



CODE OF CONDUCT FOR BUSINESS PARTNERS

January 2024

The Leica Code of Conduct for Business Partners stipulates the expectations for all business partners of the Leica Group of Companies ("Leica") regarding working standards, business ethics and compliance as well as the environmental protection and product safety. These expectations are based on national laws and regulations as well as further international conventions. In this context, the fundamental reference framework is formed in particular by the German Supply Chain Due Diligence Act, the Universal Declaration of Human Rights, the Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD) and the Conventions of the International Labor Organization (ILO). We expect our business partners to acknowledge, support and comply with this Code of Conduct and its supplementary provisions, as it forms the basis for a successful, trustful and sustainable business relationship. The following requirements more precisely state Leica's expectations for the attitude and behaviour of the business partners ("You").

01 WORKING STANDARDS

RESPECTING HUMAN RIGHTS

You make sure, that the internationally recognized human rights are respected and complied with. In all business activities within Your own sphere of influence, You shall work towards ensuring that You Yourself, Your business partners and Your suppliers do not violate any human rights or participate in violating human rights.

FAIR WORKING CONDITIONS

You ensure fair employment conditions and the compliance with the applicable working and employment laws; discrimination, harassment or offensive behaviour are not tolerated. The right of the employees to establish or join organisations of their choice, to conduct collective bargaining negotiations and - to the extent permitted by law - to go on strike is to be respected. In cases in which the freedom of association and the right to collective bargaining negotiations are limited by law, alternative possibilities of an independent and free association of the employees for the purpose of collective bargaining negotiations are to be granted. Employees must not be discriminated against due to the formation, joining or membership in such organisation.

BAN ON CHILD LABOUR

You make sure that child labour is banned at each stage of production or service. You adhere at least to the ILO Conventions on the minimum age for admission to employment and the ban on child labour.

PROHIBITION OF FORCED LABOUR

You make sure that You neither indirectly nor directly use forced labour of any kind and do not use any preliminary products manufactured by means of such labour. Employees must have the freedom to freely choose the employment relationship and to terminate it with reasonable notice.

EQUAL OPPORTUNITY / PROHIBITION OF DISCRIMINATION

You undertake to safeguard equal opportunity in employment and to refrain from any discrimination.

FAIRNESS IN WAGES, WORKING TIMES AND SOCIAL BENEFITS

You make sure that the remunerations and social benefits comply with the fundamental principles regarding minimum wages, applicable overtime regulations and statutory social benefits. The working times and non-working hours must comply with the applicable laws, the industrial standards or the applicable ILO Conventions.

HEALTH AND SAFETY AT THE WORKPLACE

You make sure that safety and health protection at the workplace comply with the respective applicable national regulations of the place of employment and support a continuous further development to improve the working environment.

02 BUSINESS ETHICS AND COMPLIANCE

COMPLIANCE WITH LAWS

You undertake to comply with all applicable national and international trade laws and regulations. A highest level of integrity is expected for all business activities and relationships.

COMPLIANCE WITH THE IMPORT AND EXPORT LAWS

You undertake to comply with all applicable import and export laws to the extent permissible according to the EU and German anti-boycott regulations, in particular if the use, the (re-)export, release or other transfer of provided goods, technologies, software and other (foreign) products is regulated thereby.

CORRUPTION

You undertake to comply with the respective applicable anti-corruption laws. You shall, in particular, make sure that your employees, subcontractors or representatives

do not offer, promise or grant any benefits to employees of Leica with the aim of obtaining an order or other preferential treatment in business transactions. These principles also apply if You cooperate with further third parties in connection with the activities for Leica.

FAIR COMPETITION

You undertake to comply with laws protecting and promoting competition, in particular cartel laws.

You make sure that in interactions with business partners decisions are taken exclusively on a factual basis, without being influenced by any personal or own financial interests.

INTELLECTUAL PROPERTY

You make sure that rights to intellectual property are respected; any technology and knowhow transfers are to be made in such manner that the intellectual property rights and customer information, if any, are protected.

