

Rotom
facilitates your logistics

BUSINESS CODE OF CONDUCT



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1. General Principles

Integrity, credibility, transparency

The company bases its business actions and decisions on generally applicable ethical values, in particular integrity, credibility and respect for human dignity. It promotes transparency, responsible management and control in the company in a suitable manner.

The scope

The Code of Conduct represents binding rules that must be observed by every employee of the company. In particular, the members of the management board and all managers are responsible for the active implementation of this code of conduct. They have to fulfill a role model function in every respect. The Code is the basis and guideline for dealing with ethical and legal challenges in day-to-day work. Every employee can contact their supervisor, the compliance officer or the managing directors with questions and information in this context.

Supply chain

The company expects its suppliers to observe the guiding values of the Code of Conduct, supports them in this as best they can and encourages them to do the same in their supply chains.

Compliance with the law

The company respects the laws and regulations of the countries in which it operates. This also expressly applies to the provisions of national, European and international chemical law as well as to embargo, customs and export control regulations.

2. Conduct towards competitors, business partners and third parties

Competition and Antitrust Law

The company respects the rules of fair and open competition and does not make any agreements that improperly influence competition.

Employees are obliged to comply with the rules of fair competition. In particular, any agreement, but also any coordinated behavior with competitors on the following topics is prohibited:

- prices and price components
- conditions
- customers
- delivery areas
- Quotas and capacities agreed market exits
- Voting on planned innovations

And coordinated behavior with peers disabling fair competition towards certain suppliers, particular on the topic of prices and price components.



Tenders

If a contract is awarded on the basis of a formal invitation to tender, the company will not discuss or coordinate bids with other bidders.

Corruption

The company expressly opposes any form of corruption at home and abroad and avoids even the appearance of wanting to influence business decisions through unfair business practices.

No employee may exploit the company's business connections for their own benefit or that of others, or to the detriment of the company. In particular, this means that no employee grants or accepts unauthorized private benefits (e.g. money, material assets, services) in business transactions that are likely to influence an appropriate decision.

Every employee of the company is obliged to seek advice or help if there are any suspicions or legal doubts regarding the existence of corruption or white-collar crime. The compliance officer and/or the managing directors offer advice and assistance.

Granting and accepting benefits, invitations and gifts

Invitations, such as to business meals or events, which correspond to recognized business practice and are appropriate, may be given or accepted if they do not serve to result in preference. The same applies to accepting or giving gifts.

If there is any doubt as to the existence of an objective reason or the customary nature of a benefit, the employee must first ask the compliance officer or a managing director.

This point is internally regulated comprehensively and meaningfully.

Public officials

Benefits of any kind to civil servants and other officials as well as to agents of state institutions, even indirectly via third parties, are prohibited, regardless of their value.

Parties and elected officials

In the case of donations to parties and political organizations as well as to elected officials and candidates for political office, the applicable laws are observed.

Consultants and agents

The engagement of consultants, agents and other intermediaries must not be used to circumvent the ban on bribery.

Donations and sponsorship

Donations are only made on a voluntary basis and without expecting anything in return. Donations and sponsoring services must not be designed to covertly promote decisions in the interest of the company.

The donation must be transparent. The recipient of the donation and the specific use by the recipient must be known. It must be possible to give an account of the reason for the donation and the intended use at any time.

Payments similar to donations are not permitted. Payments similar to donations are donations that are only apparently granted as payment for a service, but whose value clearly exceeds the value of the service.

Money laundering

The company does not condone money laundering. All employees are required to strictly comply with anti-money laundering laws. They must also immediately report any suspicious forms of payment or other transactions that indicate money laundering to the compliance officer or a manager.

Tax law/customs law/foreign trade law

The Company prepares tax returns and returns truthfully. All dutiable goods are duly declared by the company. The company consistently complies with the legal requirements for export controls and customs in the areas of foreign trade and customs law and guarantees their proper implementation.

The company expects its suppliers to provide export control and foreign trade data in a qualified and timely manner and to implement sufficient security standards in the supply chain as part of global customs security programs.

3. Avoidance of Conflicts of Interest

Employee loyalty

The company expects loyalty from its employees. It ensures that its employees do not get into situations in which their personal or financial interests collide with those of the company or its business partners.

The employees of the company have to report any personal interest that could exist in connection with their work to their superiors immediately.

Secondary activities and participations

Company employees are prohibited from managing or working for a company that competes with the Company.



4. Handling Information

Operating and trade secrets

The company's employees are obliged to maintain secrecy about trade and business secrets and other internal matters. This applies accordingly to information about contractual partners and customers that is not publicly accessible. The confidentiality obligation continues to apply after the end of the employment relationship.

