

Compliance: Basis of our Business

The business of OSHINO Lamps is based on integrity, appreciation and compliance with laws. Compliance is therefore of crucial importance to us and means to abide by rules and to do the right things.

At OSHINO Lamps, compliance means conformity with legal requirements, corporate policy, and ethics. The entire OSHINO Lamps business is based on these principles. Everybody is asked to act accordingly. Everyone benefits from this: the company itself, its employees, customers, suppliers and owners.

Avoiding risks - ensuring business success

Responsibility for the compliance management system at OSHINO Lamps is at the top management level. The OSHINO Lamps compliance management system provides guidance to employees and provides mechanisms and tools to prevent, detect, and track violations.

OSHINO Lamps has established a comprehensive compliance management system, thereby reducing risks for the company and ensuring the long-term success of our company.

These are the core elements of our compliance management system:

Prevention

Above all, we focus on preventing misconduct in advance. Through discussions and open corporate communication, we promote awareness of compliance among our employees. In addition, staff members have access to the advisory services offered by the management, who can provide tips and assistance in order to behave properly in unclear situations.

Recognition

OSHINO Lamps also accepts anonymous references to potential compliance violations. The information will be researched and verified in strictest confidence. In addition, our business processes are designed to be secure and transparent through regular audits.

Reaction

We have clear rules about what is allowed and what is not. Rule- and value-conforming behaviour is valued - misbehaviour, however, is not tolerated. We consistently follow up misconduct and sanction appropriately.

CORRUPTION / CARTEL LAW

OSHINO Lamps is well positioned against corruption and antitrust violations. With this directive, we want to ensure that we consistently counteract risks and establish effective processes.

Audit Antitrust: The OSHINO Lamps Antitrust Law System was also considered within the Compliance Management System and is an effective means of detecting vulnerabilities in good time and preventing antitrust violations.

Code of Conduct

The key to business success lies in an enterprise-wide culture of integrity, ethics and personal responsibility. The ethical demands on entrepreneurial activity and in the workplace are becoming ever more demanding. Our Code of Conduct is the orientation framework for all employees in the company.

It links our commitment to law and ethics with our specific ethical behaviour requirements and the guidelines that drive our business success. He makes a claim on us, at the same time he is a promise to the outside world.

Our Code of Conduct is dynamic and does not close against new norms of behaviour.

Belonging to OSHINO Lamps requires everyone to take responsibility. We are aware that our success and the reputation of the company acquired through the daily commitment of our employees can be damaged by a single misconduct. The rules of conduct must be observed. Misconduct is therefore not tolerated.

What are we working for? How do we want to work?

The answer of OSHINO Lamps to the first question: We want to become a serious competitor for lighting and lighting elements in the European automotive industry and other industries. In doing so, we aspire to be one of the most well-regarded companies in the industry.

This Code of Conduct deals with the second question: "How do we want to work?". The guiding principles of the OSHINO Lamps are:

- Inspiring customers
- Living integrity and appreciation
- Recognizing performance
- Offering opportunities

In general, we want to work so that everybody can trust us. Trust is the basis of all cooperation. It is tedious to win but can be lost very fast. Our Code of Conduct gives us orientation on how we can justify and gain trust in our daily work. It also gives us concrete clues about what we should not do, in order not to put trust at risk. Our Code of Conduct is valid for all employees of OSHINO Lamps: for managers, executives and all employees.

Ethical and legally flawless behaviour is the responsibility of each individual. However, the environment must support this by not pricing business outcomes over integrity.

For our managers, this results in the obligation to be a role model and to credibly demonstrate this claim to the employees. Managers ensure that employees know and adhere to the Code of Conduct. Deliberate misconduct will be punished within the bounds of applicable law. In order to provide clues to such misconduct, we want to create a climate that is free of fears and of negative consequences when reporting a clue.

Behavior

Avoidance of conflicts of interest

OSHINO Lamps trusts that employees' personal interests are not in conflict with corporate interests.

Conflicts of interest arising from secondary activities

An secondary activity is any activity where, outside the main employment relationship, the workforce is made available to a third party - regardless of whether it is paid or unpaid. This also includes an independent side job. We are not allowed to engage in any secondary activities that conflict with the interests of the OSHINO Lamps, especially if there are grounds for competition.

Private use of company property

The private use of company property is generally not permitted, as far as legally or company-internally no other regulations exist.

Business relationships

Trust, fairness and a high degree of independence in business decisions characterize our dealings with business partners. Private interests and personal benefits must not influence our business decisions.

Business relationships with customers

How we handle our customer contacts profiles the appearance of our company. Therefore, it goes without saying that we behave in compliance with regulations and at the same time ethically correct in this sensitive area.

Active Corruption

In order to maintain the trust of our customers, we refrain from any form of corrupt behaviour and even avoid the mere appearance of it. We must not offer, promise or grant any undue advantage to decision-makers in private companies to national and international public officials in order to achieve favourable behaviour for OSHINO Lamps or favourable decisions for OSHINO Lamps.

We must pay special attention to gifts and invitations to business lunches and events. If we are asked by public sector officials or decision makers in private companies to grant unauthorized benefits, we will inform our managers.

Public Contracting

We respect the rules on procurement procedures for public procurement and in particular the rules on the prevention of undue influence.

Trade control

OSHINO Lamps is actively involved in the international exchange of goods and services and supports free trade. We follow existing trade controls and comply with import and export control regulations and economic embargoes.

