



### **Preamble**

Dear business partners,

We are breaking new ground and developing innovative products and services for sustainable

sustainable infrastructure and resource efficiency. Together, we are solving the challenges of the future and the commitment, ability, personal responsibility, openness and transparency as well as the legally compliant, sustainable and ethically correct behavior of each and every individual are the basis for this.

We source raw materials, goods and services worldwide to manufacture and provide our product and service solutions and expect the highest standards of sustainability from our suppliers, both in their own companies and within their local and global supply chains. We place a particular focus on the continuous improvement of working conditions, the protection of human rights and the environment as well as fair treatment and sustainable action within the supply chain. Another focus of our sustainability activities is the reduction of CO2 emissions along the entire product life cycle, from development and production through to recycling. We have set out our requirements in terms of fairness, integrity and sustainability in the Code of Conduct of Rudolf Rost Sperrholz GmbH and Rudolf Rost Interiors GmbH.

We have firmly integrated responsible action into our procurement processes. Procurement decisions are made not only according to legal, economic, technical and procedural criteria, but also according to social, ecological and ethical criteria. Sustainability therefore plays an important role at Rudolf Rost Sperrholz GmbH and Rudolf Rost Interiors GmbH when working with our suppliers. The Rudolf Rost Supplier Code of Conduct (SCoC) addresses our expectations of our suppliers and their subcontractors, based on legal requirements, comparable regulations in other countries, international agreements and principles





and our own sustainability requirements. The SCoC will be further developed by Rudolf Rost Sperrholz GmbH as soon as significant new sustainability requirements make this necessary.

We are convinced that we share these common values and that our code of conduct our Supplier Code of Conduct - brings together and expresses these binding basic rules and principles.

## 1. Expectation of compliance with laws and international regulations

- 1.1. Compliance with all applicable laws, regulations and standards in the countries in which the suppliers operate or are based;
- 1.2. Orientation towards the essential international standards on human rights and working conditions, in accordance with the ILO Declaration on Fundamental Principles and Rights at Work:
- 1.3. In addition to the fundamental rights set out in international human rights treaties, the labor standards of the International Labor Organization (ILO) set universal minimum standards for decent work. They apply regardless of a country's level of development and cover four areas:
  - Freedom of association
  - Prohibition of discrimination in respect of employment and occupation
  - Abolition of child labor
  - Elimination of forced labor
- 1.4. Compliance with the conventions of the United Nations (UN) and the Organization for Economic Cooperation and Development (OECD) to combat corruption and the relevant anti-corruption laws, including those relating to bribery abroad.





# 2. Expectation to respect human rights and fair working conditions

### 2.1. Prohibition of child labor

Compliance with the prohibition and omission of all forms of child labor in accordance with the ILO core labor standards. No toleration of any form of child labor. Children must not be prevented from their education through gainful employment and thus restricted in their development. Their dignity must be respected and their safety and health must be protected.

#### 2.2. Prohibition of forced labor

Rejection of any form of forced or compulsory labor, slavery or human trafficking. Employees must be free to leave their employer at their own discretion, subject to the statutory notice periods.

#### 2.3. Freedom of association

Employees and employers without distinction have the right to form and join organizations of their own choosing without prior authorization, subject only to the condition that they comply with their statutes.

### 2.4. Protection against discrimination

Equal treatment, fairness and respect for all employees. Ensuring a working environment free from discrimination of any kind. No employee may be disadvantaged, favored or harassed on the basis of characteristics such as gender, skin color, religion, nationality, political or other beliefs, ethnic origin, disability, age, sexual orientation and identity or other characteristics.

### 2.5. Health and safety in the workplace

Compliance with occupational health and safety requirements. Establishment and application of appropriate occupational health and safety management for the best





possible prevention of accidents and work-related illnesses. This includes the recording and investigation of incidents, the training and instruction of employees in a form that they can understand, the provision of suitable work equipment and protective equipment as well as appropriate measures for emergency prevention and response.

### 2.6. Working hours & remuneration

Compliance with applicable national legislation on working hours, remuneration, minimum wage and social benefits. If there is no national legislation on working hours, the international standards of the ILO apply.