Privacy

In addition to the general confidentiality regulations (e.g. 17 GDPR), data secrecy according to GDPR (EU) must be observed. In particular, it is prohibited to process, disclose, make accessible or otherwise use protected personal data without authorization for any purpose other than that which is part of the respective legitimate task fulfillment. This obligation to data secrecy continues even after leaving the company.

Duty of truth

All reports and other written documentation must be accurate and truthful. This applies regardless of whether the reports are internal or given to the outside world.

Data collection and other records must be based on the principles of proper bookkeeping and must always be complete and correct.

5. Principles of social and ecological responsibility

Social responsibility

Social responsibility is an indispensable part of value-oriented corporate management and a key factor for sustainable corporate success.

Human rights

The company respects and supports internationally recognized human rights. In this context, we are also in constant dialogue with our suppliers to avoid that our products contain raw materials from conflict regions.

Child labor

The bans on child labor and forced labor in any form are observed.

Sustainable Wood production

Company will secure usage sustainable produced wood in wooden packaging which complies with national and international laws and regulations (such as EUTR): illegally harvested wood is not accepted.

Company requires timber suppliers to declare that no illegal timber is supplied.

Prohibition of discrimination

Discrimination against employees and third parties is not tolerated. The company takes a firm stand against unacceptable treatment of employees, particularly sexual or verbal harassment.

Equal opportunity

The company promotes equal opportunities for its employees.

Comply to standards

Company conform to the standard pallet specifications, for both closed and open pool systems, while respecting the ownership of the pool pallet.

Workers rights

Employees' freedom of assembly and association is recognized to the extent legally permissible under national regulations. The company observes the applicable national laws and labor standards with regard to appropriate remuneration and maximum working hours. Of course, this also includes compliance with all provisions of the law regulating a general minimum wage according national regulations. Overall, the company ensures fair working conditions.

Occupational safety and health protection

Occupational health and safety at work is guaranteed within the framework of national regulations.

Company strives for high-quality working conditions in the context of the national Collective Labor Agreement for Wood Processing Industry in each country, if existing, or another applicable Collective Labor Agreement.

Environmental and climate protection

Sustainable environmental and climate protection as well as resource efficiency are important corporate goals for us.

Both in the development of new products and services and in the operation of production facilities, we make sure that any resulting impact on the environment and the climate is kept as low as possible and that our products make a positive contribution to environmental and climate protection for our customers.

Every employee is responsible for treating natural resources with care and contributing to the protection of the environment and climate through their individual behavior.

Company will secure that wood has not been treated with unauthorized preservatives or protection agents.

Company endorses the importance of careful compliancy to the requirements of ISPM 15 and act accordingly.

Company contributes to the circular economy for packaging wood.

Consumer interests

As far as consumer interests are concerned, the company adheres to the regulations for the protection of consumers.



Social Commitment

The company contributes to the social and economic development of the country and region in which it operates.

6. Compliance with the Code of Conduct

Communication

The company familiarizes its employees with the content regulated in this code of conduct and explains the resulting obligations. The company communicates the principles of the Code of Conduct to its business partners.

Policies and Processes

The behavioral requirements laid down in this code of conduct are binding as part of the employment contract for the company's employees and must therefore be observed. The company takes all necessary steps to implement the basic values and specifications contained in this code of conduct through suitable organizational measures as well as appropriate guidelines and processes in all business areas.

Regular/moderate controls

The company undertakes to regularly monitor compliance with the code.

Notification of Violations

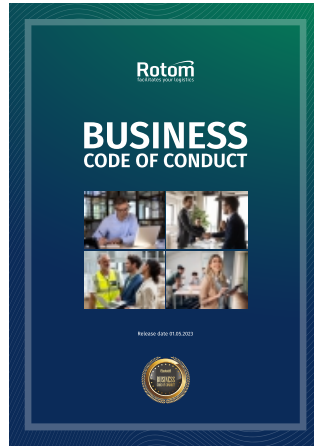
Every employee of the company is required to immediately report any (potential or imminent) violations of laws, internal regulations and this code of conduct that they observe to the compliance officer or a managing director.

Reports of violations of this Code will be treated in the strictest confidence and will have no adverse effect on the reporting employee, unless an untruthful allegation is knowingly made.

Consequences of violations

Violations of the Code of Conduct and legal provisions can, depending on the severity, result in labor and liability law consequences and also result in criminal sanctions.





LETTER OF UNDERTAKING

I hereby declare that I have received the Business Code of Conduct. It is my sole duty and responsibility to read and understand the Code, which is an integral part of my Terms and Conditions of Employment / Service. I shall conduct myself with complete integrity in the execution of my duties and assignments.

I hereby confirm and undertake to comply with this Business Code of Conduct.

Date

Full name

Signature

