



# CODE OF CONDUCT

## PREAMBLE

Dear colleagues, Dear business partners,

Our Code of Conduct describes the values we share at BURKHARDT+WEBER (BW) and Indústrias ROMI S.A. (ROMI) and how we want to cooperate.

The Code of Conduct offers both employees and our valued business partners a framework of orientation for our joint and individual actions, while at the same time appealing to our values such as personal responsibility and transparency. Based on our brand claim – strong. precise. customized. digital. – we know that we are particularly strong when we pursue the same objective. We know that business success often needs more than just a good product and is based on trust, reliability, and integrity. Therefore, we ask you to read this Code of Conduct carefully, which is based on recognized standards of responsible corporate governance and use it as a guideline for your daily performance.

Yours,  
Olaf Furtmeier, *CEO*

*For reasons of facilitating the reading, the simultaneous use of the language forms masculine, feminine and divers (m/f/d) are not used. All references to persons apply equally to all genders.*

## 1. APPLICATION

The rules contained in this Code of Ethics and Code of Conduct – and the other measures and regulations of Indústrias ROMI S.A. and its branches, as well as the national laws and regulations of the places where we operate, shall be understood and respected by the employees, directors, trainees, apprentices, suppliers, service providers and any third parties acting on behalf of ROMI and BW („Employees“).

## 2. PRINCIPLES AND VALUES

2.1 BW is committed to the highest standards of integrity, transparency and trust in all business activities and relationships and operates in accordance with ethical and moral values.

2.2 The principles and values of ROMI, on which the activities of BW are also based, include:

- +**Esteem and respect** towards people and environment
- +Awareness of **social responsibility**
- +**Honesty** and ethical integrity
- +**Focus on the customer** and their **satisfaction**
- +Quality awareness in terms of products and dedication to leading technology
- +**Continuous improvement** in all company sections regarding products and processes
- +**Advanced trainings** and enhancement of personal development of employees

## 3. CONDUCT GUIDELINES

The conducts to be followed are mutual agreements between the company and its employees which are intended to guide professional practices as well as to prevent or clarify situations that may lead to conflicts of ROMI and BW in internal and external relations.

The selected topics, which do not cover all situations have been included as a matter of priority in the Company's Code of Ethics and Business Conduct in order to contribute to its ethical and sustainable corporate governance.

### 3.1 BEHAVIOUR IN THE BUSINESS ENVIRONMENT AND TOWARDS COLLEAGUES

#### **Equal treatment and non-discrimination**

The discrimination of employees in any form is not permitted. This applies for example, to discrimination based on gender, race, skin colour, disability, political opinion, origin, religion, age, pregnancy or sexual orientation.

Any behaviour involving morally or sexually harassing, insulting, hostility, mockery, intimidation or humiliation will not be tolerated. The personal dignity, privacy and personal rights of each individual are to be respected. The goal is to maintain awareness of compliance issues at all times and starts with the training of new employees.

A corporate culture of equal opportunities and mutual respect is a condition for our cooperative working. As an internationally operating company and subsidiary of the listed Indústrias ROMI S.A., the topic of compliance is particularly complex. Following compliance with laws and regulations is an essential basic principle for our economically responsible actions. National legal systems as well as political, social and cultural conditions must be taken into account. Our Compliance Management System is designed to ensure that business practices worldwide are in line with these principles, comply with applicable law and respect ethical and moral values.

This Code of Conduct is based on national laws and regulations and international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Corporate Behaviour, the United Nations Guidelines on Business and Human Rights, the International Labour Standards of the International Labour Organization.

BW has international business relations and thus actively participates in the international exchange of goods. Relevant trade controls and the applicable regulations regarding import and export controls are followed respectively.

### **Avoiding conflicts of interest**

Business decisions are exclusively based on factual, technical and objective criteria. Conflicts of interest with private interests should be avoided right from the beginning. If this is not possible, an external committee must decide on the situation. A regulated process for analysing conflicts of interest is available.

Secondary employment must not conflict with the interests of ROMI and BW and have to be reported if BW is the main employer.

### **Corruption and gifts**

All business activities must be based on the highest standards of integrity. These include a zero-tolerance policy regarding prohibits of all forms of bribery, corruption, blackmailing and embezzling. Bribes or collusive arrangements are no valid means of justifying a business transaction. Abuse of this compliance rule is not tolerated.

When dealing with business partners and authorities, employees may only grant or accept advantages as far as these do not create the impression of influencing business processes.

Employees with a family relationship or personal interest regarding a business partner may not participate in the company's decision-making processes, nor may they make use of their position and privileges and other influences in connection with respective business partner.

BW-employees, who have any kind of relationship including family relations to people who are connected to BW or ROMI in any business matter, e.g., suppliers, investors or business partners must report to the company via "Analysis of Interest Conflicts" or via the internal auditing of ROMI and explain their respective relationship as far as these employees can influence decisions based on their activities in the company.

Gifts, such as standard promotional gifts and give-aways may only be accepted within reasonable limits and only if the market value of the gift does not exceed **50 €**.

Gifts or services exceeding this amount must be returned or if not possible, must be forwarded to the management who will decide on their final purpose.

Money gifts are not accepted. Gifts or invitations must be in accordance with local customs and limited to sporadic occasions.

### **Safety and health protection**

We consider the health and safety of all our employees and the people around us to be of utmost importance.

