

# Code of Conduct: Responsible treatment of people and nature

AVS Römer remains and always will be a reliable partner in the face of numerous challenges. We therefore set out the following standards for dealing with people and nature in this Code of Conduct with which we require to be mandatory. We therefore expect our business partners to strictly comply with these standards and see compliance as an element of trustworthy cooperation.

AVS Römer is committed to complying with the principles and requirements of the Code of Conduct. AVS Römer's business partners confirm the validity of and compliance with the following regulations in their future cooperation. Business partners of AVS Römer shall also endeavour to contractually oblige their sub-suppliers and subcontractors to comply with the standards and regulations set out in this document.

The Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Business Conduct, the United Nations Guiding Principles on Business and Human Rights and the International Labour Standards of the International Labour Organization.

## Social responsibility

### 1. Respect for human rights

AVS Römer fully respects the fundamental rights of all employees. This includes the protection of personal rights. Likewise, harassment in any form is unacceptable. Our employees are to be treated with respect as a matter of course.

### 2. Prohibition of forced labour

We strongly condemn forced labour or work of this nature. AVS Römer therefore unreservedly undertakes not to use forced labour. All work must be voluntary and employees must be able to leave work or employment at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual or personal harassment.

### 3. Prohibition of child labour

No child labour shall be used at any stage of production. AVS Römer adheres to the recommendation from the ILO conventions on the minimum age for the employment of children. Workers must be aged no less than the age at which compulsory education ends, and in any case not less than 15 years. The rights of young workers are particularly protected and protective regulations are observed.

#### **4. Fair pay**

Remuneration for regular working hours and overtime must be at least equal to the national statutory minimum wage. In any case, remuneration for overtime must exceed remuneration paid for regular hours. In addition, employees must be granted all benefits prescribed by law. We categorically forbid wage deductions as punitive measures. We further ensure that every employee receives clear, detailed and regular written information about the composition of their remuneration.

#### **5. Fair working time**

Working hours comply with the applicable laws or the minimum standards customary in the industry, whichever is higher. Overtime is only permitted if it is on a voluntary basis and does not exceed twelve hours per week, with employees granted at least one day off after six consecutive working days. The weekly working time may not regularly exceed 48 hours.

#### **6. Health and safety in the workplace**

AVS Römer is responsible for a safe and healthy working environment. Necessary precautionary measures against accidents and any damage to health are taken that may arise in connection with the activity by setting up and applying appropriate occupational safety systems. In addition, employees are regularly informed and trained about applicable health and safety standards and measures. Employees are provided with access to drinking water in sufficient quantities as well as access to clean sanitary facilities.

#### **7. Dealing with conflict materials**

The company establishes processes in line with the Organisation for Economic Cooperation and Development's (OECD) Guiding Principles on Due Diligence to Promote Responsible Supply Chains for Minerals from Conflict and High-Risk Areas in respect of the conflict materials tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt and expects the same from its suppliers. Smelters and refineries which do not have adequate, audited due diligence processes should be avoided.

### **Ecological responsibility**

#### **1. Treatment and discharge of industrial waste water**

Waste water from operations, manufacturing processes and sanitary facilities is categorised by type, monitored, inspected and, if necessary, treated before discharge or disposal. In addition, we strive to introduce measures that reduce the generation of waste water.

#### **2. Dealing with air emissions**

General emissions from operations (air and noise emissions) and greenhouse gas emissions are categorised by type, routinely monitored and verified before release. If

necessary, immediate remedial action is taken. We also see it as our duty to monitor exhaust gas purification systems, and here too we strive to find economical solutions to minimise any emissions.

### **3. Handling waste and hazardous substances**

AVS Römer follows a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a hazard if released into the environment shall be identified and managed in a manner that ensures safety during their handling, transport, storage, use, recycling or reuse and disposal.

### **4. Consumption of raw materials and natural resources**

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, is to be continuously reduced or avoided. Either directly at the point of origin or through processes and measures, for example by changing production and maintenance processes or procedures in the company, by using alternative materials, through savings, through recycling or by reusing materials. Energy consumption is constantly monitored and documented. It is part of our corporate mission to find economic solutions to improve energy efficiency and minimise energy consumption.

## **Ethical business conduct**

### **1. Fair competition**

The standards of fair business, fair advertising and fair competition are observed. In addition, antitrust laws currently in force apply, which in particular prohibit collusion and other activities that influence prices or conditions when dealing with competitors.

### **2. Confidentiality and data protection**

AVS Römer is committed to meeting the reasonable expectations of its customers, suppliers and employees with respect to the protection of private information. Here, we must comply with data protection and information security laws and government regulations when collecting, storing, processing, transmitting and disclosing personal information.

### **3. Intellectual property**

Intellectual property rights are respected; technology and know-how are transferred in such a way that intellectual property rights and customer information are protected.

### **4. Rejection of bribery and acceptance of benefits**

All business activities are based on the highest standards of integrity. AVS Römer has a zero-tolerance policy in respect of all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards are applied to ensure compliance with anti-corruption laws.

## Acknowledgement and consent

By signing this document, AVS Römer undertakes to act responsibly and to adhere to the principles listed. AVS Römer further undertakes to communicate the contents of this Code to its customers, suppliers, employees, agents and subcontractors and to take all necessary precautions to implement the requirements.

By countersigning this document, business partners of AVS Römer undertake to act responsibly and to comply with the rules of this Code of Conduct

This Agreement shall enter into force upon signature.

Business partner:

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Place	Date	Signature/Stamp
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AVS Römer GmbH & Co. KG

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Place	Date	Signature/Stamp
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