

# Supplier Code of **Conduct**

ROTHENBERGER Group Code of Conduct for Business Partners





# Introduction

The ROTHENBERGER Group thrives on its reputation as a company characterised by integrity that operates within the law and enjoys a name that is trusted in many countries

We attach equal importance to the responsible, ethical conduct of our suppliers, service providers and other business partners (hereinafter collectively referred to as „business partners“) towards their employees, society and the environment. The requirements to be met in this respect are specified in this Supplier Code of Conduct (SCoC).

Furthermore, ROTHENBERGER is committed to the following guidelines:

- › 10 Principles of the UN GLOBAL COMPACT
- › UN Convention on the Rights of the Child
- › UN Convention on the Elimination of All Forms of discrimination against Women
- › OECD Guidelines for Multinational Enterprises
- › ILO Core Labour Standards

By signing this SCoC, our business partners vouch for acting responsibly and adhering to the basic principles listed in this SCoC. This SCoC represents a minimum standard that must be observed by all our business partners. If our suppliers' standards go beyond these basic requirements, for example through social commitment in non-profit organizations, we welcome this commitment. The ROTHENBERGER Group itself is committed to the TOOLS FOR LIFE Foundation, [www.tools-for-life-foundation.com](http://www.tools-for-life-foundation.com).

ROTHENBERGER reserves the right to change the requirements of this SCoC if necessary.

# Code of Conduct



## 1. Basic requirements for conduct

### Compliance with applicable law

We expect our business partners to comply with all laws, guidelines and regulations applicable to their companies. Furthermore, the principles of the United Nations Global Compact, the Universal Declaration of Human Rights and the guidelines mentioned in the introduction are to be observed in accordance with national laws and practices.

**Observance and respect of human rights** The ROTHENBERGER Group and its business partners bear the responsibility for ensuring human rights, both in the workplace and in their sphere of influence in general.

### Prohibition of forced and child labor

ROTHENBERGER does not tolerate any form of forced or compulsory labor, debt bondage, servitude or slave labor, or conditions similar to slavery. No employee may be directly or indirectly forced

into employment by violence and /or intimidation. Employees shall only be employed if they have put themselves forward for employment voluntarily.

ROTHENBERGER expects its business partners to work against all forms of child labour and exploitation of young people in accordance with the Convention on the Rights of the Child and the ILO Conventions. In addition, employees who are not of the legal minimum age must not be hired. National standards for the protection of children and young employees must be observed.

### Prohibition of bribery and corruption

ROTHENBERGER opposes all forms of bribery and corruption—in business dealings as well as in dealings with public officials. All business partners and their employees are obliged to observe these principles as well, so that no personal dependence, obligation, or influence arises. We require business conduct based on fairness and

compliance with the applicable national and international standards. Insofar as gifts are customary and polite in the respective country, it must be ensured that no obligatory dependencies may arise and that the applicable laws are observed.

### Integrity in business transactions and fairness in competition

ROTHENBERGER as well as its business partners will do everything in their power to prevent embezzlement, passive corruption and taking personal advantage in any form. All the above-mentioned conduct is neither practised by ROTHENBERGER itself nor is it tolerated directly or indirectly.

ROTHENBERGER and its business partners behave fairly in competition, respect the applicable anti-trust laws and do not enter into unfair or even forbidden agreements.



## 2. Dealing with employees

ROTHENBERGER as well as its business partners treat their employees fairly and respectfully.

### Prohibition of discrimination

Any discrimination in employment and occupation is prohibited. In particular, any discrimination, exclusion or preferential treatment based on race, skin color, sex, age, confession, political opinion, membership in an employee organization, physical or mental disability, ethnic, national or social origin, nationality, sexual orientation or other personal characteristics is prohibited.

### Fair working conditions and equal treatment

ROTHENBERGER as well as its business partners comply with the applicable regulations on working hours. In addition, employees receive remuneration that is in accordance with the applicable laws and ensures an appropriate standard of living. Wage reductions as disciplinary measures

are only permitted in accordance with the applicable national law. In addition, ROTHENBERGER and its business partners undertake to pay their employees regularly and punctually.

Both business partners and ROTHENBERGER undertake to ensure that their employees are treated equally, in particular free from sexual harassment, sexual abuse, physical punishment or torture, mental or physical coercion or insult, and without the threat of such treatment.

