

Introduction

This Code of Conduct has been designed to set out the principles and rules of ethical conduct of employees of LB MINERALS, s.r.o. (the "Company"), whether externally or in relation to each other. The Code of Conduct contains specific provisions concerning compliance with laws, ethical standards and principles, including internal rules and business ethics, which apply to day-to-day work. The Code of Conduct reflects our commitment to professional conduct, mutual respect, integrity and transparency, and applies to all employees of the Company. All Company managers shall set an example for employees by enforcing the Code of Conduct in practice. They shall also instruct their colleagues on the use of the Code of Conduct, monitor compliance therewith, and educate and train them where necessary.

The Code of Conduct is based on the Code of Conduct of the LASSELSBERGER Group, which is applied throughout the Group.

General Principles

The employees shall perform their work duties acting honestly, correctly, in accordance with good manners and the principles of fair business practices and shall refrain from acting inconsistently with the employer's legitimate interests.

The employee's proper attitude, demeanour and conduct shall ensure the preservation of the Company's reputation and goodwill.

Employees shall not offer, promise, give, request or accept gifts or other benefits in connection with their work for the employer that could affect the performance of their duties or allow the performance of their tasks to be affected in any other way. This provision shall not apply to gifts or benefits provided to an employee by their employer.

When performing the assigned tasks, the employee shall act in a manner that avoids the employee from becoming obliged, or feeling obliged to pay back a service or favour that was provided to him/her.

The above principles shall not apply to receiving and providing occasional gifts of a symbolic value, hospitality, or invitation to social events of a reasonable value that are typical in the region and in business practice. Any other gifts, hospitality or invitations to social events shall be refused.

Mutual Respect

The Company strives to create an inclusive environment where everyone feels valued and respected. This includes respecting personal and cultural differences and fostering an atmosphere of teamwork and cooperation. Discrimination, bullying and harassment are strictly prohibited.

The Company's employees shall respect different views and opinions, respect individuals and the diversity of their abilities, respect cultural, racial, ethnic, religious, linguistic and national diversity, as well as the specifics of gender and social environment.

Integrity

All Company employees shall maintain high standards of integrity. This means honesty and fairness in all actions. Misrepresentation, fraud or dishonesty will not be tolerated.

The Company complies with the principles, laws and rules of fair competition. The Company wins business opportunities fairly through the quality and price of its products and services, not by offering undue advantages to others.

Confidentiality and Personal Data Protection

Employees shall respect and maintain the confidentiality of information provided to them by the Company and its business partners. This includes intellectual property, business strategies, customer lists, pricing and personal data.

To this end, the Company's employees shall keep confidential, in particular, information constituting the subject of the Company's trade secrets, which they have acquired in the course of their work and shall not misuse such information for the purpose of obtaining personal benefit or the benefit of a third party, for the entire duration of their employment and after their employment has been terminated.

Conflict of Interests

All employees shall avoid any activities that could be in conflict with their duties towards the Company or the LASSELSBERGER Group or that could influence their professional decisions. In the event of any potential conflict, this shall be reported immediately to the responsible supervisor or the Company's statutory body.

Compliance

The Company has committed to comply with any and all applicable laws and regulations pertaining to its business. In this regard, the Company's employees are required to comply with and respect any and all applicable laws and regulations. The same shall apply to the internal guidelines and instructions applicable to the Company and to the LASSELSBERGER Group.

Occupational Health and Safety

The Company values the health and safety of all persons at its workplaces. Safety at work is the right of every employee of the Company. In order to maintain this status, all employees are required to respect safety regulations and procedures and to use the required personal protective equipment.

Environmental Responsibility

Environmental protection and conservation of natural resources are of particular interest to the Company. All employees are encouraged to use resources in a responsible manner and to contribute to the sustainable development initiatives of the Group and the respective companies.

Company Assets

All employees shall manage the Company's resources in a diligent and responsible manner. Any form of abuse, fraud, wastage or negligence will not be tolerated. In particular, employees shall not misuse the Company's facilities, time, equipment and intellectual property for their personal use.

Professional Conduct

All Company employees are required to conduct themselves in a professional manner in all work-related situations. This includes proper language, behaviour and attitude.

Customer satisfaction is the Company's top priority. Employees shall not be satisfied with the status quo and shall strive for higher goals instead; they need to continuously improve their own procedures in order to achieve maximum efficiency and quality of work.

Use of Technology

The Company provides various technical resources to its employees for business purposes. Any misuse of these resources, including unauthorized access, use for personal gain, or any conduct that compromises the security of these resources, shall be prohibited.

Reporting Code Violations

Employees are encouraged to report any suspected violation of this Code of Conduct immediately to the Company's management. Reports shall be made to a supervisor using the Internal Reporting System or anonymously via the LASSELSBERGER Group whistleblower platform. The Company will not tolerate retaliation against anyone who makes a report in good faith.

Review and Revisions

This Code of Conduct shall be reviewed on a periodical basis in order to ensure its currency and effectiveness. The Company's management may make changes as it deems necessary, while encouraging suggestions from all Company levels.

Conclusion

This Code of Conduct sets out basic values and standards, but cannot anticipate all possible situations. Therefore, every employee of the Company is expected to apply these principles with common sense and good judgement. Our shared commitment to comply with this Code of Conduct will ensure that the Company and the LASSELSBERGER Group continue to operate in a professional, responsible, sustainable and successful manner.