#### 1. Introduction

Within the RP GROUP (RP-Technik GmbH, hereinafter always referred to as the RP Group), we have set ourselves the goal of developing and bringing to market innovative products and solutions with very practical benefits to enable our customers to enjoy even greater success.

This also creates the basis for steady, profitable growth and a long-term, sustainable increase in the value of the company and allows the RP GROUP to remain an independent family business for future generations.

Our actions are based on individual responsibility, sincerity, loyalty and respect for other people and the environment. Management bear particular responsibility in this respect.

The **Code of Conduct** outlined below illustrates these principles. This code aims to avoid situations where the honesty of our actions and trust in our products and services could be brought into question. We also want to encourage all members of staff to take personal responsibility for their actions and provide guidance on how to do this.

This **Code of Conduct** lays down the basic rules, standards and behaviours needed to achieve these aims.

The **Code of Conduct** applies to everyone who works in or for the RP GROUP. This includes management, employees (including temporary agency workers etc.) and other people working for the RP GROUP.

If the RP GROUP is mentioned in the **Code of Conduct**, this means all companies controlled directly or indirectly.

## 2. Honest and compliant business management – compliance with rules and legislation

We consider compliance with national and international legislation and internal specifications to be the main principle of commercially responsible conduct. We observe legally binding prohibitions and obligations at all times even if they result in short-term financial disadvantages or difficulties for a partnership, individual companies or individual people.

Managers act as role models. They take responsibility for their own behaviour and the behaviour of staff within their area of responsibility. They are also responsible for correct compliance with all procedures intended to avoid reputational and legal risks. They must take the necessary and appropriate measures to ensure full compliance with the code of conduct during the course of our business practices and procedures.

All employees are assisted in recognising and observing all relevant legislation and regulatory requirements within their work environment.

All employees are required to act honestly and fairly in their work environment and to avoid any conflict between their personal interests and the business interests of the RP GROUP or those of our customers.

All employees are expressly encouraged to talk to their superiors if they find that anyone is acting in a manner which may not be compliant with relevant regulations. This can prevent minor problems turning into major ones. No employee who voices concern in good faith need fear any negative consequences — even if their concerns prove to be ungrounded. Company management is responsible for ensuring this. Concerns can also be voiced anonymously.

### 3. Respectful dealings with one another – nondiscrimination rule – progress through achievements and potential

Our success is also essentially based on respectful dealings with one another. We are prepared to learn from mistakes and value frankness.

We are conscious that our staff are just as diverse as our clientèle. The RP GROUP will not therefore tolerate any discrimination or harassment in the workplace, be it on the basis of age, disabilities, origin, sex, political orientation, the activities of trade unions or other bodies representing workers, race, religion or sexual orientation. The main criteria on which staff progress through the company are therefore their individual achievements and potential.

#### 4. Human rights and employment rights

We respect internationally recognised human rights, dignity and personal rights and help to comply with them. We strictly reject any form of enforced or child labour. We respect the freedom of association and collective bargaining within the framework of applicable regulation. We are committed to fair working conditions, including fair wages, fair working hours and fair protection of privacy.

# 5. Protection of personal data and confidential information - requests for information from authorities

We strictly observe compliance with rules for protecting personal data and respect the general personal rights of everyone in terms of their personal data. Confidential information and documents about customers, the RP GROUP or employees must be suitably protected so they cannot be accessed by third parties or colleagues who are not involved. Personal data may only be collected, processed or used if this has to be done for defined, clear and legal purposes.

Employees' rights to access and rectification and if necessary to protest, blocking and deletion should be safeguarded. An appropriate, state-of-the-art standard should be observed when providing technical protection from unauthorised access to data and information and from loss or destruction. The RP GROUP cooperates with all responsible public bodies and inspectorates. Communication relating to requests for information are channelled to the staff appointed for such work.

### 6. Protection of company assets and natural resources

The intellectual property of our company is our most valuable asset, which needs to be protected by all staff. We likewise respect the intellectual property of others. Intellectual property includes copyrights (including the copyrights to software and databases), brands, knowhow or other information relating to copyrights.

Technical trade secrets and commercial business secrets are important company resources. All staff are therefore committed to protecting them. This includes strict compliance with the information security requirements of the RP GROUP. The assets and operating equipment, business records and tools of the RP GROUP must be neither misused for personal purposes nor made available to third parties without authorisation.

During their work, staff are required to protect natural resources and ensure that the business activities of the RP GROUP put as little strain as possible on the environment by cutting material consumption, planning that saves energy and reducing and recycling waste. When selecting sub-suppliers, advertising materials or other external services, all staff should therefore consider not just financial aspects but also ecological and social criteria.

#### 7. Personal conflicts of interest

If employees find themselves in conflicts between their personal interests and the professional activities and/or interests of the RP GROUP or our customers, this may damage the reputation of this employee and the RP GROUP as a whole. Employees should therefore avoid such situations in the interest of the RP GROUP and in their own interest.

In detail, this means:

- No financial involvement in companies, which may be affected by professional decisions taken by the employee or the RP GROUP
- Making supervisors and Compliance aware in advance if orders are placed with family members, life partners or other people closely related to members of staff – if known. This also applies to business with companies in which family members are directly or indirectly involved.
- Positions of responsibility (e.g. board member, managing director, chair, supervisory board, advisor) in customer companies, business partners or competitors must not be accepted without the prior consent of management and once Compliance has been informed.

