

## Compliance of the Rattay Group

### Foreword from the executive board

The RATTAY Group sets great store by law-abiding, ethical behaviour in all its business activities with its business partners.

All employees and the executive board of the RATTAY Group are tied to the basic rules of conduct and internal policies. These make up the ethical values and high standards to which the RATTAY Group are committed at home and abroad.

The executive board of the RATTAY Group shall structure the work environment in such a way that employees can adhere to the rules of conduct.

Udo Rattay

Frank Tennagels

### Scope of application

**Compliance** is understood as the adherence to all laws, internal policies and regulations applicable to the company as well as internationally recognised codes of conduct.

**These guidelines apply to everyone belonging to the RATTAY Group** (hereafter referred to as “company members”).

The company members are:

- all employees of the RATTAY Group and
- all members of the executive board and other bodies in the companies of the RATTAY Group.

In addition, external cooperation and sales partners of the RATTAY Group must adhere to these guidelines

## Basic code of conduct

### **Adherence to laws, guidelines and standards**

All company members must adhere to the following regulations:

- current laws and official regulations,
- standards and norms, which apply to the products and practices of the RATTAY Group.
- internal guidelines and work instructions of the RATTAY Group (including these compliance guidelines).

### **Fair working conditions**

- The company members are a significant success factor for the RATTAY Group. For this reason the RATTAY Group creates fair and sociable working conditions. At the same time it demands a high level of commitment and care from its company members when handling internal knowledge and assets. Transparent dealings with each other, constructive criticism and suggestions for improvement are always welcome and supported.
- The RATTAY Group denounces discrimination or harassment. All company members are treated equally, independent of nationality, religion, gender, sexual orientation, age or disability.

### **Health, safety and environment (HSE)**

- All company members must maintain a safe and healthy environment. Particular importance is given to adherence to all current standards in this context.
- Environmental protection and sustainability are a high priority for the RATTAY Group. At all locations at least the Environmental Protection Act laws are fulfilled. Furthermore, the aim is to always structure the manufacturing processes and products in an environmentally compatible way.

### **Product compliance**

- Our products and services fulfil all applicable legal specifications and standards.
- The consequent implementation of customer requirements is the basis of our commercial success and high level of customer satisfaction.

### **Prohibition of corruption, gifts and donations**

- Company members must not offer business partners any donations whatsoever or accept such things from them which could lead to an objective and fair business decision being compromised or even appear to do such (“publicity test”).

- Gifts and other donations, such as invitations to business dinners, may only be accepted or permitted within the internal guidelines. Particularly strict standards apply to dealing with public officials and representatives of public authorities.
- The giving and accepting of money, regardless of the amount, is always prohibited.

**Fair competition**

- The RATTAY Group shall conduct its business activities under the terms of fair competition and in an ethical manner. In doing so it adheres to the current laws on cartel bans and restriction of competition.
- All company members are prohibited from exchanging inappropriate information with competitors.
- Agreements with customers and suppliers must not lead to a restriction of fair competition.

**Avoidance of conflicts of interest**

- The RATTAY Group expects honesty and loyalty from all its company members. Everyone is to refrain from all activities which could damage the RATTAY Group or cause loss of confidence or reputation.
- All company members are required to avoid conflicts in which their personal interests conflict with the interests of the RATTAY Group. Dealings with competitors, suppliers or customers are prohibited or to engage in private business relations with them, insofar as these could lead to a conflict of interest.
- Conflicts of interest are to be reported immediately and discussed with the respective supervisor.

**Monitoring exports and sanctions**

The RATTAY Group exports its products worldwide and has subsidiaries and several sales offices and representatives abroad.

- The RATTAY Group does not export to countries where this is forbidden by current sanctions.
- The RATTAY Group has no business dealings with people or companies against which sanctions have been imposed.
- The RATTAY exports “dual use” goods (which can be used for civil as well as military purposes) only under observance of the applicable laws.

### **Confidentiality and data protection**

- Confidentiality applies to all information about the RATTAY Group. This does not apply if publication of the information was approved by the RATTAY Group or mandatory due to laws or regulations.
- Intellectual property is particularly bound to secrecy. This includes trade secrets, patents, also business and marketing plans, salary information and all other financial data and reports which has not been published.
- Personal data is used for clear and legal purposes and protected from unauthorised access by a high standard of current data protection laws.