

Code of Conduct

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1. Introduction

To whom it may concern,

Rösler Oberflächentechnik GmbH's Code of Conduct defines our basic principles, which we consider indispensable for ethically appropriate behavior.

We firmly believe that long-term corporate success depends to a large extent on the implementation of these guidelines.

The Code of Conduct is designed to ensure mutual respect, honesty and fairness in our dealings with employees and external partners.

It takes into account the cultural differences and values of all groups involved and can, therefore, be understood as a commitment to our company's social responsibility.

Compliance is an essential prerequisite to ensure the achieved reputation with customers, business partners and the public. It is considered essential that all employees act in a compliant and responsible manner.

The Code applies with binding force to all parts of the Rösler Group. We also expect our business partners to act accordingly.

The Managing Directors



Stephan Rösler
Managing Partner



Volker Löhnert
Managing Director



Oliver Grün
Managing Director

Memmelsdorf, dated 06.02.2023

2. Corporate Principles

Legal requirements

Executives and employees at Rösler Oberflächentechnik GmbH undertake to comply with all applicable legal requirements. The same applies to the requirements laid down in this Code. Actions that contradict this are prohibited and will not be tolerated.

By way of their daily actions, all Rösler Oberflächentechnik GmbH employees contribute significantly to a corporate culture characterized by openness, honesty, appreciation and tolerance.

The personal rights and dignity of all persons involved are regarded as immutable principles. Exclusively reliable promises, both in internal business transactions and dealings with business partners, are indispensable for fair cooperation. Immoral offers, attempts at corruption or bribery by employees and/or business partners are, therefore, not accepted under any circumstances.

Business conduct

As a global company, Rösler Oberflächentechnik GmbH strictly adheres to the respective country-specific ethnic principles as well as the competition law applicable there. This includes, in particular, prohibitions under cartel law and/or other agreements and behavior that could influence competition in a negative way. Therefore, the interests of all participants are safeguarded by fair competition and no unfair advantages are created in dealings with customers, suppliers or competitors.

Suppliers

We expect fair pricing, reliability, quality and open communication channels from our customers, suppliers, service providers and other partners. Services performed must be adequately proportionate to their value and documented in a comprehensible manner. All decisions must be made free of personal interests and exclusively under the aspects of the set corporate goals. This is aimed at increasing the company's success and customer satisfaction in the long-term.



Conflicts of interest

All suppliers are evaluated neutrally and received offers are treated equally. Should conflicts of loyalty and/or interest arise or develop among employees in the course of their work, they must be reported without delay to the respective supervisor.

Management

In accordance with our corporate guidelines, which are laid down in our Mission & Vision, we expect our managers to behave in an exemplary manner and treat their subordinates with respect, fairness and openness. The superiors are to provide orientation, exemplify appreciation, promote developments and innovations, ensure networking and initiate optimal processes. In this context, supervisors are responsible for monitoring compliance with the requirements arising from this Code.

Political participation

Rösler Oberflächentechnik GmbH fundamentally supports the social commitment of its employees in associations and organizations or in public functions at a communal and supra-regional level. The necessary freedom is created for this purpose. However, such activities must be performed outside working hours and at the employee's own expense.

3. Working Environment

Anti-discrimination and human rights

The diversity of employees is crucial to the company's success as a global enterprise. Protection of international human rights must be guaranteed and respected at all costs.

Rösler Oberflächentechnik GmbH is committed to equal opportunities, the implementation of fair hiring practices and compliance with anti-discrimination laws.

Diverse differences between employees are appreciated and valued positively. Discrimination, harassment or intimidation of any kind – based on race, gender, skin color, religion, nationality, age, marital status, sexual orientation, ancestry, social status or physical disability – are prohibited because they contradict the goal of respectful and fair cooperation.

We expect our suppliers not to practice, economically benefit from or accept slavery, slavery-like conditions or forced labor. Forced labor is any involuntary work or service required of a person under threat of punishment, such as prisoners and detainees. It also includes any retraining, training or education of certain persons or groups of persons ordered or arranged by the state or a local ruler, which consists essentially of involuntary work performed under the threat of sanctions and under conditions similar to imprisonment or confinement in a psychiatric hospital or educational establishment or camp.

We expect our suppliers to treat all people, and in particular their employees, with respect, without prejudice and especially without discrimination. Any form of discrimination or disadvantage, in particular on the grounds of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or ideology is to be avoided. Legal provisions for protection against discrimination are to be observed.

Child labor

We expect our suppliers to comply with the regulations of the United Nations on human and children's rights. Rösler Oberflächentechnik GmbH does not tolerate child labor. Employment of school-age children and children before the age of 15 is to be avoided at all times. Any stricter national regulations concerning child labor and the minimum age for employment are to be complied with as a matter of priority.

Communication

Open, targeted and effective communication of information is crucial for transparency. Rösler Oberflächentechnik GmbH maintains a dynamic dialog with interested parties and informs them in a targeted and non-misleading manner.



