







# Code of conduct

February 2021

# Scope of application:

The present code of conduct applies for the following locations:

Röckelein GmbH – Neue Reichenbacher Straße 15, 08496 Neumark / OT Reuth
Röckelein GmbH – Mülheimer Straße 15, 90451 Nürnberg

At the same time, Röckelein requires the observance of the principles anchored in this code also from its suppliers.

#### Laws and statutes:

Röckelein observes the laws and statutes, which apply in the countries, in which Röckelein is active, and demands the same from its suppliers.

### Forced labour:

Any type of forced labour, including forced labour in prisons and debt bondage, is not applied by Röckelein.

#### Integrity and anti-corruption:

Röckelein orients its activities to generally accept ethical values and principles, especially to righteousness, integrity and respect of human dignity, openness and non-discrimination of religion, philosophy of life, sex and ethics. Röckelein opposes corruption and bribery. Röckelein promotes in a suitable manner transparency, integrity and responsible leadership and control in the company.

### Communication:

Röckelein is responsible that the associated requirements are communicated to all its employees and suppliers. Particularly vulnerable groups (e.g. children and adolescents) enjoy particular attention.

# **Child labour:**

Child labour is not used. Insofar as the local laws do not set a higher age limit, no persons are employed who are still of school age or who are younger than 15 years (subject to the exceptions of the ILO convention 138). Employees under 18 years must not be employed for dangerous tasks and can be exempted from night work having regard to their training requirements.

#### Non-discrimination:

At all employment decisions, including recruitments and promotions, remuneration, ancillary pay, education, dismissals and terminations, all employees are strictly treated according to their skills and qualifications.

# Harassment:

The employees are not exposed to any corporal punishments or other physical, sexual, psychical or verbal harassments or abusive acts.









#### Remuneration:

The remuneration, including wages, overtime hours and fringe benefits is made at least in the amount stipulated by applicable laws and statutes or is above this amount. The remuneration granted for the full-time work must be sufficient to satisfy the basic needs of the employee.

### Working hours:

Provided that the national regulations do not stipulate a lower maximum working time and unless in case of extraordinary company circumstances, the employees are not required to work longer than 48 hours per week on a regular basis, or work longer than a total of 60 hours per week (including overtime hours). The 5-day week is exercised.

# **Health and Safety at Work:**

Röckelein ensures fair working conditions as well as safety and health at work. As minimum criteria, the applicable legal provisions apply.

# Occupational health and safety:

In order to avoid accidents and personal injuries, Röckelein provides safe and healthy working conditions, which as minimal criteria comply with the valid legal requirements.

### Freedom of assembly and tariff autonomy:

The employers respect and acknowledge the statutory right of the employees for freedom of assembly and tariff autonomy.

### **Environment:**

At all locations where Röckelein is active, it uses environmentally-friendly practices, which are continuously improved. Röckelein meets the requirements and regarding environmental protection and treats the natural resources in a responsible way.

### **Conflict minerals:**

Röckelein undertakes to do everything in power to prevent the use of conflict minerals. This applies in particular to raw materials such as columbite tantalite (coltan, niobium, tantalum), cassirite (tin), gold, tungstenite (tungsten) from the DRC and their neighbours. This is based on Section 1502 of the US Dodd-Frank Act of 2010, Regulation (EU) 2017/821 of 17.5.2017 and comparable national and international legal obligations.

### **Material Compliance:**

Röckelein ensures safe handling of substances and products and complies with the applicable European regulations on declaration and reporting, e.B. Reach, RoHs. There is a duty of care by Röckelein not to use prohibited substances, or to to respect and point out restrictions.

# Obligation to secrecy:

Röckelein will handle confidential information in strict confidence and protect them against unauthorised disclosure.