



ZUKOWA®

Code of  
Conduct

# Foreword

Since the company was founded in 1983, our original USP has been constantly maintained and increased. The growth of LUKOWA has been made possible by adhering to certain principles and values.

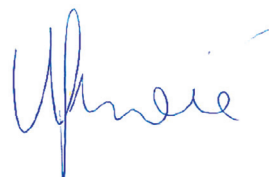
Behind the pursuing features of LUKOWA's services, such as accuracy, reliability, Swiss excellence, resilience and proactivity, there are people and their daily actions. We at LUKOWA put the focus on providing members of the LUKOWA team with the motivation to achieve the best results and thereby put their focus on our clients' success.

I would particularly like to ask each one of you, as a person working for LUKOWA, to be aware that you are an essential contributor to the professionalism of LUKOWA.

In this era of global competition, borderless trade, and diversification, LUKOWA wishes to conduct business in an open and fair way. LUKOWA aims to become recognizable, valued, and trusted company in its area of operations, by its customers and society. Accomplishing this goal requires that each one of us is aware of the gratitude we owe to our customers and society, and the necessary respect of laws and regulations. Therefore, each of us at LUKOWA should work thoroughly and in accordance with common sense and good judgment.

I kindly ask you to carefully read LUKOWA Code of Conduct, until it is understood and implemented wholeheartedly.

LUKOWA Group AG  
May, 2021



Aleksandar Savanović  
Member of the board

# Contents

## **1 Business Integrity, 4–6**

- 1.1 Anti-corruption
- 1.2 Privacy and information security
- 1.3 Conflict of interest
- 1.4 Prohibition of child and forced labour
- 1.5 Harassment, discrimination and bullying
- 1.6 Drugs and alcohol