Data protection

In the interest of the company, every employee is to protect confidential company information – that is only intended for a limited group of people and/or internal purposes – from access by unauthorized third parties. All personal data (whether employee, customer, supplier or business partner) are subject to the provisions of the General Data Protection Regulation. Strict assurance of this procedure is essential to maintain mutual trust.

Dealing with assets

Every employee of Rösler Oberflächentechnik GmbH is responsible for dealing with company property. This is to be handled with care at all times and protected against loss, damage, misuse, embezzlement or destruction. This regulation also applies to intellectual property. Performing private work at the company and use of company facilities for private purposes are prohibited.

Remuneration

Rösler Oberflächentechnik GmbH pays fair wages based on legally guaranteed minimum wages, the performance of the employees and the respective labor market. All employees receive adequate remuneration for their work.

We expect our suppliers to pay their employees appropriately and adequately and comply with applicable regulations on minimum wages and remuneration. This also includes overtime being remunerated in accordance with the applicable laws and, where applicable, collective agreements.

Working hours

We require our suppliers to comply with the laws applicable at their place of business and place of employment regarding working hours, in particular the maximum number of daily/weekly hours. This includes, in particular, compliance with applicable laws and, if applicable, collective agreements. Care is to be taken to ensure that employees have sufficient days off for rest.

Freedom of association

We expect our suppliers to respect the right to freedom of expression and freedom of association of their employees within the framework of the laws applicable at their place of business and place of employment. Workers shall not be discriminated against for forming or participating in trade unions or interest groups, or for advocating for their rights or improvements in their situation or working conditions.

4. Occupational safety

Occupational safety enjoys a high priority in our company. All international and site-specific health and safety regulations as well as the respective national working time laws must be complied with based on the respective national legislation. As a general rule, alcohol and drugs are prohibited at all Rösler Oberflächentechnik GmbH locations.



We expect our suppliers to provide their employees with a healthy and safe working environment. We demand that our suppliers recognize the risks of endangering the physical integrity of their employees, in particular, and minimize them. A system should be in place to protect employees. Occupational health and safety laws are to be complied with.

We expect our suppliers to organize the work, design of products as well as performance of work and services in such a way that accidents are ruled out as far as possible based on human judgment and the consequences of accidents are minimized to a large extent.

The contractual partner assures that it will comply with all requirements and substance prohibitions for his deliveries

according to the legal regulations valid for the European Union. (in particular: Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals (REACH, EC No. 1907/2006)).

The contractual partner furthermore assures to comply with the current limit values of the RoHS Directive (2011/65/EU) for its deliveries.

This also applies to products that do not fall within the scope of the directive. The only exceptions to this are products that clearly cannot be components of electronic products.

5. Quality

During the past few decades, signs of constant competition have emerged in all markets for all sectors. Thus, the challenge is to stand out from the competition with individual solutions and outstanding products. Efficient work and cost-conscious action are the prerequisites for the continued existence of our company. All tasks are solved pragmatically in the interest of the customer.

To achieve this, Rösler Oberflächentechnik GmbH conducts continual research into the further development of its own products – of course in compliance with relevant standards, laws and specifications. Every employee has the obligation to announce recognizable and relevant changes in the market and develop solutions to improve our positioning.

The consistent implementation, maintenance and further development of the implemented QM system and the commitment of our employees is an essential basis for achieving our goals. The quality of the services provided is the result of structured work and qualified personnel. The smooth interaction between all participants within the organization, clear definitions of the assigned tasks and responsibilities ensure that customers' requirements (input) are satisfied by way of maximum of satisfaction (output).

6. Environmental protection

The company encourages and promotes the responsible use of natural resources and designs its products and processes in such a way that energy and raw materials are used efficiently and waste of any kind is minimized or properly recycled.

The company and its employees are committed to environmental protection and work continually and systematically to improve the manufacturing process and products from this point of view. Each employee is required to make a sustainable contribution to achieving ecological objectives through his or her own behavior. The company regularly audits and reports on the fulfillment of the environmental principles.

We expect our suppliers to deal with the available natural resources in such a way that the next generations do not need to suffer from the current consumption. We expect our suppliers to consistently follow the principle of sustainability and act in an environmentally conscious way. This applies, among other things, to the quality and consumption of water.

With regard to production and development as well as the provision of services for Rösler Oberflächentechnik GmbH, we demand that our suppliers act in line with the sustainable climate protection goals. We encourage our suppliers to develop and implement a climate protection strategy aimed at CO₂ neutrality. To gradually achieve the goal of the greatest possible CO₂ neutrality of our deliveries and services, our suppliers provide us with information on the CO₂ footprint of their deliveries or services. In the interest of continual improvement processes, we will seek ways to

achieve CO2 neutrality and avoid harmful emissions in a joint dialog.



7. Implementation

It is the responsibility of the company's managers to promote the behavior of all subordinate employees in accordance with this Code and take appropriate measures as well as communicate and implement the content in their organizational units.

This Code of Conduct will be enforced promptly and consistently. We consider non-compliance to be a serious breach of work obligations.

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