



OUR CODE OF CONDUCT

RATHGEBER GROUP

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DEAR COLLEAGUES,

Together we have developed our Code of Conduct, which serves as a guideline for our day-to-day work. In it you will find our corporate values – responsible, proactive, bold, appreciative, humorous, reliable, honest and proud – which have accompanied the RATHGEBER family for many years. At the same time, the Code of Conduct serves as a guide and ensures that we can work together with trust and productively, with each other and with our stakeholders (such as our customers, suppliers, field service partners and others).

The RATHGEBER* story of success is down to the responsible and committed actions of our employees and the family-run management. We pursue our ambitious goals together and are wholeheartedly committed. For us it is not just a question of “what”, but also of “how”. Appreciation, respect and trust are basic principles in our daily interactions with one another. We want to discuss things openly and find solutions together. In this way we can create a working atmosphere characterised by openness and fairness. Acting with integrity when dealing with employees and all business partners is key to our success. We trust our employees, their competence and their desire to perform. At RATHGEBER, everyone is given the same opportunities and is employed according to their capabilities and performance.

The Code of Conduct is available to all employees of RATHGEBER and is communicated actively. It applies equally to all of us – in all companies and at all sites – and all topics are given equal weighting.

We're constantly making the Code of Conduct a reality – each and every day!

Oberhaching, 10.11.21

Andreas and Andrea Schrägle



*Note: For better readability, the text uses the terms employee, colleague, customer, supplier, field service and business partner. The text addresses persons of any gender equally. The abbreviated form of language is used solely for editorial reasons and is not intended to imply any judgement. Likewise, in order to make the text easier to read, “RATHGEBER” is used throughout instead of “RATHGEBER Group”. The RATHGEBER group includes the companies RATHGEBER GmbH & Co. KG with all its offices, as well as RATHGEBER, k.s. in the Czech Republic, RATHGEBER Sp. z o.o. in Poland and smart-TEC GmbH & Co. KG.

THE RATHGEBER GROUP IS WHO WE ARE



WE

More than 70 years ago, in 1948, Anton Rathgeber founded a business in Munich selling wooden toys, musical instruments and the first wet-glue labels. The family business grew quickly and developed from a dealer to a producer of signs and labels. In the spirit of optimism of the 1990s, the company set up a production and distribution site in the Czech Republic and a distribution centre in Poland.

We develop and produce labelling solutions for brands and products across all locations, focusing on form, aesthetics, feel, function and sustainability. RATHGEBER soon grew into an important provider of RFID and NFC solutions with its subsidiary smart-TEC and now has over 20 years of experience in this field. As a pioneer in the auto-ID market segment, the RATHGEBER Group began making its products smart and, then as now, set the trend.

This is how we grew into an international and industrial family business with over 300 employees. We are proud to see our products on so many consumer goods, in service sectors and in a wide range of industries.

We stand for premium quality, innovative and carbon-neutral products and solutions tailored to customer needs. Flexibility, reliability and high standards are what set us apart. Our shared goal is to become the number one for custom and sustainable labelling solutions in Europe.



RATHGEBER

smart-TEC



WE

respect applicable laws and promote respect for human rights.

HONEST

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1.1 Compliance with applicable laws


For all of us, compliance with the law goes without saying. Accordingly, we expect everyone to meet legal requirements and internal guidelines and agreements. We are aware that in the event of a violation of the law, proceedings may be brought against the person and the company. Violations of the law must be avoided at all costs.

1.2 Respect for and promotion of human rights

We all respect human rights and ensure that they are respected. Above all, this includes the protection of the personal dignity and privacy of each person. We reject forced labour and child labour and any form of exploitation and demand strict compliance with relevant laws. We also respect our employees' rights of freedom of association and of assembly in compliance with all applicable laws.

*"Of course, the focus is on the customer.
Yet also on our employees. For me, that is
what means a family business."*

– Andrea Schrägle, Managing Partner



»Ultimately, we have the task of not only preserving livelihoods, but also keeping social aspects in mind.«

– Andreas Schrägle, Managing Director



WE

appreciate each other, treat each other fairly and with respect.

APPRECIATIVE, HUMOROUS & PROUD

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2.1 Health and safety

Our health and safety are our most valuable assets. Occupational safety and the protection of health are an integral part of all operational processes and are included in technical, economic and social considerations at all times. We all comply with these rules and regulations.

2.2 Working hours and remuneration

All associations belonging to our group of companies comply with the applicable laws and regulations concerning working time, remuneration and social benefits. RATHGEBER ensures that the remuneration of all employees at any time complies with at least the minimum value set out in the statutory provisions. At the same time it is our concern and target to integrate the compatibility of private life and work wherever possible.

