

# Code of Conduct for Suppliers

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# ROWE®

## ROWE MINERALÖLWERK GMBH

### Pant I / Head office

Langgewann 101  
D-67547 Worms  
☎ +49 6241 5906-0  
☎ +49 6241 5906-999

### Plant II

Borkensteiner Mühle 7  
D-67308 Bubenheim  
☎ +49 6355 9541-0  
☎ +49 6355 9541-41

✉ info@rowe-oil.com

🌐 www.rowe-oil.com

ROWE MINERALÖLWERK GMBH (hereafter referred to as ROWE) seeks to conduct its business in accordance with the highest standards of corporate ethics, environmental protection, human rights, and labor rights and has undertaken to achieve market success through its employees, its innovative strength, the quality of its products and the reliability and correctness of its manufacturing and supply chains.

ROWE therefore respects applicable law and acknowledges the responsibility that the company itself has towards customers and suppliers as well as towards the environment and society. This Code of Conduct for Suppliers defines our requirements with regard to general business principles and fair competition, work standards and social standards, environmental protection and product safety that suppliers and service providers (hereafter referred to as "supplier" or "suppliers") are also expected to comply with. Further contractual obligations remain unaffected by this Code of Conduct for Suppliers and take precedence over the provisions described in this document.

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## A. Fundamental principles

### **I. CONDUCT IN THE BUSINESS ENVIRONMENT**

#### **1. Compliance with laws, recognized standards and guidelines**

In all business transactions and decisions, the supplier undertakes to comply with the respectively applicable national laws and to observe the relevant internationally recognized standards, guidelines and principles, in particular the principles of the United Nations Global Compact and the Universal Declaration of Human Rights, the Conventions of the United Nations Organization, the core labor standards of the International Labor Organization (ILO) and the OECD Guidelines for Multinational Enterprises.

Furthermore, the supplier is expected to comply with their own in-house guidelines and any voluntary obligations they have entered into.

Compliance with this Code of Conduct and the aforesaid standards shall not be circumvented by side agreements such as contractual arrangements or comparable measures.

#### **2. Prevention of corruption**

The supplier undertakes to comply with international and local anti-corruption legislation and standards. The supplier shall not influence, or attempt to influence, others in a criminal way, either in their own country or overseas, by exchanging gifts or offering or accepting other (pecuniary) benefits and / or payments.

#### **3. Cartel and competition law**

The supplier shall comply with the applicable national and international cartel laws as well as the laws against unfair competition. Agreements with competitors pertaining to prices or conditions shall therefore also be avoided, as shall other anti-competitive arrangements, including in particular agreements with competitors for the purpose of dividing up markets or customers.

#### **4. Confidentiality and data protection**

We expect our suppliers to respect the trade and corporate secrets and property rights of third parties and to treat as confidential any documents, data, offers and prices exchanged with them.

The supplier shall comply with the applicable regulatory framework governing data protection. This means that personal data may only be collected, processed and used to the extent that is necessary for specified and lawful purposes. Usage of this data shall be transparent for those concerned; the rights of access and rectification as well as, where applicable, objection, blocking and erasure shall be safeguarded.

#### **5. Export and import**

The supplier undertakes to comply with the relevant import and export control legislation, in particular sanctions, embargoes and other laws, rules, state orders and policies for controlling the transfer or supply of goods and technology.

We expect our suppliers to conduct and document their import and export operations in a traceable manner.

#### **6. Money laundering**

We expect our suppliers to comply with the national and international money laundering legislation in all transactions and other services arising from or in connection with business relationships.

## **/ II. LABOR STANDARDS**

### **1. Occupational safety and the protection of health**

ROWE strives to prevent workplace accidents and work-related illnesses. This promotes the well-being and satisfaction of employees and is also a key contributor to the company's success.

We expect our suppliers to ensure a safe, healthy and hygienic working environment and to take the necessary measures to prevent accidents and harm to health that may arise in connection with the work activity. Internationally recognized work safety standards shall be complied with. Furthermore, the supplier shall support the continuous improvement of the work environment and place importance on employee training to promote safety.

### **2. Working hours**

We expect our suppliers to comply with the applicable legislation governing labor times at their place of business and place of employment, in particular the maximum number of working hours per day / week. This also includes, in particular, compliance with the applicable wage agreements. It shall be ensured that employees have sufficient days off for recreation.

### **3. Wages and social benefits**

The supplier shall guarantee that the wages paid to employees as a minimum meet the legal minimum wage or the prescribed minimum wage for the sector. Furthermore, social benefits complying with the respective national or local standards shall be provided.

### **4. Training and qualification**

Where possible, the skills of employees shall be promoted on all levels through appropriate training and further training measures.

### **5. Freedom of association**

We expect our suppliers to respect the right of their employees to freedom of expression and freedom of association within the framework of the laws applicable at their place of business and place of employment. Employees shall not be discriminated against for forming or participating in trade unions or other representations of interest, or for defending their rights or advocating for improvements to their situation or working conditions.

### **6. Complaints procedure**

The supplier is expected to put in place communication channels for employees through which potentially unlawful conduct can be reported.

## **/ III. HUMAN RIGHTS AND BASIC RIGHTS**

### **1. Human rights**

The supplier shall respect and support the upholding of human rights in accordance with the United Nations Universal Declaration of Human Rights.

### **2. No child labor**

The exploitation of children and young people is not tolerated. The supplier shall comply with the United Nations regulations on human rights and children's rights, and in particular shall undertake to abide by the Convention concerning the minimum age for admission to employment (Convention 138 of the International Labor Organization (ILO)) and the Convention concerning the prohibition of and immediate action for the elimination of the worst forms

of child labor (Convention 182 of the International Labor Organization (ILO)). Should a national regulation provide for stricter measures on child labor, then the supplier shall give these provisions priority.

