

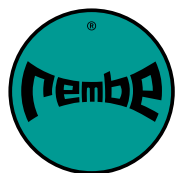


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**Code of Conduct
REMBE® Commitment
to Decency (RECODE)**

for REMBE® Family Members
for Suppliers
for Business partners
for Customers





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Abbreviations

CEO	=	Chief Executive Officer
CHRO	=	Chief Human Resource Officer
CO	=	Chief Officer
CFSI	=	Counterfeit, Fraudulent and Suspect Items
ILO	=	International Labour Organization
KI	=	Artificial Intelligence
RECODE	=	REMBE® Commitment to Decency
RFM	=	REMBE® Family Member

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Do the right thing right: Why a REMBE® Commitment to Decency?

**Dear REMBE® Family Members,
dear Suppliers,
dear Business partners,
dear Customers,**

In the global competitive environment, sustainable collaboration is built not only on high-quality products and services but also on professional and honest conduct that includes compliance with legal regulations as well as integrity, respect, and responsible behavior.

Our goal is to align economic success with ethical values, social responsibility, and sustainable action. We all share responsibility for fair, professional, and honest business conduct. For this reason, we have established this REMBE® Commitment to Decency (RECODE) to create a common understanding: it defines the values and principles that guide our daily actions.

This RECODE provides guidance and support while also setting out the binding requirements for our conduct. It applies equally to our REMBE® Family Members (RFM) as well as to our suppliers, business partners, and customers.

I expect all RFM, suppliers, business partners, and customers to actively uphold these standards, take responsibility, and contribute to a culture of trust, fairness, and mutual respect. Only by working together we create a sustainable and reliable foundation for long-term partnerships and business success.

We will closely monitor developments in the legal and business environment and, where necessary, adapt our RECODE accordingly.

Stefan Penno
Chief Executive Officer





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1 Fundamental understanding

This RECODE is based on a shared understanding of socially responsible corporate governance in accordance with the principles outlined below.

Within the scope of our respective capabilities and areas of influence, we assume responsibility by considering the legal, economic, technological, social, and environmental impacts of our business decisions and actions. We apply these principles in our relationships with customers, suppliers, and business partners, as well as in our internal collaboration. We contribute to the development of the countries and regions in which we operate and actively prevent misconduct. This includes compliance with contractual agreements and voluntarily assumed commitments.

The actions of every REMBE® Family Member are aligned with applicable laws, regulatory standards, voluntary commitments, and internal policies. We are guided by ethical values and principles, particularly integrity, honesty, and respect for human dignity, as reflected in the principles of the United Nations Universal Declaration of Human Rights, the OECD-Guidelines for Multinational Enterprises, the core labour standards of the International Labour Organization (ILO), and the United Nations Guiding Principles on Business and Human Rights. In addition, honesty, responsibility, professionalism, trust, and appreciation are values that we demonstrate through our conduct. These values represent both the company and the REMBE® brand.

Adherence to these values is essential for maintaining the trust of our business partners, succeeding in the marketplace, and ensuring the consistently high quality of our products and services. For us, the reputation of the company is more important than the individual success of any single transaction or person.

The RECODE establishes the fundamental principles that guide our actions and whose observance we actively require from our RFM worldwide. Its provisions apply to all subsidiaries, locations, and business units of our company. We expect our suppliers and business partners to share this same fundamental understanding, as further described in Section 7.4. This RECODE is not intended to create any rights in favor of third parties.



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2 Basic rules

2.1 Compliance with Laws

Compliance with all applicable laws, regulations, and official requirements in the countries where REMBE® operates is a fundamental obligation of the company, its managers, and all RFM.

Where local laws or regulations impose lower standards than the principles set out in this RECODE, the higher standards of this RECODE shall apply. If national or regional regulations contain more extensive or stricter requirements, those requirements shall take precedence and must be followed. The same applies in cases where mandatory local law conflicts with the provisions of this RECODE.

Ensuring lawful conduct has become increasingly challenging due to the growing complexity of international business relationships and the continuously expanding range of legal and regulatory requirements. This makes it all the more important that all employees understand their responsibilities and contribute through their daily actions to ensuring compliance with these requirements.