The way in which actions are perceived by third parties is crucial. Even the semblance of a personal conflict of interest may be damaging. If staff have a justified interest, they may ask to be excused from specific individual work, which could result in a conflict of interests.

### 8. No conflicts of interest with customers and business partners

The RP GROUP strives to achieve lasting business relations with its customers and business partners that benefit both parties.

All staff must therefore ensure that the interests of our customers and business partners are taken into consideration in a fair manner. The interests of customers or business partners must not be prioritised to the detriment of other customers or business partners.

#### 9. Protection of competition

Competition legislation prohibits behaviour, which prevents free and fair competition and restricts trade. This legislation applies equally to us as a supplier and purchaser of goods and services.

The RP GROUP is not involved in illegal agreements or activities, which restrict competition, in particular agreements on prices, conditions and sharing the market with competitors. Before staff deviate from standard contracts or procedures stated in partnership agreements, they clarify with management whether this will result in consequences not permitted by competition legislation. When contacting competitors and business partners, employees of the RP GROUP do not talk about internal matters, such as prices and sales or financial conditions, costs. market overviews organisational procedures or other confidential information from which competitors or business partners may draw competitive advantages.

The RP GROUP provides all staff with appropriate ways of being able to recognise problematic actions in good time and in a relevant way.

## 10. No tolerance of corruption, particular attention for public officials

Our market success is based on our innovations, ability to motivate, performance, flexibility and responsiveness of service and must not be obtained by dishonest payments. Our business partners trust in the ability of our staff to make professional judgements.

The RP GROUP does not therefore tolerate any form of bribery or corruption, the granting or acceptance of benefits by a public official.

Anyone failing to observe the regulations governing gifts and invitations in Item 11 of this **Code of Conduct** runs the risk of prosecution on the grounds of corruption. Even promising or demanding dishonest advantages may render a person liable for prosecution.

Should staff offer invitations or payments to people from outside the RP GROUP, their internal regulations governing gifts and invitations should always be observed. This applies in particular to contact with public officials.

Providing public officials with benefits can be prosecuted both as the granting or acceptance of benefits by a public official because the action is related to the official position. There is no need for the exercising of public duties to be dishonestly influenced for an individual to be prosecuted. Any officer performing public duties may be considered a public official, not just government officials and public sector workers.

### 11. Gifts, business meals and events

Gifts, business meals and events for the purpose of providing information, representation or entertainment can be used as a means of establishing or boosting business connections. They must however never be used to gain dishonest commercial advantage and may only be

of a scope and nature which is appropriate and does not bring into question the professional independence and ability of those involved to make judgements.

Particularly strict standards are required when making contact with public officials. The regulations governing gifts and invitations of the employer in question must be observed.

#### 12. Preventing money laundering

The RP Group adheres to money laundering legislation. No cooperation partners are involved in money laundering activities. If in any doubt, all employees of any cooperation partner must have unusual financial transactions checked by the Finance, Legal or Compliance department. This applies especially to cash transactions that may cause them to suspect money laundering.

### 13. Donations and sponsorship

Donations and sponsorship are important instruments for demonstrating social responsibility; in principle the financial support of charitable matters is aimed at the public. Management makes decisions relating to donations and sponsorship. They must not be used to bring about dishonest benefits indirectly from business partners.

### 14. Communication with customers, business partners and the public, social media

All key statements and reports issued by the RP GROUP must be complete, honest, precise, topical and comprehensible no matter whether they are made to business partners, customers or the public.

This applies in particular to information and advertising material relating to our products. Business partners, customers or the public may only be provided with information about the RP GROUP, our products, our customers or business partners via staff authorised to do so.

Anyone within the RP GROUP who is not responsible for communications and talks about issues that may affect the RP GROUP or our business partners in a public discussion or social media, should make it clear that he or she is acting as a private individual. This is usually done through the use of private accounts, e-mail addresses etc. The content must be such that it cannot give the impression that the RP GROUP shares the stated opinion. The employee should not speak out against the interests of the RP GROUP and its business partners. While individuals have a protected freedom of expression, their duty to consideration and loyalty to their employer and their employer's business relations as laid down in their employment contract must be ensured.

Please note that people say things informally and spontaneously in e-mails and on social media, but the content is retained and visible to the recipient and/or online for a long time.

# 15. Long-term environmental protection and tackling climate change

Long-term environmental protection and tackling climate change are amongst our most important goals.

Both when developing new products and services and when supporting existing customers, we ensure that all resultant impacts on the environment and climate are minimised as far as possible and that our products positively help our customers to protect the environment and tackle climate change.

### 16. Consequences of violating this code of conduct

Violating these rules may result in significant losses of reputation and legal disadvantages for the employees in question, their colleagues and the RP GROUP. This may extend to fines, prosecution or restrictions on official permits. In most cases, such misconduct will also be a breach of duty under employment law and may result in corresponding sanctions.

#### 17. Summary

We want this **Code of Conduct** and the values, rules and standards on which it is based to be actively and openly communicated. Given their function as role models, our management must be gauged against this **Code of Conduct**. Management ensure that all staff are aware of, understand and apply the **Code of Conduct** and are the first port of call should staff have any issues understanding or interpreting individual rules. Across the entire company, we support trusting and good collaboration between staff and managers. This is demonstrated through open sharing of information, honest dealings with one another and mutual support.