



# HOW TO KEEP AN OVERVIEW

CODE OF CONDUCT OF THE  
RODENSTOCK GROUP FOR EMPLOYEES  
MARCH 2026

# FORWARD



*"Trust, innovation and care are our values and have made us who we are today: The global specialist for ophthalmic lenses."*

Marcus Desimoni  
Rodenstock CEO



*"Everyone deserves to be treated with respect. For me, acting responsibly comes first. You take care of what you are responsible for."*

Roland Dimbath  
Rodenstock COO



*"Integrity – both professional and personal – is the cornerstone of our success and forms the basis for sustainable trust among our partners and customers. Transparency and openness characterize our interactions."*

Dr. Martina Bentele  
Rodenstock CFO

Dear colleagues,

As an innovation leader and major manufacturer of high-quality ophthalmic lenses, the Rodenstock Group can boast a number of ground-breaking innovations and market-leading technologies. Our products incorporate many years of research expertise, the highest level of craftsmanship and intelligent technology.

The Rodenstock Group with its three brands Rodenstock, optovision and Indo is active worldwide with different cultures. You, our employees<sup>1</sup>, characterise the Rodenstock Group.

Our behaviour is based on our corporate culture and unites us worldwide.

The Code of Conduct transfers our values of Trust, Innovation and Care into standards and ethical principles. It defines the rules for the daily work of all managers and employees at all levels and all subsidiaries worldwide, because we are constantly developing new revolutionary technologies and breaking new ground. Our Code of Conduct is a binding guideline and presents itself as the Rodenstock Group's flagship.

By observing the rules of this Code of Conduct, we help to maintain the trust of our customers and our business partners in the Rodenstock Group and ensure economic success.

Familiarise yourself with the contents of this Code of Conduct and work in accordance with this binding guideline. Our Compliance Department is always available to answer your questions. We also offer you our compliance trainings. Please take advantage of this offer to receive support in case of uncertainties. You will find the contact details at the end of this Code of Conduct.

Thank you for your support!

Marcus Desimoni  
CEO

Roland Dimbath  
COO

Dr. Martina Bentele  
CFO

<sup>1</sup> Stands here and in the following for both male and female employees.  
This also applies to other gender-specific designations in this Code of Conduct.

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# RODENSTOCK<sup>2</sup> CODE OF CONDUCT: IT IS UP TO ALL EMPLOYEES

**Responsibility: living values together – creating values together**

This Code of Conduct serves as a binding guideline for daily work, business decisions and cooperation with business partners. It does not regulate every conceivable question and situation that one is confronted with every day at Rodenstock. However, it can serve as a guideline for doing the right thing, because compliance is not complicated. The following questions will generally help you to make the right decision:

- Is my behavior in line with Rodenstock's values?
- Is it legal?
- Can Rodenstock's reputation be damaged if the media report on my behavior?
- What would the people who are important to me think about my behavior?
- Am I prepared to take responsibility for my behavior?

The Code of Conduct is based on Rodenstock's three corporate values – **Trust**, **Innovation** and **Care**. The corporate values are not only practised, they also offer employees and business partners security and orientation. The Code of Conduct reflects the values of the company. It represents the foundation of daily work and cooperation.

## TRUST

**We create trust through cooperation, transparency and openness**

Through cooperation, transparency and openness, the corporate value of “trust” is put into practice. Employees act as a team, listening, motivating and supporting each other. Open communication also helps to address misconduct openly. This culture promotes the shared and sustainable success of the company. It is in the hands of all employees.

## INNOVATION

**We strive for perfection and break new grounds**

Innovation means progress and is the drive to keep getting better. We are constantly responding to a changing world with creative solutions. Ideas are encouraged, and further developments and openness ensure change. This creates added value for customers and a secure future for the company. Innovation also means striving for new approaches in all areas of work.



## CARE

**We foster a culture of respect, appreciation and responsibility**

Care is expressed through respect and appreciation for each individual. All employees are supported, valued and respected. This also applies to customers, the community and the environment.