### 2.7. External personnel

When external personnel, e.g. security personnel, are deployed by suppliers, the applicable national law is complied with in contractual and labor relations, regardless of the type of contract (e.g. contract for work or temporary work). External personnel must be sensitized and monitored by means of suitable measures, particularly with regard to human rights risks such as occupational health and safety, inhumane treatment and injury to life and limb;

# 3. Environmental expectations including climate protection

- 3.1. Establishment and application of an appropriate environmental and energy management system;
- 3.2. Efficient and responsible use of resources such as energy, water and raw materials to protect biodiversity;
- 3.3. use of technologies to avoid and reduce waste, greenhouse gas emissions, wastewater pollution and pollutant emissions;





- 3.4. promoting the reuse of raw materials;
- 3.5. No violation of environmental obligations by:
  - the use of mercury and mercury compounds in products/manufacturing processes and through the treatment of mercury waste,
  - the use and disposal of persistent organic pollutants and the collection, storage and disposal of the resulting waste, or
  - the transboundary movement of hazardous waste and its disposal;
- 3.6. work on continuous improvements to reduce direct and indirect CO2 emissions, promote the use of renewable energy and alternative energy sources and a science-based emissions reduction target.

## 4. Expectation for dealing in the business environment

4.1. Prohibition of bribery and corruption Rejection of any form of corruption, theft, embezzlement, fraud or extortion. Zero tolerance for illegal payments or the granting of other advantages to an individual,

company or public official with the aim of influencing decision-making processes;

4.2. Rejection of any form of bribery. No giving or accepting of bribes, kick-backs or other illegal payments, inducements, favors or other benefits or gratuities of value for the realization of business opportunities, to expedite or facilitate an official act (facilitation or kickbacks) or in any connection with business activities.





### 4.3. Offering and accepting gifts, benefits and entertainment

No attempt to influence business contacts, customers or public officials through invitations or gifts. No demanding inappropriate benefits from Rudolf Rost employees. Invitations and gifts to Rudolf Rost employees or persons close to them are only permitted if the occasion and scope are appropriate, i.e. they are of low value and can be regarded as an expression of generally accepted local business practice;

#### 4.4. Conflicts of interest

Decisions relating to business activities with Rudolf Rost Sperrholz GmbH and Rudolf Rost Interiors GmbH are made exclusively on the basis of objective criteria. Conflicts of interest with private interests or other economic or other activities, including those of relatives or other related persons or organizations, must be avoided from the outset;

### 4.5. Antitrust & competition law

Fair conduct in competition, no participation in agreements that violate antitrust law, no abuse of a dominant market position and no participation in other anti-competitive business practices

### 4.6. Data protection

Compliance with all applicable data protection laws; comprehensive protection of personal data and no processing of personal data without legal permission; appropriate management of the supplier's information systems containing confidential information or data of Rudolf Rost Sperrholz GmbH and/or Rudolf Rost Interiors GmbH as well as their appropriate technical protection against unauthorized access.





### 4.7. Foreign trade law

Compliance with the respectively applicable international and national regulations of foreign trade law, in particular export control and embargo regulations and no maintenance of legally inadmissible business activities with sanctioned persons, companies or organizations.

# 5. Review of the above Expectations

- 5.1. As part of our risk management, we check compliance with our expectations on a random basis, for example through audits and/or self-assessment questionnaires. We align the risk classification of our suppliers in particular with regard to human rights and environmental protection. To ensure that the above-mentioned expectations of our suppliers and their supply chains are consistently met in accordance with the current Supplier Code of Conduct, we expect our suppliers to set up suitable management systems and business processes and to cooperate in minimizing or ending any violations of our expectations.
- 5.2. If we suspect that our expectations are not being met (e.g. due to negative media reports or other indications), we want our supplier to inform us immediately of its findings and provide information in response to our inquiries. We also want our supplier to identify the underlying causes of non-compliance with our expectations and to take immediate remedial action.
- 5.3. If the supplier demonstrably fails to meet our expectations contained in this Supplier Code of Conduct or does not strive for and implement improvement measures or does not take remedial action within a reasonable period of time set by Rudolf Rost Sperrholz GmbH and/or Rudolf Rost Interiors GmbH, the companies reserve the right to terminate individual or all contractual relationships.





### 6. Final provisions

As the challenges for companies are constantly changing, Rudolf Rost Sperrholz GmbH and/or Rudolf Rost Interiors GmbH will continuously review their Supplier Code of Conduct and its implementation to ensure that it is up to date and effective. Important changes in the immediate environment of Rudolf Rost Sperrholz GmbH and/or Rudolf Rost Interiors GmbH can thus be recorded and internal processes adapted accordingly.

Rellingen, 02.09.2024

Signed Managment Director

Rudolf Rost Sperrholz GmbH & Rudolf Rost Interiors GmbH Lohe 4 | D-25462 Rellingen Internet: www.rudolf-rost.de

Amtsgericht Pinneberg - HRB 4769 & HRB 4993 USt-ID Nr.: DE118593244 & DE141785149