

Compliance

Supplier Code of Conduct

ROSENBERGER-GROUP





This Rosenberger Supplier Code of Conduct (hereinafter: “SCoC”) is based on the legal regulations applicable to Rosenberger, as well as on principles of internationally recognised standards and guidelines for responsible corporate governance that are important to us. Rosenberger expects all contractors and comparable business partners, e.g. suppliers, service providers, consultants, sales and cooperation partners (hereinafter: „business partners“) to comply with the requirements of this SCoC in their own business and in their upstream and downstream value chain in an appropriate manner.

This SCoC is part of the contractual agreements between Rosenberger and its business partners as well as part of our risk management on corporate responsibility.

The SCoC applies to all organisational units of the international Rosenberger Group and is the binding basis for any cooperation with a company of the Rosenberger Group.

Supplier Code of Conduct



Art. 1: Compliance with Laws

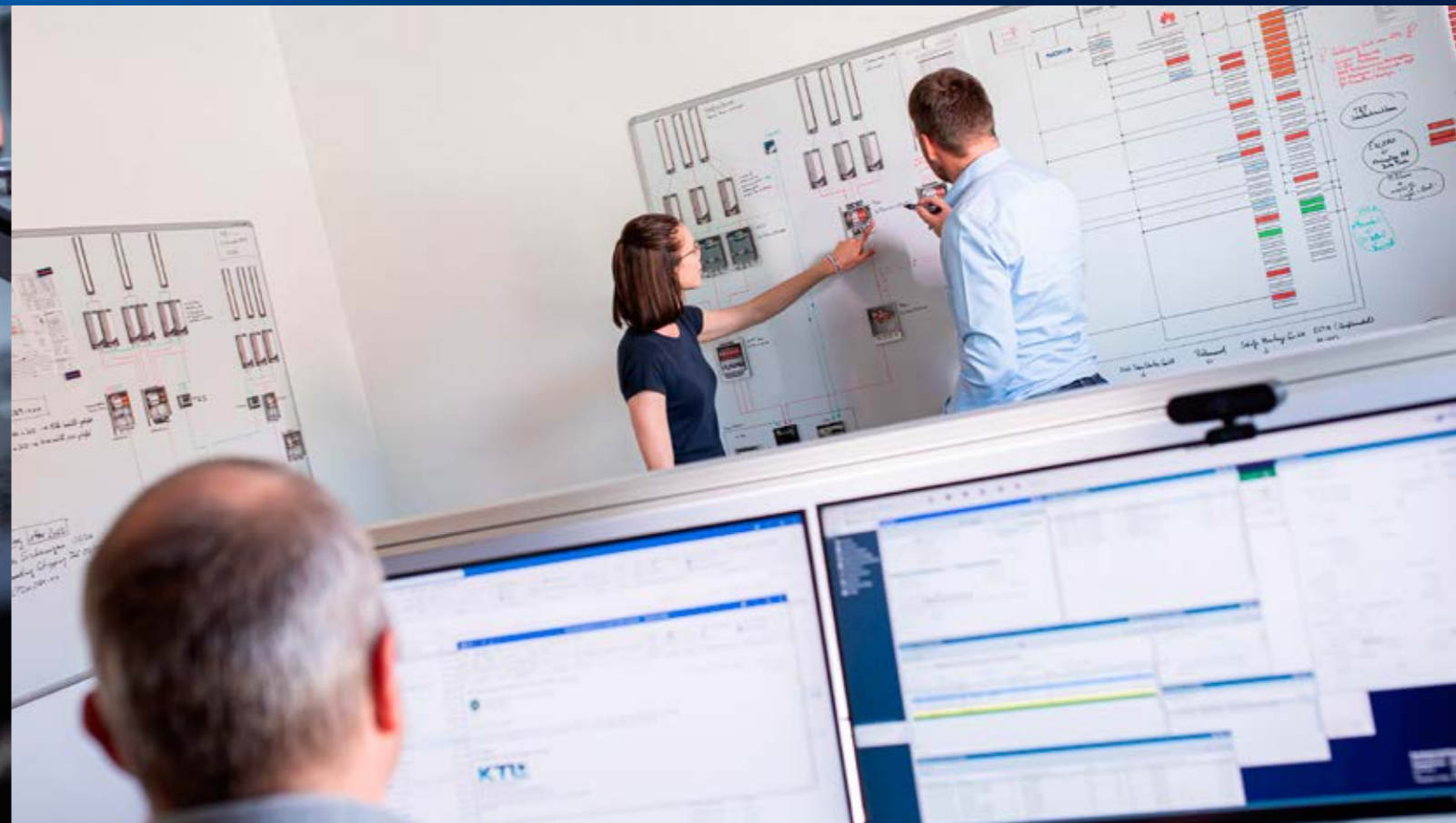
Our business partners must comply with all applicable national and international laws. In addition to human rights and environmental requirements, this also includes, for example, the payment of duties and taxes owed, the necessary obtaining of official orders, the protection of the tangible and intangible legal assets (e.g. intellectual property) of third parties as well as the observance of all criminal law barriers, namely in the areas of money laundering, fraud and breach of trust. In individual countries, business areas or markets, stricter regulations may exist than those described in this document. In such cases, the stricter regulations shall be applied. If requirements of this SCoC conflict with national laws, these shall be applied, and the requirements of this document shall be implemented as best as possible.