Work safety is therefore an integral part of all operational processes. Every manager is committed to briefing his or her employees to these issues and to be in compliance with the regulations. Furthermore, some of our health measures also have a precautionary character and contribute to the support of physical and mental health.

Employees who discover dangerous and inefficient processes about employment health and safety shall immediately report this to their supervisor. Employees are regularly trained on these topics.

### **Union membership**

BW recognizes the right of employees to form and join unions and employee representatives on a democratic basis. This also includes joining professional associations or political parties and other constitutional corporations provided that the practice is carried out responsibly and



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ethically within the framework of the legal regulations.

Employees who belong to a trade union or employee representation are neither disadvantaged nor favoured.

## **Social responsibility**

BW and ROMI comply with all labour laws in all countries and regions in which they operate. We respect the fundamental human rights of all people and support their fulfilment.

Child labour is strictly prohibited in any phase of production. Suppliers are required to comply with the recommendations of the ILO-conventions regarding the minimum age for employment of children aged 15.

Further, we reject all forms of forced labour. We respect the right of adequate compensation for all employees and therefore the remuneration should be in line with national and local standards.

## 3.2 BEHAVIOUR WITHIN SOCIETY

### **Sustainable environmental & climate protection**

We continuously strive to optimize our business activities, our products and services in terms of sustainability and thus encourage our suppliers to contribute in terms of a holistic approach to these values.

Economic solutions are to be made to improve energy efficiency and to minimize energy consumption. The proper handling of hazardous substances is clearly defined and regularly included in training courses.

### **Donations**

We see ourselves as a responsible member of society and are therefore involved in a wide variety of fields, such as youth development, education, social issues and sports.

Our priority is to support regional sponsorships and cooperation's and the foundation of our mother company Indústrias ROMI S.A. The purpose of the foundation as well as the use of the foundation's funds can be looked up on the website [www.romi.com](http://www.romi.com).

We refrain from financial contributions and other donations to political parties situated domestic and abroad.

## 4. HANDLING OF INFORMATION AND COMPANY PROPERTY

BW places great importance to truthful, open, transparent communication and reporting of business transactions both within the company and to customers, business partners and the public in general.

### **Confidential company information**

We take the necessary steps to protect confidential information and business records in a correct manner.

### **Data protection and information security**

The protection of personal data of employees, customers and suppliers is our highest priority. We therefore comply with all applicable EU-DS-GVO guidelines. Our staff is regularly trained on this topic and respectively sensitised.

### **Protection of company property**

We use tangible and intangible company property exclusively for company purposes and not for personal use. The private use of company property is only allowed if the company provides such operations.

We use the property and resources of the company appropriately, carefully, responsibly and sustainably. Keeping workplaces tidy is our mission. We strive to avoid waste at all times.

Sideline activities which are in accordance with this code must be registered with the Human Resources Department and may be performed with respect to the legal requirements (in compliance with break times).

### **Concurrent activities**

Employees are not permitted to carry out any professional activities whether paid or unpaid if it involves a conflict of interest with the company.

## 5. QUESTIONS AND ADVICE / WHISTLEBLOWING

Your questions and advices are a chance to make things better. By taking action, communicating and reporting questionable behaviour, you protect your colleagues and our reputation. After all, problems can only be solved if you bring them to the attention of others.



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If you have any questions regarding the application of the Code of Conduct or if you wish to report a conflict of interest, please use the central e-mail address [compliance@burkhardt-weber.de](mailto:compliance@burkhardt-weber.de).

Reporting of infringements where non-compliance is suspected regarding laws, internal guidelines or regulations should be made at best knowledge and belief. The informer is not disadvantaged by the submission of a report, as long as it does not violate applicable law.

## ROMI Compliance Program



In addition, employees who are aware of situations, actions, facts or practices that infringe the terms of this Code of Conduct may also report them anonymously on the ROMI-website. The ROMI Whistleblowing system allows a transparent, anonymous communication and guarantees a neutral and confidential handling.

Reports made through this channel will be checked by the internal auditing of Indústrias ROMI S.A. and the Ethic Committee, who examine each case adequately and guarantee the secrecy and identity of the Whistle blower to avoid any act of retaliation.

Please use following link:

<https://www.romi.com/fornecedores>.

The detailed compliance policy of Indústrias ROMI S.A. can be accessed at [www.romi.com](http://www.romi.com).

The Legal and Compliance Department of Indústrias ROMI S.A. together with the Ethics Committee is responsible to submit continuous updates of recommendations to improve of the Code of Ethics and Conduct.

BW-employees can find important regulations regarding company agreements and collective agreements in our web-based QMS-system. Infringements of the guidelines or legal regulations have serious consequences not only for the individual personally, but also for the entire company and its reputation. Deliberate misconduct will not be tolerated and will be sanctioned with measures taking into account the serious nature of infringement and its degree.

ROMI reserves the right to change or revise the valid measures and regulations without notice, and without necessarily changing this Code of Conduct which is only referred to.

If the contents of this Code of Conduct conflicts with the national laws of countries in which ROMI or BW operate, the legal requirements shall prevail over the terms in this Code of Conduct.

The Company's employees receive regular training on compliance issues and how to follow them.



STRONG.



PRECISE.



CUSTOMIZED.



DIGITAL.

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