<sup>2</sup> stands here and in the following for the Rodenstock Group

# 1 RODENSTOCK'S RESPONSIBILITY IN ITS BUSINESS DEALINGS

The success story of Rodenstock is not only based on personal commitment, consistent customer orientation and the special quality of products, but also on integrity, fairness and transparency in dealing with business partners. This is something Rodenstock wants to and will continue – across the globe and without compromise.

# TRANSPARENCY AND OPENNESS REGARDING CONFLICTS OF INTEREST

## Separating private interests from corporate interests

The employees of Rodenstock are also human beings with private goals and interests. In some situations, private interests may seemingly or actually collide with those of Rodenstock, for example in the context of a secondary employment, with respect to the selection of suppliers and service providers or when procurement is awarded.

Placing personal interests above those of the company may result in damage to Rodenstock. Therefore, situations that have even the appearance of a conflict of interest should be avoided by disclosing the situation at hand to the supervisor or to the Compliance Officer. Business decisions must never be influenced by personal relationships and interests.

**Q:** My niece has been working for 5 years for a local catering company that regularly supplies us at company parties. I have been working at Rodenstock for a year in a position responsible for organizing such parties. Is that a problem? What should I do?

**A:** To avoid even the appearance of a possible conflict of interest, I contact my supervisor and disclose the situation to him and, if necessary, to other involved departments, e.g., the procurement departments. Whenever in doubt I contact the Compliance Officer.





# PROHIBITION OF CORRUPTION

## Clean business is possible and necessary everywhere – Rodenstock maintains integrity and does not engage in corruption

Corruption leads to business decisions being taken for improper reasons. It prevents progress and innovation and distorts competition. It harms Rodenstock and the entire economy.

Therefore, Rodenstock firmly rejects any form of corruption, even if that may mean losing a business in an individual case.

Rodenstock employees are prohibited from offering, paying, demanding or accepting bribes. The employees are obliged to immediately report any bribery attempts or behavior that could indicate corruption to the Rodenstock Compliance Officer.

**Q:** An important business partner calls my sales department and offers to place a high-volume order with Rodenstock. In return, however, he demands that I promise to offer his son an apprenticeship training position at Rodenstock without following the regular application process. What should I do?

**A:** I will only respond to the request after consultation with our Compliance Officer. This could in fact constitute a criminal offence of bribery and corruption in commercial transactions. The promise of professional employment constitutes an advantage within the meaning of criminal law. It is irrelevant that the grant is not intended to directly benefit the business partner.

# DEALING WITH GIFTS AND INVITATIONS

**Gifts and invitations will only be accepted within the reasonable and legally permissible limits**

Gifts to and from business partners, hospitality and invitations to events are customary in a business environment. From a compliance perspective, such benefits are not problematic as long as they are limited to a scope that is reasonable and customary in the business at hand and as long as they do not violate applicable law or internal regulations.

Gifts that are inappropriate, and that may influence the recipient in a business decision or give him/her the impression that the donor expects something in return are problematic and potentially amount to criminal acts.

**Q:** During a business meeting in China, a business partner presents me with a valuable sculpture. I am afraid of offending the business partner if I refuse the gift. What should I do?

**A:** I contact my supervisor or the Compliance Officer. If the gift cannot be returned, e.g., for cultural reasons, the company may consider a donation to a charitable organization.

# NO GIFTS TO PUBLIC OFFICIALS

**Strict rules apply for dealings with public official**

Particularly strict rules apply to business dealings with public officials. The term “public official” is construed very broadly and includes not only civil servants, judges and administrative staff but also employees of state-owned or state-controlled institutions (e.g., public authorities, employees of public broadcasting corporations, doctors in public hospitals, employees at universities).

When dealing with public officials, it is essential to refrain from making donations of any kind. Nor may any facilitation payments be made either that are intended to accelerate the performance of official acts to which Rodenstock is legally entitled. Any cases of doubt must always be clarified in advance with the supervisor and/or the Compliance Officer.





# ANTITRUST AND COMPETITION LAW

**Rodenstock is committed to fair and undistorted competition worldwide**

Antitrust law protects free and fair competition by prohibiting anti-competitive agreements and concerted practices by competitors and the abuse of a dominant position. Competition law also protects competition from being distorted by unfair commercial practices, such as misleading advertising or undue disparagement of competitors.

