



LOMGroup's Corporate Social Responsibility (CSR) Policy

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Foreword Management Board

In addition to systematic growth in revenue and earnings, we also systematically reflect on how to operate our business on a responsible basis. We see sustainability as leaving behind a world worth living in – for our children and our grandchildren.

By voluntarily accepting responsibility for society, LOMGroup combines entrepreneurial success with responsible behavior and develops and manufactures products that make life easier, safer, and greener. This is our approach towards Corporate Social Responsibility.

Management Board

Preamble

This Corporate Social Responsibility (CSR) Policy describes our focus areas and voluntary self-commitment to fulfill the necessary measures in these areas.

Legal compliance is the basis of our acting whereas the Global Compact and its ten principles are the overall guidance and orientation for our approach and business. Internal rules and requirements, voluntary commitment(s) and self-agreement(s) as well as customer requirements provide an additional framework.

We strive to meet the needs of LOMGroup stakeholders in terms of CSR and to evaluate and include those in its daily operations whenever possible.

Based on these tenets, we have identified six fields of activity: Business Ethics, Occupational Health and Safety, Environmental Sustainability, CSR Supply Chain Management, Corporate Citizenship, as well as Human Resources Management and Human Rights.



This Policy must be considered in the day to day business of all LOMGroup employees and in all business relationships with stakeholders. This document cannot answer all questions related to CSR programs and strategy. Therefore, it refers to important further documents in the description of each CSR focus area.

Environmental Sustainability & Occupational Health and Safety

Since the creation of LOMGroup, our first priority has been to avoid and prevent potential risks for our employees as well as to mitigate our impact to the environment.

- › Our Environmental Protection & Safety and Health strategies, processes, objectives and our globally internal requirements are included in our heritage. We have roots going back to 19th century.
- › The first priority in terms of our responsibilities for our employees is the prevention of health and safety risks.
- › With our Energy Management System according to ISO 50001 standard which is integrated in our work, we strive to have a continuous improvement of our energy performance by maximizing the use of our energy sources and energy-related assets, thus reducing both energy costs and consumption.
- › We ensure that our [LOMGroup Group Policy](#) for Environmental Protection, Energy Management, Safety and Health is effectively implemented. The required technical and organizational procedures are regularly checked and continuously improved.
- › Above these standard requirements, we strive to stay business leader in energy efficiency.
- › With our products and solutions, we enable sustainable and energy-efficient end-products and applications, and thus contribute to meet the challenges of our global society such as climate protection and resources consumption.
- › We continuously work to further increase our ecological net benefit with our products and solutions on the one hand, and with our efficient processes and production on the other hand.
- › Our objective is to prevent personal injuries and damage to assets and to minimize impacts on the environment and the effects on climate change.
- › We consider the support of our objectives and targets in environmental protection, safety and health as well as energy management as an obligation of every employee.
- › We continuously work to improve our approach in matters of health, safety, environmental protection, and energy management.

Human Resources Management and Human Rights

As part of the business community, LOMGroup has a responsibility to respect human rights, labor standards and fair business practices, providing a better environment for business.

- › Forced, bonded or indentured labor or involuntary prison labor is not tolerated. All work is voluntary, and workers shall be free to leave upon reasonable notice.
- › Child labor is not tolerated. The term “child” refers to any person under the age of 15. Exceptions apply to employment relationships in developing-countries operating under the International Labor Organization (ILO) Convention 138 (minimum lowered to 14) or to governmental authorized job trainings or apprenticeship programs that would clearly benefit the persons participating.
- › Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.
- › There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, nor is there to be the threat of any such treatment.
- › We respect the rights of workers to associate freely in accordance with local laws.
- › We value and appreciate our employees’ diversity. We are convinced that mixed teams and diverse workforce are crucial to securing long-term success. Diversity shall be actively supported.

CSR Supply Chain Management

According to the United Nations Global Compact we voluntary address our commitment to communicate our policies and expectations to suppliers as an integral part of our CSR understanding.

As a consequence:

- › CSR aspects are part of our supply chain management.
- › We expect our suppliers to support the 10 principles of the UN Global Compact Initiative.
- › Our suppliers shall adhere to our [Principles of Purchasing](#), which are aligned with LOMGroup [Business Conduct Guidelines](#).
- › Our suppliers have to comply with all applicable laws and regulations.
- › We encourage our suppliers to have an environmental management system according to ISO 14001 or adequate and a safety & health management system according to OHSAS 18001 or adequate in place.
- › We adequately analyze our supply chain, when mapping risks, opportunities and impacts.
- › We adequately monitor suppliers’ CSR performance within our sphere of influence.

Business Ethics

Integrity shapes how LOMGroup deals with shareholders, business partners, employees and the general public. This fundamental statement is the basis for the [Business Conduct Guidelines](#).

The [Business Conduct Guidelines](#) are binding for all employees and form an integral part of each individual employment agreement.

The [Business Conduct Guidelines](#) contain the basic rules and principles for the conduct within the company and in relation to the external partners and the general public. Guidelines are regularly reviewed and updated – when deemed necessary – by the Compliance Officer (e. g. changes in law and/or processes), at least annually.

The [Business Conduct Guidelines](#) intend to help employees deal with ethical and legal challenges in their daily work. They define how to perceive the ethical and legal responsibility as a company and also contain specific requirements for instance for

- › complying with competition law and anticorruption laws,
- › handling donations,
- › avoiding conflicts of interests when carrying out the work,
- › complying with the prohibition of insider trading,
- › protecting company assets,
- › data and information management and
- › occupational health and safety & environmental protection

Corporate Citizenship

LOMGroup recognizes its voluntary responsibility to be a good citizen for the societies which we directly interact with.

We firmly believe that the trust, credibility, and goodwill that we have built in our communities help creating a positive social, working, and business environment.

Our principal global citizenship efforts are focused in four primary areas which are described in our Corporate Citizenship and Sponsoring Rule:

- › Environmental Sustainability
- › Natural and Humanitarian Disasters
- › Education for Future Generations
- › Local Social Needs

Employees are free to make suggestions on this topic on the basis of the Corporate Citizenship & Sponsoring Rule mentioned above.

References

LOMGroup Group Policy for Environmental Protection, Energy Management, Safety and Health Business

Conduct Guidelines: [BCGs](#)

Principles of Purchasing: [PoPs](#)

Corporate Citizenship and Sponsoring Rule (only internally available): [Website](#)



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