OTTO ROTH

CORPORATE GUIDELINES

The Otto Roth Code of Conduct

OUR GUIDELINES **OUR BELIEF**

CODE OF CONDUCT

“We believe that responsible business practices based on ethical values generate trust and guarantee sustainable economic success.”

FOREWORD/PREAMBLE

Diversity, expertise and reliability. That is what the Otto Roth Group has stood for since 1914. With Otto Roth GmbH & Co KG and Berliner Schrauben GmbH & Co KG, we are represented in nine locations throughout Germany. Social responsibility has always been the foundation of our sustainable corporate success throughout more than one hundred years of our company’s history.

Topics such as globalisation with strongly interconnected value chains, climate change or demographic change are constantly presenting companies with new challenges today. The Code of Conduct is intended to be followed by all employees as a guide for our actions and a basis for our business operations. This is to ensure legally and ethically correct behaviour across the supply chain.

The Code of Conduct lays down binding rules that all employees must follow. The board of management and the executives, in particular, are responsible for actively implementing the Code of Conduct within the scope of their role.

Our Code of Conduct is based on the principles of the Global Compact for sustainable and responsible corporate governance, the core labour standards of the International Labour Organization (ILO) and national laws and regulations.

The Code of Conduct applies to all Otto Roth Group companies and branches. Violations of the Code of Conduct will be punished and may have consequences under labour and liability law.

The general principles of behaviour described in this Code of Conduct also apply to our dealings with customers, suppliers, and other business partners. Therefore, we expect our business partners to have the same basic understanding of our Code of Conduct, that they fulfil the requirements described here or in equivalent behavioural codes to the best of their abilities and that they pass this on to their business partners. This does not constitute any third-party rights.

We would like to thank all employees and business partners who, together with us, are committed to responsible and sustainable behaviour across the supply chains.

PRINCIPLES OF SOCIAL RESPONSIBILITY

The Otto Roth Group believes that social responsibility is indispensable for sustainable corporate success. Our actions are in line with applicable laws and framework conditions and with a responsible basic understanding as described in the following points.

Compliance with laws and regulations

Our activities are in accordance with the statutory regulations and legal provisions of the countries in which we operate. We also expect our suppliers and business partners to comply with and observe the relevant regulations. If local laws and regulations are less stringent than the rules described here, our activities will guided by the principles of this Code of Conduct.

Compliance with legal regulations

Respect for human dignity

The Otto Roth Group respects and promotes the observance of internationally recognised human rights in accordance with the United Nations Guiding Principles and is committed to ensuring that human rights are not violated. We respect every individual’s dignity and personal rights and do not tolerate any unacceptable treatment of employees or business partners. In this sense, we also expect our suppliers and business partners to respect human dignity and human rights and follow these principles.

Respect for human dignity and human rights

Child labour and forced labour

The Otto Roth Group does not tolerate work by children or young people who have not yet reached the minimum age for employment in the respective country. We also reject any form of forced labour, slavery and human trafficking and expect our suppliers and business partners to comply with the ban on child labour and forced labour. This applies to the entire supply chain insofar as this is within the scope of feasibility or influence.

Prohibition of child and forced labour

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Freedom from discrimination and compliance with the German General Act on Equal Treatment (AGG)

Non-discrimination, diversity & equal opportunities

Discrimination or disadvantage based on skin colour, nationality, social and ethnic origin, health status, sexual orientation, political or religious beliefs, gender or age as defined by the German General Act on Equal Treatment (AGG) is not tolerated by the Otto Roth Group. Instead, we promote equal opportunities for all employees and treat one another with tolerance and respect. It is our common duty to create a fair, tolerant, respectful and supportive working environment.

We expect our suppliers and business partners to provide their employees with a working environment free from discrimination or harassment, ensure equal treatment of employees and promote diversity and equal opportunities.