National and international laws also regulate the import, export or domestic trade of goods, technologies or services, the handling of certain products, and capital and payment transactions. Our business partners must take appropriate measures to ensure that transactions with third parties do not violate applicable economic embargoes or regulations on trade, import and export controls or on combating the financing of terrorism.

Art. 2: Avoidance of Conflicts of Interest

Business decisions are based exclusively on factual criteria - irrespective of any possible personal or own financial interest.

Our business partners are obliged to avoid all actions that could lead to a conflict of interest. If this is not possible, the business partner shall inform Rosenberger in order to find a fair and transparent solution.



Art. 3: Fair Competition and Protection against Corruption and Bribery

Business partners are obliged to comply with the rules of fair competition, in particular the applicable national and international competition and antitrust laws.

Our business partners and employees are not permitted to offer or accept, promise or be promised monetary gifts or disproportionate benefits. This applies both to public officials and in business dealings.

Hospitality and gifts to Rosenberger employees must not exceed what is reasonable, taking into account the justified business interests, i.e. they must be of low value and must be made within the framework of the statutory regulations and those applicable to Rosenberger.

Art. 4: Handling Confidential Information and Data Protection

Confidential information of any kind (e.g. business secrets, inventions, designs, sketches, technical or economic data, know-how, etc.) must be kept secret and may not be disclosed to unauthorised persons.

When processing personal data, our business partners ensure the utmost care and strict confidentiality as well as strict compliance with applicable laws and rules on data protection. Where necessary, our business partners ensure the conclusion of the necessary contractual bases (including contracts for commissioned processing, standard contractual clauses, corporate binding rules) for the processing of personal data with their business partners and Rosenberger.



Art. 5: Fair Working Conditions and Human Rights

Business partners respect internationally recognised conventions, agreements and laws for the protection of human rights and fundamental freedoms. Business partners are required to implement human rights obligations in accordance with the SA8000® standard in their business area. Rosenberger expects the business partner to recognise and implement the following principles in particular:

Prohibition of Child Labour

Child labour as defined by the ILO conventions must not be tolerated within the entire value chain. ILO Convention No. 79 must be respected in the context of the employment of young people.

Prohibition of Forced Labour and Slavery

Forced labour, modern slave labour or comparable measures that deprive people of their freedom are prohibited. All work must be voluntary and there must be the possibility to terminate the employment relationship.

Right to Health and Safety at the Workplace

As a minimum, occupational safety and health must be ensured within the framework of the applicable national provisions.

Compensation and Working Hours

Working hours comply with local legal requirements or the respective industry standards. Remuneration is based on the applicable laws and, if existing, binding collective agreements and is supplemented by the relevant, national minimum wage laws.

