



TRADITION VERBINDET • SEIT 1842



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LENZEN GRUPPE
CODE OF CONDUCT



FOREWORD

The Lenzen Group has stood for quality, reliability and technological innovation in strapping technology for more than 180 years.

From a traditional family-owned company, it has grown into a globally active solution provider offering high-quality products and services for packaging and strapping solutions – founded on entrepreneurial foresight, values passed down through generations and a strong team spirit.

What makes us successful is not our technology alone – it is the people in our company: colleagues who work every day with commitment, responsibility and expertise to develop tailored solutions, meet customer needs and provide new impetus. Our cooperation is shaped by trust, respect and open, constructive exchange.

Our aim is to be economically successful while consistently acting in line with our values, with social responsibility and with awareness of our ecological responsibility.

If we continue to uphold our “Made in Germany” quality, drive innovation and at the same time create a reliable and appreciative working environment, we will remain successful in the future.

With this Code of Conduct, we make clear what matters to us: respectful, transparent and integer behaviour. It reflects our attitude and provides all of you with binding yet practical guidance for everyday professional life.

Let us continue on this path together – with responsibility, team spirit and the will to preserve what has proven successful while boldly shaping something new.

Best regards

Peter W. Lenzen
CEO



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PRINCIPLES OF CONDUCT

Our employees are the heart of the Lenzen Group – their commitment, expertise and sense of responsibility make our long-term success possible. As a medium-sized family-owned company with a history spanning more than 180 years, we build on a corporate culture that promotes trust, cohesion and reliability. Our values – openness, responsibility, team spirit and quality – form the basis of our daily actions. They shape how we work with colleagues as well as with customers, partners and society. With this Code of Conduct, we establish a binding framework for integer, fair and sustainable behaviour. It serves as guidance in our day-to-day work, supports respectful and efficient cooperation and helps prevent misconduct. We are all called upon to actively live and shape these principles – today and in the future. We are aware that not every individual case or legal aspect can be covered in this document. However, these principles help prevent misconduct and strengthen responsible conduct in line with our corporate values.

Scope and Application

This Code of Conduct applies to every employee of the Lenzen Group, including all subsidiaries, regardless of position or type of employment.

Consequences

Violations of applicable law, internal rules or the values and standards of conduct set out in this Code of Conduct may have serious consequences for the Lenzen Group as well as for individuals and are therefore not tolerated. In cases of misconduct, the Lenzen Group reserves the right to take disciplinary and employment law measures.



1. COMPLIANCE WITH LAW AND LEGISLATION

In all our activities, we strictly comply with applicable law, statutory requirements and internal guidelines. We place particular importance on compliance with labour, environmental and data protection law, the prevention of illegal employment, adherence to competition and antitrust law, and measures to prevent corruption. Unlawful conduct is not tolerated within the Lenzen Group.

For us, compliance with law and legislation means more than simply following rules. It reflects our understanding of values and our entrepreneurial responsibility. We always act properly, transparently and in line with our principles – both internally and externally. We expect the same from our business partners. Our employees represent the company externally and, through their conduct, help maintain the trust of our customers and preserve our good reputation.

2. NON-DISCRIMINATION AND FREEDOM OF EXPRESSION

We respect the dignity of every person and are committed to a working environment shaped by fairness, diversity and mutual appreciation. We do not tolerate discrimination, bullying, harassment or any form of inappropriate conduct – whether based on gender, age, ethnic origin, religion, belief, disability, sexual orientation or any other legally protected characteristic. All employees are entitled to respectful and equal treatment, regardless of role or hierarchy.

This principle applies not only to our daily interactions, but also to dealings with business partners, customers and external third parties. We expressly recognise the right to freedom of expression as well as political and trade union activity. At the same time, we expect all employees to express themselves responsibly and to safeguard the legitimate interests of the Lenzen Group – also outside the workplace. Integrity, respect and a professional attitude form the basis of our conduct, both within the company and in the public sphere.

3. PREVENTION OF ILLEGAL EMPLOYMENT

The Lenzen Group is committed to full compliance with all labour law and human rights requirements. Employment relationships within our company are based on voluntary work and comply with legal requirements – in particular with regard to the permitted employment age, fair working conditions and the protection of human dignity.