Violations of antitrust law may result in invalid contracts, criminal sanctions, hefty fines, and damage to Rodenstock's reputation.

When dealing with business partners in the same industry, e.g., at association meetings or when attending trade fair events, special attention is essential with regard to competition and antitrust law.

# NO ANTI-COMPETITIVE AGREEMENTS

**Rodenstock likes to measure itself against its competitors and complies with the applicable competition and antitrust laws**

Agreements and concerted practices with competitors which have as their object or effect the prevention or restriction of competition are prohibited. This includes in particular any agreements and exchange of information on prices or price components, market or customer allocations, capacities, supply relationships or conditions or offer behavior.

Not only explicit written agreements are prohibited, but also verbal arrangements, “gentlemen’s agreements” and concerted actions resulting from unilateral declarations.

Certain agreements and contractual arrangements with customers or suppliers may also be prohibited under antitrust law. This includes restrictions on the freedom of customers to autonomously set prices or delivery conditions for the resale of products. Employees must never enforce non-binding price recommendations by threatening with disadvantages or promising advantages to customers. Also, certain exclusivity arrangements, exclusivity deliveries, and non-competition clauses may have a restrictive effect on competition in individual cases and thus be prohibited by antitrust law.

**Q:** At a trade fair, an employee of a competitor approaches me and complains about the increased raw material prices in Asia. He asks me whether at Rodenstock, we would also consider a price increase in the order of 5 % as justified in order to save the margin. What should I do?

**A:** I will immediately and unequivocally inform the competitor’s employee that I will not discuss these issues with him or her, as we at Rodenstock avoid, in discussions with competitors, issues that are relevant for the competition. These include, among others, prices, pricing, business planning, development status or delivery conditions. After the trade fair, I will inform our Compliance Officer about the incident.



# NO ABUSE OF MARKET POWER

## Rodenstock does not abuse the strong market position

In some countries and business areas, Rodenstock products have a leading market position. This is neither illegal nor unethical. However, it is prohibited by antitrust law to abuse a dominant market position. Rodenstock and its employees must therefore handle the position in the market responsibly and observe the legal requirements.

In markets where Rodenstock could have a dominant position (to be considered at market shares of 30 - 50% and above), Legal & Compliance should be contacted before discriminating customers without objective justification, charging unreasonably high or low prices (e.g., by means of “predatory pricing”) or refusing to supply business partners without an objective reason.

# NO UNFAIR COMPETITION

## No disparaging remarks about competitors

Rodenstock faces its competitors openly and does not shy away from comparison. However, there should never be spoken badly about competitors or their products and services. Because Rodenstock convinces customers with the quality and innovative power of the products and never with untrue or misleading statements – neither in public communication and advertising nor in direct exchanges.

# PROHIBITION OF MONEY LAUNDERING AND TERRORIST FINANCING

**Rodenstock works only with reputable business partners worldwide and selects them carefully**

Money laundering is the process of transforming the profits from criminal activity, for example tax evasion, into apparently legitimate assets. An increased risk exists under money laundering aspects if payments are made by third parties and not the customer itself. Money laundering is a criminal offence. It is a global “problem” with far-reaching consequences.

Rodenstock firmly rejects any business with persons or organizations involved in criminal activities or whose funds are of illegal origin. The employees are required to carefully verify the identity of the business partners, to allocate incoming payments to the corresponding services and to book them properly. Making or accepting any cash payments or payments to/from third parties is prohibited.

Any information that could lead to suspicion of money laundering, such as suspicious payments and questionable customer requests regarding payment methods must be immediately reported to the Compliance Officer.



**Q:** A customer of Rodenstock has paid an excessive amount of money to Rodenstock and asks me to repay in cash or by bank transfer to an account located in Pakistan instead of his original business account in Italy. What should I do?

**A:** I firmly refuse a cash payment or a payment to another bank account. I ask the customer about the reason why the repayment should not be made in the original payment method and discuss with our Compliance Officer the best course of action.



# TAXES, CUSTOMS DUTIES AND EXPORT CONTROL

Rodenstock respects the existing rules on cross-border trade

**Q:** I receive a request from a potential customer based in a country where export restrictions apply. What should I do?

