
 G. A. Röders	Code of conduct G.A.Röders GmbH & Co.KG / Mesit&Röders v.o.s.	Index 02
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Our Code of Conduct has been further developed against the background of the activities of G.A. Röders and Mesit & Röders (known as Röders). Röders is a company that is over 200 years old. We are proud to have found an agreement with our employees for fair and transparent co-operation over this long period. The new Code of Conduct sets out the basic rules and principles on which we work at RÖDERS. The RÖDERS Code of Conduct is largely based on the UN Global Compact (www.unglobalcompact.org) and summarises Röders' uniformly high standards with regard to management, our employees, our environment and our external partners.

In addition to the quality policy, the Code of Conduct serves as an orientation framework for all of us, whether managers or employees, in our daily work. It is a standard we set ourselves. At the same time, it is the standard by which we orientate ourselves in order to behave responsibly towards business partners, the public and colleagues. Together, we are responsible for Röders' reputation. Last but not least, consistent compliance with a "Code of Conduct" is a mandatory component of successful certification in accordance with IATF 16949 and DIN 9100 and is therefore required for every supplier to the automotive or aircraft industry. We therefore ask you to read the Code of Conduct carefully and to use it together with us as a guideline for our daily behaviour.


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IMPORTANCE OF THE CODE OF CONDUCT

Our good reputation and the trust of our customers, employees, suppliers and the public depend crucially on the behaviour of each individual in the company. Every employee is therefore equally responsible for being committed to the values and goals of the company and acting accordingly in their respective areas of responsibility. A reliable set of rules is therefore needed. This Code of Conduct summarises the most important rules and guidelines that apply to all Röders and Mesit & Röders (from now on referred to as Röders) employees worldwide. We expect all employees, without exception, to comply with all laws, avoid conflicts of interest, protect Röders' assets and respect and honour the traditions and values of the countries in which we do business. As role models, we require our managers not only to communicate these rules, but also to set an example and demand them from their employees. They are the first point of contact in all matters relating to this Code. It is our aim to conduct all business in an ethically and legally impeccable manner, with the aim of manifesting a climate of mutual trust both towards our business partners and in our internal dealings. We see this as a central basis for the long-term success of our company.

1. BASIC REQUIREMENTS

We are convinced that the sustainable success of our family business depends to a large extent on a value-based corporate culture and that each individual employee makes an important contribution to the company's success. We therefore take our responsibility particularly seriously and are committed to complying with internationally recognised human rights.

2. MANAGEMENT AND COOPERATION AT RÖDERS


2.1 Personal responsibility

We expect all Röders employees to comply with the statutory provisions and company guidelines, whereby all managers are particularly called upon to fulfil their role as role models. The personal dignity of each individual must be respected and protected. All managers are called upon to prevent violations of this Code in their areas. Every employee must be expressly made aware of these regulations.

2.2 Mutual respect

We do not tolerate any different treatment of our employees on the grounds of race or ethnic origin, gender, religion or ideology, disability, age or sexual identity. As a globally active company, we work with employees and partners of different cultures, mindsets or nationalities and are convinced that successful cooperation is only possible with mutual respect and consideration for the individual.

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2.3 Fair working conditions

We comply with the applicable regulations on working hours. Furthermore, we adhere to the legally guaranteed minimum wage and offer all employees fair working conditions that meet the legal requirements. We reject any form of forced or child labour. Professional development is based solely on the performance, skills and personal suitability of the individual.

2.4 Avoidance of conflicts of interest

We ensure that our employees' own interests are in harmony with the interests of the company. Every employee should therefore avoid situations that could lead to a conflict between their personal interests and the interests of the company. This could occur, for example, in the case of activities or shareholdings in other companies or in business dealings with friends or relatives. Such business relationships must be avoided and reported immediately to the line manager. Any secondary employment for remuneration must be authorised in writing in advance by the line manager or the HR department.

2.5 Dealing with assets

We require our employees to protect tangible and intangible assets. These assets include buildings, land, vehicles, office equipment as well as expertise, patents, technologies and other information that is valuable to Röders and must therefore be protected. All facilities and equipment may only be used for private purposes with express permission.


2.6 Dealing with information

We oblige our employees to keep confidential data, information, inventions and expertise secret and only use them for business purposes. These are the basis for our sustainable success and may not be passed on to third parties or obtained from them in any form. The same applies to the personal data of Röders employees, customers and suppliers.

2.7 Occupational safety, health and environmental protection

We all share responsibility for protecting people and the environment. It is the responsibility of our employees to maintain their workplace in an orderly and safe condition, to protect the environment and to use the available resources sparingly and carefully. Any abnormalities must be reported to the manager. Our environmental management system in accordance with ISO 14001 with our principles in the environmental policy and the guidelines on occupational safety are important components of this. Röders is committed to complying with the highest occupational safety requirements, regardless of whether lower requirements would be permissible in specific countries.

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2.8 Human rights

For us, respect for internationally recognised human rights in our own company and in our supply chains is a basic prerequisite for all business activities. We are therefore committed to the human rights derived from the appendices to the Supply Chain Sustainability duties Act. A list of these human rights is available in the company and employees are required to take note of them, respect them and behave in such a way that no violations occur. Should any person nevertheless be of the opinion that human rights are being disregarded or even violated by the behaviour of Röders employees, the person concerned can submit a complaint to the Röders Human Rights Officer or directly to the management.

3. COOPERATION WITH RÖDERS

We want to be reliable partners, both in our collaboration with our customers, suppliers and business partners and within our company. In addition to our expertise, innovative strength and the quality of our products, this includes communicating openly, honestly and transparently and honouring our commitments and contractual relationships.

