

Code of Conduct

Principles of Conduct

We stand for our values

CONTENTS

- 1 FOREWORD**
- 2 RESPONSIBILITY IN DEALING WITH BUSINESS PARTNERS**
- 3 SOCIAL RESPONSIBILITY**
- 4 RESPONSIBLE WITH EACH OTHER**

1 *Foreword*

Dear employees,

familial, dynamic and responsible action are the three pillars of the corporate principles of the Roth family business.

With this Code of Conduct, we explicitly acknowledge our social responsibility in the context of our entrepreneurial activities and thus create secure guidelines for our actions. On this basis, we strengthen the trust that our business partners place in us and build on it in the long term.

Every day, we take responsibility for the processes in our companies, our products, business relationships, employees as well as for the environment and society. To do this, we must know our values, act accordingly and comply with applicable laws and regulations. With this voluntary commitment, we also want to ensure compliance with global social requirements for ethical and moral conduct. This also means maintaining and promoting fair and sustainable standards in our dealings with suppliers and customers as well as company employees.

We strive to ensure that all those involved in our processes are guided by these contents and behave accordingly. By adhering to our values, we ensure the success and future viability of our value-based family company.

This Code of Conduct applies to all Roth companies.

Your management
Roth Industries GmbH & Co. KG



Matthias Donges
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familial - dynamic - responsible

2 *Responsibility
in dealing with
business partners*





Our business activities are geared towards the customer - this focus is an important part of our corporate principles. In connection with this, we are committed to fair competition in our relationships with customers, suppliers and market partners. We maintain a trusting relationship with authorities and observe consumer protection standards. Our business activities are based on generally accepted business practices of fairness and honesty.





No corruption

To ensure the success of our partnerships, we take care to avoid personal dependencies and obligations towards business partners. We reject bribery and corruption and do not tolerate these behaviours. In particular, company employees must not accept or make any gifts that can be assumed to influence business decisions or that result in an undue advantage. If gifts are customary and courteous in a country, it must be ensured that no obligatory dependencies are created as a result and that national legal standards are observed. We rely on all Roth employees to use common sense when giving or accepting gifts. Violations will result in measures under labour law.

Laws, antitrust and competition law

Roth is committed to fair competition. To this end, we observe competition-protecting laws, in particular antitrust law and other competition-regulating standards. Unlawful agreements on prices or other conditions, sales territories or customers as well as abuse of market power contradict our corporate principles.

We are guided by universally accepted ethical values and principles, in particular integrity, honesty and human dignity. We comply with the applicable laws and standards in the countries in which we operate.

Foreign trade law and export control

As an internationally active company, we attach great importance to free trade in accordance with applicable law. For this reason, we observe the international legal provisions on export control in our export and foreign trade activities and carry out the necessary checks for this – for example with the help of individually developed software.

Data protection

We handle the data of our business partners, customers and employees responsibly and observe the laws and regulations of data protection. Business secrets of business partners are treated confidentially by the company and its employees. Disclosure of confidential information to third parties or making it publicly available is prohibited. This also applies to company employees after termination of the employment relationship.

In the daily use of our information technology (IT), we expect our employees to protect the computer system and the IT network. Each individual is required to be careful with user data, passwords, files, e-mail attachments and Internet links in order to avoid damage from inside or outside the company.