## **2 Work Environment, 7–8**

- 2.1 Health and safety
- 2.2 Working hours
- 2.3 Compensations and benefits

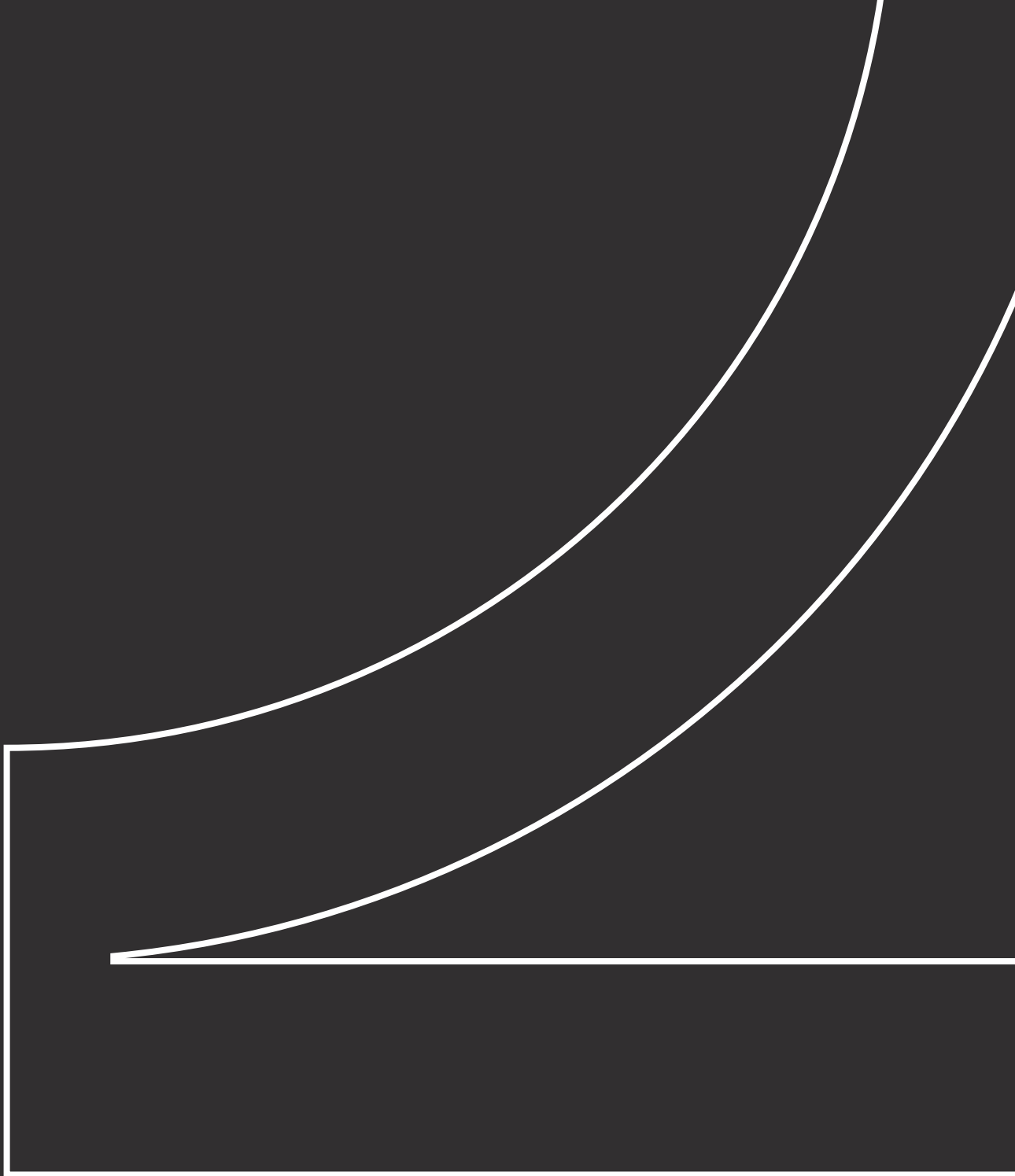
## **3 Assets, 9–10**

- 3.1 Physical assets (equipment)
- 3.2 Intellectual property

## **4 Local Community, 11–12**

- 4.1 Environment
- 4.2 Cooperation with suppliers
- 4.3 Families
- 4.4 Society

## **5 Fair Competition, 13**



# Business Integrity

LUKOWA is committed to conducting its business in an honest and ethical manner and in compliance with strong Business Integrity and all applicable laws and regulations, including:

- 1.1 Anti-corruption
- 1.2 Privacy and information security
- 1.3 Conflict of interest
- 1.4 Prohibition of child and forced labour
- 1.5 Harassment, discrimination and bullying
- 1.6 Drugs and alcohol

# 1

# Business Integrity

## 1.1 Anti-corruption

In doing business anywhere in the world, no LUKOWA employee, officer or member of the Board of Directors shall directly or indirectly offer, pay, promise, authorize or receive any bribe, kickback or other illicit payment or benefit in violation of this Code of Conduct or the anti-corruption laws of any other country in which we do business. Compliance with these laws protect LUKOWA and LUKOWA employees from fines, exclusion from tendering for public contracts, prosecution and irreparable damage to reputation.

## 1.2 Privacy and information security

LUKOWA shall establish and maintain comprehensive protection and clear accountability for all LUKOWA information assets and resources. This includes information assets that are proprietary to LUKOWA, private to LUKOWA customers and partners, and all other private and proprietary information and assets and resources that, if subject to inadvertent or unauthorized access or disclosure, would likely cause financial, legal, or reputational damage to LUKOWA or LUKOWA customers and partners.

## 1.3 Conflict of interest

All employees of LUKOWA must act at all times in the best interest of LUKOWA. They shall disclose all potential and actual conflicts of interest to the Board of Directors and, if required, remove themselves from all discussions of any related matter. Employees must ensure to declare any potential conflicts of interest in advance if they wish to speak in debate where the subject of the debate could potentially lead to a conflict. Employees must declare any relationship, connection or association with another person or company that could give rise to an actual or perceived conflict of interest.

