



INNOVATIV · FLEXIBEL · KOMPETENT

Code of Conduct Dr. Werner Röhrs GmbH & Co. KG

I. Introduction

As a family business, Dr. Werner Röhrs GmbH & Co. KG is expressly committed to acting in a sustainable, ecological, ethical and socially responsible manner. We expect this behavior from our employees as well as from all our suppliers and sub-suppliers who are used by our direct business partners to fulfill contracts, along the entire supply chain.

Röhrs products are continually optimized and adapted in the interests of sustainability and, thanks to our high-quality standards, set benchmarks in the industry for high-quality technical springs.

We adhere to the principle of legality in our daily actions, our measures, contracts and all other processes. This includes, in particular, the full respect of human rights and compliance with all relevant laws and regulations in the countries for which our products are intended and with which we enter into business relationships.

II. Claim of Dr. Werner Röhrs GmbH & Co. KG

Law-abiding

We act in accordance with our commitment to comply with all relevant laws, regulations and ordinances that apply to the relevant business area. In particular, we comply with:

- UN Guiding Principles on Business and Human Rights
- United Nations Global Compact Guidelines
- Core labor standards of the ILO (International Labor Organization)

Exclusion of forced labour

We act in accordance with our strict rejection of any form of forced labor, slave labor or similar work. All work must be voluntary and carried out without threat of punishment. Employment relationships must be able to be terminated at any time in accordance with the law. In addition, there must be no unacceptable treatment of workers, such as psychological hardship, sexual or personal harassment or humiliation.

Deployment of security forces

When security forces are deployed, it must be ensured that no one is treated or injured inhumanely or degradingly or that freedom of association is impaired.

Prohibition of child labour

Child labour must not be used at any stage of production. We adhere to the recommendation from the ILO conventions on the minimum age for the employment of children. Accordingly, the age should not be lower than the age at which compulsory schooling ends under the law of the place of employment and in any case not less than 15 years. The rights of young workers must be protected. In particular, workers under the age of 18 must not be employed in work that is harmful to the health, safety or morals of children. Special protective regulations must be observed.

Fair pay & working hours

Working hours comply with applicable laws or industry standards. For example, remuneration for regular working hours and overtime must comply with the national statutory minimum wage and industry minimum standards. Employees must be granted all legally required benefits. We also ensure that all national laws and regulations at the respective place of employment are complied with, in particular regulations on working hours, overtime, breaks and regular paid leave.

Dr. Werner Röhrs GmbH & Co. KG

Oberstdorfer Str. 11-15 /// D – 87527 Sonthofen /// www.roehrs.de /// info@roehrs.de /// Fax +49 8321 614-139 /// Tel. +49 8321 614-0

Sparkasse Allgäu, SWIFT (BIC): BYLADEM1ALG, IBAN: DE15 7335 0000 0320 0043 69

HypoVereinsbank, SWIFT (BIC): HYVEDEMM570, IBAN: DE98 7332 2380 6660 1200 15

Managing Directors: Dr. Klaus-Philipp Koepff, Andreas Elenz, AG: Kempten HRA 6315, VAT ID No.: DE 128513624

General partner: Dr. Röhrs limited liability company, registered office: Sonthofen, AG: Kempten HRB 1079



Freedom of association

We ensure that employees' rights to establish, join or form interest groups of their choice are respected. Employee representatives and employees are protected from discrimination. We also grant employees the right to represent their interests on the basis of the applicable national legislation.

Prohibition of discrimination, diversity and inclusion

Discrimination or unjustified unequal treatment of employees in any form is not permitted. This applies, for example, to disadvantages based on gender, race, caste, national, ethnic or social origin, skin colour, disability, health status, political opinion, origin, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of every individual are respected.

Health protection, occupational safety and product safety

We are responsible for a safe and healthy working environment in compliance with the relevant national regulations and standards. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the work. Excessive physical or mental fatigue must be prevented by appropriate measures. In addition, employees are regularly informed about applicable health and safety standards and measures and are trained in this. Employees are given access to sufficient drinking water and access to clean sanitary facilities. All deliveries must meet the relevant quality and safety standards, which is ensured by appropriate checks.

Preservation of natural resources

We strive not to take away land, forests or waters, the use of which secures people's livelihoods, in violation of the rights of third parties. Harmful soil changes, water and air pollution, noise emissions and excessive water consumption must be avoided if, in accordance with the relevant legal regulations, this damages people's health, significantly impairs the natural basis for food production or prevents people from accessing clean drinking water or sanitary facilities.

Complaints mechanisms

We are responsible at the operational level for ensuring that effective grievance mechanisms are in place. The grievance procedure must be accessible to employees while maintaining the confidentiality of their identity and ensuring effective protection against discrimination.

Dealing with conflict minerals

For conflict minerals such as tin, tungsten, tantalum and gold, as well as for comparable raw materials such as cobalt, our suppliers are required to implement processes in accordance with the Organisation for Economic Cooperation and Development (OECD) due diligence guidelines to promote responsible supply chains for minerals from conflict-affected and high-risk areas.

Ecological responsibility

We are committed to environmental protection. We also comply with all relevant laws and other regulations regarding environmental protection and sustainability.

Handling industrial wastewater and air emissions

Wastewater and general emissions from operations, manufacturing processes and sanitary facilities are classified, monitored, checked and, if necessary, treated before discharge or disposal in accordance with national legal requirements and standards. In addition, we take measures to reduce the generation of wastewater and work on economical solutions to minimize any emissions.

Handling waste and hazardous substances

We take a systematic approach to identifying, managing, reducing and responsibly disposing of or recycling solid waste. In particular, we comply with the ban on exports of hazardous waste under the Basel Convention, as amended. Chemicals or other materials that pose a hazard if released in accordance with relevant legal standards are identified and managed in a way that ensures safety in handling, transport, storage, use, recycling or reuse, and disposal of these substances.

Reducing the consumption of raw materials and natural resources

We reduce or avoid the use and consumption of resources, especially water and energy, and the generation of any kind of waste during production.

Dealing with energy consumption/efficiency

We monitor and document our energy consumption as best as possible and want to create transparency with regard to our CO2 emissions. Furthermore, we strive to find economical solutions to improve our energy efficiency and minimize our energy consumption.

Fair competition

We adhere to the standards of fair business, fair advertising and fair competition. We also comply with applicable antitrust laws, which in particular prohibit agreements and other activities that influence prices or conditions when dealing with competitors. Furthermore, we do not enter into any agreements or coordinated practices with other companies that have the purpose or effect of preventing, restricting or distorting competition, and we do not illegally exploit any dominant market position.

Data protection and cybersecurity

We comply with all applicable regulations, official provisions and laws on data protection and information security. We protect the data and information we provide in an appropriate and reliable manner against access by third parties.

confidentiality

We ensure that our customers' confidential information is kept secret even if the business relationship ends.

Intellectual Property

We respect intellectual property rights; technology and know-how transfers are carried out in such a way that intellectual property rights and customer information are protected at all times.

Integrity/bribery, taking advantage

We apply the highest standards of integrity in all our business activities. We have a zero-tolerance policy prohibiting all forms of bribery, corruption, extortion and embezzlement.

Money laundering

We and our suppliers properly comply with the relevant legal provisions on money laundering prevention and the corresponding reporting obligations.

Foreign trade regulations

We comply with all sanctions regulations as well as foreign trade and customs regulations.

Sonthofen, 2024-09-30

Dr. Philipp Koepff
Managing Partner

Andreas Elenz
Managing Director