

The Roto-Group Code of Conduct ("Roto Code of Conduct" – February 2023)

I. Introduction

The Roto Group ("we") is committed to responsible and sustainable corporate governance.

In particular, the principles of ecological, social and ethical behaviour listed in this Code of Conduct form the basis of our corporate governance. We are guided by international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the International Labour Standards of the International Labour Organization and the United Nations Global Compact, as well as national laws and regulations.

Our principles form the basis of our cooperation with our business partners, especially suppliers and service providers. We take into account the different conditions under which our business partners have to operate. In particular, we recognize the challenges faced by smaller partners. We support our business partners, as necessary, in their ongoing effort to improve their adherence to all our principles of corporate governance.

II. Our principles

1. Social responsibility

It is important to us that our employees work in a safe, healthy, positive, tolerant and appreciative environment.

1.1. Diversity

We value, promote and encourage diversity as part of our success and we take care that our employees are able to balance work and family life.

We do not tolerate discrimination against employees based on gender, nationality, ethnic or social origin or descent, skin colour, disability, health, political conviction, ideology, religion, age, pregnancy or sexual orientation. Partial treatment is only permitted when it is necessary and justified by the requirements of employment.

1.2. Exclusion of forced labour

We do not tolerate forced labour, slave labour, slave-like practices, servitude or other forms of domination or oppression in the workplace environment.

We also do not tolerate unacceptable treatment of workers, including physical or psychological hardship, economic or sexual exploitation or humiliation.

All work must be voluntary and without threat of punishment.

1.3. Prohibition of child labour

We do not tolerate child labour.

This applies to all stages of our value chain, especially in product creation processes. We comply with the national laws in the respective place of employment on the minimum age for the employment of children. Workers under the age of 18 will not be employed for work that is likely to be harmful to their health, safety or morals.

1.4. Reasonable remuneration

We pay our employees a fair wage.

The remuneration for regular working hours and overtime takes into account the national statutory minimum wage. Our employees receive all benefits required by law or collective bargain agreements. We do not tolerate wage deductions as punitive measures.

1.5. Safety at the workplace

We attach importance to a safe working environment and compliance with the respective local legal regulations on occupational health and safety.

We ensure that working hours comply with applicable laws.

We pay attention to (1) sufficient safety standards in the provision and maintenance of the workplace and work equipment, (2) the existence of suitable safety measures to avoid exposure to chemical, physical or biological substances, (3) the observance of measures to prevent excessive physical and mental fatigue, in particular by organising working hours and rest breaks, and (4) sufficient training and instruction of employees.

1.6. Freedom of association

We respect the right of our employees to form and join organisations of their choice.

Such organisations are free to operate in accordance with the law of the place of employment and, in particular, to bargain collectively and to strike. Our employees will not be discriminated against because of forming, joining or being a member of such an organisation.

2. Ecological responsibility

We are aware of our ecological responsibility and want our corporate actions to live up to this responsibility.

2.1. Safety at the workplace

We pay attention to the preservation of our natural resources and avoid harmful soil contamination and emissions as well as water and air pollution.

It is a matter of course for us to use raw materials in a resource-conserving way and to continuously assess our processes in order to optimize our sustainable business activities. The use and consumption of resources, especially during production, and the generation of waste of all kinds, including water and energy, is regularly reviewed and reduced by procedures and measures, for example by changing production

and maintenance processes or procedures in the company, by using alternative materials, by savings, by recycling or with the reuse of materials.

2.2. Managing energy consumption/efficiency

We value mindful energy consumption.

To this end, we monitor it and continuously work to find economic solutions to improve energy efficiency and minimise energy consumption.

2.3. Handling waste and hazardous substances

We comply with the legal regulations on the handling of hazardous substances.

We ensure that waste and hazardous substances are handled in an environmentally sound manner with the aim of reducing, responsibly disposing or recycling them. Chemicals or other materials that pose a hazard when released into the environment are identified and handled in a manner that ensures safety during their handling, transport, storage, use, recycling or reuse and disposal.

3. Ethical business conduct and compliance

For us, compliance with law and fair dealings with our business partners are the basis of sustainable success and we expect the same from our business partners.

3.1. Fair competition

We attach great importance to fair competition.

We do not tolerate anti-competitive behaviour and train and alert our employees accordingly.

3.2. International business

We observe the laws applicable to international business transactions. In particular, we comply with the applicable sanction regulations.

3.3. Integrity/bribery and avoidance of conflicts of interest

We maintain a high level of business ethics and do not tolerate corruption, bribery, fraud or extortion.

3.4. Confidentiality/Data Protection

We respect the protection of confidential information and personal data and ensure compliance with applicable data protection laws.

3.5. Intellectual Property

We value and protect intellectual property.

We take appropriate measures to protect our intellectual property, but we also respect the intellectual property rights of third parties.



III. Compliance with the Code of Conduct

We do not tolerate violations of our Code of Conduct.

Our goal is to continuously and sustainably improve our entrepreneurial activities. Consequently, we have set up an internal whistleblowing system and encourage our employees to report any violations or suspected cases. We follow up on all such reports, consistently pursue violations and optimise our processes where necessary in order to avoid future violations.