

CODE OF CONDUCT

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Alec Reiff
CEO REIFF-Gruppe

„As a family business with regional roots, we bear a special degree of social responsibility.“

Alec, why do we need a Code of Conduct?

Every business decision has economic, environmental, and social impacts. I want us to be aware of these impacts – and to act with integrity and sustainability. A Code of Conduct contains concrete common basic principles and at the same time it is a clear signal to our customers and business partners: you can rely on it and we expect the same from you.

What are your expectations of the company's employees?

As a family business with regional roots, we bear a special degree of social responsibility. Accordingly, I expect all employees at REIFF to adhere to the Code of Conduct and stand up for its basic principles. I am convinced that long-term success is only possible if it does not come at the expense of others or the environment.

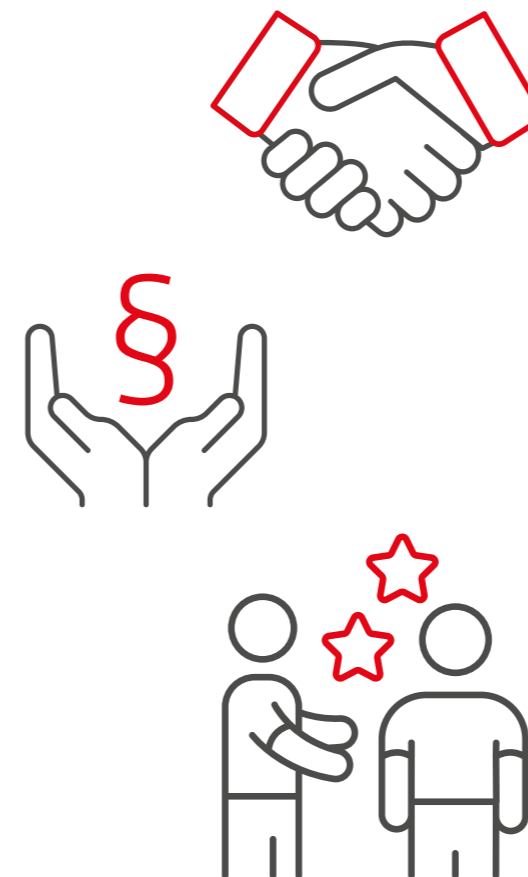
What does this mean for our day-to-day business?

It means that the basic principles of the Code of Conduct are firmly anchored in our processes, our decisions, and our culture. It also means that we openly address and do not tolerate non-compliance with these principles. This is what we stand for.

CODE OF CONDUCT – SCOPE OF APPLICATION

This Code of Conduct forms the basis of our corporate actions and applies without restriction to all employees of the REIFF Group. It serves as a guideline to anchor our values and obligations in our actions and strengthens REIFF's reputation as a fair, reliable business partner and attractive employer.

The Code of Conduct is based on 3 fundamental principles:



- 1** We behave with integrity and act ethically in our collaboration with each other and with our customers, suppliers and other partners.
- 2** We comply with national and international laws and regulations.
- 3** We value entrepreneurial freedom and trust our employees to responsibly make use of this freedom.

In addition, our Code of Conduct is based on international standards, in particular the core conventions of the International Labour Organization (ILO) and the Ten Principles of the UN Global Compact.

This Code of Conduct is supplemented by internal guidelines, regulations, and contractual agreements.

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GENERAL PRINCIPLES

COMPLIANCE WITH LAWS & REGULATIONS

Compliance with laws and legal regulations is a self-evident basic principle of our actions.

PROFESSIONAL AND FAIR BEHAVIOUR TOWARDS OUR FELLOW PEOPLE

We attach great importance to respectful cooperation, characterised by mutual trust, openness, tolerance, and respect. Every person has the right to be treated fairly and with dignity, and we encourage and demand that people treat each other "as equals".

EQUAL TREATMENT & OPPORTUNITIES

We are committed to equality, diversity, and inclusion. We do not tolerate any form of discrimination and treat all people equally, regardless of gender, age, skin colour, culture, ethnic or social origin, sexual identity, disability, religious affiliation or ideology. Likewise, we do not tolerate any form of sexual harassment, racism, bullying, abuse of power, intimidation and threats or other forms of harassment.

HUMAN AND LABOUR RIGHTS

We respect, protect and promote internationally recognised human rights as fundamental, uncompromising standards. We strictly reject any form of forced, child and compulsory labour as well as any form of modern slavery; the regulations for the protection of young employees are observed. This applies to all our cooperation and business partners.

We respect the existing rights of our employees to freedom of assembly. We work with elected employee representatives in a trusting, cooperative and constructive relationship.