We expressly reject child labour, forced labour, human trafficking and any form of discrimination. This position applies not only to our own company, but also to our cooperation with suppliers, service providers and other partners. We expect them to comply with comparable standards and to organise their employment practices responsibly and in accordance with the law.

4. AVOIDANCE OF CONFLICTS OF INTEREST

Private interests must not influence business decisions. As employees of the Lenzen Group, we are required to address potential conflicts of interest – for example through secondary employment, shareholdings in competitors or private business relationships with suppliers – at an early stage and openly.

In the spirit of professional and trust-based cooperation with our colleagues, customers and business partners, it is of central importance to us that potential conflicts of interest are handled transparently. If we find ourselves in a situation in which personal interests could conflict with the interests of the company, we are obliged to disclose this circumstance to our manager.

The respective manager reviews the situation and decides on the next steps. In cases of doubt or uncertainty, further contact persons within the company are available to ensure an appropriate and fair clarification. In this way, we safeguard our independence, maintain the trust of our partners and strengthen the integrity of the Lenzen Group.

5. PREVENTION OF CORRUPTION AND BRIBERY

The Lenzen Group strictly rejects any form of corruption, bribery and undue advantage. We award and receive orders exclusively on the basis of transparent and objective criteria such as quality, price and reliability. Gifts or invitations may only be accepted or offered if they are appropriate, business-related and free from any improper influence. They must not violate legal requirements or our internal guidelines. In case of uncertainty, employees should contact their department management or the management board. Particular care is required when dealing with public authorities.

6. OCCUPATIONAL HEALTH AND SAFETY

The safety and health of our employees have the highest priority within the Lenzen Group. We create safe, ergonomic and health-promoting working conditions and ensure responsible handling of machinery, materials and hazardous substances. Accident prevention, occupational safety and health protection are firmly embedded in our operational processes.

We all bear responsibility – for ourselves and for our colleagues. Every employee is required to comply with safety instructions, report hazards and actively contribute to a safe working environment.



7. CONFIDENTIAL INFORMATION AND DATA PROTECTION

The protection of confidential information and personal data has the highest priority within the Lenzen Group. We handle sensitive data responsibly – both in the interests of the company and to protect the personal rights of our employees, customers and business partners.

Confidential information may only be made accessible to authorised persons and used solely for legitimate business purposes. All employees are required to exercise care, discretion and integrity when handling internal and external information. Personal data is processed in accordance with applicable data protection laws, in particular the General Data Protection Regulation (GDPR). We ensure the confidentiality, integrity and security of this data through technical and organisational measures. An appointed data protection officer monitors compliance with data protection requirements, advises on implementation and is available to all employees as a contact person. Violations of data protection obligations may have legal consequences and will be pursued consistently.

8. PROTECTION OF ASSETS AND INTELLECTUAL PROPERTY

We all share responsibility for the careful handling of the tangible and intangible assets of the Lenzen Group. These include machinery, equipment, products and operating materials, as well as confidential information, developments, data and intellectual property. These resources must be protected with the greatest possible care and used exclusively for lawful, company-related purposes.

Confidential information may only be made accessible to authorised persons and must not be disclosed to unauthorised third parties. Access is always limited to what is necessary and granted in compliance with existing confidentiality agreements. This also applies to information and products provided to us by customers or business partners. We treat them with respect, responsibility and in accordance with the agreed standards.

Copyright-protected, licensed or sensitive content may not be used for private or other unauthorised purposes. All work results created in the course of professional activities are considered the property of the Lenzen Group. We expect all employees to actively protect our values, our know-how and our property, and to develop them responsibly.



9. ENVIRONMENTAL PROTECTION

The protection of the environment and climate is an integral part of our corporate culture and our self-image as a responsible industrial company. We rely on resource-efficient production processes, sustainable material selection, energy-efficient technologies and continuous ecological improvements along our value chain. Within the Lenzen Group, ecological aspects are incorporated into our decision-making processes on an equal footing with economic considerations. Our goal is to minimise environmental impacts and contribute to a future worth living. All employees are called upon to actively contribute to environmental protection within their area of responsibility – whether through the careful use of materials, the reduction of waste or by pointing out environmentally relevant improvement potential. Responsibility for the environment and climate starts with small actions – and it can only succeed together.