2.3 Mutual respect, fairness and integrity

RATHGEBER employs many people from different nations and cultures. We see this as enrichment. We want to create a working environment that is based on respect and integrity and that gives each of us the opportunity to develop our strengths and to grow. Furthermore, we are open to people with disabilities. Diversity and inclusion are two concepts that cannot be separated.

We treat each other with courtesy and respect and do not accept discrimination against colleagues or third parties with regard to gender, origin, creed, colour of skin, age, disability or illness, trade union membership or legally compliant political affiliation, sexual orientation or marital status. We do not tolerate any form of verbal assault, sexual harassment or coercion. We act respectfully and courteously on digital channels such as social media, internet forums, blogs and in any other form of communication.

"What we do here only works as a team."

– Roger Gräler, Online Marketing

"It is about living and experiencing appreciation. This is also shown through mutual interest."

– Ingo Held, Marketing

APPRECIATIVE, HUMOROUS & PROUD

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2.4 Our mission statement and our values

We are all the foundation and a part of the success of RATHGEBER. We have developed an internal mission statement for cooperation and leadership based on our values – responsible, proactive, bold, appreciative, humorous, reliable, honest and proud. These guidelines lead us in our daily cooperation.

2.5 Leadership and responsibility

Our leaders are responsible for ensuring constructive cooperation both within the team and across departments and sites. Our goal is appreciative and supportive leadership. This Code of Conduct, our values and the internal mission statement point us in the right direction. Our leaders place trust in their employees, targets are agreed together and personal responsibility and freedom are developed.

2.6 Responsibility for the reputation of RATHGEBER

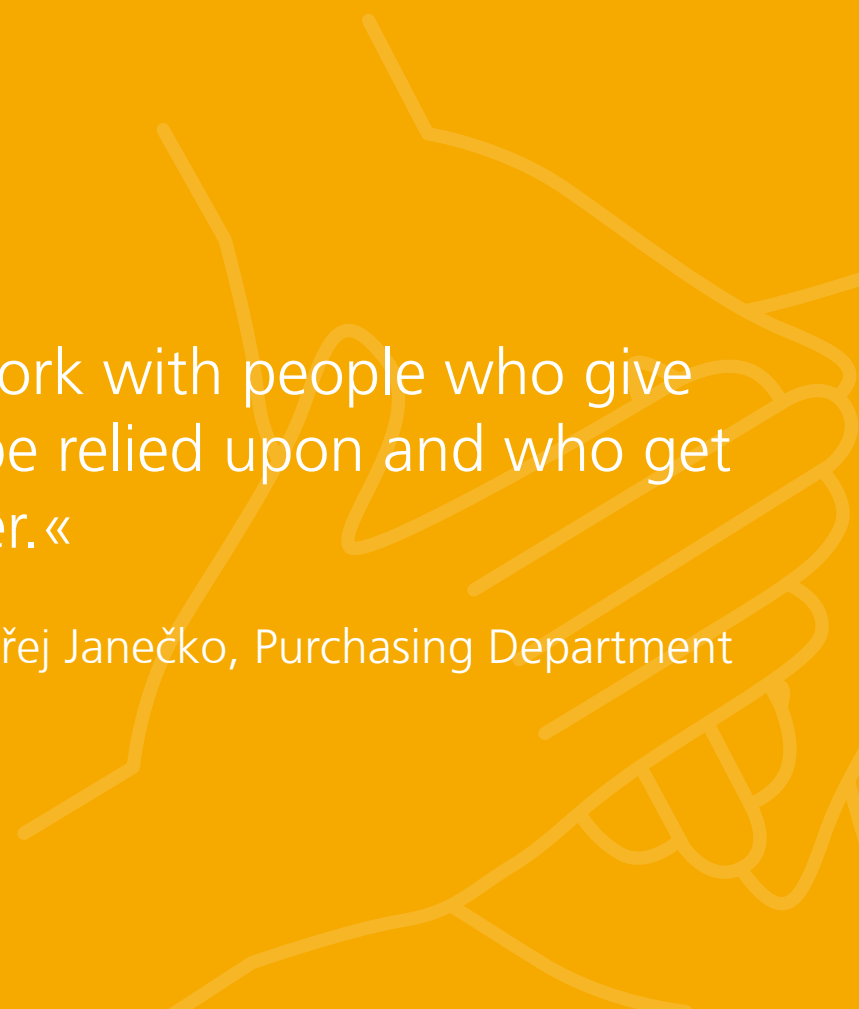
The reputation of RATHGEBER is materially shaped by the appearance, actions and conduct of each of us on a daily basis. We all project a competent and friendly image when performing our tasks and appearing in public, thereby contributing to a positive reputation for the corporate group.

“The chemistry I feel from a person is the most important thing for me. Technical skills come second because they are to be learned.”

– Martin Uhrinec, Sales Department

“To question the existing and create added value, you have to leave your comfort zone. As leaders, we need to set an example.”