## 1.4 Prohibition of child and forced labour

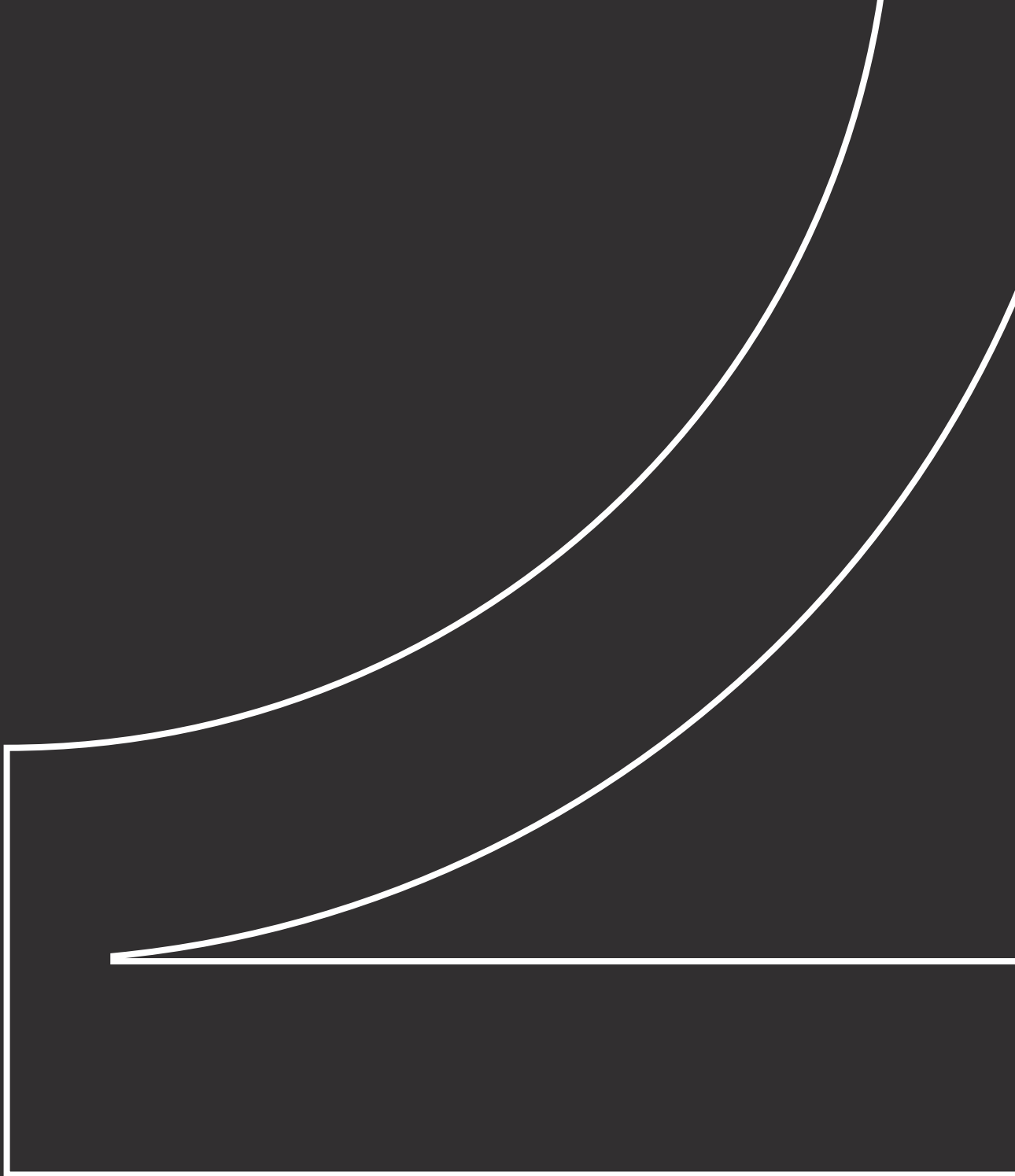
LUKOWA is firmly opposed to all forms of child exploitation and we are committed to preventing and eliminating child labour wherever it occurs in our supply chain. LUKOWA prohibits the use of forced labour, bonded labour and prison labour within our company or those that supply to or subcontract for us. This includes slavery and abduction, misuse of public and prison works, forced recruitment, debt bondage and domestic workers under forced labour situations and internal or international trafficking.

**1.5  
Harassment, discrimination  
and bullying**

LUKOWA is committed to providing an environment that is free of all forms of unlawful harassment, discrimination and bullying. In accordance with this commitment, we maintain a strict policy prohibiting all forms of unlawful harassment and discrimination in interactions that take place in the company. Harassment interferes with work performance and creates an intimidating, hostile, or offensive work environment. Sexual harassment is defined as unwanted sexual advances, or visual, verbal, or physical conduct of a sexual nature. This definition includes many forms of offensive behavior and includes gender-based harassment of a person of the same or opposite sex as the harasser. Bullying is unwelcome or unreasonable behavior that demeans, intimidates or humiliates people, either individually as a members of a group.

