

ROTTOLIN-WERK • P.O.Box 10 10 36 • 95410 Bayreuth

Your reference	Our reference	Extension	Date
		+49 (0) 921-7850 -0	08.07.2025

Code of Conduct

Dear Sir or Madam,

as part of our introduction of the "Corporate Social Responsibility (CSR)" and as a requirement for important suppliers, some of whom are active worldwide, we have defined a Code of Conduct that is intended to be a binding directive for our company as well as for our business partners to comply with all ethical standards in all business activities.

These criteria are now also included in the future selection and evaluation of suppliers with the implementation of the Code of Conduct. As a result, please complete and return the enclosed declaration of commitment to and return it to us by Datum einfügen.

If you have any questions, please do not hesitate to contact us immediately.

Note: If you have a CSR certification, please provide us with a copy.

Doing so means that you will no longer need to send us confirmation of this letter.

Kind regards

ROTTOLIN-WERK

p.p.

Code of Conduct



Content

Declaration of principles relating to Corporate Social Responsibility (CSR)

1. Scope of Application
2. Compliance with human rights
 - a) Child labour and under-age employees
 - b) Protection against forced labour and against harassment
 - c) Equal treatment, anti-discrimination
3. Respectful relations
4. Fair working conditions
5. Management system
6. Protection of the environment
7. Occupational health and safety
8. Anti-corruption policy
9. Trade and business secrets
10. Data protection
11. Procedures in the event of non-compliance with this Code of Conduct
12. Declaration of commitment

Declaration of principles relating to Corporate Social Responsibility (CSR)

The company ROTTOLIN is a medium-sized European company based in Germany. Our special products are made to order for our customers on a closed campus that is monitored by our security service.

Our understanding of the law and of justice prohibits us from acting in a highly negligent way and avoiding applicable laws; this includes:

- Corruption and bribery
- Any form of forced labour or child labour, as well as any form of harassment
- Compliance with the Equal Opportunities Act
- Collective agreements/working hours/wages
- Company agreements (including in terms of confidentiality)
- Occupational health and safety/environmental protection
- Data protection

The whole of the workforce at ROTTOLIN, including the management team, are therefore committed to acting in accordance with these basic principles as part of social responsibility and to continuously improve their performance.

Wolfgang and
Thomas Rotter

Bayreuth, 20.07.2021



Code of Conduct



1. Scope of Application

This Code of Conduct (hereinafter referred to as the "Code") specifies the basic business requirements that all employee, suppliers and contractual partners are expected to meet at Rottolin.

To ensure successful implementation and compliance, this Code of Conduct will be effectively communicated to all employees, suppliers and contractual partners.

2. Compliance with human rights

As a company that operates nationally and internationally, Rottolin is committed to respecting human rights:

a) Child labour and employees under age

Rottolin will not conduct any business with companies where there is reasonable suspicion of employing child labour, either directly or indirectly by means of subcontractors involved, within the scope of its business processes or within its value-added supply chain. We expect the same from our customers, suppliers and business partners.

Unless local laws specify a stricter age limit, no person of school age or younger than 15 years of age (exceptions according to ILO Convention No. 138) can be employed. Workers under the age of 18 may not carry out hazardous work and may only work at night on a restricted basis, taking into account the requirements of their education.

b) Protection against forced labour and against harassment

We do not tolerate forced labour, prison labour or slavery. All of our employees are free to decide whether they want to work at Rottolin or to leave the company at their own request. They are also generally free to choose the way in which they spend their private leisure time.

Rottolin does not permit or support any form of violence, does not engage in physical or psychological punishment, degrading or humiliating treatment or threats.

c) Equal treatment, anti-discrimination

We are committed to a non-discriminatory working environment and conduct. We strongly oppose unequal opportunities of any kind. All employees have the right to be treated fairly, courteously and with respect.

No person may be harassed, disadvantaged or discriminated against because of their race, skin colour, nationality, ancestry, gender, beliefs or ideology, political beliefs, age, physical constitution, appearance, sexual orientation or otherwise.

Our employees are required to protect and respect each other's personal privacy. This includes, but is not limited to, sexual harassment or the use of violence of any kind.