– Sabrina Marx, Product Management



»I am fortunate to work with people who give their best, who can be relied upon and who get along with each other.«

– Ondřej Janečko, Purchasing Department



WE

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cooperation built on
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to us.

RELIABLE

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3.1 Dealing with customers, suppliers and third parties – expectations of business partners

Our diverse business relationships are built on mutual trust, fairness and fostered cooperation. Likewise, they are based on objective criteria such as quality, price, sustainability and delivery commitments. The Code of Conduct forms the basis for our business relationships, so we also expect our partners to fully assume their responsibilities and to behave in accordance with our code.

"It is about finding the best product for each individual in close interaction with very many, very different customers."

– Olli Schütz, Development Department

3.2 Quality standards

Our aim is to develop and produce the highest quality and the best solution for our customers and we carry out extensive quality controls to achieve this. Our short decision-making channels and intragroup quality management enable us to act and react immediately. The active contribution of each of us, along with the continuous striving for improvement enables the success of RATHGEBER and our customers.

"Quality is when the customer returns and not the product."

– Andreas Schräggle, Managing Director

3.3 Non-compete provision and avoidance of conflicts of interest

We all ensure that our cooperation with our business partners is not guided or overridden by private interests. We attach great importance to this issue and are mindful that no one should come into conflicts of interest or conflicts of loyalty. Decisions should be based on solely factual criteria. We are aware that operating an undertaking or other business that competes with RATHGEBER is not permitted. Any kind of participation in a competitor is subject to an obligation to provide information. Furthermore, we shall be informed of closely associated persons who operate a business in competition with RATHGEBER or who are involved in it and exert influence on business decisions.

We avoid closely associated persons being in official dependency relationships. In the event that we are authorised to issue instructions or perform supervisory or inspection duties, we shall disclose existing official relationships with related parties.

RELIABLE

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We undertake not to use our position or any information to which we have access for our personal benefit or for the benefit of closely associated persons.

A conflict of interest is not misconduct in itself – it is crucial that this situation be dealt with transparently and on the basis of trust. We report potential conflicts of interest to our supervisor, the management or anonymously via our dialogue platform.

3.4 Competition and monopolies law

We comply with the legal regulations of competition and monopolies law. The exchange of information between competitors on prices and pricing factors, on the division of territorial and customer groups as well as agreements or information on supply relationships and their conditions are not permitted.


3.5 Corruption, bribery and other benefits

RATHGEBER GmbH & Co. KG has been a member of the UN Global Compact since 2011 and supports national and international efforts to fight corruption. This means RATHGEBER emphatically rejects any form of bribery and corruption.

However, in the context of a business relationship, small gifts and invitations may be granted to maintain or as thanks for successful activities. However, this must always be done moderately. This does not create any binding dependencies. We comply with the applicable legal requirements, in particular tax regulations. In case of doubt, we turn to our supervisor.

“The annual Communication on Progress of the Global Compact enables us to transparently communicate and continuously improve our sustainability activities in line with the 10 principles.”

– Theresa Landwehr, CSR



»In case of doubt, we also discuss fractions of a millimetre. Simply everything has to fit.«

– Alexandra Gerlach, Graphic Department



WE

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and nature, data
and information in
a sustainable manner.

RESPONSIBLE

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4.1 Sustainability is close to our hearts

Sustainability is an essential foundation of our thoughts and actions at RATHGEBER. We respect and protect the resources of our Earth. We do not focus on short-term gains; we consider future generations. In product development, in the operation of production facilities and in all processes, we make sure that any impact on the environment and climate is kept as small as possible. Unavoidable pollutants are disposed of and recycled in an environmentally friendly manner. We offset emissions by funding certified climate protection projects through the voluntary purchase of official CO₂ certificates. RATHGEBER has been carbon-neutral with all delivered products since 2010. Through regular audits and certifications according to DIN standards, we document that we meet the highest standards in terms of environmental protection, occupational safety and quality.

4.2 Company facilities and company assets

We treat company property responsibly and protect it from loss, damage, theft and misuse. The same also applies to the property of our customers and partners. We manage our financial and intangible assets carefully, such as our intellectual property, copyrighted materials, financial records and our brand image. Company facilities, equipment and property are used exclusively for official business except where private use is expressly permitted or governed by company policies.

4.3 Internal information and knowledge management

We all ensure a quick and seamless exchange of information within the company. We document, store and archive our information in such a way that it is possible for all of us to quickly find the relevant information at any time. We pass on the necessary knowledge unaltered and in full, provided that there are no conflicting overriding interests (such as confidentiality obligations or data protection regulations).

"With every decision we make – no matter how small – we have to ask ourselves what impact it has on the environment and whether there is a more sustainable way to do it."

– Andreas Schräggle, Managing Director

RESPONSIBLE

WE handle resources and nature, data and information in a sustainable manner.



