

# **RÖCKELEIN GMBH**

code of conduct



*Image: Managing Directors Mr. Soner Aksoy & Ms. Nathalie Röckelein*

# Context

Our company places great importance on a sustainable and forward-thinking business strategy. As part of this approach, we are committed to upholding high social, environmental, and ethical standards. Responsible sourcing is a key element of value chain. We aim to build long-term, collaborative relationships with our business partners to promote sustainable values and practices.

The employees and business partners of Röckelein GmbH actively contribute to putting these standards into practice in their daily work. Our conduct not only influences business success but also fosters trust with our partners in public.

Adhering to the principles outlined in this Code of Conduct is therefore essential to minimizing legal risks, protecting our reputation, and fostering a responsible working environment. Each individual plays a vital role in this shared responsibility.

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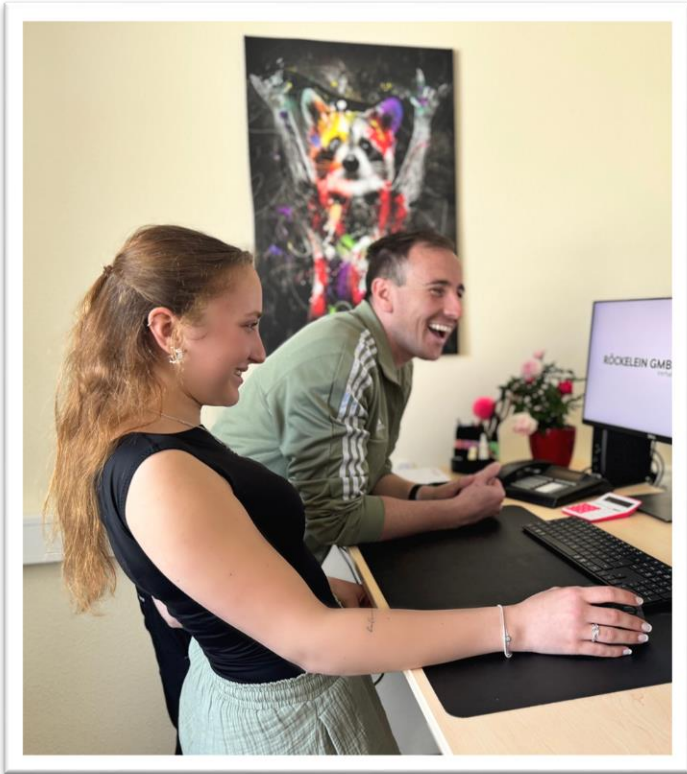
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# 1. General Principles

We are committed to full compliance with all applicable national and international laws and standards. Integrity, transparency, and fairness from the foundation of our business conduct. We cultivate an open and respectful corporate culture in which ethical principles are actively practiced and consistently upheld. Every employee bears responsibility for adhering to these principles and for preventing any form of misconduct.

## 2. Human Rights and Social Responsibility



All forms of forced, compulsory, or slave labor are strictly prohibited. Employment must be based on free will, and employees must have the right to terminate their employment with reasonable notice. Any form of threat, coercion, or intimidation is unacceptable. The use of security personnel must never serve to restrict basic rights or personal freedom.

We respect internationally recognized human rights. Our business partners are expected to uphold these rights—for their own employees and throughout the supply chain. Abuse, intimidation, or degrading treatment is strictly forbidden.

Discrimination based on gender, age, origin, religion, sexual orientation, or any other personal characteristic is not tolerated. We are committed to fostering an inclusive, respectful, and equitable working environment for all.

We value diversity and equal opportunity in all aspects of employment, including hiring, training, career development, and compensation. A discrimination-free environment is essential to ensuring respectful and constructive collaboration.

## 2. Human Rights and Social Responsibility



Child labor is prohibited at all stages of production or service delivery. The legal minimum age of 15 years must be observed. Adolescents under the age of 18 may only be employed under strict protection requirements. Their health, safety, and personal development must always be safeguarded – in accordance with ILO conventions.

All employees must receive compensation that meets at least the legal or industry standards – and is sufficient to secure a livelihood. Overtime is only permitted on a voluntary basis, must be limited, and additionally compensated. Working hours, breaks, vacation, and days off must comply with legal requirements. Wage deductions as punishment are strictly prohibited.

The right to freedom of association and collective bargaining is a key element of fair working conditions. Employees may freely represent their interests – individually or collectively – without disadvantage or retaliation.

Workplace safety is a top priority. We ensure safe working conditions and take measures to prevent health risks.

# 3. Workplace Safety, Occupational Health & Safety

Compliance with all relevant occupational health and safety laws is mandatory. We implement safety systems to prevent accidents and health hazards. Measures are in place to prevent excessive physical or mental fatigue.

Employees receive regular training and are informed about workplace risks and how to mitigate them.

Hazards are actively identified, and appropriate preventive and corrective actions are taken. The free provision of appropriate personal protective equipment is standard practice.





## 4. Environmental Protection and Sustainability



We actively promote the responsible use of natural resources. Protection of water, air, and soil is an essential part of our environmental strategy.



