
Code of Conduct

Rohm & Werner GmbH

Preamble

Rohm & Werner GmbH is active in many countries in Europe and around the world as a reliable partner in the production of ecological detergents, cleaning agents and cleaning products. Our work focuses on innovation, creativity, fairness, quality and sustainability.

In line with our company philosophy

„For our customers, for the environment - for all of us“

As a responsible and value-conscious company, we observe various national and international standards and norms of conduct in addition to applicable laws, which are explained below, subdivided into social, ecological and ethical requirements.

We have drawn up this Code of Conduct in response to the Supply Chain Duty of Care Act (Lieferkettensorgfaltspflichtengesetz, LkSG), which has been in force in Germany since the beginning of 2023 and identify with it.

The subject of the Code is the protection of the environment, human and children's rights as well as occupational health and safety for fair competition and transparent business conditions within the supply chains on which our business and economic activities are based. Legally regulated in this context are workload, occupational health and safety, working hours, occupational health and safety, fair trade, social compatibility, prevention of exploitation and child labor and compliance with environmental standards.

The Code is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the International Labor Standards of the International Labor Organization and the United Nations Global Compact.

As part of a global supply chain, we make the same demands on ourselves as we do on our customers and suppliers.

1. social responsibility

All nationally and internationally applicable agreements, regulations, laws, standards and conventions must be complied with in full.

1.1. Exclusion of forced labor

Employees carry out their work of their own free will and have the option of terminating it at any time in accordance with the legal requirements. Forced labor, slave labor or similar forms of labor are prohibited. Workers must not be subjected to psychological hardship or sexual and personal harassment.

1.2. Prohibition of child labor

Child labor and any form of exploitation of children and young people are not tolerated in any way. Employment as an employee is only undertaken if the legal minimum age of 15 years is guaranteed. If national laws provide for stricter regulations, these will be observed and complied with as a matter of priority.

1.3. Fair remuneration

Work performed must be remunerated appropriately. The minimum wage regulations must be complied with. Salaries and wages must be suitable to cover normal living expenses and must allow the employee to build up a minimum level of reserves. Employees have the right to receive regular written information about their pay slips. Deductions from wages cannot be used as an instrument for punitive measures against employees. The applicable laws and regulations regarding employee compensation are complied with.

1.4. Fair working hours

Working hours should comply with applicable laws or industry standards and take into account an appropriate work-life balance. Overtime should be avoided where possible or kept to a necessary minimum and should be compensated with pay or time off. After six consecutive working days, the employee must be granted at least one day's rest.

1.5. Freedom of association

Every employee shall be granted the opportunity to organize, form or join an organization without fear of reprisals in order to defend their employment rights. In cases where this is not possible due to legal restrictions, appropriate alternatives must be provided for the purpose of free and independent association. Employee representatives must be protected against discrimination. They must be granted free access to the workplaces of their colleagues so that they can carry out their tasks and duties in a lawful and peaceful manner.

1.6. Prohibition of discrimination

Discrimination has no place in a company. It is fundamentally unlawful to discriminate against employees on the basis of gender, race, skin color, disability, political conviction, origin, religion, age, pregnancy or sexual orientation, for example. The personal dignity, privacy and personal rights of each individual must be respected at all times.

1.7. Health protection and occupational safety

The health and safety of employees in the workplace is a valuable asset worth protecting. For this reason, appropriate technical or organizational measures must be taken to protect employees from hazards and enable them to work without accidents. In hazardous areas, employees must be provided with suitable

personal protective equipment (PPE). Employees must receive regular instruction and training on applicable health and safety standards and measures. A hygienic working environment is essential, especially in the face of increasing waves of infection and pandemics.

1.8. Preservation of natural resources

No company may withdraw land, forests or waters whose use secures the livelihoods of people. Harmful changes to the soil, water and air pollution, noise emissions and excessive water consumption are unacceptable, especially if they damage the health of people or local wildlife, significantly impair the natural basis for food production or prevent people from having access to safe drinking water or sanitary facilities.

1.9. Complaints mechanisms

Suppliers must pass on information received from Rohm & Werner GmbH regarding accessibility, responsibility and the implementation of a complaints procedure to their employees in an appropriate manner. The complaints procedure must be accessible to employees while maintaining confidentiality of identity and effective protection against discrimination. If no notice is given, the supplier itself is responsible for setting up an effective grievance mechanism at company level for individuals and communities that may be affected by negative impacts.

1.10. Dealing with conflict minerals

In order to meet the due diligence requirements for responsible supply chains for minerals from conflict and high-risk areas in connection with the conflict minerals tin, tantalum, tungsten and gold, as well as with a number of other raw materials such as cobalt, Rohm & Werner GmbH observes the guidelines of the Organization for Economic Cooperation and Development (OECD) and also expects this from its suppliers, especially when selecting smelters and refineries.

