

# Römheld & Moelle

## Code of Conduct for Suppliers and Business Partners

### Content

<b>Introduction</b> .....	<b>2</b>
<b>1. Transparent business relations and fair market conduct</b> .....	<b>2</b>
Antitrust law .....	2
Anti-corruption - Benefits in the form of hospitality, invitations and gifts .....	2
Export control and anti-money laundering.....	2
Avoidance of conflicts of interest.....	3
Data protection and proper business information and protection of know-how, patents, trade and business secrets.....	3
Whistleblowing and protection against retaliation .....	3
<b>2. Responsibility towards employees and society</b> .....	<b>3</b>
Human rights.....	3
No child labour .....	3
No forced labour.....	3
Anti-discrimination.....	3
Remuneration, working time and freedom of association.....	4
Land, forest and water rights.....	4
Health and safety.....	4
Responsible raw material procurement.....	4
<b>3. Responsibility towards the environment</b> .....	<b>5</b>
Greenhouse gas emissions and decarbonisation .....	5
Energy management.....	5
Sustainable resource management.....	5
Responsible chemicals management .....	5
<b>4. Sustainability management</b> .....	<b>5</b>
<b>5. Consequences of breaches of this Code of Conduct</b> .....	<b>6</b>

## Introduction

Römheld & Moelle Eisengießerei GmbH ("Römheld & Moelle") is an internationally active company with a long tradition. For this reason, Römheld & Moelle assumes social responsibility towards suppliers, business partners, employees and the public. This social responsibility includes that Römheld & Moelle adheres to applicable laws at all times and in all places (compliance) and also acts in an ecologically, economically and socially sustainable manner.

Our suppliers assume responsibility along their supply chain and therefore also promote compliance with this Code of Conduct or an equivalent code of conduct of their own among their suppliers. Therefore, we expect our suppliers to pass on and actively implement the standards along their value chain. These are aligned with general agreements and guidelines such as the Declaration of Human Rights or the United Nations Global Compact.

Accordingly, Römheld & Moelle expects its suppliers, service providers and business partners as well as commissioned third parties (e.g. subcontractors) to act responsibly and to commit to the basic principles set out in this Code of Conduct.

---

## 1. Transparent business relations and fair market conduct

### *Antitrust law*

Römheld & Moelle expects its suppliers and business partners to comply with applicable antitrust regulations. This concerns in particular the observance of the prohibition of anti-competitive agreements or concerted practices with competitors as well as the prohibition of abuse of a possible dominant position.

### *Anti-corruption - benefits in the form of hospitality, invitations and gifts*

Römheld & Moelle is expressly committed to fighting corruption and expects its suppliers and business partners and their subcontractors not to tolerate corruption. Benefits in the form of hospitality, invitations and gifts must always be customary and appropriate for the business and must be made in a fully transparent manner. They must not involve the risk of undue influence.

### *Export control and anti-money laundering*

Römheld & Moelle's suppliers and business partners observe compliance with all applicable laws for the import and export of goods, services and information. They maintain business relations only with business partners of whose integrity they are convinced and observe the respective applicable laws against money laundering.

# Römheld & Moelle

## *Avoidance of conflicts of interest*

Römheld & Moelle expects its suppliers and business partners to base their decisions exclusively on factual criteria and not to be influenced by personal interests and relationships.

## *Data protection and proper business information and protection of know-how, patents, trade and business secrets*

We expect Römheld & Moelle's suppliers and business partners to comply with all applicable data protection regulations.

You respect the know-how, patents, trade and business secrets of Römheld & Moelle and third parties. You will not disclose such information to third parties without the prior express written consent of Römheld & Moelle or in any other unauthorised manner. We expect our suppliers and business partners to distance themselves from the appropriation of thoughts, ideas or other intellectual property of other business entities and to refrain from attempts at plagiarism.

Römheld & Moelle's suppliers and business partners publish business data and report on their business activities truthfully and in accordance with the respective applicable laws.

## *Whistleblowing and protection against retaliation*

Römheld & Moelle expects its suppliers to have an internal mechanism for reporting and dealing with violations of the Code of Conduct. All reports will be treated confidentially. Furthermore, no retaliation shall be taken against the person who raises and discloses a violation.

---

## 2. Responsibility towards employees and society

### *Human rights*

We expect our suppliers and business partners to respect human rights and to treat their employees fairly and with respect. In doing so, our suppliers recognise their corporate social responsibility to identify requirements in this regard and ensure compliance. This includes the following areas in particular:

### *No child labour*

Römheld & Moelle strictly rejects child labour in the supply chain and expects its suppliers and business partners not to tolerate child labour in their business.

### *No forced labour*

Römheld & Moelle rejects any form of forced labour and other forms of slavery and human trafficking in our company and among our suppliers and business partners.

