

Supplier Code of Conduct of the RKW Group

1. Preamble

Commitment to respect human rights

As an internationally operating company, the RKW Group (RKW) is aware of its responsibility to respect human rights. We are therefore committed to respecting human rights within our own business activities and to working towards preventing risks and ending violations in our global supply and value chain.

In doing so, it aligns its corporate actions with the internationally recognised Guiding Principles on Business and Human Rights of the United Nations. In addition to general expectations towards our suppliers, our Supplier Code of Conduct aims to implement and comply with the requirements of the German Supply Chain Act in our upstream supply chain.

2. Requirements for suppliers

2.1. Social responsibility

Prohibition of child labour

The use of child labour in any form is not permitted. The supplier is required to comply with the recommendations of the ILO conventions on the minimum age for the employment of children. Accordingly, children under the age at which compulsory schooling ends may not be employed. Even if local regulations permit the employment of younger children, the supplier must in no case employ children under the age of 15. With regard to work that is harmful to the health, safety or morals of children, the minimum age must not be less than 18 years.

Prohibition of forced labour

No forced labour or work comparable to forced labour may be used. All work must be voluntary and workers must be able to leave work or employment at any time. Workers shall retain control of their identity documents at all times. These must not be confiscated by the supplier. In addition, there shall be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment, by either management or security personnel.

Prohibition of disregard for freedom of association

Workers must not be restricted in their rights in accordance with local laws. These include the right to form and join organisations, to bargain collectively and to strike. Workers must not be discriminated against for exercising these rights. Workers must be able to communicate openly with management without fear of negative consequences.

Prohibition of discrimination

Discrimination against workers in any form is not permitted. This applies, for example, to discrimination based on gender, race, caste, skin colour, disability, political opinion, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each person are respected. The supplier company promotes equal opportunities in the workplace and equal treatment of its workforce. This includes equal pay for work of equal value.

Fair working conditions (incl. appropriate wage)

The supplier shall pay its workers appropriately and in a timely manner. Accordingly, the wage shall be at least equal to the national statutory minimum wage and otherwise be determined by the law of the place of employment. Working hours must comply with applicable laws or industry standards.

Health protection and safety

The supplier shall provide a healthy and safe working environment through appropriate health and safety management. This shall include appropriate safety measures to effectively protect workers from accidents, potential hazards as well as occupational diseases, including employee training and personal protective equipment. Appropriate measures shall be taken to prevent excessive physical or mental fatigue. The supplier shall effectively identify and prevent relevant risks and emergency situations in the workplace, and in the public environment. Workers shall be provided with access to drinking water in sufficient quantity and access to clean sanitary facilities.

Preservation of the natural foundations of life

The supplier shall not deprive land, forests or waters, the use of which secures the livelihood of persons, if this violates legitimate rights. The supplier shall also refrain from all activities that contribute to soil degradation, water and air pollution and excessive water consumption, if this harms the health of persons, significantly affects the natural basis for the production of food or prevents persons from having access to drinking water or sanitation.

2.2. Ecological responsibility

Saving resources

The supplier strives to continuously reduce the use of resources such as energy, water and other raw materials within production. This can be done, for example, by using alternative materials, by reusing materials or by further developing the production landscape.

Reduction of greenhouse gases

The supplier supports RKW in achieving the climate commitments (especially Scope 3). To this end, the supplier monitors its greenhouse gas emissions at regular intervals and provides us with existing relevant data upon request. The supplier is required to develop and implement suitable measures to reduce its emissions. These measures are to be regularly reviewed for effectiveness.

Waste reduction

The supplier develops appropriate measures to reduce waste and establish a circular economy. In this context, materials that can be recycled and reused are used wherever possible. Hazardous waste that could have a negative impact on the natural environment is monitored and disposed of appropriately.

Compliance with legal requirements for the protection of the environment

The supplier is obliged to comply with all applicable statutory and sovereign requirements for the protection of the environment and nature.

2.3. Ethical business conduct

Fair competition

The rules for fair competition, including fair advertising and the applicable antitrust laws, are essential for a cooperative partnership. The supplier shall comply with these rules in accordance with all applicable competition and antitrust laws.

Data protection

The supplier shall ensure the protection of all personal data of clients, customers, employees, etc. In the context of data collection, storage, processing and transfer, the applicable laws and regulations must be observed.

Intellectual property

The supplier respects and protects intellectual property rights. In the case of technology and knowledge transfer, intellectual property rights and customer information are protected.

Corruption

The supplier does not tolerate or participate in any form of corruption, bribery or extortion. This includes any illegal offers of payment or similar benefits to public officials in order to influence their decision-making. The supplier shall develop appropriate measures to monitor and comply with anti-corruption laws and regulations.

Money laundering

The supplier supports all necessary measures to prevent money laundering within its sphere of influence. Money laundering means the smuggling of acquired funds into the legal financial circuit with the aim of concealing their true origin.

Sanctions list check

The supplier is obliged to ensure that it complies with all applicable sanctions and embargo regulations and that its own suppliers do likewise in order to guarantee a legally compliant supply chain.

3. Implementation of the requirements

We expect our suppliers to identify the risks of violating the above-mentioned legal positions 2.1.-2.3. within their supply chains and to take appropriate (preventive) measures. In the event of suspected violations, the supplier shall inform RKW in a timely manner.

Should the supplier violate this Code of Conduct, it must end the violation in the near future. If this is not possible, a concept for termination or minimisation must be drawn up and implemented immediately. If the supplier does not comply with these requests, we reserve the right to take measures up to and including termination of the business relationship.

4. Acknowledgement and consent of the supplier

By signing this document, the supplier undertakes to act responsibly and to comply with the regulations/requirements listed. The supplier shall communicate the contents of this Code of Conduct to workers, agents and its own suppliers in a comprehensible manner and shall take precautions to address the requirements appropriately.

Place, date

Name and signature, company stamp