2. ecological responsibility

Suppliers and vendors should take into account the requirements of ISO standards 9001 (quality management), 14001 (environmental management), 50001 (energy management) and the EMAS regulation in order to meet the ever-increasing challenges of climate protection, sustainability, environmental compatibility and resource conservation.

2.1. Treatment and discharge of industrial wastewater

Wastewater from operational procedures and production processes must be analysed and, if necessary, treated before discharge or disposal. In addition, measures should be taken to avoid wastewater as far as possible.

2.2. Dealing with air emissions

Air, noise and greenhouse gas emissions must be reduced to a necessary minimum. Modern exhaust gas purification systems can do a good job here. Any emissions that occur must be routinely monitored, checked and, if necessary, treated.

2.3. Handling waste and hazardous substances

When handling hazardous substances and materials, i.e. when using, storing, transporting, recycling, reusing or disposing of them, care must be taken to ensure that these substances are not released into the environment and that the safety of workers handling them is guaranteed. Solid waste must be systematically collected, handled, reduced and responsibly disposed of or subjected to a recycling process.

2.4. Reduction in the consumption of raw materials and natural resources

Waste prevention takes precedence over waste disposal. The supplier should install systems that help prevent the spillage or release of environmentally harmful substances into the environment. The use and consumption of resources during production and the generation of waste of any kind, including water and energy, must be reduced or avoided. For these purposes, the processes can be intervened in directly at the point of origin or through procedures and measures, such as the modification of production and maintenance processes or procedures in the company, the use of alternative materials, savings, recycling or with the help of the reuse of materials.

2.5. Energy management/efficiency

Generating energy requires resources and pollutes the environment. This also applies to renewable energies. Energy consumption should therefore be as low and efficient as possible. A comprehensive energy management system helps to increase energy efficiency and pursue a sustainable approach.

3. ethical business conduct and compliance

Fair and transparent dealings with business partners require compliance with the following principles without exception.

3.1. Fair competition

All business partners and competitors should act fairly and behave ethically and legally at all times. No one should take unfair advantage or disadvantage anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or the like, or engage in other intentionally unfair trade practices. Business activities are subject to antitrust and trade regulation laws designed to ensure fair and honest competition. These laws govern how companies should interact with competitors, customers and suppliers and prohibit activities such as fixing prices and entering into anti-competitive agreements with competitors.

3.2. Confidentiality/data protection

The Supplier undertakes to adequately implement the protection of private information in accordance with the expectations of its client, suppliers, customers, consumers and employees. The laws on data protection and information security as well as official regulations must be complied with when collecting, storing, processing, transmitting and passing on personal information.

3.3. Intellectual property

Intellectual property rights are a valuable asset that must be respected. When transferring technology and know-how, it is important to ensure that intellectual property rights and customer information remain protected.

3.4. Integrity/bribery and avoidance of conflicts of interest

No forms of bribery, taking advantage, corruption, extortion or embezzlement are tolerated. Business decisions are to be made free of private interests and personal benefits. Furthermore, it is expected that conflicts of interest and even the appearance of such conflicts are avoided. Conflicts of interest can already arise if a business relationship is maintained with another company in which there is a financial interest or in which a relative or friend is directly or indirectly significantly involved.

4. Implementation of the requirements

Systematic risk management is an important component of sustainable supply chain management.

We expect our suppliers to identify and monitor risks within supply chains and to take appropriate measures. In the event of suspected violations and to safeguard supply chains with increased risks, the supplier shall inform the company promptly and, if necessary, regularly about the violations and risks identified and the measures taken.

We check the tracking and fulfillment of the requirements listed in this document with the help of risk-based audits at our suppliers' production sites.

The supplier agrees that the client may carry out such audits regularly or for specific reasons to verify compliance with the Code at the supplier's production sites during normal business hours after reasonable advance notice by persons authorized by the client. The Supplier may object to individual audit measures if these would violate mandatory data protection regulations.

If a violation of the provisions of this Code of Conduct is identified, the Company shall notify the Supplier immediately in writing and set a reasonable grace period for the Supplier to bring its conduct into compliance with these provisions. If a remedy is not possible in the foreseeable future, the Supplier must notify the Company immediately and, together with the Company, draw up a concept with a timetable for ending or minimizing the violation.

If the grace period expires without result or if the implementation of the measures contained in the plan does not bring about a remedy after the expiry of the timetable and no milder means are available, the Company may break off the business relationship and terminate all contracts. A statutory right to extraordinary termination without setting a grace period, in particular in the case of breaches that are deemed to be very serious, remains unaffected, as does the right to compensation for damages.