

CODE OF CONDUCT

Stand 03.2019

1. Principle

We are committed to fulfilling our social responsibility in all our business activities.

2. Environmental Protection

We are committed to protecting the environment for the benefit of present and future generations. Impacts on the environment and the health of our employees will be avoided or kept as low as possible in all activities. The economical use of energy and raw materials, the minimization of greenhouse gas emissions, the use of renewable resources and the minimization of damage to the environment and health are taken into account in the development, manufacture and use of products for our business. In all our activities, we take into account the avoidance of waste, reuse, recycling and the safe, environmentally friendly disposal of residual waste. Employees are encouraged, informed and trained in accordance with their responsibilities in environmental protection.

3. Child Labour

We do not employ any employees under the legal minimum working age.

4. Forced Labour

We do not participate in any form of human trafficking or forced labour.

5. Discrimination

We offer equal opportunities and do not discriminate against any employees.

6. Freedom of Association

We respect the right to freedom of association and collective bargaining.

7. Remuneration

The remuneration and benefits paid or provided for a normal working week shall at least correspond to the legally valid and guaranteed minimum wage. In the absence of statutory or collectively agreed regulations, they shall be based on the industry-specific, customary local remuneration and benefits that ensure an adequate standard of living for the employees and their families.

8. Working Hours

The working hours comply at a minimum with the respective national legal requirements or the minimum standards of the respective national economic sectors.

9. Occupational Health and Safety

We comply with national standards for a safe and hygienic working environment and, in this framework, take appropriate measures to ensure health and safety in the workplace so as to guarantee employment conditions that are conducive to good health.

10. Ethics

We do not tolerate corruption, extortion or bribery of any kind. We do not accept or offer bribes or other unlawful inducements (e.g. bribes) in business dealings with business partners or public officials. Suppliers are not allowed to offer gifts or other benefits to rpm employees for personal advantage, which could be considered as bribery. As a matter of principle, gifts or hospitality may not be used to influence a business relationship in an unfair manner and may not violate applicable laws or ethical standards.

11. Fair Market Conduct

We will ensure fair competition and comply with applicable competition and antitrust laws. We do not enter into anti-competitive agreements with competitors, suppliers, customers or other third parties.

12. Conflicts of Interest

Our employees and suppliers must disclose any situation that could result in a conflict of interest, such as when rpm employees enjoy professional, personal and/or significant financial benefits or have ownership interests in a supplier's business.

13. Financial Responsibility

We are committed to establishing appropriate business continuity plans for operational activities that support our customers' business.

14. Plagiarism

We commit to implement all necessary and appropriate measures within our area of responsibility to ensure that neither customer products nor their workable components or raw materials, nor the related know-how, fall into the hands of counterfeiters, smugglers, thieves or other unauthorized third parties or leave the legitimate supply chain.

15. Export Controls and Economic Sanctions

We agree to comply with export control regulations and applicable economic sanctions applicable to our business and to provide accurate and truthful information about them to customs and other authorities as required.

16. Disclosure of Information

We are committed to promptly address critical issues that could negatively impact the quality of goods and services. We grant our customers the right to evaluate our sustainability performance with reasonable notice.

17. Data Protection and Intellectual Property

We are committed to using confidential information in an appropriate manner and protecting it accordingly. Our suppliers must ensure that data worthy of protection and the valid intellectual property rights of their own employees and business partners are safeguarded. Our information systems that contain confidential information or data of customers and business partners are appropriately managed and protected against unauthorized access and the unauthorized use, disclosure, modification or destruction of the data. We collect personal information only for legitimate business purposes, use it only in a lawful, transparent and secure manner, and disclose it only to persons authorized to access it. We protect information in accordance with security regulations, retain it only as long as necessary, and require third parties with access to personal information to protect it.

18. Protection against Retaliation

We expect employees to report misconduct regarding the Code of Conduct. We therefore encourage and establish channels for our employees to file complaints or report possible wrongful conduct without fear of repression, intimidation or harassment. Any communication will be treated confidentially.

Helmstedt, on 1. March 2019

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rpm – Sustainability Requirements for Suppliers - Stand 03/2019