We are committed to minimizing environmental impacts from our operations and maintaining a management system based on international environmental standards. Wastewater and emissions must be monitored, tested, and treated as needed before discharge. Emissions of pollutants and greenhouse gases are continuously monitored and reduced.



Only materials and raw materials that comply with the EU Regulation on deforestation-free products (EUDR), are deforestation-free, legally produced and covered by a due diligence statement, are used.



We promote eco-friendly innovation and sustainable production and supply processes.





# 5. Ethical Business Conduct

We strictly observe competition and antitrust laws and support fair market conditions. Any form of anti-competitive collusion is explicitly rejected.

Confidential information and intellectual property must be protected and used appropriately. Personal data must be handled in compliance with applicable data protection laws.



Conflicts of interest must be avoided or disclosed transparently. Decisions must serve the best interest of the company without seeking personal gain.

Corruption, bribery, extortion, and money laundering are incompatible with our values and will not be tolerated. We work only with partners who share this commitment.

## 6. Responsibility in the Supply Chain



Materials must be sourced responsibly in line with environmental and social standards. We prioritize sustainable resources and supply chains.

Business partners are required to uphold equivalent ethical, social, and environmental standards.

The use of conflict materials that contribute to financing armed conflicts is strictly prohibited.

# 6. Responsibility in the Supply Chain



## Import and Export Control

We comply with all applicable export and import regulations, including export controls and economic sanctions. We provide truthful and accurate information to customs and regulatory authorities when required.

## Financial responsibility

Financial obligations must be fulfilled transparently and lawfully. Business partners are expected to practice sound financial management, pay taxes properly, avoid illegal financial practices, and ensure transparent, standards-compliant accounting. The pursuit of sustainable business models and long-term stability is essential.

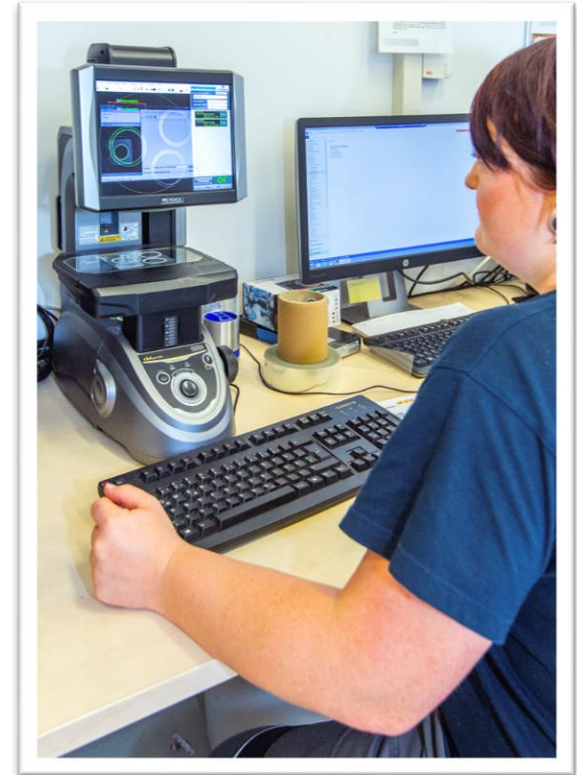


## 7. Quality and Customer Focus

We are committed to delivering high-quality products and services and to continuous improvement.

Management and process leaders actively support and enable a lived culture of quality.

All employees are involved in error prevention and continuous improvement. Our goal is not only to meet but to exceed customer expectations through excellent service and tailored solutions.



## 8. Whistleblower System

A secure and confidential whistleblower system is available to employees and external partners to report violations of this Code of Conduct. All reports are treated confidentially and investigated according to defined procedures. Whistleblowers are protected from any negative consequences.



# 9. Confidentiality and Protection of Sensitive Information

Business and trade secrets must be protected as a top priority.

The obligation of confidentiality remains in place even after the termination of employment.



Confidential company information must not be disclosed without authorization.

Personal data of employees, customers, and partners must be handled with care and confidentiality.

IT systems must ensure confidentiality, integrity, and availability through appropriate measures to mitigate potential threats and risks.



# Implementation and Compliance



Compliance with this Code of Conduct is a key element of responsible and sustainable business—within our company and across our supply chain. We expect all employees, managers, business partners, and suppliers to be familiar with, act in accordance with, and support this Code.



The Executive Management is responsible for implementing the principles and ensuring that the necessary structures, processes, and training measures are in place.



Department and process leads ensure consistent application in day-to-day operations. We foster transparency, dialogue, and cooperation. Reports of violations are treated confidentially and reviewed carefully. Depending on the severity, violations may lead to consequences, including termination of the business relationship.



Our goal is to establish a working and business environment characterized by integrity, fairness, and mutual respect—today and in the future.



Röckelein GmbH  
Neue Reichenbacher Str. 15  
D- 08496 Neumark OT Reuth  
[reuth@roeckelein-gmbh.de](mailto:reuth@roeckelein-gmbh.de)  
037600/946-0

Röckelein GmbH  
Gutenstetter Str. 8f  
D- 90449 Nürnberg  
[nuernberg@roeckelein-gmbh.de](mailto:nuernberg@roeckelein-gmbh.de)  
0911/99633-0

[www.roeckelein-gmbh.de](http://www.roeckelein-gmbh.de)

