

ROVEMA Code of Ethics

Together creating value for generations – by doing what's right



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How do we know what the "right thing to do" is? We always must ensure that we do business in line with laws and regulations wherever we operate. That is a given. But there are many situations where the answer may not be so clear. Some things are black and white, like having to pay taxes when due. Others may be less so because the rules are imprecise, or you are left with a judgment call.

This Code of Ethics sets out the principles we hold ourselves accountable to. It contains our commitment to doing what's right. But it also helps us make good choices and ensures we always act with integrity. It is no different than in our personal lives: we all have beliefs and principles that govern how we behave and interact with others so we can look in the mirror knowing that we have remained true to ourselves. That is no different for us at ROVEMA.

*“The ROVEMA values serve as a basis for us, they define who we are.”*

To get to a good decision and “do what's right,” it could be helpful to refer to the ROVEMA values and check your intended course of action against some simple guidance:

### **Honesty**

- ✓ We say what we think.
- ✓ Being sincere and honest in all of our words and actions is essential to us. That includes openly communicating our ongoing processes and decisions as well as our beliefs and opinions even if they are inconvenient

### **Reliability**

- ✓ We do what we say.
- ✓ We are convinced of our own strengths and competences with everything we do enabling us to meet our customers' demands and high standards. This makes us a business partner to rely on.

### **Integrity**

- ✓ We do what we believe in.
- ✓ At ROVEMA, we have always been deeply committed to our beliefs and virtues and keep living them throughout our organization in how we think, communicate and behave.

### **Trust**

- ✓ We rely on our partners.
- ✓ Trust is the fundament of all our relations that make ROVEMA what it is. We therefore confide in our colleagues, leaders and business partners and respect their decisions.

### **Courage**

- ✓ We take paths we are convinced of.
- ✓ Taking courage to make difficult decisions is incorporated in our DNA as we see new ways and ideas as promising opportunities. This enables us to grow and adapt to changing circumstances.

### **Responsibility**

- ✓ We want to move what moves people.
- ✓ We are mindful of our own actions and their consequences on corporate, local and global level. Based on that we take actions for people, planet and progress by promoting sustainable business models now and in the future.

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*“Keep our values in mind when asking yourself these three questions.”*

Dilemmas can come in all shapes and sizes. When you are uncertain about what to do, remember our values and try this quick “ethics check” by asking yourself:

***Is it legal?***

This goes right to the core of the matter. Does it violate law, our policies or this Code of Ethics – or does it feel like it might? If the answer is yes or possibly, the action should definitely not be taken. Talk to your Legal or compliance colleague about next steps.

***Is it fair and balanced?***

Although we compete for success and want to win commercially, we should avoid great imbalances or unfairness of our actions in favor of long-term relationships and mutual respect.

***How will it make us feel about ourselves?***

How would the decision align with our own sense of right and wrong? Could we explain it to someone else in just one sentence? Would we feel proud of the decision we made when our actions were on display for others to see?

Let the three questions sink in and talk to others about it to find out whether what you think of doing is truly the right thing to do. When in doubt, listen to what others think about it. Don't ignore advice or objections. The contacts listed under section Let's Talk are at your disposal for advice and can be consulted at any time.

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*“Why is it important to ask questions and report concerns?”*

At ROVEMA, we strongly believe that long-term success can only be achieved together as a team in a trust-based and open environment. That is why ROVEMA wants every employee to feel comfortable to ask questions about this Code of Ethics and seek guidance when they are uncertain about what's right in a particular situation.

But more importantly, we ask everyone to raise concerns when they witness something that is or could be in breach of our Code of Ethics, any of our policies or the law. Upholding our commitments is everyone's responsibility and we all are personally accountable for ensuring compliance with all applicable laws and regulations.

