

ROMMELAG CODE OF CONDUCT

for social responsibility

1. Basic understanding of social responsibility in corporate management

A common, basic understanding of social responsibility in corporate management forms the basis of this CoC. This means the signatory company assumes responsibility by considering the consequences of its business decisions and actions on an economic, technological, social and environmental level and creates an appropriate balance of interests. Rommelag voluntarily contributes to the wellbeing and long-term development of a global society in every possible instance and to the full extent of its ability at the locations in which it operates. It is geared towards universally held ethical values and principals, especially those of integrity, honesty and the respect of human dignity.

2. Scope of application

2.1 This CoC applies to all those affiliated companies, subsidiaries and business units of the signatory company worldwide.

2.2 Rommelag also endeavours to adhere to the content of this CoC for its suppliers and in other parts of the value chain in all instances and to the full extent of its ability.

3. Basic principles of social responsibility in corporate management

Rommelag proactively works to ensure that the values mentioned below are put into practice and adhered to, both now and in the future.

3.1 Compliance with laws

Rommelag complies with the applicable laws and other legal provisions of the countries in which it is registered as a company. Similarly, those foreign trade and payment ordinances of the supplier countries valid at the time of invoicing are to be complied with.

3.2 Integrity and organisational governance

3.2.1 Rommelag gears its activities towards universally held ethical values and principals, especially with regard to integrity, honesty, respect of human dignity, openness and non-discrimination on the grounds of religion, ideology, gender and ethnicity.

3.2.2 Rommelag rejects corruption and bribery as described in the relevant UN Convention¹. It uses the appropriate means to promote transparency, act with integrity and manage responsibly in the company.

3.2.3 Rommelag pursues recognized business practices

and fair competition. In terms of competition, it holds itself to professional behaviour and high standards of quality for work. It fosters partnership and a trusting relationship with the supervisory authorities.

3.3 Communication

Rommelag communicates transparently and strives to open dialogue with employees, customers and suppliers about the requirements of this CoC and the implementation thereof. All documents and all information are produced according to obligation and properly stored. These are not unjustly changed or destroyed.

Company secrets and business information belonging to partners are handled sensitively and treated confidentially.

3.4 Human rights

Rommelag is committed to promoting human rights. The Group observes human rights according to the UN Declaration of Human Rights², especially:

3.4.1 Privacy

The protection of privacy.

¹ United Nations Convention against Corruption, 2003, effective since 2005

² Universal Declaration of Human Rights, UN Resolution 217 A (III), 1948

3.4.2 Health and safety

The guarantee of health and occupational safety, in particular that of a safe and health-promoting work environment in order to avoid accidents and injuries.

3.4.3 Harassment

The protection of employees from physical punishment and from physical, sexual, psychological and verbal harassment and abuse.

3.4.4 Freedom of opinion

The protection and granting of the right to freedom of opinion and freedom of expression.

3.5 Work conditions

Rommelag observes the following ILO³ core labour standards:

3.5.1 Child labour

The prohibition of child labour, i.e. the employment of those younger than 15 years of age, insofar as local legal provisions provide no higher age limit and insofar as no exceptions are permitted.⁴

3.5.2 Forced labour

The prohibition of forced labour of any kind.⁵

3.5.3 Remuneration

Work standards concerning compensation, with particular regard to the level of compensation according to applicable laws and regulations.⁶

3.5.4 Employee rights

Respecting the rights of employees to freedom of association, freedom of assembly and collective bargaining, insofar as this is legally permitted and possible in the respective country.⁷

3.5.5 Principle of non-discrimination

Treating all employees in a non-discriminatory manner.⁸

3.6 Environmental protection

Rommelag fulfils the requirements and standards of environmental protection that concern its operations and acts in an environmentally conscious way at all locations.

3.7 Civic commitment

Rommelag contributes to the social and economic development of the countries and regions in which it operates.

4. Implementation and application

4.1 Rommelag undertakes to make every appropriate and reasonable effort to implement and to apply consistently those principles and values specified in this CoC.

4.2 The relevant currently applicable version of this CoC is available on our Intranet and on the Internet. Any violations of the rules set out in this CoC may be brought to the attention of superiors or human resources managers.

4.3 The relevant applicable version of the CoC is referred to in our General Terms and Conditions.

January 2023, Rommelag

³ ILO = International Labour Organisation

⁴ ILO Convention No. 138, 1973 and ILO Convention No. 182, 1999

⁵ ILO Convention No. 29, 1930 and ILO Convention No. 105, 1957

⁶ ILO No. 100, 1951

⁷ ILO Convention No. 87, 1948 and ILO Convention No. 98, 1949

⁸ ILO Convention No. 111, 1958