



**Reifenhäuser**

The Extrusioneers



# Reifenhäuser Code of Conduct.

Basic principles of our actions.

## **Our Basic Understanding**

Reifenhäuser is a family-owned company. Sustainable entrepreneurship and thinking for future generations require a common basic understanding of socially responsible corporate management in the sense of the following guidelines. We, the Reifenhäuser Group and all its employees, assume responsibility within the framework of our respective possibilities and scope of action by taking into account the consequences of our entrepreneurial decisions and actions in legal, economic, technological as well as social and ecological terms. In this way, we contribute to the social and economic development of the countries and regions in which we operate. We act in accordance with the relevant legal regulations. We are guided by ethical values and principles, in particular integrity and probity as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the core labor standards of the International Labour Organization (ILO), and the United Nations Guiding Principles on Business and Human Rights. This Code of Conduct sets out the basic principles of our actions, which we actively demand our employees worldwide to observe. The contents apply in all of our company's subsidiaries and business units. We expect the same basic understanding from our business partners. It is not intended to create rights in favor of third parties.



## **Compliance with the Law**

It is a matter of course for us to comply with the applicable laws and other legal provisions of the countries in which we operate. If local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct. In cases where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, local law shall prevail. However, we will endeavor to comply with the contents of this Code of Conduct.

## **Integrity and Compliance**

We have taken appropriate compliance measures so that the following topics are adequately covered:

### Corruption and Fraud

We do not tolerate corruption, bribery, extortion or fraud; they prevent fair competitive conditions. Benefits which are connected with the intention or could give the appearance of influencing business decisions or obtaining any other improper advantage are neither promised, offered, granted, demanded or accepted in our business relationships, nor do we allow ourselves to be promised such benefits. We apply a particularly strict standard in our dealings with persons to whom special criminal and liability regulations apply (e.g. public officials).

### Fair Competition

We act in accordance with national and international competition and antitrust law and do not participate in price fixing, market sharing or customer, market or bid rigging as well as any other anti-competitive practices.

### Prevention of Money Laundering

Money laundering refers to the process of smuggling illegally generated money or illegally acquired assets into the legal financial and economic cycle. We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets. We distance ourselves from any actions or transactions that serve or could serve to finance terrorism.

### Protection of Information and Intellectual Property

We protect confidential information and respect intellectual property; technology and know-how transfers shall be made in a manner that protects our customers' intellectual property rights and information, trade secrets and non-public information. We shall comply with the applicable laws on the protection of trade secrets and treat confidential information of our business partners accordingly.

### Data Protection

We process, store and protect personal data in compliance with legal regulations.

Thus, personal data is collected confidentially, only for legitimate, previously defined purposes and in a transparent manner. We process personal data only if they are protected against loss, modification and unauthorized use or disclosure by appropriate technical and organizational measures.

#### Export Control

We undertake to comply with the relevant legal standards for export control - in particular licensing requirements, export and support prohibitions - in the context of the transfer and export of our goods.

#### Avoidance of Conflicts of Interest

We avoid internal and external conflicts of interest that could illegitimately influence business relationships. If this is not possible, we disclose these conflicts.

### **Health and Safety**

We safeguard the health of our employees by taking appropriate health and safety measures (e.g., implementing an occupational health and safety management system) that adequately cover the following topics:

- Compliance with applicable laws and orientation to international standards regarding health and occupational safety;
- Appropriate workplace design, safety regulations and provision of appropriate personal protective equipment;
- Implementing preventive controls, emergency response, an accident reporting system, and other appropriate continuous improvement measures;
- Enabling access to drinking water in sufficient quantity and access to clean sanitary facilities for employees.

We ensure that all our employees are appropriately instructed.

## **Remuneration and Working Hours**

Remuneration is based on the applicable laws and, where applicable, existing, binding collective agreements and is supplemented by the relevant, national minimum wage laws. Employees are informed clearly, in detail and regularly about the composition of their remuneration. We comply with applicable laws and (international) labor standards regarding maximum permissible working hours and ensure that:

- working hours, including overtime, do not exceed the respective maximum limits permitted by law;
- weekly working hours, including overtime, do not exceed 60 hours, even in exceptional cases, in the absence of such provisions;
- employees have at least one full day off per calendar week.