Freedom of Association and the Right to Collective Bargaining

The right of workers to freedom of association, freedom of assembly and collective bargaining must be respected to the extent that this is legally permissible and possible in the respective country in which the business partner operates. If this is not permissible, we seek appropriate compromises for our employees.

Equal Opportunities and Protection against Discrimination

Any form (verbal or physical) of harassment or discrimination, e.g. on the grounds of nationality, origin, religion, gender, marital status, age, sexual orientation or any other characteristic protected by law is prohibited.

Prohibition of Land Grabbing

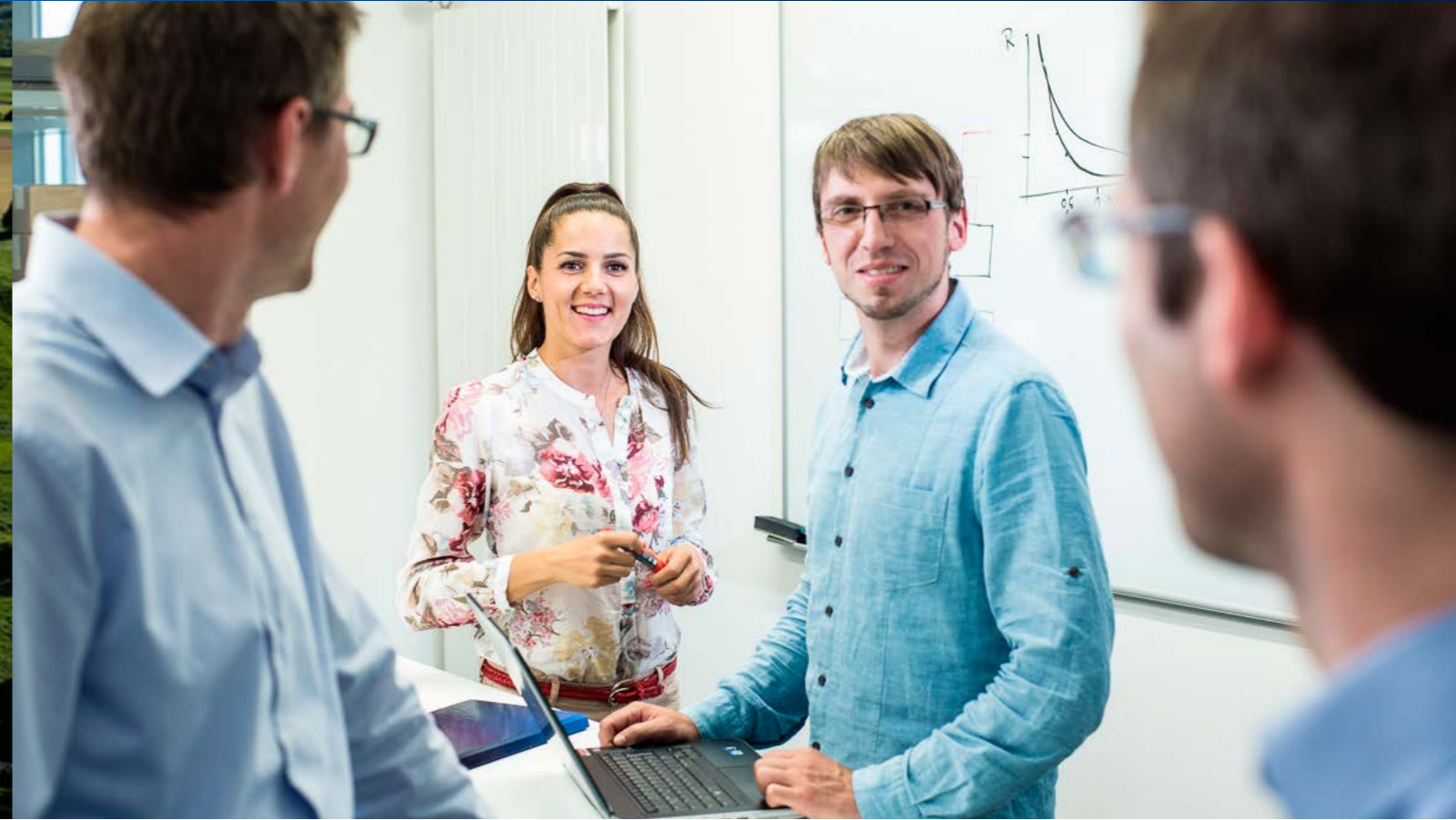
The unlawful eviction and the unlawful taking of land that serves as the livelihood of persons are prohibited.