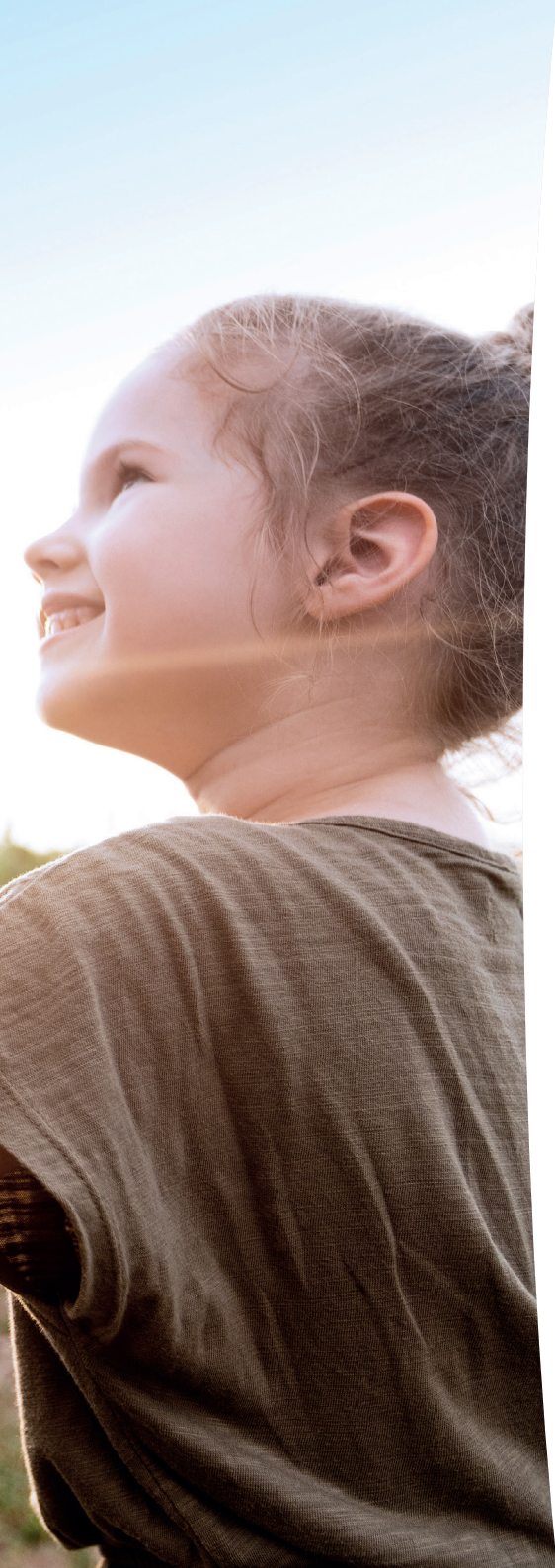
3 *Social responsibility*





We strive for competence leadership in the respective markets through quality and innovation - this is part of our corporate principles. The development and growth of our company is closely aligned with people's living conditions and living spaces. Therefore, social responsibility and integrity are important pillars of our actions.





Protection of human and labour rights

As a family-owned company operating world-wide, we assume global responsibility and observe internationally recognised human rights in accordance with the UN Human Rights Charter. We strengthen their observance at all Roth locations. We reject child labour and any kind of exploitation of children and young people and comply with the relevant laws. We reject any form of forced labour. We also expect our suppliers and business partners to recognise human rights.

Company employees must not be forced into employment, either directly or indirectly, through violence or intimidation. Even in the case of disciplinary measures, all company employees must be treated with dignity and respect. Such measures may only be taken in accordance with applicable national and international standards and internationally recognised human rights.

Social responsibility

We are committed to social progress, education, art, culture and club life because, as a value-based family company, we want to strengthen people's living conditions - especially in the respective regions of our locations. Many organisations and institutions are supported by Roth, for example the "Lebenshilfe" workshops. For the balance of work and family, we offer our employees numerous offers, such as the "Rothkehlchen" crèche at the company's headquarters and job sharing, as well as flexible working time models for employees who care for relatives.

In particular, the training of skilled workers is an important concern for us. Numerous apprentices, one-year trainees and students are in training with us every year. The rate of employment and the training rate in the Roth family business are above average.

Environmental protection

Active environmental protection is anchored in our company principles. We attach great importance to the conservation of resources in the development, production and use of our products. We thus act in accordance with the principles of the Rio Declaration of the United Nations.

Our responsibility towards our environment obliges us to ensure that we go beyond the legal requirements to protect the environment. In doing so, we help to reduce CO₂ emissions to a considerable extent.

At essential European Roth production sites, we are committed to continuously improving our environmental performance with our own environmental statement and the establishment of an environmental management system in accordance with EMAS (Eco-Management and Audit Scheme of the European Union).