10. FAIR COMPETITION AND DEALING WITH BUSINESS PARTNERS

The Lenzen Group is committed to active, fair and lawful competition. Respectful conduct towards competitors is a matter of course for us. Price fixing, anti-competitive conduct or any other agreements prohibited under antitrust law are strictly forbidden. We act in full compliance with applicable competition and antitrust laws – violations of these rules may result in serious legal consequences and will not be tolerated.

In our dealings with business partners, and especially along our supply chains, we are also committed to integrity, transparency and responsibility. When selecting suppliers, we place great importance on ecological and social criteria as well as compliance with all applicable legal standards. Our aim is long-term, partnership-based cooperation with reliable suppliers who share our values and meet the highest quality, environmental and compliance requirements. We preferably source products from EU countries and avoid procurement from crisis regions. The entire purchasing process is geared towards sustainability, transparency and risk minimisation. Sustainability, energy efficiency, climate protection and respect for labour and human rights are becoming increasingly important in our procurement decisions. In our dealings with suppliers, we rely on dialogue, development and shared responsibility for the future. The minimum requirement for any cooperation is compliance with all laws applicable in Germany and the EU, as well as recognised international standards.

11. COMMITMENT OF THE MANAGEMENT BOARD

The management board of the Lenzen Group is aware of its special role model function – both in conduct and in attitude. We live the values we expect from everyone: integrity, reliability, transparency and respect.

We fully commit ourselves to the principles of this Code of Conduct and undertake to consistently align our entrepreneurial actions with them. At the same time, we promote a corporate culture that creates trust, strengthens personal responsibility and enables partnership-based cooperation.

As the management board, we are committed to ensuring that this Code does not exist only on paper, but is lived in everyday practice – in decisions, in leadership and in cooperation with all stakeholders. In this way, we jointly create a fair, responsible and sustainable working environment – both within and outside our company.

12. COMMITMENT OF EMPLOYEES

We all bear responsibility for safe, fair and respectful cooperation within the Lenzen Group. We therefore expect all employees to comply with our shared rules and values. The following points are important:

- Alcohol, drugs or other mind-altering substances are not permitted at the workplace.
- Anyone taking medication that could affect occupational safety must inform the responsible manager.
- Gifts or personal benefits that could create dependencies must not be accepted or offered.
- All laws and internal rules must be complied with.
- Every person is treated with respect – regardless of origin, gender, religion, age, sexual orientation or other personal characteristics.
- If private interests could influence business decisions, they must be addressed openly.

In this way, we jointly create a trust-based, responsible and safe working environment – for ourselves and for everyone we work with.



13. REPORTING VIOLATIONS

Violations of applicable law, internal regulations, or the principles enshrined in this Code can and should be reported at any time. Employees have the option of contacting their relevant manager, internal reporting contacts, or the Lenzen Group's anonymous whistleblower system (Hintbox) directly. Reports regarding misconduct can be submitted securely, confidentially, and completely anonymously via the digital Hintbox portal. The portal is also available to external parties.

Web link to the anonymous whistleblower system Hintbox and the internal reporting officers:

[LENZEN-GRUPPE.hintbox.de](https://lenzen-gruppe.hintbox.de)

Anyone who reports a concern in good faith does not have to fear any disadvantages – even if the suspicion is not confirmed afterwards. Protecting whistleblowers is a matter of course for us. At the same time, we reserve the right to take appropriate employment law or disciplinary measures in cases of deliberately false or abusive allegations.



LEGAL NOTICE

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Disclaimer: This Code of Conduct serves as a guide and does not constitute an exhaustive set of rules covering every conceivable individual case. It does not replace statutory provisions or individual employment contracts or company agreements. In cases of doubt, the relevant statutory regulations and internal guidelines of the Lenzen Group apply. No legal claims may be derived from the content of this Code.