2.2 Integrity and Compliance

We implement appropriate compliance measures and adhere to all applicable legal requirements to ensure that the following areas are adequately addressed:

Anti-Corruption and Integrity

When competing for business opportunities, REMBE® bases its decisions on objective business criteria such as quality, price, and customer value. We do not tolerate corruption, bribery, or extortion, as they undermine fair competition. Benefits or advantages that are intended, or could appear to be intended, to influence business decisions or secure an improper advantage are neither promised, offered, granted, requested, nor accepted in our business relationships, nor do we allow such benefits to be promised to us. This means that RFM are prohibited from offering or providing direct or indirect benefits to third parties in order to improperly influence business decisions, whether through financial payments or any other means. Likewise, no RFM may use their employment position to demand, accept, or otherwise obtain unjustified advantages. Gifts, favors, hospitality, or other benefits may only be given or accepted if they comply with applicable laws and would not damage the reputation of REMBE® or the integrity of the RFM if publicly disclosed. We also do not tolerate criminal acts involving financial misconduct, such as fraud, theft, or the misuse of company assets. We expect strict compliance with all applicable anti-corruption laws, including the UK Bribery Act and the U.S. Foreign Corrupt Practices Act (FCPA).

Fair Competition and Antitrust Law

In our dealings with competitors and business partners, we comply with the principles of fair competition and all applicable national and international competition and antitrust laws. These laws are essential to ensuring a market environment based on performance and fair competition. Any actions aimed at gaining an economic advantage through anti-competitive practices or cartel arrangements are strictly prohibited. This includes, in particular, agreements between competitors to fix or control prices, boycott specific suppliers or customers, allocate customers, territories, or markets or restrict the production, supply, or sale of products. Violations of applicable competition laws may result in substantial fines, exposure to damages claims, and reputational harm, all of which can adversely affect our company and our position in the marketplace.

Tax Law

As an internationally operating group, REMBE® complies with all relevant tax laws and regulations. REMBE® does not support inappropriate conduct by business partners. We determine transfer prices in accordance with internationally recognized principles and also take into account comparable terms offered by third parties. RFM working both domestically and on international assignments are individually responsible for understanding, observing, and complying with the tax laws applicable to them personally.



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Prevention of Money Laundering

Money laundering refers to the process of introducing illegally generated funds or unlawfully acquired assets into the legitimate financial and economic system. We comply with all legal obligations relating to the prevention of money laundering and do not participate in any transactions that serve to conceal, disguise, or integrate criminally or illegally obtained assets into the legal economy.

Fair Business Relationships

We maintain fair and ethical relationships with all business partners. Suppliers and service providers are selected based on objective and transparent criteria, including competitive evaluations and comparisons of offers.

Commissions or benefits (e.g., discounts or price reductions) in connection with goods and services are permissible. However, their use requires not only comprehensive documentation but also the utmost care and strict compliance with all applicable laws, regulations, and internal requirements.

Payment for goods and services received is made directly to the respective contractual partner and, as a rule, in the country where that partner is based. Before agreeing to any alternative payment arrangements, the responsible CO or the CEO must be informed.

Protection of Information and Intellectual Property

We protect confidential information and respect intellectual property rights, including through the prevention of Counterfeit, Fraudulent, and Suspect Items (CFSI). We do not tolerate the manufacture, distribution, or support of such products. All employees and business partners are expected to carefully verify the authenticity, quality, and origin of goods and to report suspicious activities without delay. Through appropriate control mechanisms, transparent supply chains, and ongoing training, we ensure that our business processes meet the highest standards of integrity and compliance. Technology and know-how transfer is conducted in a manner that safeguards intellectual property rights, customer information, trade secrets, and other non-public information. We comply with all applicable laws governing the protection of trade secrets and treat the confidential information of our business partners accordingly.

Data Protection and Information Security

We process, store, and protect personal data in accordance with applicable legal requirements. Personal data is therefore collected and processed confidentially, transparently, and solely for legitimate and previously defined purposes. We process personal data only when it is protected against loss, alteration, unauthorized use, or disclosure through appropriate technical and organizational measures.

All information relating to REMBE® may constitute confidential business information. Consequently, and to the extent permitted by law, such information must generally be treated as confidential and may not be disclosed to unauthorized third parties (including family members and friends) during or after the termination of employment. Every RFM is required to handle such information responsibly and diligently, for example by storing it securely and ensuring that it is not left unattended where it could be accessed by unauthorized people. Innovative products and solutions are of great importance to the company's development. Inventions created by RFM or third parties on behalf of the company must be adequately protected through appropriate legal measures. No RFM may disclose information concerning the company's know-how (such as drawings, business ideas, market information, pricing information, or data storage media) or trade secrets to project partners or other third parties for personal gain, for the benefit of others, or to the detriment of REMBE®, unless expressly authorized to do so. In cases of doubt, the approval of the CEO or an appropriately authorized representative must be obtained before any such information is disclosed or shared.