CONFIDENTIALITY / DATA PROTECTION

You undertake to use and protect confidential information and data in a conscientious and reasonable way, and to use them only for the purpose of processing the respective order.

You undertake to respect the laws on data protection and information security as well as the applicable official regulations when collecting, storing, processing, transmitting and disclosing personal information.

RISK MANAGEMENT

You make sure that with regard to business continuity and supply chain continuous extensive activities are made to identify and assess risks and consistently implement necessary risk management measures.

You make sure that the provisions of this Code of Conduct are adequately addressed along the supply chain and are enforced towards your contract partners with suitable contractual regulations.

HANDLING CONFLICT COMMODITIES

You make sure that processes for conflict commodities are established in compliance with the guiding principles of the OECD, and also enforce these towards suppliers. Enterprises without adequate and audited processes are avoided.

SYSTEM & TRAINING

You make sure that an adequate system is established to identify, reduce and address the risks mentioned in this Code of Conduct.

You make sure that training measures are established by You to impart an appropriate level of knowledge and understanding of applicable laws and regulations as well as recognized standards to Your executives and employees.

03 ENVIRONMENTAL PROTECTION AND PRODUCT SAFETY

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

You undertake to follow the precautionary principle in environmental matters, to take initiatives to promote more environmental responsibility and promote the development and dissemination of environmentally friendly technologies. Business partners must not take away land, forests or water whose use secures the livelihoods of persons in violation of legitimate rights. Harmful changes to the soil, water and air pollution, noise emissions and excessive water consumption must be refrained from.

You undertake to comply with all applicable environmental laws, standards and regulations. Environmental protection and product safety are of high importance - not only for the reputation of the company, but also for the safety of our customers and future generations.

You make sure that optimal environmental protection is guaranteed at all stages of production. This includes a proactive approach to avoid or minimize the consequences of accidents which might have a negative impact on the environment. In this context, the use and further development of energy and water saving technologies are of specific importance - marked by the use of strategies for reducing emissions, recycling and reprocessing.

You make sure that all products manufactured along the supply chain comply with the corresponding applicable environmental standards. This includes the full product life cycle and all materials used. Chemicals and other substances which might endanger the environment when released must be identified. A hazardous substance management system must be set up for them so that they can be safely handled, transported, stored, reprocessed or reused and disposed of using suitable procedures.

04 FINAL PROVISIONS

You can prove the implementation and compliance with the standards specified in this Code of Conduct by Your own code of conduct, by adopting an industry standard or through Your own corporate policy that includes these standards. If no corresponding standards are established, we expect you to undertake to comply with this Code of Conduct and to inform Your employees about the standards specified in this Code of Conduct, and to ensure compliance. To the same extent, You have to work towards the implementation and compliance with the standards specified in this Code of Conduct by any third parties You employ.

Leica reserves the right to carry out assessments or specific audits (after reasonable advance notice) either

itself or through persons authorized by Leica to ensure that You comply with this Code of Conduct as well as the applicable laws, regulations and standards. You undertake to cooperate in these audits and to support them to the best of Your ability.

If a violation of the provisions of this Code of Conduct is identified, or if there is cause for concern, the Parties shall jointly draw up a concept with a time schedule to end or minimize the violation. However, if such violation has occurred culpably or systematically or if the deadline has expired fruitlessly or the implementation of the measures contained in the concept has not remedied the situation after expiry of the time schedule and a continuation of the contract until ordinary termination is unreasonable for Leica, we also reserve the right to terminate any relationship.

Further contractual obligations remain unaffected by this Code of Conduct and shall in case of doubt prevail over the provisions described in this document, to the extent they are in compliance with applicable laws.

FURTHER INFORMATION AND CONTACTS

If You have any questions regarding this Code of Conduct, please reach out to Your contact in the Procurement Unit.

Furthermore, Leica has established a [grievance procedure](#) that can be used for information on violations of duties relating to human rights or the environment.

Leica Camera AG
Wetzlar (Germany), January 2025