Safeguarding of Human Rights also When Using Own or Private Security Service Providers

If own security forces or private security service providers are used, internationally recognised human rights must be respected.

Conflict Minerals

In order to support Rosenberger and its customers in complying with the applicable rules and regulations for the procurement of conflict minerals, Rosenberger expects its business partners to fulfil their due diligence obligations along the value chain with regard to conflict minerals.

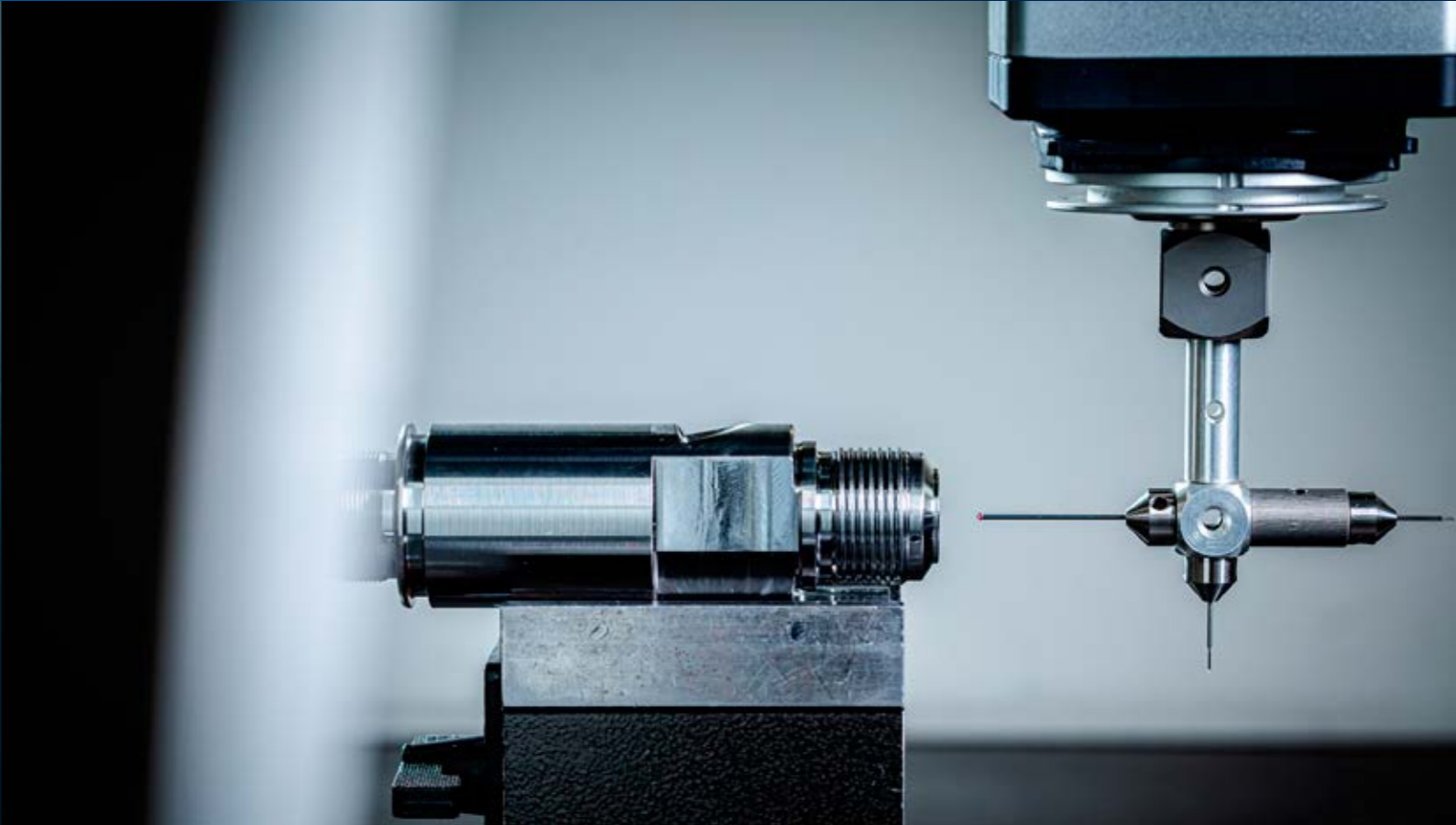


Art. 6: Environmental Responsibility

Business partners observe the laws and regulations applicable to them as well as international standards for the protection of the environment. They are obligated worldwide to avoid damage to natural foundations, to use resources sparingly and to actively participate in environmental protection (especially reduction of greenhouse gas emissions).

Art. 7: Value Chain

Our business partners carefully select the business partners they engage in the course of their work for Rosenberger and are committed to ensuring that at least equivalent principles to those in this SCoC are also adhered to by their business partners as well as within their own business unit.



Art. 8: Risk Management

Rosenberger has implemented processes to evaluate and mitigate risks in the value chain. These processes form the basis for the cooperation between Rosenberger and a business partner and are continuously developed. As a result of the business partner review, Rosenberger reserves the right to impose further requirements on the supplier as a basis for the cooperation.

The business partner assures to operate a risk management in order to avoid violations of human rights obligations, environmental obligations and the requirements of this SCoC in its own business areas and in the upstream and downstream value chain.

Art. 9: Compliance with this Code of Conduct

The business partner will inform relevant persons and business partners about the content of this SCoC and ensure compliance with the requirements through appropriate processes. Appropriate processes may include in particular: guidelines, work instructions, audits, committees, training, communication measures and the careful selection of employees and other business partners.