### **3. No forced labor**

Any form of forced or compulsory labor is not tolerated. This means that the supplier shall not use any labor that has been provided involuntarily under threat of punishment, including forced overtime, debt bondage, forced prison labor, slavery or servitude. Furthermore, the supplier undertakes to take action against forced and compulsory labor.

### **4. Freedom of association and right to collective bargaining**

The supplier shall respect the basic right to freedom of association and the right to collective bargaining within the framework of national laws, and shall ensure that this is not infringed. In the event that national conventions restrict the right of association and the right to collective bargaining, the supplier shall strive to ensure that the free and independent association of employees for the purpose of negotiation is enabled and permitted.

### **5. Disciplinary measures and the treatment of employees**

ROWE expects the supplier to treat their employees with dignity and respect. Sanctions, fines and other penalties or disciplinary measures may only be implemented in accordance with national and international standards and human rights.

The supplier shall ensure that no employee is subjected to verbal, psychological, sexual and/or physical violence, coercion or harassment.

### **6. No discrimination**

It is expected that the equal treatment of all employees is a fundamental principle of the supplier's corporate policy. The supplier shall refrain from any form of discrimination, for example on the grounds of ethnic, national or social origin, skin color, gender, age, religion and ideology, political activity, membership of a workers' association, disability, sexual orientation or other personal characteristics. The supplier undertakes to ensure equal opportunities in employment. The relevant legal provisions shall apply.

## **IV. ENVIRONMENTAL PROTECTION**

### **1. Environmental and climate protection**

The protection of people and the environment is a fundamental part of ROWE's corporate policy. ROWE expects its suppliers to minimize environmental pollution and to pay attention to and continually improve on environmental and climate protection in regard to applicable international standards and legal provisions. This includes the prevention of emissions and waste as well as steps to increase resource efficiency. To this end, suitable and traceable measures shall be taken and management systems (e.g. complying with ISO 14001 or equivalent) shall be put in place to ensure protection of the environment and climate. ROWE expects its suppliers to develop and manufacture products, as well as package and transport them, with due consideration to safety and environmental compatibility.

The selection and assessment of suppliers takes into account environmental and safety aspects. The success of the cooperation between ROWE and the supplier is based on trust, transparency, reliability and fairness.

### **2. Waste and emissions**

The supplier is expected to maintain procedures and systems which guarantee the safe handling, transport, storage, recycling, reuse and management of raw materials, materials and waste. Any generation and disposal of waste and any release of substances into the air or water which could potentially have negative effects on human health or the

environment, shall be minimized as much as possible and the substances handled, checked and/or treated in an appropriate manner before being released into the environment. The supplier is obliged to employ suitable procedures and systems to prevent or minimize accidental or diffuse leakage or release of pollutants into the environment. The supplier is expected to maintain procedures and systems that sustainably optimize the use of all relevant resources such as energy, water and raw materials.

### **3. Process reliability**

The supplier is expected to use a management system to control work processes, with due consideration of recognized safety standards. Where applicable, specific risk analyses for systems shall be carried out. For all systems, the supplier shall implement measures to prevent incidents such as chemical leaks and/or explosions.

## **I.V. PRODUCT RESPONSIBILITY**

### **1. Product safety**

The relevant country-specific laws and legal requirements shall be complied with. The supplier undertakes to provide ROWE with all relevant product information, in particular on the composition, use (processing instructions, installation instructions and occupational safety measures) and, where applicable, disposal of their products in good time before delivery / provision of service. Furthermore, to comply with legislation, full documentation such as safety datasheets, labeling provisions, etc., is required. Information provided by ROWE shall be included in the appropriate documents.

### **2. Conflict minerals**

The supplier shall ensure that no products are supplied to ROWE that contain metals whose source minerals or derivatives originate from conflict areas and high-risk areas where they directly or indirectly help to finance or support armed groups. The EU Regulation 2017/821 setting out supply chain due diligence obligations shall apply.

## **B. Implementation of standards and requirements**

### **I. Implementation**

The supplier shall take appropriate measures to ensure that the basic principles contained in this Code of Conduct are respected and complied with within their own company as well as by their direct suppliers and service providers.

If the supplier has devised their own code of conduct or company policy incorporating the requirements listed in this Code, evidence of compliance with it shall be provided. In the absence of their own code of conduct, etc., the supplier shall commit to this Code and comply with the requirements it sets out.

ROWE recommends striving for continuous improvement with the assistance of a suitable management system (defining and documenting responsibilities, procedures, goals and measures). Any violations identified by the supplier shall be remedied immediately and any improvement concepts derivable therefrom shall be comprehensively checked.

ROWE expects its supplier to work towards consistently incorporating the basic principles of this Code into its supply chains.

### **II. Information and communication**

This Code of Conduct can be viewed and printed out at any time on the Internet at <https://www.rowe-oil.com/de/code-of-conduct>.

### **III. Monitoring**

ROWE reserves the right to verify compliance with the aforesaid requirements of this Code of Conduct, this being performed either by ROWE itself or by independent third parties, and taking the form of certificates and statements or subject-specific on-site audits.

### **IV. Sanctions and remedial actions**

Any violation of the stated principles shall be regarded by ROWE as a material breach of contract on the part of the supplier and entitles ROWE to give notice of extraordinary termination of all existing contracts.

Where possible, we give the supplier the opportunity to implement suitable remedial actions.

## C. Contact

Confirmation of the Code of Conduct for Suppliers and other reports can be communicated to the person responsible at ROWE, or can be sent directly to [procurement@rowe-oil.com](mailto:procurement@rowe-oil.com).

Information or reports on violations must be sent without exception to <https://www.rowe-oil.com/de/whistleblowing>.