



LUC Group
High Tech in Polyurethane

Code of Conduct



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CONTENT

CONTENT.....	0
1 INTRODUCTION	2
2 ETHICAL STANDARDS	2
3 HEALTH & SAFETY	2
4 SUSTAINABILITY AND ENVIRONMENT	3
5 FAIR EMPLOYMENT	3
6 FAIR TRADE.....	4
7 PROTECTION OF COMPANY ASSETS AND INFORMATION	4
8 DATA PROTECTION	5
9 SALES AND PURCHASING PRACTICES.....	5
10 FINANCIAL INTEGRITY	5

1 INTRODUCTION

From the start in 1971 LUC specializes in producing and processing hot cast and cured polyurethane (PUR) elastomers. Polyurethane elastomers combine the strength of plastic with the elasticity of rubber. The enhanced properties make their use in many cases preferable over that of the classic rubber.

The strength of LUC is the fact that the company has a very profound knowledge of polyurethane chemistry, which is especially reflected by the numerous formulations and processing methods. In addition, when problems in a specific customer application arise, the formulations and processing methods may be altered in order to meet with the customers' requirements.

2 ETHICAL STANDARDS

LUC is strongly committed to the highest ethical standards.

LUC respects and promotes equal human rights and other leading ethical standards such as:

- Providing a safe and healthy workplace
- Taking care of the environment
- Respecting human rights and dignity
- Compliance to law and legislation

3 HEALTH & SAFETY

LUC takes responsibility to provide safe working conditions for all employees, a safe environment for all visitors and to prevent incidents of any kind from happening. This is achieved by:

- Extensive safety procedures and instructions;
- Safety guide and training for all employees;
- Continuous attention to safety on the work floor with toolbox meetings;
- Registration and evaluation of all incidents;
- Regular safety inspections.

Good working conditions go along with safety and are key to physical and mental health of the employees. LUC takes care of these working conditions in the broadest possible way, and tries to achieve a highly motivated workforce with a lot of team spirit.

4 SUSTAINABILITY AND ENVIRONMENT

LUC manufactures polyurethane elastomers which is an inert non-toxic material and therefore does not cause harm to man and nature.

LUC also aims to reduce the environmental impact of its own operations to an absolute minimum.

This is done by means of:

- Being ahead of all legal environmental requirements and regulations;
- All materials which are used by LUC are fully REACH compliant;
- Having an internal environmental care system;
- Economic use of raw materials and reducing waste;
- Move to environmental friendly materials and processes;
- Investing in manufacturing equipment with low energy consumption;
- Investing in renewable energy (solar panels at the facilities);

Furthermore, LUC also tries to help its customers to reduce their environmental impact by supplying them with longer lasting and more durable materials.

5 FAIR EMPLOYMENT

LUC respects and supports compliance with internationally recognized human rights and does not tolerate forced labour, child labour or punishment, slavery or human trafficking. We comply with the minimum age for employment in accordance with the applicable national regulations. If there is no national legislation in place, we follow the internationally recognised standards of the United Nations. If a national regulation provides for stricter provisions, these shall take precedence.

We pay wages and benefits that do not fall below the minimum legal or industry standards.

We ensure compliance with national laws and regulations or industry standards regarding working hours, breaks and holidays. This also applies to those employees who due to their role do not have a permanent position at one of our sites, for example service technicians.

We treat all employees with dignity and respect. Any kind of physical, mental, sexual or verbal abuse, harassment or physical or mental coercion will not be tolerated.

We respect the principles of equal opportunity in the selection and promotion of our employees. Any discrimination based on age, physical or mental restriction, ethnic origin, external appearance, skin colour, gender, pregnancy, sexual orientation, nationality, religion, marital status or other characteristics of employees is prohibited.

6 FAIR TRADE

LUC is subject to a number of local and international laws and regulations on corruption prevention as a result of its global business activities. Therefore, we do not tolerate any form of corruption in our business relationships with third parties. This applies to all levels of the company. We give and receive gifts only if they are material assets with a low symbolic value. Any invitations given or received must not take place in the run-up to tenders and must be appropriate to the position of the recipient. The acceptance or gifting of cash or cash equivalents, such as vouchers, is prohibited. We also do not offer business partners any intangible benefits, such as free services.

Good conduct is important to us. We avoid any form of direct influence or indirect influence over business partners. We also do not support projects or organizations (political parties, politicians and organizations) with a political background.

LUC understands the worldwide concerns regarding the use of certain minerals from conflict zones. LUC shares the deep concern about sources of minerals from these conflict zones and is therefore committed to make its products conflict-free and obtain full transparency throughout its supply chain.

LUC aims to prevent the use of conflict minerals that directly or indirectly finance or benefit armed groups. LUC will comply with the conflict free minerals requirements in the manufacture of our products.

LUC also requires suppliers, including contractors and external manufacturers, to comply with LUC's Code of Conduct, which includes requirements relating to conflict minerals and responsible sourcing. LUC suppliers shall exercise due diligence on the source and chain of custody of minerals and shall make their due diligence measures available to LUC upon LUC's request.

7 PROTECTION OF COMPANY ASSETS AND INFORMATION

Each employee has the responsibility to protect LUC's assets he/she has been entrusted with from loss, damage, misuse or theft. LUC's assets may be among other things company money, product, intellectual property, industrial and other tools and machines, photocopiers, computers, telephones and other electronics, vehicles, and employees' time at work and work product. Those assets may only be used for business purposes and to a limited extent for other purposes approved by management

Employees are obligated to keep confidential and protect LUC's business secrets and other non-public information at all times. Employees are not allowed to disclose business secrets or other non-public information to anyone, except when disclosures legitimate for business purposes. Even then, employees are expected to take appropriate steps, such as execution of a confidentiality agreement, to protect LUC's business secrets and other non-public information from misuse.

8 DATA PROTECTION

Since we process customer, employee and applicant data that is personal we are therefore subject to data protection regulations such as the General Data Protection Regulation (GDPR) in the European Union. LUC respects the data privacy laws and the right of each individual to control his own personal data whilst adhering strictly to the laws for the protection and security of personal data.

By always handling data with care and following the prescribed security precautions, we ensure that the data is safe and, above all, that it is not misused or lost. We protect the data entrusted to us by our customers, suppliers, business partners, applicants and our employees by only using this data for its intended purpose and within the legal framework.

Data may not be passed on to unauthorised persons, either internally or externally. We store our records and documents in accordance with the statutory provisions. In accordance with data protection laws, personal data will be deleted after expiry of specified deadlines where applicable.

When we use a service provider to process our personal information, the provider will be assessed and bound to comply with the applicable requirements before the commencement of their contract with LUC.

Employees at LUC are regularly informed about their due diligence obligations and given appropriate training.

9 SALES AND PURCHASING PRACTICES

LUC aims to build long-term relationships with its business partners. LUC expects its customers to perform according to law and legislation and recommends that they use similar ethical standards as LUC itself.

LUC's purchasing decisions are based on the total cost of ownership to be purchased, which means the total amount spent on a particular purchase, including among other things the initial contract price, life-cycle cost of investment, effect on the production efficiency and quality, commission fees, other transaction costs and taxes. LUC aims to not do business with those who are likely to harm our reputation. LUC expects its suppliers and contractors to perform according to the law and recommends that they comply to LUC's policies. It is the aim of LUC that its business partners, subcontractors and suppliers become familiar with this Code of Conduct and LUC's Corporate Policies, and that they follow similar standards.

10 FINANCIAL INTEGRITY

LUC complies with anti-money laundering obligations and aims to ensure it will not be part of any activities which are considered illegal or even doubtful, either directly or indirectly.