3.1 Selection of suppliers

We scrutinise all offers from our suppliers fairly and impartially. Contracts are awarded and processed strictly according to appropriate criteria. Agreements are made completely and clearly, and subsequent changes and additions are documented.

The internal regulation to ensure double-checking, the "four-eyes principle", is of great importance. to be complied with by all employees.


3.2 Fair competition

We follow the rules of fair competition and support the idea of open markets and free trade. Unfair behaviour must be avoided. We take particular care to ensure transparent documentation of the supply chain for conflict minerals in accordance with the US Dodd-Frank Act, Section 1502.

3.3 Competition and antitrust law

We expect every employee to be fully committed to fair competition and to comply with the competition law regulations of all countries in which Röders does business. It is therefore not permitted to enter into agreements with competitors that could influence competition. The same applies to the exchange of information regarding prices, conditions, capacities, market shares, margins, costs and the content or behaviour of offers.

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3.4 Gifts and benefits

We do not tolerate any form of corruption, bribery, extortion or embezzlement. All our activities are based on honest and responsible thinking and behaviour. Employees who allow themselves to be unfairly influenced by customers or suppliers or who influence them will be subject to disciplinary action. No benefits with

be linked to the requesting or granting of consideration. Gifts and invitations are only permitted if their value is not such as to make the recipient dependent on actions or decisions. In case of doubt, our employees can report the value and type of gifts to the HR department for documentation purposes.

Gifts of money are generally prohibited.

3.5 Donations

We are approached by various organisations and institutions for donations. Donations are only made with the prior consent of the management. The recipient of the donation and the specific use must be known and traceable. The principle of altruistic behaviour must also be observed here.

4. COMPLIANCE WITH THE CODE OF CONDUCT

We expect all RÖDERS employees to comply with legal regulations and company guidelines. Our managers are required to support their employees in complying with our Code of Conduct. Violations can have serious consequences for the entire company and, depending on the circumstances, can lead to disciplinary, labour law or even criminal sanctions for the employee.

4.1 Offences

We trust that all employees will make the right decision and report any violations to the responsible line manager and resolve them through constructive dialogue on site.


For certain issues, however, it may be better to address offences outside the field of work. This applies in particular to offences relating to illegal business practices.

The following contact points are available to both employees and third parties:

- Your superior
- Each member of the Management Board
- the personnel and finance department
- the employee representative body (in Soltau).

Employees who report actual or suspected misconduct in good faith must not suffer any disadvantages as a result. As far as possible and legally permissible, Röders will treat the

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identity of the employee confidentially.

4.2 Contact person

If you are unable to address your concerns locally or if you cannot find appropriate support there, you can contact the management in Soltau by telephone on +49-(0)- 5191-80919 or in writing at

ZGG@roeders.com record.

When investigating breaches of the Code of Conduct, care is taken to ensure the greatest possible confidentiality, protection of the whistleblower and compliance with data protection regulations.

G.A.Röders GmbH & Co. KG Unter den Linden 6-8 29614 Soltau
Phone: +49-(0)711-9360-1346
www.roeders.com


5. Dealing with the code of conduct of other companies

We accept and respect the code of conduct of our customers and suppliers, provided that it corresponds to the principles of this Code of Conduct. If our customers require confirmation of their Code of Conduct, we are prepared to sign a mutual recognition agreement in accordance with the requirements of the BDI (Federation of German Industries). The wording can be found in the appendix

Note on changes to this Code of Cunduct: 13 August 2018 completely revised.

The new version replaces the COC from 2011 1 October 2019 Editorial changes to the CoC from 13 August 2018

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Agreement on mutual recognition of the Codes of Conduct

The companies G.A.Röders GmbH
& Co Unter den Linden 6-8
29614 Soltau

with all its affiliated companies, in particular Mesit & Röders, henceforth
"Called "RÖDERS

and the company:

.....

both henceforth referred to as "contracting parties",

conclude the following agreement:

The contracting parties have each imposed their own codes of conduct. They are obliged to take appropriate measures to ensure that their own code of conduct is observed within their mutual business relationships. They recognise their codes as equivalent and waive any contractual submission to the other party's code of conduct.


Changes to the Code of Conduct are published on the respective website.

The provisions of this agreement replace all existing regulations and contracts between the contracting parties within the scope of this agreement with regard to compliance with the respective code of conduct, insofar as these other contracts are subject to the sole disposition of the parties

Each party shall be entitled to request information in writing from the other party regarding compliance with its own behavioural requirements within the scope of the mutual contractual relationship if there are indications of a not insignificant breach. Requests for information should always be made in writing and with due regard for the legitimate interests of the contractual partner, in particular its business and trade secrets, and with due regard for the rights of employees, in particular data protection.

If one of the contracting parties culpably breaches one of its own obligations under this agreement, the other contracting party shall be entitled to demand (in writing) that the infringing act be discontinued.

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unless the breach is insignificant. In the event that the breach in question is not remedied within a period of ... after receipt of the request, or if there is a repeated breach, the party in breach of contract shall be entitled to terminate the contract affected by the breach with immediate effect. Further claims and rights remain unaffected in terms of reason and amount in accordance with the provisions of the affected contract.

This agreement is concluded for an indefinite period and may be terminated by either party in writing with a notice period of Termination shall not affect the validity of this agreement for existing contractual relationships until their termination.

The contracting parties shall confirm amendments and additions to this agreement in writing without delay.

This contract is subject to German substantive law.

Stand	Change	Through	date
4_V1	Editorial errors improved	zgg	21.12.2023

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