



CODE OF CONDUCT

RÖHM GROUP
OCTOBER 2021

RÖHM Group Code of Conduct

Acting responsibly together.

We are all ambassadors for our company, RÖHM GmbH. It is therefore vital to behave in an exemplary manner inside and outside our company.

This code of conduct is designed to provide shareholders, the directors, managers and employees with guidelines to ensure that they deal honestly, fairly and dependably with one another and with business partners, based on our clearly defined corporate philosophy.

We are convinced that commercial results can only be translated into genuine long-term success if they are based on ethically sound conduct.

Therefore, it is vital for every one of us to behave responsibly and to act in accordance with applicable laws. Let us work together and act responsibly to make RÖHM GmbH a success.

Yours

A blue ink signature of Gerhard Glanz, consisting of a stylized 'G' followed by a horizontal line and a small flourish.

Gerhard Glanz

A blue ink signature of Dr. Till Scharf, featuring a stylized 'T' and 'S' with a horizontal line.

Dr. Till Scharf

Management Board RÖHM GmbH

1	Executive board procedures	4
2	Cooperation with customers, suppliers and other business partners	4
2.1	Fair competition	4
2.2	Agreements, cartels and non-competition arrangements.....	4
2.3	Export control and sanction law	4
2.3	Corruption and bribery	4
2.4	Acceptance or granting of benefits.....	4
2.5	Patents, industrial property rights.....	5
2.6	Selection of suppliers and service providers.....	5
3.	Management and employees at RÖHM	5
3.1	Management and trust culture	5
3.2	Tolerance and equality of opportunity	5
3.3	Fair working conditions	5
3.5	Avoidance of conflicts of interest.....	6
4	Dealing with resources	6
4.1	Health and safety in the workplace	6
4.2	Sustainability and environmental protection.....	6
4.3	Handling of information	6
4.4	Data protection and information security.....	6
4.5	Financial responsibility.....	7
4.6	Company property	7
4.7	Quality.....	7
5	Implementation of the code of conduct	7
5.1	Implementation	8
5.2	Complaints and reporting	8

1 Executive board procedures

The executive board leads the company, with the goal of creating sustainable value and taking into account the needs of shareholders, our employees and all other groups associated with the company.

The executive board defines targets for the company and its subsidiaries and develops long-term strategies to achieve them. They ensure compliance with legal requirements and internal company policies and works to ensure that these are observed throughout the group.

The members of the executive board are collectively responsible for the overall management of the business. Irrespective of executive board members' joint overall responsibility, the members are individually responsible for effective management of areas assigned to them, within the framework of executive board decisions.

2 Cooperation with customers, suppliers and other business partners

2.1 Fair competition

RÖHM adheres to the rules of fair competition and supports all efforts to implement a free market and open competition nationally and internationally.

2.2 Agreements, cartels and non-competition arrangements

Antitrust law is the most important instrument for protecting fair and undistorted competition. Every employee therefore must commit to adhering to all laws preventing restriction of competition. Even coordinated actions, casual discussions or informal "gentleman's agreements" that aim to or could bring about a restriction of competition are prohibited.

2.3 Export control and sanction law

National and international laws and regulations govern imports and exports, as well as international trade, brokerage and finance operations, provision of services and transfer of goods (physical products, software, and technology). RÖHM has appropriate processes in place to ensure that business and activities involving third parties and within the RÖHM Group do not contravene any export control or sanction laws.

2.3 Corruption and bribery

RÖHM rejects any form of corruption or bribery. Corruption is contradictory to fair competition and damages the company, both economically and in terms of its reputation. All company-related business activities must be based on honest and responsible thought and action.

2.4 Acceptance or granting of benefits

We compete based on the quality and performance of our products and services. Any acceptance or granting of benefits must be in accordance with the applicable laws and our internal company regulations. The benefits must not be associated with the initiation, awarding and handling of a contract and it must only be a benefit that

can be viewed as legally defensible under the legal regulations to which the donor and the recipient are subject.

A benefit refers to any payment made, even if it is indirect (for example, to friends, relatives, or organizations).

2.5 Patents, industrial property rights

The continuous development of our company's products through inventions and improvements in our know-how is of critical importance for maintaining our competitiveness. Protecting our technology with industrial property rights thus plays an increasingly important role.

Therefore, disclosure of new findings or business secrets to third parties by employees is prohibited, as is unauthorized acquisition or utilization of a third party's secrets.

2.6 Selection of suppliers and service providers

RÖHM assesses all quotations fairly and without prejudice. Our selection of suppliers and service providers is based on purely economic interests. Unacceptable preferment or obstruction in any form is prohibited.

When selecting business partners, RÖHM requires that the partner also complies with this policy. A violation of the RÖHM Group corporate policy by a partner can result in termination of the business relationship.

3. Management and employees at RÖHM

3.1 Management and trust culture

All employees of the RÖHM Group have an obligation to comply with company guidelines, particularly managers who perform a role model function in the company. They are responsible for ensuring that no violations occur in the area they are responsible for, which could have been prevented by appropriate supervision.

3.2 Tolerance and equality of opportunity

RÖHM respects human rights throughout the world. Nobody should be treated improperly, disadvantaged, favored, harassed, or excluded due to their race or ethnic background, nationality, gender, religion or world view, political ideology, disability, age, or sexual identity.