Rosenberger reserves the right to verify compliance with the aforementioned principles and other requirements by means of self-disclosure by the business partner or audits or to commission third parties with auditing. The business partner shall cooperate with Rosenberger to an appropriate extent in the implementation.

In the case of minor violations, Rosenberger will usually grant the business partner the opportunity to remedy the situation within a reasonable period of time. In the event of serious violations (in particular the commission of criminal offences), Rosenberger reserves the right to impose appropriate sanctions on the business partner. This may mean an immediate, full or partial termination of the business relationship as well as the assertion of claims for damages or other rights.



Art. 10: Whistleblowing System

Business partners are encouraged to submit actual or potential rule violations through our whistleblowing system. The contact details can be found on our homepage. The processing of indications of (potential) breaches of rules is carried out by employees who are particularly qualified in this respect (e.g. in particular from the Compliance Department), who carry out a risk-based examination and initiate appropriate risk-reducing measures. The business partner will appropriately inform its employees as well as its business partners who are active in the context of the business relationship with Rosenberger about the Rosenberger whistleblowing system. The business partner shall ensure that no one suffers any disadvantages because of using the Rosenberger whistleblowing system or that access to the Rosenberger whistleblowing system is actively restricted.

The current version of this Supplier Code of Conduct is available on our homepage (www.rosenberger.com).

Rosenberger

Rosenberger Hochfrequenztechnik GmbH & Co. KG

Hauptstraße 1 | 83413 Fridolfing

P.O. Box 1260 | 84526 Tittmoning

Germany

Phone +49 8684 18-0

info@rosenberger.com

www.rosenberger.com

Certified by IATF 16949 · DIN EN 9100 · ISO 9001 · ISO 14001 · ISO 50001

Rosenberger® is a registered trademark of Rosenberger Hochfrequenztechnik GmbH & Co. KG.
All rights reserved.

© Rosenberger 2022