Because REMBE®'s business activities rely extensively on information technology systems, the company's operations depend significantly on their functionality and availability. To minimize resulting risks, all applicable information security and IT security policies must be consistently observed and followed.



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International Trade & Export Control

We are committed to complying with all applicable laws and regulations relating to import controls, export controls, and customs requirements, particularly licensing requirements, export restrictions, and prohibitions on support activities in connection with the transfer and export of our goods.

Every RFM is required to comply with internal export control rules as well as all applicable legal requirements and regulations. REMBE® does not import or export any materials, products, or technologies that are subject to legal controls and require import or export authorization without obtaining the necessary approvals from the competent authorities.

Conflicts of Interest

The RFM and supplier ensure that situations in which their personal interests conflict, or could potentially conflict, with the business interests of REMBE® are avoided. Any identified conflict of interest must be reported to REMBE® without delay. This includes situations in which RFM hold a financial interest in a supplier's company or maintain another type of relationship with that supplier.

Significant shareholdings held by RFM in companies that are competitors, customers, or suppliers of REMBE® require the approval of the CEO and the responsible CO. Significant shareholdings held by close family members of an RFM in a competitor, customer, or supplier must be disclosed to the responsible CO whenever a potential conflict of interest may arise for the RFM. Close family members include spouses, registered partners, children, and other relatives who have shared the same household with the RFM for at least one year at the time the shareholding was acquired. A significant shareholding is defined as ownership of 10% or more of a company's shares, or 1% or more in the case of a publicly listed company.

Secondary employment or outside business activities require the prior approval of the responsible CO and the CHRO. Approval will generally not be granted if the activity may impair the RFM work performance and/or safety, conflict with the RFM duties, or create a risk of a conflict of interest.

No REMBE® transactions may be conducted with RFM or their family members unless such transactions have been individually approved in advance by the CEO and/or the responsible CO.

No one may use REMBE® business opportunities for personal benefit or for the benefit of third parties.

Artificial Intelligence (AI)

We are committed to the responsible use of artificial intelligence systems in accordance with our internal AI Policy, applicable laws and regulatory requirements, and the values and principles of our company.

Political Influence & Lobbying

As a general principle, REMBE® does not participate in party-political activities. This includes financial contributions, benefits, or other support provided to political parties, political organizations, or their representatives, as well as political activities or events carried out on behalf of, or on the premises of, REMBE®. However, RFM are always free to engage in political activities as private individuals and citizens outside working hours, provided that such activities appropriately support democracy, fairness, equal treatment, and the rule of law.

Social Commitment

REMBE®'s social commitment includes charitable donations, particularly for social and cultural initiatives as well as research and development projects. Donations are made transparently and free from personal interests. All donation activities are documented and conducted under the REMBE® Charity initiative.

Communication

Reports and communications directed to RFM, business partners, the public, official organizations, and authorities must be clear, accurate, truthful, and submitted in a timely manner. They must comply with all applicable laws and regulations. Our financial statements and annual accounts accurately and faithfully reflect business transactions.



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2.3 Respect for Human Rights

We respect and support the protection of internationally recognized economic, social, and cultural human rights¹ and:

- respect the personal dignity, privacy, and individual rights of every person.
- protect and uphold the right to freedom of opinion and freedom of expression.
- do not tolerate any unacceptable treatment of employees, including physical or psychological abuse, sexual or personal harassment, or discrimination.
- ensure that employees have access to adequate food, clean drinking water, appropriate clothing, and hygienic sanitation facilities in the workplace.

Prohibition of Child Labor

We do not tolerate child labor.² The best interests of the child are of paramount importance in all our decisions. Every child must be protected from economic exploitation and from work that is hazardous, harmful to health, detrimental to dignity, or likely to endanger physical, mental, spiritual, moral, or social development. Furthermore, no work may interfere with a child's education or prevent regular school attendance.

We require our suppliers and business partners not to employ children below the minimum age of 15 years and to provide proof of age where necessary. From the age of 15, employment may only take place within the limits permitted by applicable youth employment laws and regulations. In countries that fall under the developing-country exception of ILO Convention No. 138, the minimum employment age may be reduced to 14 years. We do not employ individuals under the age of 18 for hazardous work as defined by ILO Convention No. 182.

Prohibition of Forced Labor

We reject all forms of forced labor, modern slavery, human trafficking, and any comparable practice involving the deprivation of personal freedom.³ All employment relationships must be entered into voluntarily by both parties, and every employee must have the freedom to terminate their employment in accordance with applicable laws and contractual conditions.