**A:** I consult with the Export Control Officer and/or Compliance Officer. I do not enter into any contracts which obligate Rodenstock to export to such a country before the reviewing process.

Rodenstock operates globally, imports and exports goods on a daily basis, and always acts in accordance with the applicable customs, tax and import regulations. Employees working in this area are required to strictly comply with national and international sanctions (embargoes) related to countries and individuals, to correctly determine taxes and customs duties and to pay these to the relevant tax authorities.

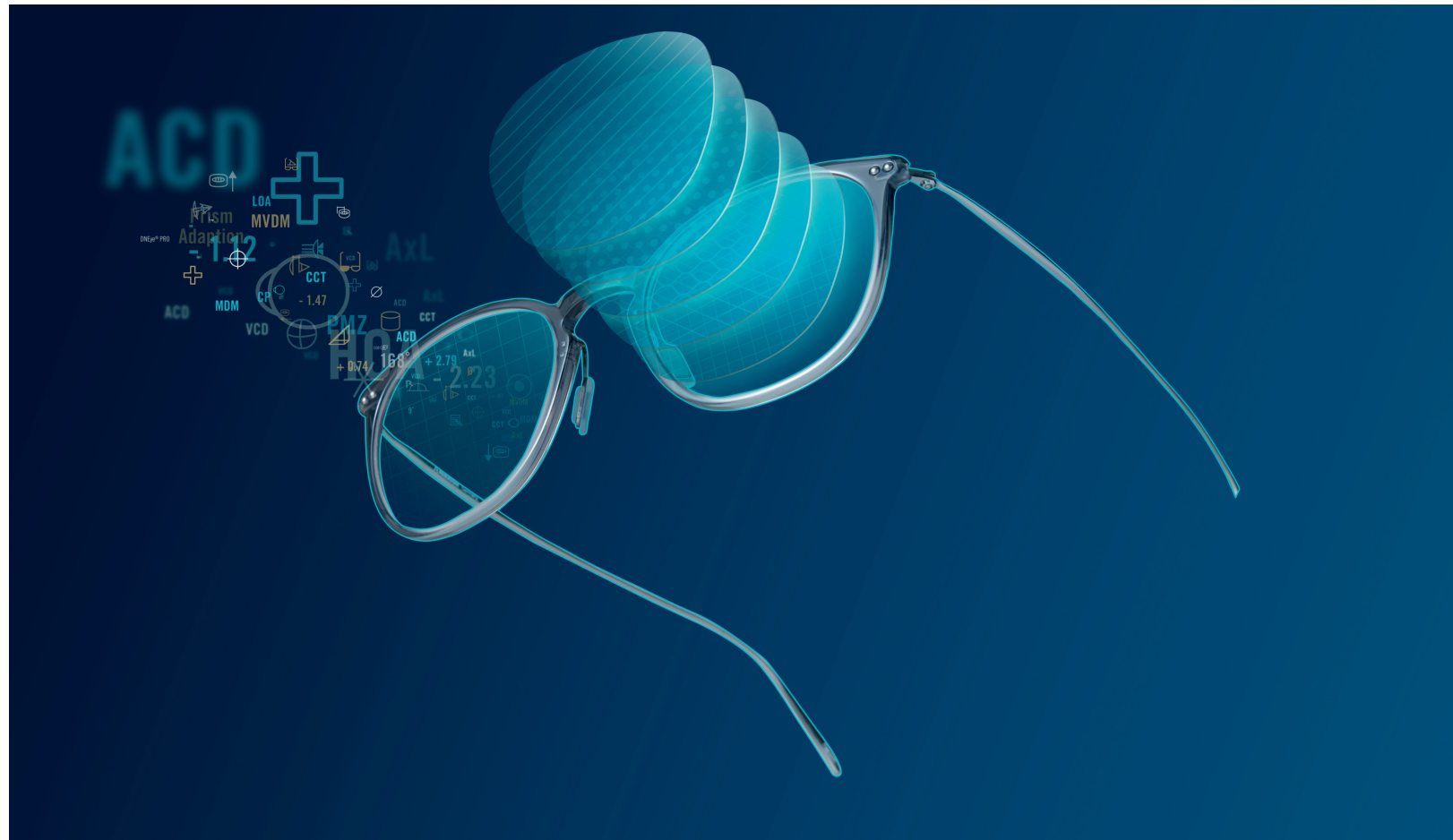
There may be situations where Rodenstock products, software, or technology cannot be shipped or supplied to certain countries or persons due to an embargo, or other restriction. If authorization is required, the Export Control Department must be involved to obtain approval. For such questions or in case of doubt regarding export or import regulations, the export department should be contacted