**1.6  
Drugs and alcohol**

LUKOWA is committed to providing a safe, healthy and productive working environment for all employees, contractors, customers and visitors involved in its operation. This Code of Conduct sets out the company's aims to eliminate alcohol and drug problems in the workplace. Alcohol and drug problems are prevalent in society and are associated with a wide variety of costs for both employees and employers. These costs include ill-health sickness absence, reduced work performance and accidents.



# Work Environment

LUKOWA achieves its results with help of a Work Environment adapted to the business needs, as well as the needs of employees, which are the company's highest value. LUKOWA places special emphasis on:

- 2.1 Health and safety
- 2.2 Working hours
- 2.3 Compensations and benefits

# 2

# Work Environment

## 2.1 Health and safety

LUKOWA believes that the provision of a healthy and safe working environment for everyone at its workplaces is an integral and essential for sustainable business. We are doing that by preventative and strategic approach to health and safety and using measurable objectives and targets to monitor performance. Supporting and promoting health and wellbeing is our priority, also as providing appropriate information, training and instruction to facilitate safe and productive work and learning environments.

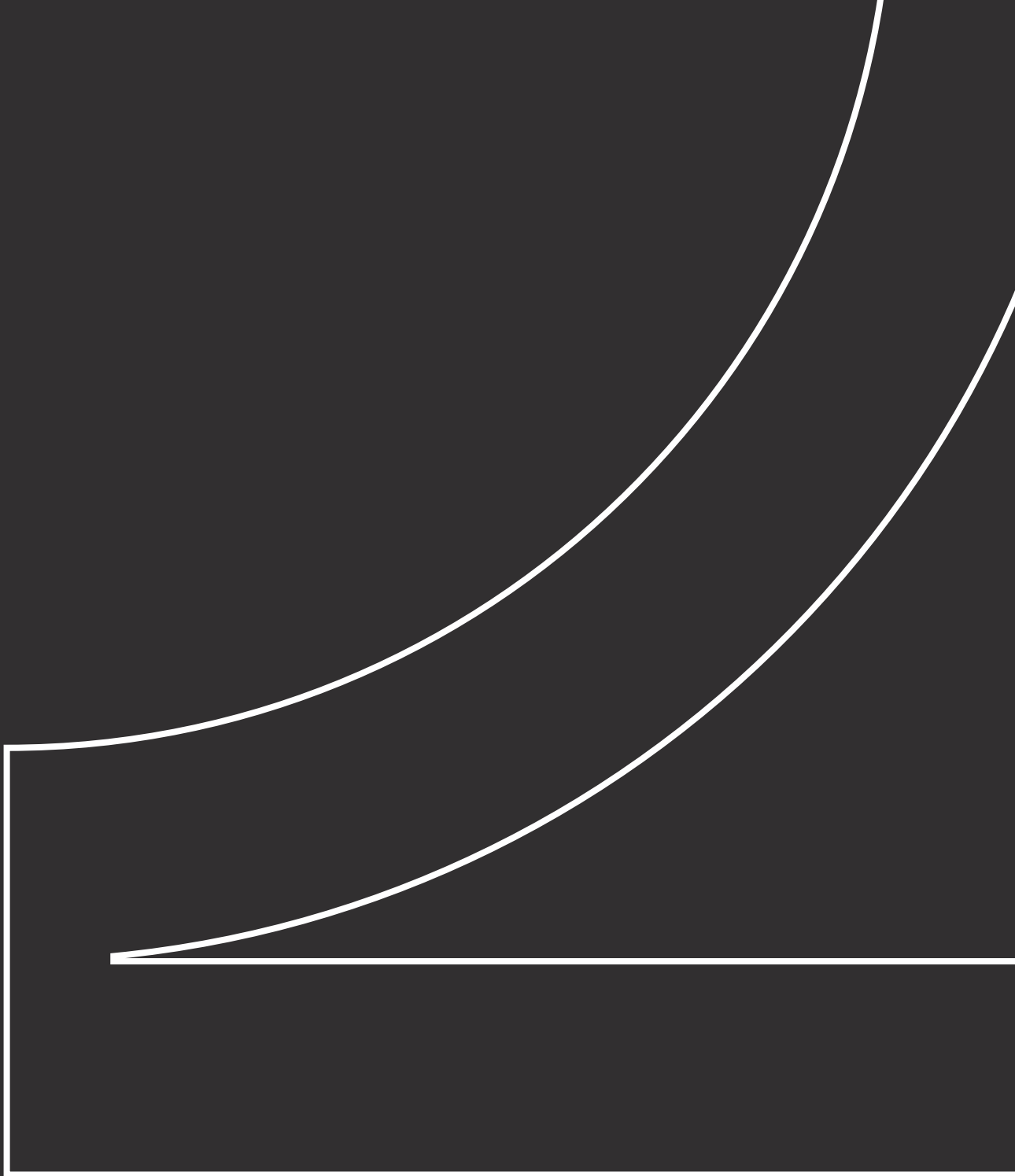
## 2.2 Working hours

LUKOWA has established a company policy that ensures compliance with local laws and regulations on working hours. LUKOWA is aware of that negative effect of excessive working hours on the health and safety of workers is twofold. Long working hours with reduced rest periods cause mental and physical stress amongst employees, which in turn results in higher accident/injury rates.

## 2.3 Compensations and benefits

One of the LUKOWA goals is to establish and maintain a competitive, fair and equitable compensation and benefits designed to attract, engage and retain a workforce that helps the company to achieve immediate and long-term success. We know that morale and job satisfaction are affected by compensations and benefits. Often there is a balance that must be reached between the monetary value the employer is willing to pay and the sentiments of worth felt by the employee, so we are committed to make our employees satisfied during whole period of working in LUKOWA.





# Assets

LUKOWA takes care about its assets, knowing how important it is to keep them functional at all times, and keep business processes running.