3. Respectful relations

We strive to maintain respectful relationships with our employees, suppliers and contractors. All relationships have the goal of being mutually beneficial so as to facilitate a long-term relationship. We incorporate the interests and requirements of every stakeholder and seek the best possible solution.

4. Fair working conditions

Rottolin stands for fair wages and salaries, which are regulated by a collective agreement. Payments are made without request and on time. The limitation and handling of overtime is regulated by law or contract. All employees have a right to regulated working hours and breaks.

As we care about the happiness of our employees and their concerns, we work closely with the works council. All our employees are also free to belong to a trade union, as is the right to freedom of assembly.

5. Management system

We want to provide high-quality services; the satisfaction of all interested parties as well as long-term relationships are our priority. We therefore take quality assurance measures for all relevant processes. To ensure and promote our quality, we have established an integrated certified management system and strive for continuous improvement.

6. Protection of the environment

Rottolin is committed to protecting the natural environment as an integral part of its responsible business practices. Rottolin places particular emphasis on the protection, conservation and sustainable use of natural resources, as well as on the promotion of environmentally friendly and socially responsible production processes.

7. Occupational health and safety

Rottolin is committed to maintaining a safe and healthy working environment and to taking the necessary measures (e.g. PPE) to prevent accidents and health hazards that may occur in connection with activities performed by staff on behalf of Rottolin.

Our motivated and committed employees are the driving force behind the company. We cannot operate efficiently without them.

Clean sanitary facilities, functional first aid equipment and access to drinking water of sufficient quantity will be provided at the site.

8. Anti-corruption policy

Our business relationships are transparent and conducted with integrity. We accept and comply with both national and international regulations and laws and prohibit any form of corruption, bribery, kickbacks, fraud or deceit. We expect this from ourselves as well as from our business partners. We do not maintain business relations with organisations or persons who do not observe these values.

All Rottolin employees must act in a manner that avoids personal dependency, obligation or interference in doing business for Rottolin. In particular, everyone is expected to act fairly and in full compliance with applicable local and international regulations.

9. Trade and business secrets

Our employees have an obligation to maintain confidentiality about company and business secrets and other internal matters. This applies accordingly to the information about contractual partners and customers that is not accessible to the public. This obligation to maintain confidentiality continues to apply even after the employment relationship comes to an end.

10. Data protection

We are committed to being loyal. This applies in particular to the handling of confidential information. Care must be taken to ensure that the information or data does not reach third parties.

Our employees must manage sensitive information properly - this includes confidential, personal and proprietary information. This will be protected from unauthorised access, damage, use, modification and disclosure by appropriate physical and electronic security devices. Information may only be used for the business purpose for which it was submitted and not for any other purpose unless the prior consent of the owner of the information has been obtained.

Employees are encouraged to contact the company's data protection officer if they have any questions about the legally correct handling of any personal data.

11. Procedures in the event of non-compliance with this Code of Conduct

Complaints or any information about possible violations of this Code of Conduct should be reported to Rottolin's management team at any time. Complaints of this nature will be handled confidentially and will not result in any form of retaliation or disciplinary action.

Declaration of commitment

1. please insert the name of the company hereby confirms that it has received the "Code of Conduct" issued by the company Rottolin-Werk, Julius Rotter & Co.KG (hereinafter referred to as "Rottolin").

2. please insert the name of the company hereby agrees

- a. to comply with these policies and requirements in addition to the obligations arising from the supplier business contracts.
- b. to communicate the content of the "Code of Conduct" to its suppliers and to assure itself of compliance with the principles and requirements.
- c. to also inform all subsidiaries in Germany and abroad of their compliance with this present "Code of Conduct".
- d. to make available to Rottolin, without being requested to do so (automatically), any respective valid certifications, e.g. QM, energy, environment, CSR, occupational health and safety, health protection etc.
- e. in the event that any breaches of this Code of Conduct are reported, provide/submit a written statement in the required form within two weeks at Rottolin's request.

Place, date

Name (in capitals), position

Company name (in capitals)

Signature

Company stamp