### Safety in the workplace

ROTHENBERGER and its business partners ensure a safe and healthy working environment. They take the necessary measures to prevent accidents and damage to health that may occur in connection with their professional activities and comply with the applicable legal requirements for health and safety at work. They support the active development and improvement of working conditions. To this end, internal processes must be set up to detect and prevent or res-

pond to potential risks to the health and safety of employees. They ensure that employees are regularly informed and trained about applicable health and safety standards and safety measures.

## 3. Social responsibility towards society and environmental protection

ROTHENBERGER and its business partners feel responsible for the effects of their activities on the environment and make every effort to minimize the impact on the environment. They also assume social responsibility and strive to be a „good corporate citizen“.

### Protection of resources, climate and environment

The protection of nature and the environment is an integral part of ROTHENBERGER's business practice. Like us, our business partners commit themselves to complying with applicable environmental laws and to following the principle of sustainability. Applicable procedures and standards for waste management, the handling of chemicals and other hazardous substances and their disposal as well as for emissions and wastewater treatment must be observed. The protection and preservation of natural resources must be given special consideration, and environmentally and socially compatible production must be promoted.

### Social commitment

ROTHENBERGER shows itself to be a responsible member of society and wants to be a good neighbor to the citizens at its locations. In addition, we are committed to promoting people with disabilities and integrating them into working life as part of our „Integration no separation“ campaign. We also expect our business partners to act considerately and responsibly.

## 4. Quality and safety

ROTHENBERGER and its business partners comply with all applicable regulations regarding quality and safety. Not only does this include the production of secure and high-quality products, but also the availability and maintenance of all necessary permits, licenses and registrations. In addition, all operational obligations and reporting requirements must be fulfilled.

## 5. Protection of intellectual property and of trade secrets

ROTHENBERGER and its business partners undertake to use and protect the confidential information obtained in connection with the business relationship only in an appropriate manner. In particular, they undertake not to use confidential data for purposes other than those agreed and not to pass it on to third parties or make it accessible to them. The term „confidential information“ includes all information, findings, documents, records, reports, contracts, financial data, staff information, investigations, court records, creative works, intellectual property and new business or product plans. Confidential information can take various forms (e.g. digital or paper).

ROTHENBERGER and its business partners undertake to take all necessary measures to properly secure and protect data worthy of protection and the valid intellectual property rights of their own employees and those of their business partners.

# Integration of the standards into your own **supply chain**



ROTHENBERGER expects its business partners to communicate the principles and minimum standards set out in this Supplier Code of Conduct to their own business partners and their employees and to ensure compliance with them.

### **Reports of infringements are taken seriously and treated fairly and confidentially**

An anonymous web form is available to our employees and also to our business partners for reporting violations. Compliance violations, especially illegal business practices, can be reported confidentially via this form: [rothenberger.com/de-de/compliance](https://rothenberger.com/de-de/compliance).

### **Contact**

The Chief Compliance Officer of ROTHENBERGER AG is available to business partners as a contact person for questions and suggestions regarding the ROTHENBERGER Supplier Code of Conduct.

He can be reached at:  
[compliance@rothenberger.com](mailto:compliance@rothenberger.com)  
Phone +49 6195 800 2060

# Compliance with these standards

Compliance with this Supplier Code of Conduct (SCoC) is essential for us. Any violation of this SCoC is considered a material breach of contract. Depending on the severity of the violation, this may result in the termination of the business relationship and, if necessary, have civil or criminal consequences. We are looking forward to a trusting and fair cooperation with you as our business partner!



Dr. Helmut Rothenberger  
Chairman of the Supervisory Board  
ROTHENBERGER AG



Dr. Christian Heine  
Chairman of the Executive Board,  
CEO  
ROTHENBERGER AG



Christian Diehl  
Member of the Executive Board,  
CFO – COO  
ROTHENBERGER AG

We hereby expressly agree to comply with the standards set forth in this SCoC:

Place/Date

Signature(s)/Stamp



ROTHENBERGER AG  
Spessartstraße 2–4  
65779 Kelkheim  
Germany

**KROLL**

kroll-fahrzeugbau.com

**RICO**

rico-gmbh.de

**ROTHENBERGER**

rothenberger.com

**ROTHENBERGER Industrial**

rothenberger-industrial.com

**RUKO**

ruko.de

**SIEVERT**

sievert.se

**SUPER-EGO**

super-ego.es

**VIRAX**

virax.com