## **Observance of Human Rights**

We respect and support the observance of internationally recognized human rights and:

- respect the personal dignity, privacy and personal rights of each individual;
- protect and grant the right to freedom of opinion and expression;
- do not tolerate unacceptable treatment of people, such as physical and psychological hardship, sexual and personal harassment or discrimination. This applies regardless of whether employees,

external stakeholders or other third parties are involved or whether the treatment is carried out by Reifenhäuser employees or by service providers or business partners commissioned by us;

- dissociate ourselves from any conduct and business practices based on unlawful eviction or the unlawful taking of land, forests or waters for acquisition, construction or other use, or which destroy the livelihood of any person.

### Prohibition of Child Labor

We do not tolerate child labor. We do not hire persons who cannot show a minimum age of 15 years and have proof of age presented to us. For hazardous work, the minimum age is 18.

### Prohibition of Forced Labor

Forced labor, slave labor or comparable measures that deprive people of their freedom are prohibited. All work must be voluntary and it must be possible to terminate the employment relationship.

### Freedom of Association and Collective Bargaining

We respect the right of employees to freedom of association, freedom of assembly and collective bargaining to the extent that this is legally permissible and possible in the respective country in which we operate. If this is not permissible, we seek appropriate compromises for our employees.

### Promotion of Diversity and Equal Opportunity

We promote equal opportunities and do not tolerate discrimination. We treat all people equally, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

### **Environment, Energy and Climate Protection**

We act in accordance with applicable laws and follow international standards to minimize negative impacts on the environment and continuously improve our activities for environmental and climate protection. We have adopted appropriate environmental protection measures that adequately cover the following topics:

- Setting goals, defining and implementing measures, and continuously improving them.
- Environmental aspects such as reducing CO<sub>2</sub> emissions, increasing energy efficiency and avoiding fossil-based energy sources, ensuring water quality and reducing water consumption, ensuring air quality, promoting resource efficiency, reducing waste and disposing of it properly, and handling hazardous substances responsibly for people and the environment.
- To protect the environment, we comply with the obligations under international

environmental agreements such as the Minamata Convention regarding the use and treatment of mercury, the Stockholm Convention on Persistent Organic Substances regarding the production, use and treatment of certain chemicals and their wastes, and the Basel Convention regarding the import and export of hazardous substances.

### **Handling Conflict Minerals**

We take due diligence measures to avoid the use of conflict minerals in our products in order to prevent human rights violations, corruption and funding of armed groups or the like.

### **Supply Chain**

We expect our suppliers to comply with the principles of this Code of Conduct or to apply equivalent codes of conduct. We also encourage them to enforce the contents of this Code of Conduct in their supply chains. We reserve the right to review the application of this Code of Conduct by our suppliers systematically and on an ad hoc basis. This may take the form of questionnaires, assessments or audits, for example. If there are still doubts regarding compliance with this Code of Conduct, we will ask the supplier to take appropriate countermeasures and report the matter to the responsible contact in our company. In addition, suppliers are obligated to report any violation of the principles of this Code of Conduct to us in writing to their

responsible contact in our company within two weeks of becoming aware of it. This also applies if suppliers become aware of a violation at one of their direct suppliers, which is part of a supply chain for Reifenhäuser as an indirect supplier.

If violations of the principles of this Code of Conduct have occurred or are imminent, we will support the supplier within the scope of our possibilities and the legal provisions in remedying or avoiding the grievances. If an improvement does not occur or no milder means is promising for other reasons, we reserve the right to appropriate sanctions and measures. This may lead to the termination of business relations as a last resort.

Our suppliers undertake to indemnify Reifenhäuser against all claims under civil law and any fines in the event of violations on their part of the obligations mentioned here.

## **Implementation and Enforcement**

We make appropriate and reasonable efforts to continuously implement, document and apply the principles and values described in this Code of Conduct. All employees are made aware of the contents of the Code of Conduct and receive training on relevant topics as required. Violations of the Code of Conduct will not be tolerated and may lead to consequences under labor law.

## Communication

We communicate openly and in a dialog-oriented manner about the requirements of this Code of Conduct and its implementation to employees, customers, suppliers and other interested parties and stakeholders.

## Notification of Violations

We offer our employees and business partners access to a protected mechanism to confidentially report possible violations of the principles of this Code of Conduct. If you have a tip, please contact us directly or anonymously via our whistleblower system at <https://reifenhauser.com/en/wistleblower-system> or by phone at +49 2241481 204.