

# Code of Conduct for Business Partners of RWS GmbH

## Introduction

Collaboration and high performance– these are the values that represent RWS. In a globalised world with increasingly complex conditions and interactions, this is becoming more and more challenging.

For RWS, business relations with customers and business partners are based on integrity and partnership, trust and mutual respect. Neglecting or disregarding these basic rules in the interest of securing business success is against our corporate culture.

RWS also expects its business partners, i.e. its customers, suppliers, service providers and their supply chains, to act with integrity in every way. In order to substantiate this, RWS sets out certain minimum standards and makes these known to its business partners.

This Code of Conduct for Business Partners forms a constituent part of all contracts with third parties and is binding on all business partners.

## 1. Compliance with laws

Within the business relationship and any actions related to it, RWS expects its business partners to comply with all laws and regulations applicable to them. RWS rejects all illegal conduct within its own companies and those of its business partners.

## 2. Human rights / Employees

RWS does not tolerate any violation of human rights or labor laws.

Business partners of RWS must observe the Universal Declaration of Human Rights of the United Nations and national and international regulations for the protection of human rights, and must ensure that they themselves and their suppliers are not involved in any form of human rights violations.

Child labour is prohibited. Business partners must not allow the employment of children within their own company or at suppliers and business partners at any stage in the supply chain, and must comply with applicable laws or relevant ILO conventions at all times.

Forced labour together with all forms of modern slavery and human trafficking are prohibited.

RWS expects its business partners to maintain a zero-tolerance policy to any form of discrimination or harassment. Adequate compensation and working hours must be provided and observed, and employees must enjoy freedom of association in accordance with applicable national laws and regulations.

Business partners of RWS must observe the labour laws of the countries in which they operate.

## 3. Health and safety

RWS expects its business partners to ensure safe working conditions and a healthy working environment for their whole workforce. As a minimum requirement, business partners confirm the implementation of all applicable legal requirements for occupational health and safety and in addition in accordance with internationally recognized standards, such as the ISO 45001 standard or ILO conventions.

## 4. Environment and resources

Business partners of RWS must observe the locally applicable environmental regulations.

They must take all reasonable measures to protect the environment, i.e. through the reduction of harmful emissions and by the economical use of energy and natural resources.

The business partners of RWS shall not make any use of conflict minerals and undertake to comply with their due diligence obligations in relation to relevant raw materials and to comply with all applicable regulations on conflict minerals such as the Regulation (EU) 2017/821 (3TG) and applicable regulations connected thereto.

Business partners must comply with all applicable laws and regulations relating to the restriction, registration and, as necessary, the authorisation or reporting of chemicals contained in the final product or production

process, insofar as these apply to the relevant market – such as REACH for the European Union.

## **5. Competition**

RWS is convinced that functioning markets drive innovation, technological progress and the continuous improvement in quality. For this reason, RWS acts as a fair and responsible competitor.

RWS expects its business partners to be part of this competition, while upholding standards for fair business practices, advertising and competition.

Fair competition also includes respecting the intellectual property of third parties and protecting information that is given in confidence.

## **6. Ban on corruption and fraud**

RWS applies a zero tolerance policy to corruption and rejects any form of bribery or any other corrupt behaviour. RWS expects its business partners neither to tolerate nor actively participate in corrupt activities, regardless of whether this is with regard to public officials or private individuals or organisations.

It is prohibited to offer, provide or accept a benefit with the intention or effect of influencing the decision-making process of a business partner or public official. In the same way, no benefits may be accepted that could influence RWS's or the business partner's own decision-making process.

Should corrupt activities be proven within the sphere of responsibility of its business partners, RWS reserves the right to terminate business relations with that partner immediately and, where appropriate, to claim compensation.

## **7. Acceptance or giving of gifts, entertainment, and other benefits / Facilitation payments**

No gifts of an exaggerated value or other inappropriate gifts may be offered, given or accepted.

Gifts and entertainment or other benefits should only be offered, given or received in good faith and only if they are appropriate and within customary business hospitality and in compliance with applicable law.

In particular, RWS's business partners shall not offer or provide benefits to public officials for routine governmental action in order to initiate or expedite performance of duties of non-discretionary nature (facilitation payments).

## **8. Data Protection**

RWS takes the protection of data that relates to a person directly or indirectly (personal data) serious. RWS expects its business partners to comply with all applicable data protection laws, including, where applicable, the EU General Data Protection Regulation ("GDPR") and local laws.

## **9. Conflicts of Interest**

RWS expects its business partners to be open and transparent about any business or personal relations that may bring them into a conflict with the interests of RWS, to ensure that the right measures can be taken to avoid a conflict of interest.

## **10. Monitoring and Reporting**

RWS actively seeks to prevent any and all types of unlawful or criminal activity within its own sphere of influence and expects its business partners to have appropriate compliance management systems in place to ensure adherence to the principles set forth in this code of conduct. RWS also expects its business partners to inform suppliers and business partners in their supply chain of these principles.

RWS reserves the right to monitor existing and new business partners for compliance with this Code of Conduct. The monitoring may be carried out by a specialized, independent organization.

RWS expects its employees and business partners to report any indications of possible misconduct without undue delay. An electronic reporting channel has been set up for this purpose and any reportings under the Supply Chain Duty of Care Act (LkSG): <https://rws.integrityline.com>.