Business relations with competitors

OSHINO Lamps is committed to free competition as an elementary component of the market economy. In all business agreements and all business relationships with third parties, we pay particular attention to the legal requirements for securing free competition. This applies in particular to agreements with competitors and other third parties if these agreements may affect competition. We do not engage in price fixing or prohibited voting on market behaviour between competitors. We are committed to fair dealings with our business partners and competitors and do not misuse our existing scope for action. Likewise, we do not disseminate false information about our competitors' products and services or attempt to gain competitive advantage in any other unfair way. We expressly reject competitive espionage as a means of unfairly procuring information about our competitors.

Business relations with suppliers

We maintain trusting and fair business relationships with our suppliers. Conversely, we expect our suppliers to treat us with the same respect and integrity that we bring to them. Purchasing operates in accordance with the laws and regulations of the countries in which we operate. In addition, as far as possible, OSHINO Lamps commits all suppliers to their Code of Conduct and prefers to work with suppliers who are environmentally and socially responsible. Frequently, suppliers are also customers. From this we do not take any unfair advantage and basically separate the procurement and the sales side.

Passive Corruption

We cannot allow ourselves to be influenced in business decisions by offering ourselves or promising benefits or accepting benefits from suppliers and customers. Nor do we demand illicit benefits from them. If we are offered, promised or granted unauthorized benefits, we reject them. We already want to avoid the appearance that we are influenced by benefits in business decisions. If we are unsure whether to accept, for example, a gift, an invitation to a business lunch, or an invitation to an event from a supplier or customer, we will contact our supervisor.

Purchasing bypass

Purchasing is responsible for obtaining goods and services competitively on optimal terms. A circumvention of the purchase can lead to disadvantages for OSHINO Lamps. Therefore, all purchases must be made by purchasing.

Relationships with third parties**Society**

OSHINO Lamps is part of a democratic and market-based community. Therefore, we fully commit ourselves to our social responsibility. While taking into account economic aspects, OSHINO Lamps makes a contribution to society. We are responsible for future generations: social and ecological aspects are a high priority for us.

Social Responsibility

OSHINO Lamps acknowledges their compliance with the adapted principles and rights set by the International Labour Organization (ILO) in its "Declaration on fundamental principles and rights at Work" (Geneva 06/98), the Directives of the UN Initiative Global Compact (Davos, 01/99) and the UN Guiding Principles on Business and Human Rights (2011). The following principles are of particular importance:

- Preservation of human rights,
- Elimination of forced, compulsory, and child labour,
- Positive and negative freedom of association,
- Elimination of discrimination based on gender, race, origin, religion or belief, membership of a trade union or the like, handicap, age, sexual identity, nationality, marital status, political affiliation, veteran status, or other characteristics protected by local laws.
- Compliance with occupational safety and health requirements,
- Protection from individual arbitrary personnel measures,
- Maintenance of employability by training and continuing education,
- Maintenance of adequate social Working conditions,
- Provision of conditions that enable employees to enjoy a reasonable standard of living,
- Remuneration which permits employees to secure their livelihoods including their social and cultural participation,
- Implementation of equal opportunities and family-friendly policies,
- The protection of indigenous rights,
- Ban on bribery and extortion,
- Compliance with current laws and regulations.

Donations

As a responsible member of society, OSHINO Lamps promotes education, science, culture, social concerns, sports and the environment through monetary and in-kind donations and services within the framework of legal and economic opportunities. We do not grant donations to obtain business benefits. All donations must be in accordance with the applicable legal system and the internal guidelines. For all donations, the addressee and the intended use must also be documented. Donations to individuals, private accounts, and individuals or organizations that may damage the interests or reputation of OSHINO Lamps will not be granted.

Sponsoring

Sponsoring is one of the communication tools of OSHINO Lamps. Unlike donations, there is a return for a service - all sponsoring activities require adequate and demonstrable communication and marketing services from the sponsoring partner / organizer and are handled transparently. The sponsoring activities focus on areas where the business interests of OSHINO Lamps or the assumption of social responsibility are in the foreground.

Political contributions

In the discussion about donations to political parties, companies are repeatedly perceived negatively in public. OSHINO Lamps neither donates money to political parties and mandate holders nor grants

them monetary benefits that go beyond what is legally permissible and socially acceptable.

Money laundering

OSHINO Lamps takes all necessary measures to prevent money laundering in its sphere of influence.

Information handling

Data security

The security of data is of paramount importance to OSHINO Lamps. It significantly influences business success and reputation in public. Therefore, we protect corporate data as well as personal customer and employee data against unauthorized access, unauthorized or misuse, loss and premature destruction using all appropriate technical and organizational means.

We collect and process sensitive data only with the consent of the subject person and if a clear legal standard allows it or if it is necessary to fulfil a contractual obligation. In addition, we collect, process and use personal data only to the extent required and for the intended purpose. We respect the wide-ranging rights of the persons whose data we collect, process and use.

All personal information is stored on a separate drive with limited access and is encrypted.

We are aware of the obligation to delete personal data as soon as this data is no longer needed or as the purpose has disappeared.

General secrecy

In addition to the technical and organizational measures for data protection, everyone is obliged to protect the company's interests. Therefore, we do not unnecessarily communicate information from and about our company to the outside world. In personal discussions or telephone calls with colleagues in public (such as in public transport), we pay attention to the confidentiality of this information. In addition, we protect our business documents from outside view.

While our strategy dictates what our goals are, the guidelines provide us with the necessary guidance on how to achieve our goals. Our understanding of performance always includes both questions: "What have I achieved?" And "How have I behaved?" Both are important to us.

OSHINO Lamps expects their executives to behave in a way that is mirrored in their competency requirements. OSHINO Lamps expects all employees to behave in accordance with the guidelines.

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