Freedom of expression

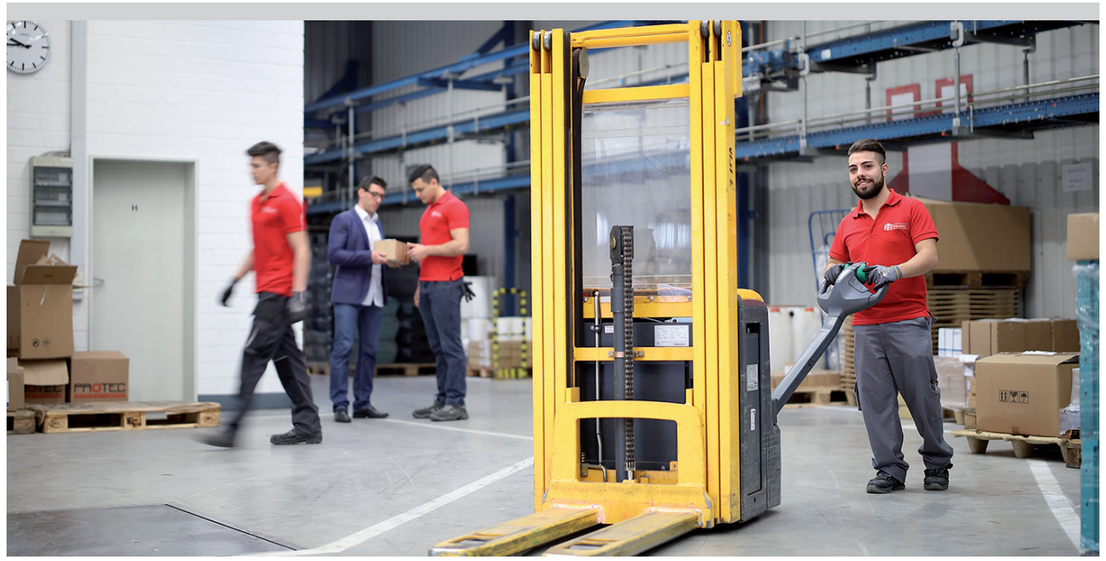
Freedom of expression

The Otto Roth Group respects freedom of expression within the framework of the German Constitution and the free democratic basic order. It expects the same from all its suppliers and business partners.

Fair working conditions

Workers' rights & working conditions

The Otto Roth Group ensures fair working conditions and observes all laws and labour standards regarding working conditions, appropriate remuneration and maximum working hours. We respect the right of employees to freedom of association and assembly to the extent permitted by national law. We expect the same from our suppliers and business partners.



Safe and healthy working environment

Occupational safety & health protection

The Otto Roth Group provides a safe and healthy working environment for all employees by taking appropriate health and occupational safety measures. In doing so, we comply with the statutory regulations on occupational health and safety, hygiene, and fire protection. Compliance with these regulations and regular training of our employees is an indispensable prerequisite for protecting our employees from potential hazards in the workplace.

We also expect our suppliers and business partners to ensure a safe and healthy working environment for their employees.

Social commitment

Commitment to society

As a family-owned company, the Otto Roth Group has promoted charitable institutions for years. It supports projects for education, refugee work, sports and social commitment in the regions where we operate. We also welcome and support the voluntary work of our employees.

We also expect our business partners and suppliers to promote employee volunteer work and engage in social commitment.

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ENVIRONMENT AND SUSTAINABILITY

We are aware of our social responsibility towards the environment. This is why efficient use of the limited resources forms an integral part of our company philosophy. This is reflected not least by our ISO 14001-certified environmental management system.

Responsibility for the environment

For us, sustainable action is an obligation towards our customers, employees, fellow citizens, and future generations. We use energy, raw materials, consumables and supplies responsibly and consider the impact on the environment when using them. We act in accordance with applicable laws and follow international environmental protection standards to reduce negative environmental impacts. Environmentally conscious behaviour on the part of our employees is supported and promoted through awareness-raising and training measures.

We also expect our partners and suppliers to act sustainably with regard to environmental and climate protection and take appropriate measures to avoid negative impacts on the environment.