Freedom of Association and Collective Bargaining

We respect employees' rights to freedom of association, freedom of assembly, and the right to engage in collective bargaining and labor negotiations⁴, insofar as such rights are legally permissible and feasible in the countries in which we operate. Where these rights are restricted or not permitted by law, we seek appropriate alternative arrangements and constructive solutions for our employees that take their underlying interests into account.

Non-Discrimination

We reject all forms of injustice and discrimination. In accordance with ILO Convention No. 111, any form of discrimination is prohibited, including, but not limited to, discrimination based on national or ethnic origin, race, gender, marital status, religion or belief, age, sexual orientation or identity, or disability. We actively promote a culture of non-discrimination.⁵ Relationships among all employees within all departments, teams, and across all REMBE® locations and business units are characterized by professionalism, mutual respect, and fairness. We foster a culture in which stronger individuals support and encourage those who need assistance. We do not tolerate discrimination, harassment, retaliation, or any form of abusive behavior in the workplace. This principle also applies to our interactions with people outside the company.

Fair Remuneration and Working Hours

Our wages, benefits, and overtime compensation meet or exceed the requirements of applicable laws, including relevant national minimum wage legislation and any binding collective bargaining agreements where applicable. We provide all legally mandated benefits, including public holiday pay, paid annual leave, sick leave, and parental leave. Employees are informed clearly, in detail, and on a regular basis about the composition of their remuneration.

1 International Covenant on Economic, Social and Cultural Rights | 2 ILO Conventions No. 79, 138, 142 and 182
3 ILO Conventions No. 29 and 105 | 4 ILO Conventions No. 87, 135 and 154 | 5 ILO Convention No. 111



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Our working hours comply with all applicable legal requirements. We adhere to local laws and collective bargaining agreements regarding working hours where applicable. Where no relevant local regulations exist, working hours shall be governed by applicable ILO standards. Overtime may only be worked in accordance with mandatory legal requirements and must be compensated either through time off or appropriate remuneration. Employees are granted adequate rest periods in accordance with locally applicable mandatory legal provisions.

3 Occupational Health, Safety and Workplace Protection

We are committed to protecting the health and safety of our employees and preventing work-related injuries and illnesses by implementing appropriate occupational health and safety measures (e.g., the implementation of an Occupational Health and Safety Management System in accordance with DIN EN ISO 45001 and aligned with ILO Convention No. 120). These measures appropriately address the following topics:

- Compliance with applicable laws and adherence to international standards relating to occupational health and safety
- Appropriate workplace design, safety regulations, fire protection measures, and the provision of suitable personal protective equipment (PPE)
- Implementation of preventive controls, emergency preparedness and response measures, an incident and accident reporting system, training and awareness programs, and other appropriate measures for continuous improvement
- Provision of sufficient access to safe drinking water and clean sanitary facilities for all employees

We ensure that all our employees receive the appropriate training.

4 Environment, Energy and Climate Protection

Compliance with high environmental standards is an integral part of our corporate policy. This includes incorporating environmental considerations into all business activities and fostering a strong environmental awareness among all employees in their daily work. We are committed to complying with all applicable environmental laws and regulations and to acting responsibly and proactively regarding to environmental protection. Our objective is the continuous improvement of our environmental and climate performance. Certification in accordance with DIN EN ISO 14001, DIN EN ISO 50001, and other internationally recognized standards provides the framework for minimizing or preventing negative impacts on the environment and biodiversity (e.g., through deforestation or damage to ecosystems) and for continuously enhancing our environmental and climate protection activities.

We have implemented appropriate environmental protection measures (e.g., the operation of an Environmental and Energy Management System and the establishment of the REMBE® green initiative), which appropriately address, among others, the following topics:

- Setting objectives, defining and implementing measures, and ensuring their continual improvement
- Environmental aspects such as reducing CO₂ emissions, improving energy efficiency, and increasing the use of renewable energy sources
- Preventing air, water, and soil pollution, as well as minimizing emissions and pollution such as noise
- Promoting resource efficiency, reducing waste (e.g., through increased recycling rates), ensuring its proper disposal, and responsibly managing hazardous substances and chemicals to protect people and the environment
- Engaging and raising awareness among employees regarding environmental initiatives and communicating environmental developments and achievements

6 ILO Guidelines on Occupational Safety and Health (ILO-OSH 2001); relevant ILO Occupational Safety and Health Conventions and Recommendations; SA8000 Social Accountability Standard; ISO 45001 Occupational Health and Safety Management Systems

7 OECD Guidelines/COP21



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5 Conflict-Affected and High-Risk Materials

We take appropriate measures to avoid the use of conflict minerals and other high-risk materials in our products to prevent human rights violations, corruption, and the financing of armed groups or similar activities. This includes providing relevant information upon request.

