

# BUSINESS PARTNERS

## CODE OF CONDUCT

### Basic understanding of socially responsible corporate governance

This Code of Conduct is based on a basic understanding of socially responsible corporate governance, which we see as a prerequisite for sustainable corporate governance for ourselves and all our business partners.

For our business partners, this means assuming responsibility by considering the consequences of their business decisions and actions from an economic, technological, social and environmental perspective and by achieving an appropriate balance of interests. Our business partners contribute to the well-being and sustainable development of global society in the locations where you operate within the scope of their respective capabilities and scope of action. They are guided by generally applicable ethical values and principles, especially integrity and righteousness and respect for human dignity.

### Scope of application

This Code of Conduct applies to all business relationships between companies of the Rommelag Group and all companies, subsidiaries and business units of the business partner worldwide.

### Key points of socially responsible corporate governance

We consider it a prerequisite for a business relationship that our business partners observe and adhere to the following values and principles in particular:

#### • Compliance with the law

Our business partners adheres to the relevant laws and other legal regulations of the countries in which it does business. Likewise, Rommelag complies with the foreign trade regulations of the destination countries at the time of invoicing.

#### • Integrity and organisational governance

Our business partners respect universal ethical values and principles, especially with regard to integrity, honesty, respect for human dignity, openness and non-discrimination on the grounds of religion, ideology, gender or ethics. Our business partners reject corruption and bribery within the meaning of the 2003 United Nations Convention against Corruption (in force since 2005) and promote transparency, integrity and responsible corporate governance in an appropriate manner.

Our business partners follow recognised business practices and respects fair competition. Competition, professionalism and high-quality work are guiding principles. You strives to maintain a relationship of partnership and trust with regulatory authorities.

#### • Communication

Our business partners communicate the requirements of this Code of Conduct and its implementation to employees, customers and suppliers in an open manner and with a view to achieving mutual understanding. All documents are duly generated in line with our obligations, are not unfairly modified or destroyed, and are stored properly. Trade secrets and business information belonging to partners are treated as confidential and handled with care.

### Human rights

Our business partners are committed to promoting human rights. They shall respect human rights in accordance with United Nations Resolution 217 A (III) of the 1948 Universal Declaration of Human Rights, in particular the following:

#### • Privacy

Protection of privacy.

#### • Health and safety

Protection of health and occupational safety, especially the provision of a safe, healthy working environment in order to avoid accidents and injuries.

#### • Harassment

Protection of employees against physical punishment and physical, sexual or verbal harassment or abuse.

#### • Freedom of opinion

Protection of and respect for freedom of opinion and freedom of expression.

#### • Work conditions

Our business partners undertake to guarantee the right to fair working conditions in accordance with the applicable ILO conventions. This applies in particular to compliance with the following core labour standards of the ILO<sup>3</sup>:

#### • Child labour

The prohibition of child labour, i.e. the employment of people under 15 years of age, provided that the local legal regulations do not set out higher age limits and provided that no exceptions are permitted.

#### • Forced labour

The prohibition of all forms of forced labour.

- **Remuneration**

The labour standards concerning remuneration, especially concerning the amount of remuneration pursuant to the relevant laws and provisions.

- **Employee rights**

Respect for employees' right of association, right to organise and right to collective bargaining, provided that this is legally admissible and possible in the country in question.

- **Prohibition of discrimination**

The treatment of all employees free from discrimination.

## **Environmental protection**

- **Environmental standards and management**

Our business partners meet at least the applicable legal and environmental standards and are committed to sustainable solutions in all aspects of their business operations. Environmental pollution and hazards to people and the environment are avoided to the greatest extent possible. Suitable management systems have been implemented to avoid environmental risks and improve our own environmental protection standards.

- **Climate protection and resource consumption**

Our business partners are actively committed to climate protection and use natural resources (water, raw materials, energy sources) efficiently and sparingly. To underline our commitment to reducing energy consumption and greenhouse gases, ambitious reduction targets have already been defined and concepts developed or already implemented.

- **Waste, effluents and hazardous substances**

Our business partners pay attention to waste avoidance and have taken measures to reduce waste. Waste of all types and emissions that may enter the air, water or soil are minimised, labelled and monitored.

The safe handling, movement, storage, reuse or disposal of substances that are classified as hazardous when they enter the environment is ensured in particular.

## **Data protection**

Our business partners comply with the statutory data protection provisions of the GDPR.

## **Implementation and execution**

By entering into a business relationship or maintaining a business relationship with companies of the Rommelag Group,

our business partners undertake to implement and apply all the principles and values described in this Code of Conduct on an ongoing basis.

The latest version of the Code of Conduct is available on the internet on the Rommelag website.

Our business partners undertake to provide the information and evidence required to enable Rommelag to assess the implementation of the principles and values described in this Code of Conduct. This can be done through the cyclical collection of information and evidence or as part of an on-site audit of our business partners.

Any violation of the contents of the Code of Conduct must be reported to Rommelag. Messages can be sent to the email address

[compliance@rommelag.com](mailto:compliance@rommelag.com)

or sent to us via the Rommelag whistle-blower system.

Violations of the Code of Conduct must be investigated by the business partners and corresponding action plans must be submitted which will lead to the cessation or minimisation of the violation. The measures must be documented, checked for effectiveness and reported to Rommelag once they have been concluded.

A breach of the Code of Conduct constitutes an impairment of the business relationship. In the event of violations, Rommelag reserves the right to terminate the business relationship without notice.

*January 2023, Rommelag*