We expect every employee to deal with colleagues and third parties in a friendly, objective, fair, and respectful manner.

Adherence to these principles contributes to the good reputation of the RÖHM Group worldwide.

3.3 Fair working conditions

RÖHM offers all employees appropriate remuneration and fair working conditions, in compliance with all legal regulations.

3.4 Respect for human rights and prohibition of forced and child labor

RÖHM respects human rights and is committed to observing and protecting them. We respect the dignity and personal rights of our employees and third parties.

We reject forced and child labor and any form of exploitation, and ensure strict compliance with relevant laws.

3.5 Avoidance of conflicts of interest

RÖHM ensures that business and private interests are always kept separate. Particularly during working hours, all employees have an obligation to promote the commercial interests of RÖHM.

Conflicts of interest can arise due to personnel decisions, business relationships with third parties, private engagement of RÖHM suppliers or other business partners, or the use of RÖHM employees for private purposes. Possible conflicts of interest must be avoided or, in case of doubt, resolved by consulting a line manager.

4 Dealing with resources

4.1 Health and safety in the workplace

Health and safety in the workplace is the top priority for RÖHM. Our aim is a completely accident-free workplace, as any accident is one too many. Every employee is called upon to identify any accident risks in their personal working area and either to eliminate it independently or to report it to the appropriate line manager. All employees, customers, and suppliers have an obligation to comply with the health and safety regulations in place at our sites.

By continuous improvement of working conditions and a wide range of prevention and health promotion initiatives, we maintain and support the health, performance, and satisfaction of our employees.

4.2 Sustainability and environmental protection

We undertake to operate our business as sustainably as possible. We are constantly working on improving the sustainability of RÖHM as a company and our products. The aim is not only conservation of valuable resources, but also to achieve lower costs for us and our customers.

As a commercial company, we take responsibility for the environmental compatibility and sustainability of our products, sites, and services. We employ environmentally sound, advanced, and efficient technologies, and implement them over the entire life cycle of our products. Throughout development and production, we ensure prudent use of natural resources, a continuous reduction in environmental impact, and compliance with all environmental laws and regulations.

4.3 Handling of information

Our employees have an obligation to treat any trade and business secrets that are entrusted to them as part of their operational activities or of which they otherwise become cognizant, in the strictest confidence.

Trade and business secrets and know-how must not be passed onto third parties or made public without legal protection (for example, non-disclosure agreements). Inventions, know-how, and our brands are of paramount value. We protect these intangible assets because they have a significant economic importance for the future of our company.

4.4 Data protection and information security

We manage our relationships with current and former employees, applicants, business partners, and other groups in such a way that all business-related,

confidential, secret, and personal data is effectively protected. We only collect, process, or use personal data to the extent that is necessary for defined, clear, and legal purposes. The use of data for affected parties must be transparent. We provide a right of information and correction, and where necessary objection to, blocking, or deletion of data. Our employees have an obligation to comply with statutory data protection provisions, legal and company regulations, and to protect against misuse of data. We undertake to maintain an appropriate standard in safeguarding data. All data processing components must be secured in such a way that unauthorized internal or external use is prevented.

4.5 Financial responsibility

RÖHM upholds the highest standards of honesty. It is essential that the internal and external reports and documents that we produce, publish, or provide to the authorities represent a complete, appropriate, accurate, up-to-date, and comprehensible picture. In addition, accurate records and reports on financial information are necessary to make responsible business decisions. All financial documents, records, and accounts must accurately reflect transactions and events, and must comply with the generally recognized principles of accounting and the RÖHM internal control system.

If employees are unsure, they should contact our executive board. Part of our commitment to honesty is the assurance that all financial transactions by RÖHM are legally sound and are made for the stated purpose, as authorized by RÖHM.

4.6 Company property

Our employees must use company property and assets for their intended purpose, economically, and responsibly.

4.7 Quality

Quality is our most important characteristic in the market. The success of our products and services is inextricably linked to their quality.

Every RÖHM employee has an obligation to incorporate this quality awareness into their actions and therefore into their involvement with the company.

5 Implementation of the code of conduct

This code of conduct is both a mandatory requirement and a protection for every employee of the RÖHM Group. It sets out the framework within which RÖHM employees can operate and, for example by protecting against discrimination and ensuring adherence to safety regulations, is in their direct interests.

5.1 Implementation

RÖHM calls on every employee to assess their own behavior against the requirements set out in the code of conduct and to guarantee that these standards are met. Every line manager has an obligation to organize the area for which they are responsible in such a way that compliance with the code of conduct and the legal regulations is guaranteed. Any grievances must be actively addressed and resolved.

5.2 Complaints and reporting

Violations of the code of conduct or any suspicious situations are to be reported to the direct line manager, the HR department, or the executive board, depending on the employee's preference. It is also possible to report any complaints

anonymously using the “Complaints management” mailbox in the break room on the ground floor of the main administration building (tower block), or using an Internet form at <https://www.roehm.biz/unternehmen/code-of-conduct/>, or by e-mail to compliance@roehm.biz.

Employees who have specific reasons and have in good faith come to believe that a violation of the code of conduct has occurred or could occur, and report this using one of the channels set out above, will not be disadvantaged in any way as a result. The company will take the appropriate measures to protect the reporting employee and to treat their identity confidentially.