Suppliers shall ensure that the goods and materials supplied to REMBE® have not been sourced through illegal or unethical practices. Furthermore, suppliers shall ensure that, where REMBE® orders products containing conflict minerals (tin, tantalum, tungsten, and gold – 3TG), these materials are not sourced from conflict-affected or high-risk areas. The most current list of Conflict-Affected and High-Risk Areas (CAHRAs) can be accessed at:

<https://www.cahraslist.net/cahras>

6 Consumer Interests and Product Responsibility

Where consumer interests are affected, we comply with applicable consumer protection laws and regulations and adhere to fair marketing, sales, and information practices. Special attention is given to vulnerable groups (e.g. young people or pregnant women).

Operational safety is a responsibility to which REMBE® is fully committed. Worldwide, we pursue one objective: to provide optimum protection for our customers' plants, equipment, and processes in accordance with their specific requirements. The quality and safety of our products are ensured through compliance with all applicable product safety legislation and through regular assessments and certifications by internationally recognized testing and certification bodies. As a result, our safety products are approved globally and comply with relevant industry-specific standards and regulatory requirements.

7 Implementation and Enforcement

We undertake appropriate and reasonable efforts to continuously implement, document, and apply the principles and values set out in this REMBE® Commitment to Decency. All RFM are made aware of the contents of the RECODE and receive appropriate training on relevant topics according to their responsibilities and needs. Each RFM is expected to actively and consciously contribute to the proper implementation of the principles set out in this RECODE within the scope of their duties. In particular, the CEO and the responsible CO or Team Leader are accountable for providing employees with the necessary guidance, support, and access to relevant internal policies and procedures, and for explaining these where required.

Violations of the RECODE will not be tolerated and may result in disciplinary measures as well as civil, employment-related, or criminal consequences. Such violations will be addressed in accordance with the Company's established policies, procedures, and applicable laws.

7.1 Leadership Responsibility and Role Model Function

The RFM who hold leadership responsibilities serve as role models for all employees. They are expected to demonstrate a particularly strong commitment to the principles defined in this RECODE, actively promote them, and ensure their consistent application in day-to-day business activities.

We cooperate with official organizations and public authorities and support their work while safeguarding our legitimate rights and interests.

To avoid misunderstandings and/or misinterpretations, only expressly authorized RFM may make statements on behalf of the Company. This applies in particular to communications with the media, official organizations, and public authorities. Generally, we do not disclose information regarding customer relationships, matters relating to individual RFM, competitors, or ongoing investigations. Furthermore, we do not comment on rumors.

7.2 Preventive Legal Advice

To minimize potential risks, all RFM are entitled to have a lawyer provided by REMBE® in the event of legal questions or uncertainties.



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7.3 Communication

We communicate openly, transparently, and in a spirit of constructive dialogue regarding the requirements of this RECODE and its implementation. This communication extends to employees, customers, suppliers, and other stakeholders and interested parties.

7.4 Supply Chain

We expect our suppliers to comply with the principles of this RECODE without modifications or exceptions, or to apply equivalent codes of conduct. It is the supplier's responsibility to ensure the implementation of the code of conduct. In addition, we encourage them to enforce the provisions of this RECODE throughout their supply chains.

We reserve the right to review our suppliers' compliance with this RECODE both systematically and on an ad hoc basis. This may take the form of, for example, questionnaires, assessments, or audits. If doubts regarding compliance with this RECODE persist after such reviews, the supplier will be asked to take appropriate corrective measures and report the matter to their designated contact at our company.

7.5 Reporting Concerns and Violations

Through our website, we offer our RFM, business partners, and suppliers access to a secure mechanism for confidentially reporting potential violations of the principles of this RECODE. Every report submitted to our whistleblower system is thoroughly reviewed by the internal reporting office. If additional information is needed, the whistleblower will be contacted. If this initial review reveals a concrete suspicion of a violation of laws or internal policies, an investigation will be launched. The results of the investigation will then be evaluated, and appropriate follow-up measures will be taken.

If you have a report to make, please contact the following office directly or anonymously:

<https://platform.compliance.one/case/welcome/191/81ffd38892c0/>



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