

RÄDER-VOGEL®
FOR BETTER WHEELS AND BETTER SERVICE



CODE OF CONDUCT

This Code of Conduct defines the fundamental principles for RAEDER-VOGEL, RAEDER-UND ROLLENFABRIK GmbH & Co. KG (RAEDER-VOGEL) and its suppliers and business partners regarding their responsibility towards people and the environment. RAEDER-VOGEL, its suppliers and/or business partners with an intermediary function hereby declare that they share and respect

- the 10 principles of the UN Global Compact and
- values underlying the 10 principles of the UN Global Compact mentioned below

RAEDER-VOGEL is entitled to carry out inspections to verify compliance with the Code of Conduct.

1. UN Global Compact

Human rights

- **Principle 01:** We support and respect the protection of international human rights.
- **Principle 02:** We ensure that we are not complicit in human rights abuses.

Labour standards

- **Principle 03:** We uphold the freedom of association and the effective recognition of the right to collective.
- **Principle 04:** We are committed to the elimination of all forms of forced and compulsory labour.
- **Principle 05:** We uphold the elimination of child labour.
- **Principle 06:** We work for the elimination of discrimination in respect of employment and occupation.

Environmental protection

- **Principle 07:** We follow the precautionary principle in dealing with environmental problems.
- **Principle 08:** We take initiatives to promote greater environmental awareness.
- **Principle 09:** We accelerate the development and diffusion of environmentally friendly technologies.

Fighting corruption

- **Principle 10:** We work against corruption in all its forms, including extortion and bribery.

2. Further basic principles:

Working hours and remuneration

- We comply with the maximum number of working hours set out in the applicable laws.
- We pay appropriate remuneration and provide the relevant statutory minimum wage.

Health and safety in the workplace

- We act in accordance with the applicable legal, international standards and the latest technology regarding health and safety in the workplace and ensure safe working conditions.
- We establish an appropriate management system to ensure health and safety at work.
- We conduct training (instruction) to ensure that employees (m/f/d) are trained on occupational health and safety issues and are aware of potential hazards.

Compliance with legal regulations

- We comply with the laws of the applicable jurisdiction.
- **Conflicts of interest**
- We act in accordance with national and international competition rules and do not engage in price fixing, market or customer sharing or bid rigging with competitors.
- We avoid all conflicts of interest that could negatively affect business relationships.
- We make decisions related to business activities with other business partners exclusively based on objective criteria.

Fair treatment and supply chain

- We respect the intellectual property rights of others.
- We use reasonable efforts to inform our suppliers of this Code of Conduct and actively pursue compliance with it.
- We follow the principles of non-discrimination in relation to the selection and treatment of suppliers.

Import and export regulations

- We comply with applicable laws and regulations governing the import and export of goods, services and information, and the fight against international terrorism.

Data protection

- We comply with the respective laws on the protection of personal data (especially of employees, contractors and customers).

Resource management / climate change

- We continuously optimise or reduce the consumption of energy, water and non-renewable resources.

Material Compliance and Conflict Minerals

- We comply with all relevant applicable legal or other requirements for substance prohibitions and restrictions, and the ongoing assurance of associated obligations.
- We make reasonable efforts to avoid the use of raw materials in our products that directly or indirectly finance armed groups that violate human rights.

Compliance, monitoring and verification obligations

- We inform employees (m/f/d) about the contents of this Code of Conduct and the resulting obligations and instruct them to comply accordingly.
- We document compliance with the aforementioned basic principles and standards via suitable business documents and present this documentation in an appropriate form upon request.

Compliance with and implementation of this Code of Conduct is a continuous process.

Standards and procedures shall be reviewed and improved on an ongoing basis.

Consequences of violations

A violation of the basic principles and standards listed here is considered a significant impairment of the business relationship or the contract. RAEDER-VOGEL reserves the right to impose appropriate sanctions in such cases.

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Räder- und Rollenfabrik GmbH & Co. KG
Spertsdeicher Weg 19-23 · D-21109 Hamburg
Tel.: +49 40 75499-0 · Fax: +49 40 75499-175

www.raedervogel.de · rv@raedervogel.de