

Rodenstock Business Code of Conduct for Suppliers and Business Partners¹

This Business Code of Conduct defines the basic requirements placed on the suppliers and business partners of Rodenstock concerning their responsibilities towards their stakeholders and the environment. The Rodenstock supplier and/or business partner declares that it will comply with the following obligations:

1. Legal Compliance

Comply with all applicable laws and regulations.

2. Human Rights and Labor Practices

Ensure respect of all internationally acknowledged human rights by avoiding causation of and complicity in any human rights violations; heightened attention shall be paid to specifically vulnerable humans or groups of humans such as children, migrant workers, women, or (indigenous) communities.

- **Prohibition of Forced Labor:**

Neither use nor contribute to slavery, servitude, forced or compulsory labor or human trafficking.

- **Prohibition of Child Labor:**

- Employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, employ no workers under the age of 14.
- Employ no workers under the age of 18 for hazardous work according to ILO Convention 182.

- **Non-Discrimination and Respect for Employees:**

- Refuse to tolerate discriminatory treatment of employees, in particular with respect to skin color, race, nationality, ethnicity, political affiliation, social background, disabilities, gender, sexual identity and orientation, marital status, religious conviction, or age.
- Refuse to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

- **Women's rights:**

- It must be ensured that women workers will receive equal remuneration compared to their male colleagues, including benefits, equal treatment, equal evaluation of the quality of their work and equal opportunity to fill all positions open to male workers.

- **Working Hours, Wages & Benefits for Employees:**

- Recognize applicable labor law regarding the rights of workers to form or join existing trade unions and to engage in collective bargaining; neither disadvantage nor prefer members of employee organizations or trade unions. In countries where this right is restricted by local laws, alternative legitimate options for employee participation are to be supported.
- Adhere to all applicable working-hours correspond at least to the respective national legal standards.
- Ensure that employees are appropriately remunerated corresponding at the very least to the legally valid and guaranteed minimum. Where legal or collective bargaining agreements do not exist, compensation and benefits are based on industry-specific collective agreements customary to the respective location that ensure an appropriate standard of living for the employees and their families.

¹ Including business partners with an intermediary or representative function that act in the interests or on behalf of Rodenstock and their employees.

- In the event of cross-border personnel deployment adhere to all applicable legal requirements, especially with regard to minimum wages.
- **Health & Safety of Employees:**
 - Comply with the relevant legal regulations for health and safety in the workplace and provide safe working conditions.
 - Provide training to ensure employees are educated in health & safety issues.
- **Worker Residence (Dormitory):**
 - Dormitory facilities must comply with all applicable, legally mandated standards, for public domiciles in the countries and communities in which they are located. Dormitories must provide a clean, safe and healthy residence environment. The dormitory design must provide adequate privacy, security and freedom of movement for all occupants.
- **Grievance Mechanism:**

Provide access to a protected mechanism for employees to report possible violations of the principles of this Business Code of Conduct.

3. Environmental Protection

- **Compliance with legal provisions:**

Take responsibility when it comes to environmental protection concerns and comply with all applicable legislation relating to the environment and sustainability.
- **Increase energy and resource efficiency:**

Use natural resources sparingly and minimize environmental pollution in their production processes and products. Contribute to reducing energy consumption and CO2 emissions.
- **Implementation and application of environmental management systems:**

Continuously improve the environmental performance. Suppliers and business partners with production sites implement suitable environmental management systems (e.g., in accordance with ISO 14001 or the EMAS Directive of the European Union).

4. Product Safety

The Rodenstock Group purchases and sells their products not only to satisfy functional requirements and aesthetical taste, but also respecting the most strict safety and quality regulations. This is also expected from the Partner.

5. Fair Operating Practices

- **Avoiding Conflicts of Interest:**

Avoid all conflicts of interest that may influence business relationships and avoid already the appearance of such a conflict.
- **Anti-Corruption and Bribery:**

Tolerate no form of and do not engage directly or indirectly in any form of corruption or bribery and do not grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage. This includes to renounce from giving or accepting improper facilitation payments.
- **Fair Competition, Anti-Trust Laws and Intellectual Property Rights:**
 - Act in accordance with national and international competition laws and do not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.
 - Respect the intellectual property rights of others.

- **Anti-Money Laundering, Financing of Terrorism:**

Do not directly or indirectly facilitate money laundering or the financing of terrorism and be always in compliance with the applicable anti-money laundering provisions.

- **Data Protection:**

Process personal data confidentially and responsibly, respect everyone's privacy and ensure that personal data is effectively protected and used only for legitimate purposes.

- **Export Control and Customs:**

Comply with the applicable legal provisions for importing and exporting goods, services, and information and observe export control and customs regulations.

6. Responsible Minerals Sourcing

Take reasonable efforts to avoid in its products the use of raw materials which originate from conflict-affected and high-risk areas or that contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects.

7. Security of the international Supply Chain

Ensure that the business premises and the loading and shipping areas where products for Rodenstock are produced, stored, prepared, loaded and transported, are protected against unauthorized access within a safe and secure supply chain, and that all employed staff is reliable.

8. Audit right

Rodenstock reserves the right to send experts to inspect the business premises of its suppliers and business partners for compliance with the requirements listed below on a case by-case basis. Advance warning will be given of such inspection, which will take place during normal business hours in the presence of a representative from the supplier or business partner and in compliance with the applicable law, particularly with data protection laws.

9. Subcontractors

If the suppliers or business partners commission third parties (e.g. subcontractors or representatives) in their scope of application business dealings with Rodenstock, Rodenstock expects these third parties to also observe the principles laid down in this Rodenstock Supplier and Business Partner Code of Conduct.

Legal consequences of violation

This Business Code of Conduct is an integral part of the relationship between Rodenstock and the supplier and/or business partner. If a Rodenstock supplier and/or business partner does not observe the basic principles laid down in this Business Code of Conduct, Rodenstock is entitled to terminate the business relationship for cause. It is with in the discretion of Rodenstock to forgo such consequences and, instead, to take alternative measures if the supplier or business partner provides credible assurance and is able to prove that it has immediately initiated countermeasures to prevent comparable violations occurring in future.