The health and safety of our employees are just as important to us as customer satisfaction and economic success. Accordingly, we understand occupational safety and health protection as integral components of all operational processes and pay attention to a healthy work-life-balance.

OUR BEHAVIOR IN SOCIETY

ENVIRONMENTAL AND CLIMATE PROTECTION

Minimising our environmental footprint is a core element in our sustainability strategy. We are committed to using natural resources in a responsible manner. In addition, we see it as our social responsibility to minimise the impact of our business activities on the environment and climate as far as possible.

All employees contribute to this and are called upon to conserve natural resources through their individual actions in the business environment.

DONATIONS, SPONSORING & CHARITY

As a company with regional roots, social commitment is important to us. Donations and other forms of social commitment are made solely in the company's interest, are subject to a transparent approval process and aim to have a long-term effect. We do not make any financial contributions, in particular donations and sponsoring measures, to political parties in Germany or abroad, to party-affiliated or party-like organisations, to individual elected representatives or to candidates for political office.

POLITICAL REPRESENTATION OF INTERESTS

Political independence and neutrality are particularly important to us. We avoid even the appearance of undue influence and are committed to behaving with integrity in our interaction with political interest groups.

PUBLIC APPEARANCE AND COMMUNICATION

We value consistent, clear and appropriate communication with employees, business partners and stakeholders. At the same time, we respect the right to freedom of speech and the protection of personal rights and privacy.

As part of REIFF, each of our employees bears responsibility for a consistent appearance towards third parties and for safeguarding REIFF's reputation in public – this applies both in a professional context and in private life.



OUR CONDUCT AS A BUSINESS PARTNER

FAIR & COOPERATIVE BEHAVIOUR

We are committed to fair behavior with customers, suppliers, and competitors. Our business relationships are characterised by partnership, openness and long-term orientation. Compliance and the highest ethical principles are the guiding principles for our actions.

AVOIDING CONFLICTS OF INTEREST

We make business decisions exclusively in the best interests of the company. Our employees are encouraged to avoid conflicts of interest from the outset or to address them openly. In the improbable case of any occurrence of a conflict of interest, it is resolved in compliance with the law.

MONEY LAUNDERING

REIFF complies with its legal obligations to prevent money laundering and does not participate in money laundering activities. We immediately allocate incoming payments to the corresponding services and book them. We ensure transparent and open cash flows. Every employee is requested to have unusual financial transactions, especially with regard to cash, checked by finance and compliance officers in case of doubt.

REIFF checks the identity of business partners. Our aim is to maintain business relationships only with partners whose business activities are of a reputable nature and in compliance with legal regulations.

ANTI-CORRUPTION

We reject any kind of corruption, acceptance of advantages and bribery or corruptibility. We only grant benefits to business partners, customers or other external third parties within the legal framework and in accordance with internal regulations.

Every employee is called upon to look out for possible violations in his or her area of responsibility and to actively address them – directly or via the available reporting channels.

PURCHASING

We select our suppliers carefully and on the basis of objective criteria. In addition to technical and economic aspects, we also include sustainability aspects in our decisions.

DEALING WITH DATA

We are committed to handling all data relating to our business partners, employees and third parties with care. The protection of personal and other highly sensitive data is of particular importance. To this end, we take appropriate organisational and information technology measures and pay particular attention to the principle of data minimisation.

IMPLEMENTATION AND CONTACT PERSONS

REIFF obliges all employees to comply with the principles contained in this Code of Conduct and the internal regulations derived from it. Openly addressing problematic issues is expressly encouraged.

In the event of violations, consequences under civil claims and criminal sanctions must be expected.

SPECIAL DUTIES OF MANAGERS

We expect our managers to show leadership, responsibility and – in compliance with the Code of Conduct – the courage to break new ground. Each manager enjoys the full confidence of the board.

Our managers have a special role in ensuring compliance with this Code of Conduct: they ensure the effective implementation of the Code of Conduct in their area of responsibility and make sure that all employees know and understand the contents of the Code of Conduct. Last but not least, they promote acceptable behaviour in line with the Code of Conduct as part of their management duties.

HELP & WHISTLEBLOWING PROCEDURES

The e-mail address compliance@reiff-gruppe.de is available to all employees, business partners and other interested parties for questions regarding the Code of Conduct. Information on possible violations of the Code of Conduct can also be sent to this address; the strict confidentiality of personal data is guaranteed. In addition, employees can use the anonymous whistleblower system.

TRANSFER TO SUPPLIERS

As part of our business activities, we also see it as our responsibility to contribute to a transparent and sustainable supply chain. Accordingly, we expect our suppliers to commit to the basic principles contained in this Code of Conduct. For us, this is the basis for a long-term business relationship based on partnership.