# PRODUCT SAFETY AT RODENSTOCK

## The products do not pose any risks

Rodenstock is proud of the special quality of the products. Rodenstock products are synonymous with “premium” because they “serve” customers and opticians in all phases of cooperation with perfect work and the highest quality standards. The products correspond to the respective state of the art. At no time do they pose any risk to the safety and health of the customers.

It must be ensured that the Rodenstock quality claim holds water in accordance with the applicable specifications and standards and promises made.



## **2 RESPONSIBILITY AT THE WORKPLACE**

Promoting the health of employees and the safety at the workplace are particularly important. Rodenstock is only successful if employees are healthy and motivated. Because only those who are healthy can master the demands of everyday work life with success and pleasure in the long term. Rodenstock strives to offer all employees a safe and healthy working environment.



# FAIR AND RESPECTFUL TREATMENT

**Rodenstock respects and protects the dignity, privacy and personal rights of each individual**

Fair and respectful treatment is important to Rodenstock.

The selection, hiring and promotion of employees shall always be based on merit.

No bullying, harassment or discrimination will be tolerated, whether based on gender, pregnancy or parenthood, age, sexual orientation, religion, skin color, disability or any other reason. Always act in accordance with the principle of equal opportunity and equal rights.

**Q:** My supervisor frequently makes racist comments about a colleague, which also personally offends me. But I do not feel comfortable to speak up to him. What should I do?

**A:** Racist comments are not acceptable at Rodenstock. I have the right to express my disapproval of such comments without fear of retaliation. Since I am uncomfortable talking about this directly with my supervisor, I contact the Human Resources Department or the Compliance Officer.

# HEALTH AND SAFETY AT WORK

## Safety at the workplace is a top priority

As a manufacturing company, Rodenstock is exposed to a higher level of risk. Rodenstock particularly ensures a healthy and hazard-free working environment by complying with applicable laws and international standards for occupational safety and health protection, e.g., for operating machinery and handling hazardous substances. Therefore, employees are required to comply with all guidelines and rules concerning occupational health and safety.

# CAREFUL HANDLING OF COMPANY PROPERTY

## The property of Rodenstock must be respected and protected in daily use

All Rodenstock employees are responsible to respect Rodenstock's company property and to protect it from damage, loss, abuse, theft and unauthorized access. Company property provided, such as laptops, office materials, tools, pool vehicles etc., are to be used exclusively for company purposes and not for private purposes.



# PROTECTION OF INTELLECTUAL PROPERTY AND TRADE SECRETS

Know-how is an essential basis for Rodenstock's success.  
Sensitive data is handled responsibly

Rodenstock has been a global leader in the field of ophthalmic optics and a major manufacturer of high-quality spectacle lenses for over 145 years. Rodenstock holds a large number of patents worldwide and applies for new patents for innovations in products and processes every year. In order to continue to inspire customers with innovative products in the future, all employees are obliged to protect intellectual property such as know-how, inventions, product prototypes and trade secrets from unauthorized use.

Employees are obliged to keep confidential information of Rodenstock, such as internal plans, strategies, price calculations, details about customers and suppliers, secret and to not disclose it to unauthorized persons (this includes family and friends). This also applies for the use of social media.

At the same time, employees must respect confidential information of suppliers, customers and business partners and equally protect their trade secrets and intellectual property.

**Q:** I need to prepare a presentation for a sales meeting in a timely manner. A colleague offers me a private software and a presentation of his former employer as a template to create my presentation. Can I install the software on my company computer and use the colleague's presentation?

**A:** No. By law and according to the Rodenstock IT guidelines, I am not allowed to use unlicensed software and software not approved by Rodenstock. Ultimately, I and Rodenstock could be held liable for copyright infringement by the manufacturer/author. This also applies to the use of documents, such as presentations that are created by another author.

