

Business Partner Code of Ethics

Together creating value for generations – by doing what’s right

ROVEMA GmbH and all its subsidiaries (hereinafter jointly referred to as ROVEMA), as a premium supplier of packaging machinery and equipment, feel a special responsibility towards society, employees and business partners, which is reflected in the ROVEMA Code of Ethics.

Compliance does not just mean obeying the law – that goes without saying. It also means doing “the right thing” by following simple ethical principles to make good decisions. The ROVEMA Code of Ethics describes the standard by which we measure ourselves and sets out the principles we require our employees to follow. For us, it is a matter of course that all employees comply with the law. It is also our obligation to do the right thing and make good decisions. ROVEMA is committed to sustainability and has made a commitment to the United Nations to uphold the Ten Principles of the UN Global Compact.

Sustainable and responsible action, recognition of social responsibility towards our own company, towards customers and suppliers, towards the environment and society is something we also expect and demand from our business partners.

This ROVEMA Business Partner Code of Ethics sets out minimum standards based on the principles of the UN Global Compact and the United Nations Universal Declaration of Human Rights, which we require our customers, suppliers and other contractual partners to comply with. We expect them to recognize and comply with these minimum standards. Our business partners are also required to communicate the principles of this ROVEMA Business Partner Code of Ethics to their direct contractual partners and to work to ensure that they also adhere to the principles.

Integrity and Business Relationships

ROVEMA considers integrity and reliability in the business relationships of all parties involved as an essential prerequisite for sustainable business. Our **central principles regarding integrity and business management** are:

1. Respect for the law

→ Complying with all laws and regulations of each applicable jurisdiction.

2. Human rights and working conditions

→ ROVEMA does not tolerate human rights violations. Our business partners undertake to comply with national and international regulations on the protection of human rights.

Child labor is prohibited. Business partners are requested not to permit the employment of children either in their own operations or those of their business partners.

Employment relationships arise exclusively on a voluntary basis and can be terminated in compliance with agreed termination periods. Forced labor and any form of modern slavery and human trafficking are not permitted.

Our business partners create fair and secure jobs. They do not tolerate discrimination based on gender, age, ethnic origin, nationality, social status, political opinion, or sexual orientation and promote diversity. The work environment is free from harassment and unlawful practices or discrimination.

3. Freedom of expression and association

→ Our business partners are committed to protecting freedom of expression and personal rights and support the right to organize and collective bargaining in accordance with applicable laws.

4. No conflicts of interests

→ Business decisions are made exclusively on the basis of proper considerations. Personal interests, especially of a financial nature, must not play a role. Our business partners therefore undertake to prevent conflicts of interest.

5. No bribery & corruption

→ ROVEMA does not tolerate any form of bribery or corruption. At ROVEMA, business decisions are based on objective criteria such as the reliability and integrity of a business partner, the price and the quality of products or services. Decisions must never be influenced by the prospect of granting or receiving personal benefits to public officials or private business partners.

Our business partners therefore undertake not to offer, request and/or accept gifts, payments, services, or invitations that could improperly influence a business relationship.

6. Anti-Trust & fair competition

→ Our business partners comply with all relevant competition law requirements. In particular, they do not engage in collusion with competitors or conduct that unlawfully prevents or restricts competition.

7. Data privacy and information security

→ Our business partners must protect the personal data of their employees, business partners and customers. They must also ensure that the use of personal data – as well as the collection, recording, storage and deletion of such data – is always carried out in compliance with applicable laws and regulations.

Confidential information of all own employees as well as of business partners will not be disclosed to third parties without authorization and will be protected at all times, by appropriate information security measures.

8. Safety and health in the workplace

→ Our business partners provide their employees with a safe and healthy working environment and regularly identify potential safety risks in accordance with legal requirements.

This means: Preventing accidents, establishing appropriate occupational health and safety management for this purpose, i.e. identifying, assessing and reducing actual and potential accident and health risks, recording and investigating incidents, training and instructing employees in a form they can understand, providing appropriate work tools and protective equipment, and taking appropriate emergency care and response measures.

9. Responsibility to the environment and communities

→ Responsible treatment of the environment and natural resources is a matter of course for ROVEMA. We use natural resources appropriately and sparingly to ensure that our activities have as little impact on the environment as possible. We promote environmental awareness among our employees and are committed to the dissemination and application of energy-efficient and environmentally friendly technologies. We also have this expectation of our business partners.

10. Sanctions

→ Our business partners ensure compliance with all applicable laws governing the import and export of goods, services, and information, as well as applicable embargoes and sanctions.

11. Money laundering and terrorist financing

→ Our business partners comply with all laws prohibiting money laundering or the financing of illegal or illicit purposes. They take appropriate measures in their companies to prevent money laundering and terrorist financing in their companies.

SpeakUp portal

If there are any indications of a violation of laws or the principles of the ROVEMA Business Partner Code of Ethics, you can contact us via the SpeakUp portal, our electronic, multilingual notice system:

<https://www.speakupfeedback.eu/web/rovemaexternal>