

Guideline of Business Compliance (Code of Conduct)



ROB GmbH is a medium-size enterprise supplier of the electronic industry.

We endeavor to achieve excellence, innovation and performance in a sustainable manner. People and the environment are our most important resources.

For this reason, we are working to attain the highest standard in business integrity and in the social and environmental performance of our supply chain.

The following guidelines clearly describe our minimum expectations toward business ethics, working conditions, human rights, and environmental leadership, for our suppliers as well as our customers.

These guidelines are based on fundamental principles of social and environmental responsibility that are compliant with local law, consistent with international expectations.

Conduct that does not comply with this standard can be reported to management, the works council or a designated person of trust.

Business Ethics

1. Business Integrity

The basis for sustainable and successful business activity is to have integrity and transparent business practices. Companies are expected to operate honestly and equitable throughout the supply chain in accordance with local law. They shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on Supplier's business book and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

2. No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be accepted, promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

3. Disclosure of Information

Information regarding Supplier labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable laws, regulations and prevailing industry practices. Falsification of records and / or misrepresentation of conditions or practices are unacceptable.

4. Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and, customer information is to be safeguarded.

5. Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available and used.

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6. Responsible Sourcing of Minerals

Suppliers shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products, parts, components, and materials they manufacture does not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

7. Privacy

Suppliers are committed to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Environmental Standards

ROB GmbH recognizes that social and environmental responsibilities is integral to producing and providing world class products and services.

In manufacturing or industrial operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of workers and the public.

The environmental standards are:

- **Environmental permits and reporting**
- **Pollution and resource use reduction**
- **Hazardous materials management**
- **Wastewater and air pollution prevention**
- **Implementation of material restrictions**
- **Reduction of energy consumption and Greenhouse gas emissions**

Businesses are expected to support a proactive approach to environmental challenges, and encourage the development and diffusion of environmental friendly technologies.

Working Conditions and Human Rights

1. Child Labor

Child labor should not be tolerated and the age of employment must be in accordance with local labor law. Workers under the age of 18 (“young workers”) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.

2. Wages and Benefits

Compensation and benefits should be competitive and comply with applicable local laws, including those relating to minimum wages, overtime compensation, and legally mandate benefits.

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3. Working Hours

Working Hours, including overtime, should comply with applicable local laws regulation hours of work.

4. Forced Labor

Any form of forced or compulsory labor including human trafficking, should not be tolerated.

5. Freedom of Association

Workers should be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment. Workers should have the right to associate freely, to join or not join labor unions, seek representation, and join workers' councils in accordance with local laws.

6. Health and Safety

Workers should have a safe and healthy working environment that meets or exceeds applicable standards for safety and occupational health.

7. Harassment and Discrimination

Harassment or discrimination against employees in any form is not acceptable.

Neulingen, 15. June 2021

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- Management –