Speak up when things aren't right. There are several **resources** you can turn to any time you are unsure about the right course of action or wish to report an issue that concerns you:

- Your immediate manager
- Your HR Partner
- The Compliance Team
- Your Legal Counsel
- The Chief Executive Officer or Chief Financial Officer

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When it is difficult or impractical to communicate to any of the colleagues mentioned on this page, the People Intouch Speak up System – a confidential hotline for anonymous reporting – is available if preferred. In any case, your matter will be handled in strict confidence. Anyone who raises a potential concern or provides information related to a compliance investigation will not suffer any negative consequences. ROVEMA will not tolerate but sanction any attempt to retaliate against employees who, in good faith, support us in our effort to uphold our commitment to doing what's right.

You can find more detailed information about SpeakUp under FAQ.

## Our eight guiding principles that we all must respect and abide

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1. Respect for the law
  2. Fair employment practises and diversity
  3. No conflicts of interests
  4. No bribery & corruption
  5. Anti-Trust & competition
  6. Safeguarding assets & information
  7. IT & data security and digital media
  8. Responsibility to the environment and communities

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*“We comply with all laws and regulations.”*

### **The Principle**

We respect and comply with all applicable laws, regulations, our internal policies and guidelines. ROVEMA respects internationally recognized human rights, such as the UN Global Compact, and supports their observance. We make sure we understand all relevant laws and regulations prior to starting any business, abide by their principles and ensure through our actions that we do not inadvertently violate those laws.

### **Purpose**

At the center of ROVEMA’s values is our deep commitment to the highest standards of integrity and ethical conduct. This starts with complying with the law and applicable regulations.



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*“We create fair and safe places to work.”*

### **The Principle**

We create fair and safe places to work where everyone can develop their potential. We will not tolerate discrimination based on gender, age, ethnicity, nationality, social status, political opinions or sexual orientation. Harassment, retaliation, bullying or disrespect have no place in the ROVEMA culture, where everyone’s contribution counts.

We will take active steps to build and foster a diverse and inclusive culture that treats everyone with dignity and respect. Targets for diverse hiring and promotion, educating our teams on inclusiveness and including different perspectives and experiences in our business processes and decisions will give equal opportunity to all employees to contribute to our goals.

### **Purpose**

Our organization and society at large become better and safer places to live and work where everyone has equal opportunity to realize their potential. Furthermore, we are convinced that inclusive and diverse teams are more creative, find new ways and drive necessary change – making us a better employer and a better business closer to our customers.

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***“Business decisions are made exclusively in the interest of ROVEMA”***

**The principle**

Business decisions are made exclusively in the interest of ROVEMA. Outside one's employment relationship, personal interests and considerations, especially those of a financial nature, must not play a role at any level of decision-making. If employees experience an actual or even merely potential conflict between their business and private interests, the matter must be disclosed to the manager to seek a solution – if necessary, by consulting the next level of management.

**The purpose**

To maintain trust and confidence within ROVEMA and with all others dealing with us, we must ensure that we make decisions that are in the best interest of ROVEMA.

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***“We do not tolerate any form of bribery or corruption.”***

### **The principle**

We do not tolerate any form of bribery or corruption. Business decisions at ROVEMA are based on objective criteria such as a business partner's reliability and integrity, the price and the quality of products or services. Decisions must never be influenced by the prospect of giving or receiving personal benefits.

To avoid even the appearance of improper influence on decisions, ROVEMA employees are prohibited from offering, demanding or accepting inappropriate gifts and entertainment under any circumstances. We recognize that giving and accepting gifts and corporate hospitality can be a legitimate way to generate long-lasting goodwill in business relationships. Specifically, gifts and hospitality must always be appropriate, represent bona fide business expenditures and should not be offered or accepted if doing so could influence the outcome of a business transaction or be perceived as influencing such a decision. Care is especially required in relation to gifts or hospitality involving government officials.

However, if gifts and hospitality are disproportionate or inappropriate, they can cloud judgement, so always exercise caution. When in doubt, employees must seek prior permission from their manager and report immediately when a favor has been given or received that might exceed these boundaries. Transparency is the best means of avoiding even the appearance of bribery or corruption.

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### **The purpose**

Corruption is corrosive and destroys trust in governments and businesses alike. It reduces the chances of bringing the best products and services for the best price to those who need them most and supports the existence of unethical or illegal structures.