BEHAVIOUR TOWARDS COMPETITORS, BUSINESS PARTNERS AND THIRD PARTIESN

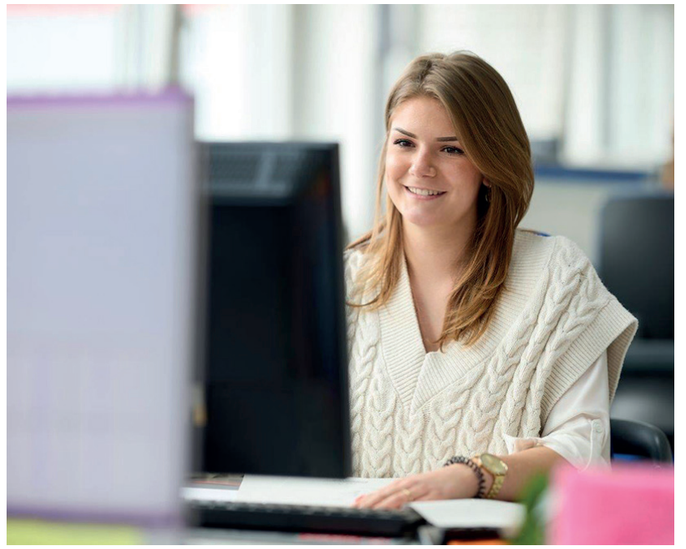
The Otto Roth Group respects fair competition laws and regulations and does not enter into any agreements that influence competition in an inadmissible manner. Laws and regulations to protect competition, such as antitrust law, are observed. This applies in particular to national and international embargo and import and export control regulations.

Fair competition

We strictly reject any form of corruption that influences business decisions. Employees must not take advantage of their position to demand or accept undue benefits for themselves or third parties. Gifts or invitations, such as business meals, that are appropriate and within the scope of customary hospitality in business may be extended and accepted if they do not foster undue preferential treatment. Attempts by business partners to influence decisions must be reported to the respective manager.

We also avoid internal and external conflicts of interest that could unlawfully influence business relationships. Private and business interests are kept strictly separate from one another.

We expect the same behaviour from our suppliers and business partners.



HANDLING OF INFORMATION

In an ever more closely networked world, the Otto Roth Group pays great attention to protecting and securing confidential information and the personal data of our partners and employees. We comply with statutory regulations and handle confidential information responsibly. A data protection officer ensures compliance with and implementation of the General Data Protection Regulation and other data privacy policies. Further information on data protection can be found in the data protection declaration on our homepage (currently only in German):
https://www.ottoroth.de/de/datenschutz/OR_Datenschutzerklaerung.php

Data privacy and security

The Otto Roth Group expects its business partners to handle confidential information and personal data properly and to protect it from unauthorised access, destruction, use, modification or disclosure.

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COMPLIANCE

Compliance with codes of conduct

We expect the employees of the Otto Roth Group and our business partners to comply with the principles of our Code of Conduct described here or to apply equivalent guidelines of conduct. All employees are made aware of the contents of the Code of Conduct and familiarised with the resulting requirements and obligations. Through their integrity, our managers act as role models for employees regarding compliance with our Code of Conduct.

Reporting violations

To ensure compliance with the Code of Conduct, all employees must report violations of laws, internal regulations or the Code of Conduct to prevent damage to the Otto Roth Group and to ensure fair cooperation. The first point of contact is always the immediate superior. However, employees are also free to contact management at any time.

The information will be treated confidentially so that the whistleblower does not face any negative consequences. Violations of the Code of Conduct or statutory regulations may have consequences under labour and liability law.

Basis for cooperation

For our business partners, the Code of Conduct represents the basis for our cooperation and must be observed. Our business partners, like us, make appropriate and reasonable efforts to implement the principles and requirements described here and to enforce them in their supply chain. Violations of the Code of Conduct must be reported to the Otto Roth Group without prompting and, depending on the severity, may lead to consequences under liability and criminal law and termination of the business relationship. We reserve the right to conduct systematic or ad hoc audits of the Code of Conduct implementation.

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ALWAYS CLOSE BY.
ALWAYS AT YOUR SERVICE.

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