3.1 Physical assets (equipment)

3.2 Intellectual property

# 3

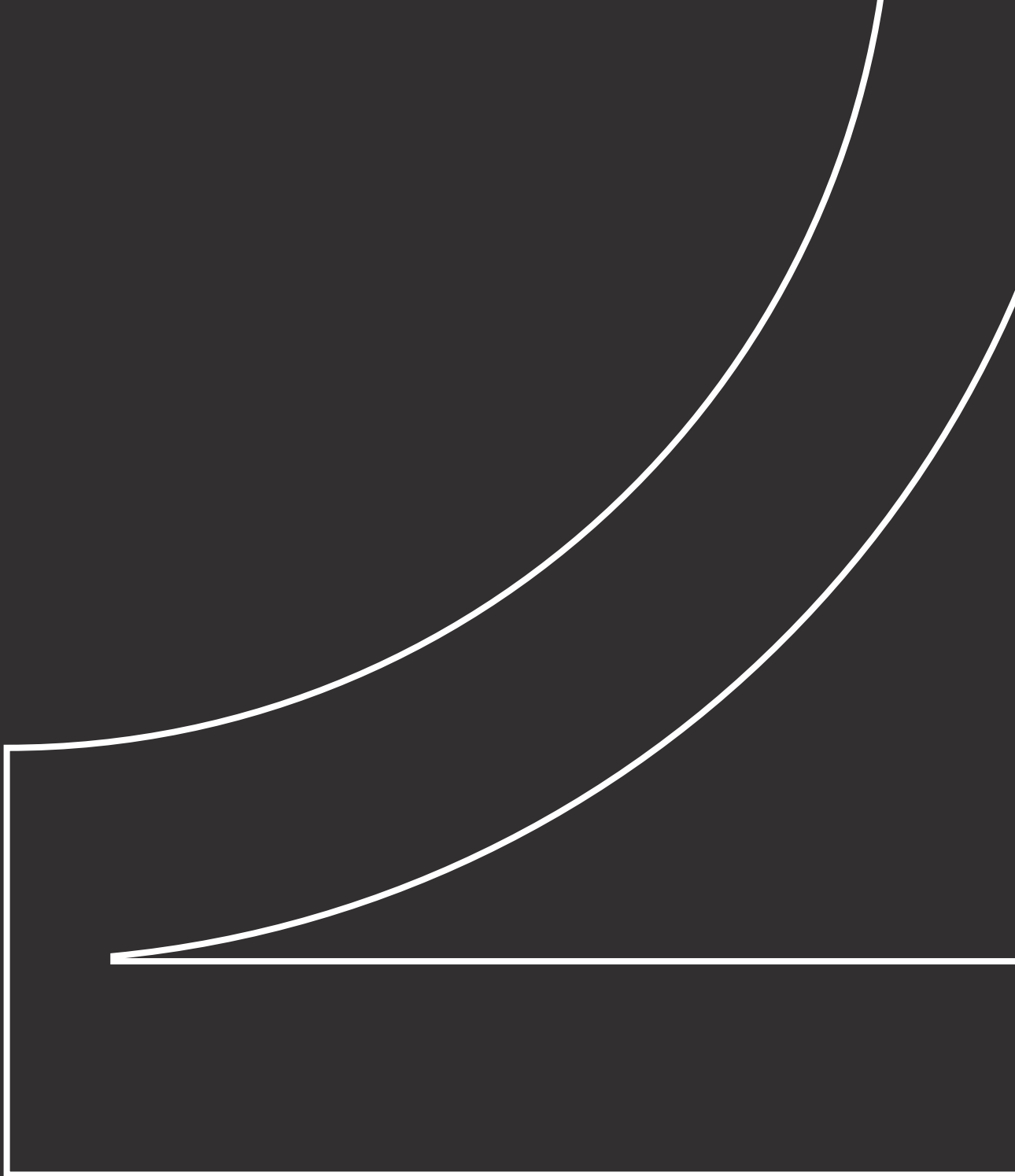
# Assets

## 3.1 Physical assets (equipment)

LUKOWA defines physical assets as any individual item which is both movable and non-movable, and has a useful life of at least one month. It does include real property (including land), hardware, software, machines, vehicles or library holdings. In fulfillment of its mission and compliance responsibilities, all employees must maintain an accurate inventory system and procedures that safeguard assets, and assure financial accountability, adequate insurance, efficient utilization and appropriate disposition of all equipment.

## 3.2 Intellectual property

LUKOWA is aware that intellectual property is an intangible creation of the human mind, usually expressed or translated into a tangible form that has assigned certain rights of property to it. Intellectual property refers to creations of the mind: inventions, literary and artistic works and symbols, names, images and designs used in commerce. In accordance with awareness of that, LUKOWA guarantees intellectual property protection for every employee or customer.



## Local Community

LUKOWA is a socially responsible company that, with its impact on the local community, aims not only to preserve it, but also to continuously improve it. The most important spheres of influence are:

- 4.1 Environment
- 4.2 Cooperation with suppliers
- 4.3 Families
- 4.4 Society

# 4

# Local Community

## 4.1 Environment

LUKOWA is very sensitive to environmental issues throughout our business systems, including our selection of materials, processes, and products. We utilize appropriate monitoring techniques to ensure adherence to accepted standards. Conducting operations in full compliance with applicable environmental laws and regulations is our priority. We are striving to maximize the utilization of recycled materials in the products we manufacture and use. Special emphasis of LUKOWA is on minimizing the generation of discharges to the environment, including air emissions, wastewater, and solid waste.

