a concern with your management, we have set up a speak-up process described on MyLEM Legal or on lem.com in the compliance section.

COMPLIANCE AND DISCIPLINARY MEASURES:

The managers shall ensure that employees under their supervision understand and comply with this Code of Conduct and internal policies. Any violation of this Code of Conduct or other internal policies will be subject to appropriate disciplinary action, which may include termination of employment.

NO RETALIATION:

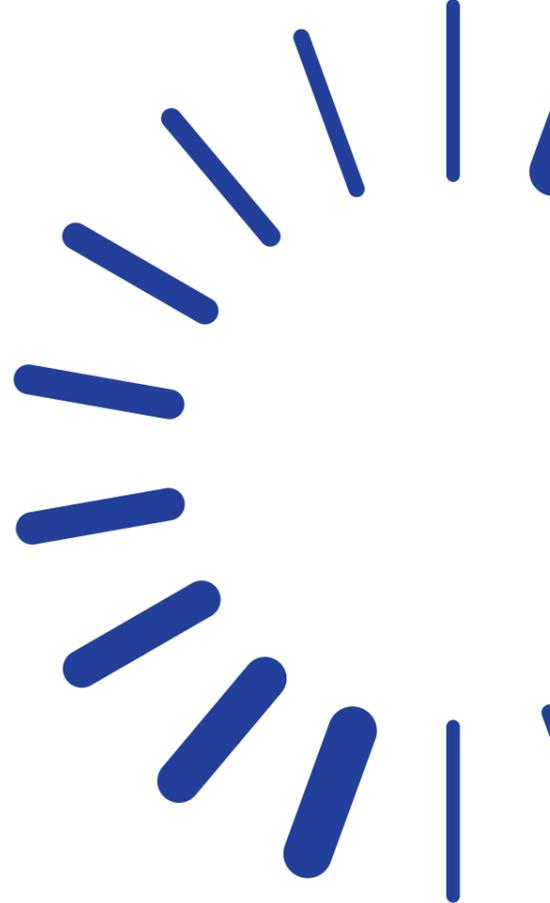
We refrain from discriminatory or disciplinary action, adverse employment or career consequences against persons who make bona fide reports to the management, the competent public authorities or to the speak-up hotline, on practices that contravene the law, this Code of Conduct, or our policies. However, any breach of this Code of Conduct may lead to disciplinary action and contract termination.

INVESTIGATION:

The Risk, Control and Audit Department is responsible for overseeing internal investigations into suspected misconduct under this Code and related policies. You must not interfere in internal investigations or engage in your own fact finding, but you must cooperate with the Risk, Control and Audit Department. Any investigation and corrective action, as applicable, will be conducted and enforced in compliance with local laws.

CONTACT:

If you have any questions regarding the Code of Conduct or about compliance, you may contact the Human Resources Department, the Legal Department or the Risk, Control and Audit Department.



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