By using renewable energies, waste heat and purchasing green electricity at major Roth locations, we have halved CO₂ emissions since 2014. In terms of locations, we already operate in a climate-neutral manner.

Sustainability of Roth products

Roth product concepts are designed to protect the environment from harm by using environmentally friendly materials. The use of carefully selected materials and the system technologies employed ensure the longevity of our product ranges. They have proven themselves in decades of use.

Through innovative product solutions, we bring about manufacturing processes that require less energy input with the same or even better efficiency. By using durable high-tech plastics as the base material for our product systems, we make a significant contribution to improving the eco-balance.

The use of recyclable materials for the manufacture of our product systems is mandatory for development. Our constant commitment to the conservation of resources is recognised by awards.

The innovative product concepts of building and industrial technology help to save energy and protect the environment every day. For example, we achieve great energy savings through our pressure storage systems for capital goods, but also through ecological energy generation with heat pumps and solar and through efficient radiant heating and cooling systems for energy use. The European Environmental Bureau recognised the sustainability of Roth's building technology product range in 2021.

*4 Responsible
with each other*





A family atmosphere characterises our corporate culture. Direct contact, detached from hierarchical levels, short decision-making processes, continuity in management and long employment with the company are what distinguish us. We master challenges as a team. Freedom of action is given and personal initiative is encouraged. Every single employee is an important part of our family company. We maintain an open and trusting communication climate - characterised by mutual respect, appreciation and tolerance.





Respect

We treat all people fairly and with dignity. We value diversity and promote a climate in which we learn from each other. We respect the personal rights, dignity and privacy of every individual. We reject any kind of discrimination, be it because of ethnic or national origin, skin colour, gender, mental or physical disability, age, religious belief, membership in an employee organisation or other personal characteristics.

The right of workers to freedom of association, freedom of assembly and collective bargaining, to the extent permitted and possible by law in the respective country, shall be respected.

We do not tolerate bullying, physical, psychological or sexual violence. We guarantee the right to freedom of opinion and expression.

Work and health

Safe and pleasant working conditions are the basis for our economic success. Our health and safety management creates the conditions for this, identifies potential hazards at an early stage and takes appropriate countermeasures. In doing so, national and international regulations for ensuring health and safety in the workplace are adhered to. All Roth company employees should pay attention to preventing occupational accidents and work-related illnesses.

We also offer health days, training and preventive programmes to promote the health of our employees.

All employees receive a fair salary for their employment. Remuneration shall be paid in a practical manner and a pay slip shall be provided on an adequate scale. Working hours shall be in accordance with applicable national law, industry standard or relevant ILO conventions.

Protection of company resources

We handle the provided company resources with care, we do not waste them and we protect them from damage or theft. They are used exclusively to achieve Roth's corporate goals; we use them only for business purposes. A cost-conscious use of the resources provided contributes to the success of the company.

We also respect the property of our customers and business partners.

Protecting the company's resources also means that we treat intellectual property, inventions, business and trade secrets as strictly confidential and only use them for business purposes in the interest of the Roth family company.

Communication

Our respectful treatment of each other is also reflected in our external communication. In social media channels, for example, we treat the Roth family company, Roth products and our colleagues with respect. In public private expressions of opinion, it should be clearly recognisable that it is not a statement of the company.

Conflicts of interest

Our professional activities are geared to the good of the company. We make sure that our business decisions do not lead to conflicts between the interests of the Roth family company and our personal interests.

Compliance with the Code of Conduct

This Code of Conduct protects the Roth family company, its employees and business partners from misconduct and is intended to ensure that all employees behave in accordance with laws and regulations as well as our own guidelines. The Code of Conduct is obligatory for all employees. Roth brings this Code of Conduct to the attention of its employees at regular intervals and ensures compliance with it.

No one who in good faith reports violations of this Code of Conduct shall be disadvantaged as a result – Roth is committed to ensuring that this is the case. Violations may also be reported anonymously.

Roth is also committed to the Code of Conduct of the “GKV” (Gesamtverband Kunststoffverarbeitende Industrie e. V.), the association for the plastics processing industry in Germany, and is certified for this every two years.



www.roth-industries.com