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*“We compete fairly.”*

### **The principle**

We are especially mindful of our responsibility in the area of competition law. We compete energetically, fairly and always within the law, on the merits of our products and services alone. We will not take part in any collusive arrangements with competitors or conduct that unlawfully prevents or restricts competition. Specifically, we must not engage in any form of communication or agreement which tries to:

- fix prices, credit terms, discounts or rebates,
- allocate contracts, markets, customers or territories, or
- boycotts certain customers or suppliers.

### **The purpose**

Restricting competition is illegal. Besides, we believe that fair competition is in everyone’s best interest, resulting in more dynamic markets with wider choice, better value and increased innovation. Free competition leads to the best possible allocation of human, financial and economic resources, benefiting all market participants and creating a future worth living.

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*“Each of us is responsible for protecting and preserving the company's property.”*

### **The principle**

We use our assets in a proper manner and for their designated purpose. All of us are responsible for the detection and prevention of fraud, theft, misappropriations, and other irregularities. **Some of our most valuable assets are intangible and include our trade secrets, intellectual property and company confidential information.** We must guard our intangible assets just as we would our company's equipment or money.

### **The purpose**

Any improper use of ROVEMA resources may result in significant added costs, disruption of business processes or other disadvantage to ROVEMA. Theft, carelessness and waste hurt our financial performance.

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*“The efficient operation and security of our IT systems and data is the basis for the effective functioning of all our business processes.”*

### **The principle**

We place great importance on information security including IT security and data protection, to protect ROVEMA against threats and malicious attacks. IT and Data Security is much more than a matter of IT – all of us are asked to use technology in a proper and responsible way and in line with applicable standards. This principle also extends to the use of digital and social media. These new channels allow us to communicate even faster and more effectively – but they also harbor completely new sources of danger. For this reason, we are all called upon to exercise the same caution when dealing with digital and social media.

### **The purpose**

Attacks have increased in recent years – a downside of digitization. Receiving, processing and passing on information – this forms the basis for all business processes. Internal knowledge must not fall into unauthorized hands and we must ensure that we always have access to the correct and complete information to run the business without interruption and to comply with our financial reporting obligations.

Furthermore, responsible use of data and information provided to us by others is a key element to maintain trust. Unintentional copyright infringement, liability and data protection violations can quickly result in legal disputes.

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*“Our mission is to build sustainable businesses for a future worth living.”*

### **The principle**

Responsible treatment of the environment and natural resources is a matter of course for ROVEMA. We use natural resources appropriately and economically to ensure that our activities have the least possible impact on the environment. We promote environmental awareness in our employees and are committed to the dissemination and application of environmentally friendly technologies.

As a responsible member of society, ROVEMA donates financial and material resources to social and humanitarian projects. ROVEMA does not make political donations (to politicians, political parties or political organizations). We encourage our staff to do volunteer work.

### **The purpose**

We strongly believe that stopping climate change is the priority task for our generation – and we will do our part. We understand the importance of the part we play in creating a more sustainable future for planet earth. Social engagement helps create a future worth living and supports the communities we operate in.



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*“Whenever we encounter an ethical or legal dilemma, we resolve it in line with the Code.”*

This Code is an expression of who we are and how we want to be perceived. We put the Code into daily practice, and we are all expected to act in accordance with its content and spirit.

Every ROVEMA employee is responsible for seeking advice in case of questions or uncertainty. Every employee is encouraged to report actual or suspected misconduct to the contacts listed in this Code. ROVEMA is committed to maintain confidentiality where legally possible and protects those raising a concern against retaliation.

This Code of Ethics was approved by the ROVEMA Management on March 7, 2022. It applies to all employees and operations of the ROVEMA-Gruppe regardless of rank or title. Breaches of this Code, our policies and guidelines or applicable law will result in remedial, corrective and, if necessary, disciplinary action up to and including termination of employment.

It replaces the ROVEMA Code of Conduct dated June 2020.

We hope you like what you read and that our Code of Ethics inspires you. Do you have questions, comments, or something to share? Get in touch – we look forward to your feedback.

Please contact your ROVEMA Compliance Team at [compliance@rovema.de](mailto:compliance@rovema.de)