

Anti-Corruption Policy

Introduction

LUCIEN ORTSCHHEIT GmbH (the Company) is committed to conducting its business in an ethical and honest manner and implementing and enforcing systems that ensure all forms of bribery, corruption and fraud are prevented. The Company has zero tolerance for bribery and corrupt activities. It undertakes to act fairly and with integrity in all business relationships with employees, customers and suppliers. Compliance with all national and relevant international laws (e.g. UK Bribery Act, Foreign Corrupt Practices Act) to combat bribery and corruption is always assured.

Our Commitment & Decision

The management of the company decided to introduce an anti-corruption guideline for all business areas. This decision will be communicated throughout the organization through this document and subsequent training. It is also made known to business partners and the public, e.g. via the website.

The provisions of this guideline must be checked regularly, but at least every two years, to ensure that they are up to date and appropriate, and redefined if necessary.

The Company is committed to promptly eliminating and combating any inappropriate behavior and will in no way tolerate such behavior on the part of employees, managers, or customers/suppliers. Through this policy, the Company commits to regularly discussing and mitigating factors related to any form of bribery, corruption or fraudulent conduct.

Bribery and Corruption

The Company prohibits any form of bribery and corruption regardless of the person or position of the parties involved. The Company does not engage in bribery or corruption or any activity that could be perceived as such. This means that all employees must avoid any form of bribery or corruption, whether direct or indirect through intermediaries.

By bribery, we mean offering, giving or accepting anything (tangible or intangible) that the briber uses to improperly influence the recipient's decisions or behavior, for personal gain or otherwise secure a business advantage. It is not just the acceptance or granting of financial or other benefits that is considered unlawful, but also their offering or requesting.

Gifts and Entertainment

All forms of gifts and entertainment given and received should be treated with caution, particularly with regard to risks of bribery, corruption and conflicts of interest. Both while giving and receiving, it must be ensured that this complies with external and internal legal requirements and guidelines.

All gifts and entertainment with a value of at least EUR 100.00 (including sales tax) accepted by employees should be reported to the company.

Both gifts received and given are acceptable if they:

- are appropriate
- are non-cash and of little value
- comply with local law and custom

Conflict of Interest

All employees must avoid potential, actual or even alleged conflicts of interest in their business activities. In cases in which they cannot avoid conflicts of interest, these should be disclosed to the company proactively, but at the latest when they become known. The employee and the company must work together to manage the conflict of interest with reasonable mitigation measures so that the situation that has arisen does not affect the judgment, obligations or loyalty of the affected employee.