

Code of Conduct (CoC) of Georg Rügamer GmbH

Originating from an agricultural business in 1929, Rügamer GmbH works in the 3rd generation as a tradition-conscious company in the sense of the founding generation as a family business with special reference to sustainable management.

Furthermore, Rügamer is aware of its overall social responsibility within the scope of its worldwide procurement and sales activities along the supply chain (Corporate Social Responsibility).

The following company guideline represents the value basis on which the company continuously works:

- Unconditional respect for human rights in accordance with UN Resolution 217.
- Absolute confidentiality for whistleblowers in the event of violations of UN Resolution 217.
- Profit generation in compliance with sustainability is the basis of economically sensible behavior and secures competitive and efficient jobs and thus the livelihood of our employees and their families.
- All employees of the company are guaranteed fair remuneration for their work performance, and statutory minimum wages are observed and complied with.
- Environmentally friendly behavior (the Rügamer delivery program consists of 100% renewable raw materials), resource-saving work as well as the ever-increasing use of sustainably produced energy are lived practice with almost 50% energy produced by PV systems.
- In the area of waste management, we are constantly looking for ways to increase our raw material yields, reduce waste, and further develop environmentally friendly packaging and logistical solutions.
- When procuring raw materials, preference is given to suppliers who demonstrably pay high attention to the preservation of biodiversity.
- Our employees work in a safe working environment in terms of occupational health and safety, personal data are subject to legal requirements.
- all company employees are encouraged to deal with customers and suppliers in a spirit of partnership. Bribery and/or corruptibility are strictly prohibited and will result in disciplinary measures up to and including termination.
- Our employees are enabled by training and further education to safely reach the set quality targets. Constant learning is obligatory for all employees!
- In our dealings with one another, respect and consideration for those who think differently is a mandatory requirement. Discrimination on the basis of disabilities, religious or sexual orientation or ethnic origin is strictly prohibited in the company.
- Rügamer employees are obliged not to disclose company and business secrets as well as confidential information in any form to third parties.

- Compliance with legal and customer-related requirements is a prerequisite for the safety, legality and conformity of our products and services. The cooperation with the responsible supervisory authorities takes place in the spirit of common objectives.
- In the procurement process, we maintain an open dialog with suppliers regarding their social standards in order to positively influence them without, however, calling into question the sovereignty of the suppliers.
- The prohibition of child labor and forced labor is a matter of course for Rügamer. Corresponding behavior is also demanded from its suppliers.
- Sustainable business practices, appropriate social standards in our own company, compliance with minimum social standards at our suppliers, and striving for economic success are considered an obligation for the Executive Board and management.
- We see ourselves as a medium-sized company which, through lean organizational structures and efficient work, represents a market-economy corrective for customers who want to counteract the constant oligopolization and even monopolization in the market.
- The principles, behaviors and regulations mentioned in the Rügamer CoC are continuously developed, applied and implemented in the best possible way. Our contractual partners have the right to inspect the respective measures in mutual exchange, excluding company and trade secrets.

The Management has decided and published this CoC with immediate effect.

Managing Director

Sandra Gündermann-Goldschmidt

Rügamer GmbH, January 27.2021

Version 2, replaces version 1 from 22.10.2019

Managing Director

Gerhard Schlund