## PATENTSCHRIFT

1879.

— № 10252 —

Klasse 42.

G. RODENSTOCK IN WÜRZBURG.

**Neuerungen an Augengläsern.**

Patentirt im Deutschen Reiche vom 18. Juli 1879 ab.

Bei allen seither bekannten und gebrauchten Augengläsern wurde bei deren Anwendung am meisten störend, unangenehm und sehr nachtheilig für die Augen gefunden die durch ungenügende Abgrenzung des Gesichtsfeldes ent-

Auftragung eines dunklen Randes um die Gläser herum.

Durch die Anbringung einer dunklen Nuth, wie in Fig. 3 und 6 ersichtlich, wird besonders

# IT SECURITY AND DATA PROTECTION

## Personal data is protected in accordance with applicable law

One of Rodenstock's values that characterize day-to-day actions is the protection of personal data. Rodenstock collects, gathers, processes, uses and stores personal data of employees, business partners and third parties always in accordance with applicable legal requirements.

All employees who have access to personal data must handle such data responsibly.

It is the responsibility of IT professionals to protect Rodenstock from data theft through cyber and hacker attacks, phishing, spying and malware with security measures such as passwords, anti-virus software and clear authorization and access concepts.

IT security is not solely the responsibility of IT specialists, but a shared responsibility of all employees, who help protect Rodenstock by acting prudently and adhering to IT policies.

All employees must comply with the security standards set by the IT department at all times. Employees must not store company or customer data on private electronic devices or connect private electronic devices to the company network.



## **3 SOCIAL RESPONSIBILITY**

Rodenstock bears social responsibility. Care is always taken to comply with all requirements. This includes paying employees legally defined minimum wages in accordance with national regulations by law. Rodenstock sets itself ever higher standards in order to improve in all areas.

# HUMAN RIGHTS

## **At Rodenstock, the focus is always on people**

Rodenstock respects, protects and promotes the applicable regulations for the protection of human rights in the entire supply chain worldwide, as well as in the manufacture of the products.

Rodenstock condemns all forms of child and forced labor as well as any form of human trafficking and modern slavery.

# ENVIRONMENT AND SUSTAINABILITY

## **Rodenstock is aware of its responsibility for environmental and climate protection and acts accordingly**

Every day, Rodenstock processes raw materials into high-quality products in the optical industry. Environmental protection and the principle of sustainability have always been an integral part of the corporate strategy.

In the production, attention is paid to the precautionary protection of people and the environment. Furthermore, Rodenstock is committed to sustainable and economical consumption of resources. Knowledge of the environmental compatibility of products is constantly being expanded and the corresponding precautionary measures are taken. Raw materials and energy are used sparingly, thus protecting nature. Therefore, it is important to always act in accordance with applicable environmental legislation.



# 4 REPORTING OF VIOLATIONS – CONTACT PERSON

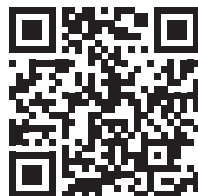
It is important to talk openly about compliance and to address and clarify questions, concerns and problems. This is the only way to prevent compliance violations, learn from mistakes and continuously and effectively improve the compliance system.

Any circumstances that hint to an infringement of laws, internal regulations or this Code of Conduct must be immediately reported to one of the following constituencies:

- The supervisor
- The Compliance Officer
- The legal department
- The HR department

Alternatively, a confidential, optionally anonymous whistleblower portal is available for you to report possible compliance violations. You can reach this portal at [rodenstock.integrityline.com](https://rodenstock.integrityline.com). Alternatively feel free to use the adjacent QR-Code.

You will also find the link in the In-Site and on the Rodenstock homepage. Indications of compliance violations are investigated objectively. Confirmed violations are appropriately sanctioned.



Legal & Compliance department is available to answer any questions regarding the Code of Conduct and to provide advice on all compliance-related topics:

**Sebastian Lewisch**  
**Compliance Officer**  
**Legal & Compliance**  
**Phone: +49 89 7202-125**  
**E-mail: [compliance@rodenstock.com](mailto:compliance@rodenstock.com)**

# IMPRINT

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