## 4.2 Cooperation with suppliers

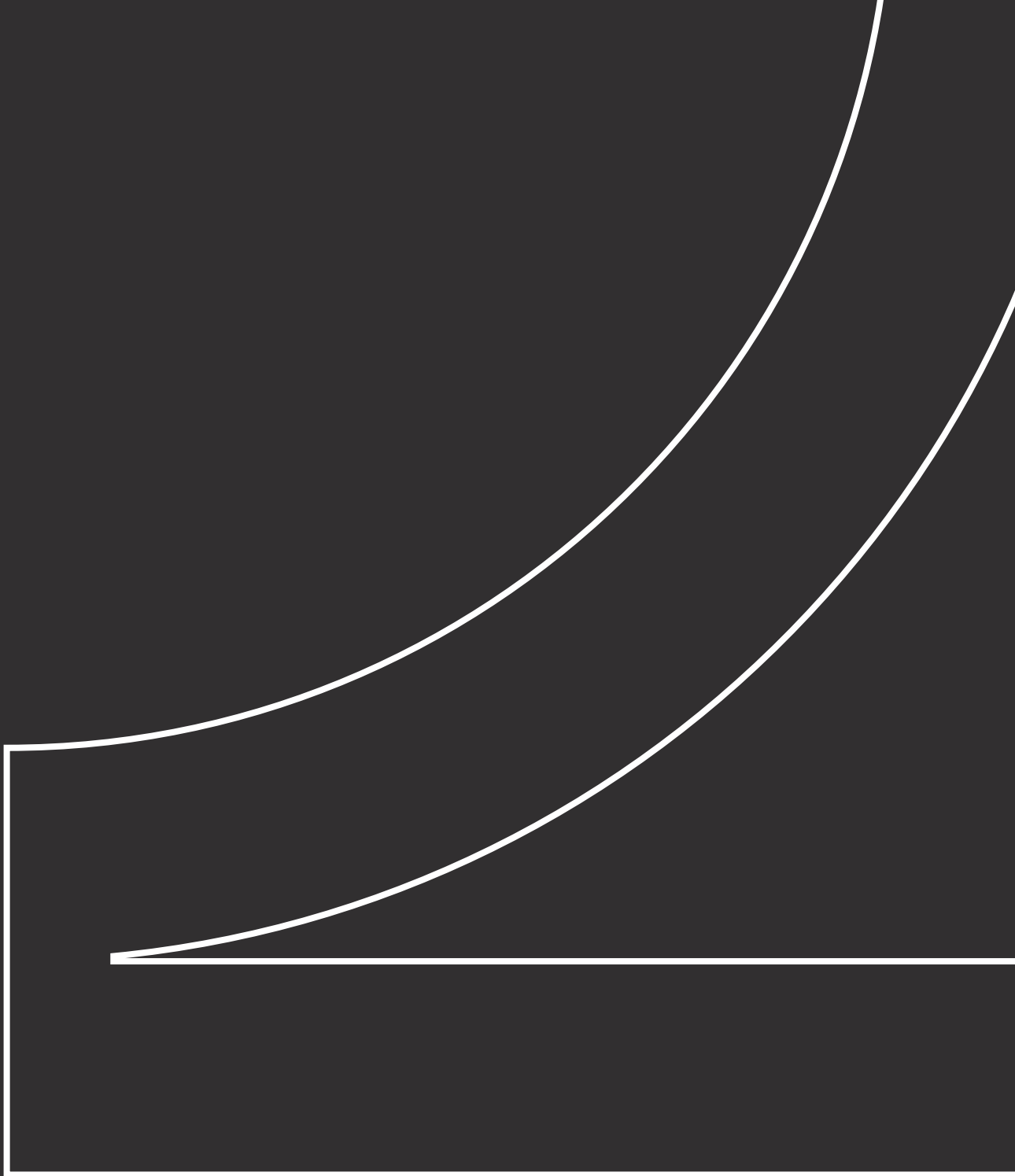
LUKOWA expects from all suppliers to take all necessary steps to comply with this Code of Conduct. We encourage our suppliers to hold their suppliers accountable to these standards as well. By accepting this Code, a supplier commits to ensure that all its business relations and agreements with LUKOWA, existing and future, respect the requirements it sets out. The supplier must make sure that all its employees involved in activities with LUKOWA are fully acquainted with the Code.

## 4.3 Families

LUKOWA recognizes the significant role of family in everybody's life and in accordance with that fact, we are trying to be responsible employer, which includes paying employees on time, respecting their working hours and keeping them satisfied, so they can leave the working place always with positive attitude.

## 4.4 Society

LUKOWA is supporting local universities through the significant projects such as LUKOWA Academy. We are also giving our endowment through employment of local residents in every region we operate.



## Fair Competition

LUKOWA is strongly committed to Fair Competition with all its competitors.

LUKOWA is dedicated to compliance with all competition laws and to promoting fair competition for the sustainable development of the industry and the benefit of customers. Promotion of a fair competition environment serves the interests of LUKOWA and our partners as it provides the best opportunity for the most competitive services and pricing to prevail in the market. Compliance with competition law regimes is not just a commitment made by the Board of Directors, it is also the responsibility of all our employees.

