Zeichentechnik Rosenbaum GmbH & Co. KG Code of Conduct



1) Introduction/Preamble

Labelling plays an increasingly important role in industry and in everyday life. Our company, founded in Essen in 1961, operates in a constantly growing market with its industrial marking solutions. Our products and services include identification and labelling devices, applications for electronics manufacturing, control cabinet- machine- and plant construction as well as cables and wires. We supply label materials, assembled according to user specifications, for permanent markings, for safety, security and RFID.

Our company is committed to ecologically and socially responsible corporate governance. We expect the same behaviour from all our suppliers. We also expect our employees to observe the principles of ecological, social and ethical behaviour and to integrate them into our corporate culture. In addition, we strive to continuously optimise our business activities and our products in terms of sustainability and, as part of a holistic approach, we ask our suppliers to do the same.

This Code of Conduct is based on national laws and regulations such as

- the Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains (Lieferkettensorgfaltspflichtgesetz LkSG)
- the ILO core labour standards
- the Rio Declaration on Environment and Development
- the United Nations Convention against Corruption

2) Social responsibility

2.1 Forced labour exclusion

Our company is committed to the prohibition of any kind of forced labour, slave labour or similar work. All work must be voluntary and without threat of punishment. Workers must be able to leave work or employment at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment and humiliation

2.2 Prohibition on child labour

Our company is committed to the prohibition of all forms of child labour. When employing minors, we observe the minimum age for admission to employment in compliance with national regulations. According to this, children (under 15 years of age) may not be employed as a matter of principle. The rights of young workers must be protected. Under 18 years olds may not be employed in work that is harmful to the health, safety or morals of children. The special protective regulations applicable to this must be observed.

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2.3 Faire wage

The payment for the hours worked shall correspond to the national statutory minimum wage. Employees shall be provided with all benefits prescribed by law. Deductions from wages as a penalty are not permitted. We ensure that workers receive clear, detailed and regular written information about the composition of their remuneration.

2.4 Fair working hours

The working hours of our employees comply with the applicable laws.

2.5 Freedom of association

Our company is committed to the right of workers to form and join organisations of their choice, to bargain collectively and to strike. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative means of independent and free association of workers for the purpose of collective bargaining shall be provided. Workers' representatives shall be protected from discrimination. Workers shall not be discriminated against on the basis of their membership in such an organisation or membership of such an organisation shall be discriminated against. Their representatives shall be given free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

2.6 Ban on discrimination

Discrimination and unequal treatment of employees in any form is inadmissible unless it is justified by the requirements of employment. This applies, for example, to discrimination based on gender, race, caste, ethnic or social background, skin colour, disability, health status, political conviction, origin, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

3) Health protection, workplace safety

Our company is responsible for a safe and healthy working environment for our employees. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the activity. In addition, employees are regularly informed about applicable health and safety measures.

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4) Preservation of the natural foundations of life

Our company attaches importance to keeping environmental risks and negative effects on the environment as low as possible through preventive measures. In doing so, we pay particular attention to

- -the avoidance of waste
- -responsible chemical management
- -the economical use of water
- -a high input of recyclable materials into the recycling process

5) Handling conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, our company establishes due diligence processes to promote responsible supply chains for minerals from conflict and high-risk areas and expects the same from its suppliers. Smelters and refineries without adequate, audited due diligence processes should be avoided.

6) Ethical business behaviour

6.1 Fair competition

Our company is committed to upholding the standards of fair business, fair advertising and fair competition. We also comply with applicable antitrust laws, which specifically prohibit collusion and other activities that affect prices or terms when dealing with competitors. Furthermore, these regulations prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to determine their prices and other conditions autonomously when reselling.

6.2 Confidentiality/data protection

The company Zeichentechnik Rosenbaum GmbH & Co. KG commits itself to meet the reasonable expectations of its clients, suppliers, customers, consumers and employees with regard to the protection of private information. We undertake to observe the laws on data protection and information security and the official regulations when collecting, storing, processing, transmitting and passing on personal information.

6.3 Intellectual property

Intellectual property rights are respected by our company. Technology and know-how transfers are made in a way that protects intellectual property rights and customer information. Non-disclosure agreements are drawn up on request.

Zeichentechnik Rosenbaum GmbH & Co. KG Am Zehnthof 52, 45307 Essen Kommanditgesellschaft mit Sitz in Essen, AG Essen HRA 10903 Ust.-Ident.-Nr. DE 320785673

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Bankverbindungen Deutsche Bank Essen Sparkasse Essen Postbank Essen Commerzbank Essen

| IBAN: DE60 3607 0050 0298 7550 00 | BIC: DEUTDEDEXXX | IBAN: DE79 3605 0105 0008 4179 74 | BIC: SPESDE3EXXX | IBAN: DE69 3601 0043 0002 8074 32 | BIC: PBNKDEFF360 | BIC: COBADEFF360 | BIC: COBADEFF360

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6.4 Integrity/Bribery, Taking Advantage

The highest standards of integrity are applied in all business activities.

We have a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Monitoring and enforcement procedures are in place to ensure compliance with anti-corruption laws.

7) Contact person

If you have any questions about sustainability or the Code of Conduct, please contact us at any time at a-floetchen@ztrb.de.

8) Complaint procedure and Whistleblower Policy

Hints and complaints about possible violations of laws or of the Code of Conduct may be addressed as as follows:

Zeichentechnik Rosenbaum GmbH & Co. KG Personal/confidential CSR-representative Am Zehnthof 52 45307 Essen or alternatively by e-mail to: csr@ztrb.de

The anonymity of the whistleblower and confidentiality are guaranteed under all circumstances. The whistleblower is protected from retaliation or reprisals.

45307 Essen, 2nd. January, 2023

Martin Rosenbaum, managing director