

## Corporate Responsibility Policy / Code of Conduct

The purpose of this policy is to define the principles and requirements that apply to our employees, suppliers, and business partners in the course of business, based on the values of the RAFI Group. This policy applies for all RAFI's business activities globally. All RAFI employees and business partners are responsible for implementing this policy regarding their responsibility for people and the environment.

### Ethics and Law

At all of its operational locations, RAFI complies with the applicable local legislation. As the company is domiciled in Germany, this policy is based on German legislation. For certain regions, countries or functions, stricter guidelines or more detailed instructions may apply, however these must comply with this corporate policy. Should any provision in this policy be in conflict with local legislation, the provisions of the local legislation shall take precedence.

- ***Social Commitment***  
RAFI is aware of its corporate responsibility. RAFI recognizes its financial, social and environmental responsibilities as a global company and strives to promote positive development in communities where the company operates, while respecting local cultures and customs. We conduct business with a high level of integrity.
- ***Human Rights***  
RAFI respects the principles of international human rights conventions such as the United Nations Declaration of Human Rights and applicable ILO Conventions (*International Labour Organization*).
- ***Child Labor***  
RAFI complies with the UN and ILO Conventions on the rights of children and does not engage in or support the use of child labor.
- ***Forced Labor***  
RAFI does not engage in or support the use of forced labor.
- ***Discrimination***  
RAFI does not engage in or support discrimination based on national or social origin, religion, disability, gender, sexual orientation, union membership, political affiliation, physical limitations, or age. RAFI does not allow abusive, harassing, or otherwise offensive behavior. This includes gestures, language, and physical contact that are sexually coercive, threatening, abusive, or exploitative.
- ***Health and Safety***  
RAFI's occupational health and safety management is based on prevention. As an employer, we provide our employees with a healthy and safe working environment according to applicable laws and regulations. We also continuously improve our occupational health and safety management. RAFI's units are locally responsible for health and safety management, including compliance with the applicable occupational health and safety laws and regulations.
- ***Freedom of Association and Right to Collective Bargaining***  
RAFI guarantees its employees the right to freedom of association, to join trade unions, and to participate in collective bargaining, according to local laws and regulations.
- ***Disciplinary Practices***  
RAFI does not allow the use of corporal punishment, mental or physical coercion, and verbal abuse in any form.

- *Working Hours*  
RAFI complies with applicable laws, industry standards, and applicable collective bargaining agreements on working hours and overtime remuneration.
- *Remuneration*  
RAFI complies with applicable laws and industry standards on wages. Remuneration, social benefits, and other bonuses are paid under full compliance with applicable laws.
- *Whistleblowing Procedure*  
RAFI provides its employees with access to a protected procedure for reporting possible infringements against principles of this Code of Conduct.

## Fair Business Practices

- *Corruption and Bribery*  
RAFI does not tolerate any form of corruption or bribery, and does not participate in such practices, either directly or indirectly.
- *Fair Competition, Antitrust Law, and Intellectual Property*  
RAFI complies with national and international competition laws and does not participate in prohibited price fixing, bid-rigging, or market-sharing. We respect the intellectual property rights of third parties.
- *Conflicts of Interest*  
RAFI's employees must avoid entering into situations involving the giving or receiving of gifts, which can give rise to a mutual obligation that goes beyond normal business practices, and must report such behavior. Family relationships and friendships must not result in a negative effect on business decisions.
- *Money Laundering, Financing of Terrorism*  
RAFI does not, directly or indirectly, support money laundering or financing of terrorism.
- *Data and Information Privacy*  
RAFI's employees always treat personal, product, and business data confidentially, responsibly, and according to applicable data protection laws. RAFI effectively protects all data and information in its area of responsibility and only uses it for legitimate purposes.
- *Procurement of Raw Materials and Minerals*  
With appropriate effort, RAFI avoids the use of raw materials from conflict and risk zones which could promote human rights violations, corruption, or similar negative effects.
- *Export Checks and Customs*  
RAFI complies with the applicable export check and customs regulations.

## Environment

RAFI's environmental management is an integrated part of the Corporate, Quality, and Environmental Policy.

## Suppliers

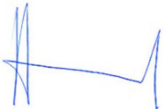
We expect our suppliers to comply with the principles of this policy. Should there be any indication of violation of the standards described here, the supplier is audited. If non-conformities are found, we agree with the supplier on adequate corrective actions. If the corrective actions are not carried out within a reasonable period, RAFI excludes the supplier from the supply chain.

## Monitoring

We regularly instruct and train our employees with regard to the contents and application of the principles described here. Questions about the application or meaning of our policy or about potential violations are reported to superiors or the internally published list of persons of trust. RAFI additionally provides a whistleblower system employees can use to report violations anonymously. RAFI regularly instructs internal or external persons to perform audits which monitor compliance with these principles. In cases of serious violations, the Compliance Officer, local Human Resources management, or Occupational Safety Officer conduct appropriate investigations.

Any acts inconsistent with this policy will be immediately corrected. Disciplinary actions can be taken which can lead to consequences up to termination of employment. There are no adverse work-related consequences as a result of an employee reporting violations of this policy.

Berg, April 30, 2021



Dr. Lothar Seybold  
CEO



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