

## Compliance Guideline

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As an international company with customers, suppliers and business partners spread throughout the world, we are subject to a variety of legal regulations, cultural values and political framework in varying national and international environments. Compliance with these varying requirements not only helps to avoid legal issues and sanctions, but also protects our business relationships and our good reputation as a company. We take great care to comply with all laws as well as our own high standards for sustainable business and to consistently react to all transgressions. For these purposes, we have developed and implemented the ruhlamat compliance policy guideline.



## 1. Function and objectives of the compliance policy guideline

As a globally operating company, ruhlamat GmbH bears responsibility to its employees, customers, suppliers and the general public. The foundation of this responsible corporate management is ruhlamat always adhering to established laws, ethical values as well as company guidelines and acting sustainably. The adherence of these requirements is also referred to as compliance.

This guideline is intended to prevent violations of statutory provisions and is valid worldwide for all employees at all company levels. We expect our managers and employees to adhere to this guideline. It is a directive to all employees and also serves as a clear warning that violations will not be tolerated.

Corruption, competitive distortion and other violations of statutory provisions pose great risk for a company and its employees. ruhlamat GmbH is committed to a free market and strongly rejects any unlawful distortion of competition. Compliance with laws and internal corporate guidelines always takes precedence over economic success.

This guideline is part of ruhlamat GmbH's integrated management system.

## 2. Management requirements

Management must adhere to the following guidelines:

- Management must carefully select employees according to individual and professional qualifications and suitability. The level of due diligence must increase with the responsibility of the duties that the employee has to perform (selection requirement).
- Management must supervise compliance with legal requirements within its scope of responsibility (control requirement).
- Management must clearly communicate to their employees the importance of integrity and compliance with legal requirements in day-to-day business, making clear that violations of law are not acceptable and disciplinary action will follow (communication requirement).

### **3. Dealing with business partners and third parties**

Fair competition is a prerequisite for free market development and the associated social benefits. Accordingly, fairness also applies to competition for market shares. Each employee is required to comply with the rules of fair competition.

Because of the difficulty of antitrust judgments, especially in international competition, all employees are prohibited from:

- speaking with competitors about prices, production, capacity, distribution, bidding, profit, profit margins, costs, distribution methods or other factors that determine or influence the competitive behavior of the company with the aim of causing competitors to behave similarly
- making agreements with competitors about noncompetition to restrict business relationships with suppliers or to influence bidding or distribution of customers, markets, areas or production programs
- influencing the resale prices of our customers or trying to use them to restrict the export or import of products in the company as a whole

Similarly, employees are not allowed to acquire information relevant to competition by means of espionage, bribery, theft or fraud or knowingly provide false information about competitors, their products or services.

#### **3.1 Offering and providing benefits**

We attain contracts in a fair manner, through quality, pricing and innovation—not by offering unauthorized benefits. No employee may, directly or indirectly, offer, promise or provide any payment or other unjustified benefit in connection with business activity or approve such benefits. The acceptance of money or its equivalent is prohibited in principle. No employee may use their position to gain, accept, procure or approve benefits. However, this does not include the acceptance of occasional gifts of symbolic value or food or event invitations on an appropriate scale. The maximum value to which gifts can be accepted is € 30.00.

#### **3.2 Business relationships with suppliers**

ruhlamat aims for consistent supplier management, in which our sustainability requirements are integrated. We expect our suppliers to share these values and comply with all laws. Our requirements are formulated in the purchasing terms and form the basis of our business relationships.

### **4. Conflicts of interest**

#### **4.1 Avoiding conflicts of interest**

Employees are required to make business decisions in the best interests of ruhlamat GmbH and not based on personal interests. Conflicts of interest arise when employees pursue personal activities or interests at the expense of the interests of the company.

If there is a connection to duty performance at ruhlamat GmbH, an employee must communicate personal interest conflicts to their supervisor. Any existing or emerging conflicts of interest due to business relationships or involvement with competitors are to be reported to the employee's supervisor and, in principle, avoided. Additional employment activities are to be approved in writing in advance.

#### **4.2 Use of company property**

Our company has numerous systems and devices such as telephones, copiers, computers, software, Internet / intranet, machines and other means of work such as e-mail and answering systems in its offices and operating premises. These may only be used for company purposes and not for personal use. Under no circumstances may information be obtained or shared which supports or encourages racial hatred, violence or other offenses or has content that is sexually offensive against cultural background.

### **5. Secrecy and data protection**

#### **5.1 Confidentiality**

For internal confidential or proprietary information which is not intended to be disclosed to the public, confidentiality applies. Non-public information from the company or persons associated with the company (e.g. employees, suppliers, customers, agents, consultants, guests) must be protected in accordance with legal and contractual requirements. Confidential or proprietary information may include, in particular:

- details of a company's organization and facilities, prices, revenues, profits, markets, customers and other business matters
- internal reporting data

The obligation to maintain secrecy shall continue to apply beyond the end of the employment or contractual relationship.

## **5.2 Data protection and security**

Effective precautions against data protection risks are an important part of information technology management, the management task and also the behaviour of each individual. Personal data may only be processed to the extent necessary for defined, clear and legitimate purposes (e.g. the employment relationship). If personal data are to be processed beyond what is necessary, this requires the consent of the person concerned. It must be ensured that personal data is stored securely and protected against access by unauthorized third parties. Adequate measures in accordance with the state of the art must be applied to data transmissions. The principles of the DSGVO must be observed with regard to data quality, quantity and technical and organisational security.

## **6. Violations of the compliance policy guideline**

### **6.1 Reporting**

ruhlamat GmbH expects employees and business partners to report any known breaches of compliance to this guideline immediately. Negative consequences against those reporting are not to be tolerated in any manner. Through this guideline there is no legal obligation to report misconduct.

### **6.2 Consequences of non-compliance**

Compliance is compulsory for all employees of ruhlamat GmbH. Without regarding possible statutory sanctions, employees who do not adhere to this guideline, because of violation of employment requirements, will face disciplinary consequences.

## **7. Compliance-implementation and control**

Management of ruhlamat GmbH actively supports the comprehensive communication of the compliance policy guidelines and ensures their implementation. Compliance with laws and internal guidelines are to be monitored regularly at all locations.

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