### *Anti-discrimination*

Römheld & Moelle expects its suppliers and business partners to refrain from any kind of discrimination, which means that no employee is treated unfavourably on the basis of gender, race, skin colour, religion,

# Römheld & Moelle

age, national origin, disability or sexual orientation. Equal treatment of all employees in recruitment, training and employment should be a key part of the company's philosophy.

## *Pay, working time and freedom of association*

Römheld & Moelle expects its suppliers and business partners to comply with the applicable legal regulations regarding working hours and remuneration. Remuneration should be fair and allow employees to enjoy a decent standard of living.

They shall respect the right of their employees to assemble freely, to form and join trade unions and to form employee representative bodies, in accordance with applicable laws. Employees who participate in employee representation bodies shall not be discriminated against.

## *Land, forest and water rights*

Our suppliers are also committed to protecting land, forests and waters whose use secures the livelihood of local people (especially ethnic minorities and indigenous people) and recognise the right of local people to use land, forests and waters for their livelihood. Therefore, they reject any kind of expropriation and forced eviction.

## *Health and safety*

Healthy employees are the most valuable asset of any company.

Römheld & Moelle expects its suppliers and business partners to provide a safe and healthy working environment for their employees that meets or exceeds the legal standards for occupational safety and health in order to protect employees from chemical, biological or physical risks.

Furthermore, Römheld & Moelle expects its suppliers and business partners to take care of safe working procedures and technical protective measures in order to avoid accidents and occupational diseases. This also includes the provision of suitable protective equipment.

Suppliers and partners must ensure that all types of security personnel, including contracted security personnel, comply with the social responsibility requirements set out in this policy and apply a counter-measure appropriate to the situation in the event of a threat.

## *Responsible raw material sourcing*

Römheld & Moelle's suppliers and business partners support activities that ensure the responsible procurement of raw materials. The procurement and use of raw materials obtained illegally or through ethically reprehensible or unreasonable measures are to be avoided.

The use of conflict minerals affected by embargoes or other import restrictions shall be excluded.

Suppliers are therefore obliged to identify these raw materials in manufactured products in the supply chain and to disclose the origin and sources of the raw materials they use.

## 3. Responsibility towards the environment

### *Greenhouse gas emissions and decarbonisation*

Furthermore, Römheld & Moelle expects its suppliers to minimise their climate impact by emitting greenhouse gases (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>) through technical, strategic and organisational means in order to protect the environment and the lives of future generations. In addition, transparency should be created with regard to the greenhouse gases emitted, e.g. with the help of a corporate carbon footprint.

### *Energy management*

Our suppliers work to increase energy efficiency and continuous improvement. Römheld & Moelle advocates the use of renewable energies.

### *Sustainable resource management*

We expect our suppliers and business partners to also comply with all applicable environmental laws and regulations in order to keep the impact on the environment as low as possible. To this end, suppliers and business partners manage natural resources sparingly and conscientiously in order to reduce or avoid waste in all phases of production.

Furthermore, we are continuously working together to reduce the impact of energy and water consumption on people and the environment through the use of the best possible technology and thus to improve air and water quality.

Our suppliers comply with applicable regulations on odour, dust and noise emissions and respect ecologically sustainable land use. In this sense, they also promote the protection of the soil and biodiversity within the scope of their possibilities.

They recognise the importance and responsibility of animal welfare and are committed to treating all living creatures ethically and with respect.

### *Responsible chemicals management*

Appropriate concepts for the responsible handling of chemicals must also be taken into account.

---

## 4. Sustainability management

Römheld & Moelle expects its suppliers to integrate the goal of sustainable economic growth into their corporate policy. The three pillars of sustainability (social, economic and ecological) are to be taken into account.

Römheld & Moelle therefore recommends appointing at least one person responsible for the topic of sustainability, who defines goals, develops and implements measures. The management should be provided with information in order to be able to take sustainable aspects into account when making

# Römheld & Moelle

decisions. In addition, the sustainability activities should be communicated internally and externally - as comprehensibly as possible, justified, easy to understand and easily accessible. The publication of a sustainability report according to recognised standards is recommended.

We also expect our suppliers to commit to the United Nations (UN) 2030 Agenda and its goals for achieving a sustainable global society and to integrate them into their sustainability management.

---

## 5. Consequences of breaches of this Code of Conduct

As part of our supplier management, Römheld & Moelle expects all suppliers and business partners to acknowledge this Code of Conduct and to confirm with their signature that they will take the above principles into account in practice.

In the event that suppliers or business partners of Römheld & Moelle do not comply with the basic principles laid down in this Code of Conduct, Römheld & Moelle will terminate the business relationship.

---

*Place, date*

*Signature/stamp supplier*