4.4 Formal records and reports

All records and reports to be published externally in the context of our business activities are subject to the criteria of truthfulness and transparency. They are complete, appropriate to the period, correct and transparent. Our documentation is drawn up in accordance with legal requirements.

4.5 Data protection and data security

In our day-to-day business, we use confidential information only to the extent allowable for business reasons. We do not make it accessible to unauthorised third parties under any circumstance. We treat personal data such as information from customers, business partners and colleagues with the utmost confidentiality and strictly adhere to the provisions of the General Data Protection Regulation (GDPR). Where such data is used, this must be transparent for the data subjects. We also protect their rights, in particular their rights of access, rectification and erasure. Regular training is provided on this topic. Information stored electronically is protected by means of current and best possible technical capabilities. We also have an information security management system, which we are constantly developing as part of the TISAX certification to ensure the best possible protection against cyberattacks.

"There is always a certain urgency to develop further. That is why we are positioned so well and so securely today."

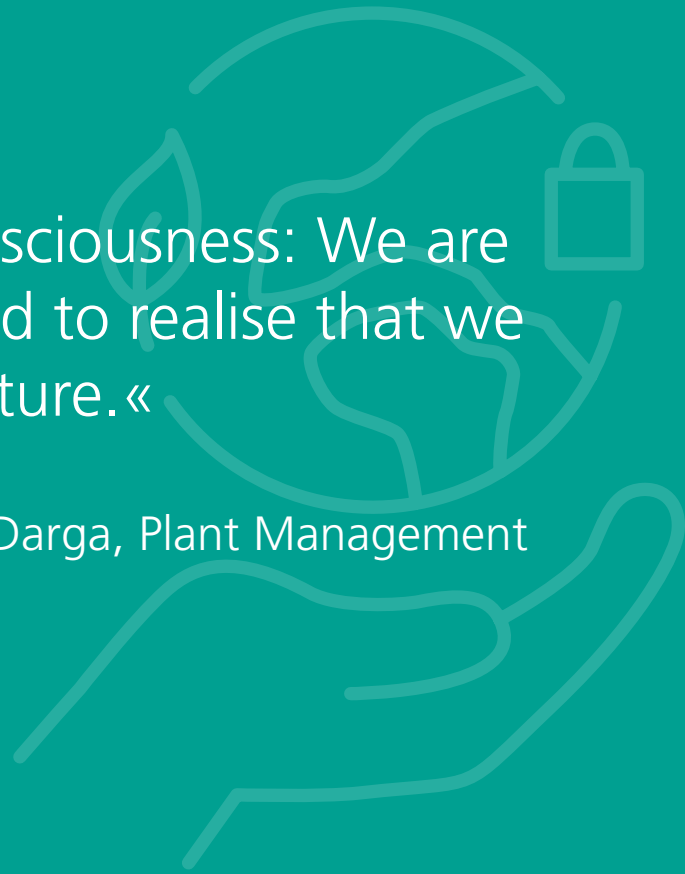
– Helmut Rößle, IT

4.6 Social commitment, donations and sponsorship

We welcome the personal commitment of our colleagues in voluntary functions and for charitable purposes. Our donations are always voluntary and not linked to any quid pro quo. In any case, we take into account the applicable laws and regulations. We categorically exclude donations to political parties, candidates or holders of office, as well as to administrative officers, companies and other institutions.

»Create a change in consciousness: We are a part of nature and need to realise that we can not exist without nature.«

– Dr. Alexander Darga, Plant Management





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PROACTIVE AND BOLD

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WE are open to continuous development and take questions and feedback seriously.

In its more than 70-year history, the RATHGEBER Group has become an industry leader because we are characterised by our commitment, boldness, initiative and personal responsibility, built on a foundation of innovative thought and action. The long-term development of the corporate group is and remains the goal of all of us. This includes both our willingness to constructively question what is already in place and our openness to actively drive change in a timely fashion. Investments in promising projects, the constant development of the company in the course of technical progress and our years of know-how allow us to realise high-quality products and solutions for changing markets and customer requirements. In this spirit, we also want to drive forward our Code of Conduct. We are always happy to receive feedback on our Code: What are we missing? What do we want to add or change?

Our Code of Conduct cannot cover all situations we might face. We all ensure that we understand RATHGEBER's policies and rules and adhere to the standards in our work. We deal with uncertain situations with integrity and reason.

We can openly raise our concerns and have the opportunity to take the initiative by seeking advice and support from our supervisor or the management. We can also communicate via our dialogue platform. Reports under the Hinweisgeberschutzgesetz (HinSchG – Act for Better Protection of Whistleblowers) are submitted via the intranet. External parties have access to our whistleblower system via our website. Confidentiality and anonymity are guaranteed on both channels.

Colleagues who report a suspected case or violation are not to expect any disadvantages as a result. Reports are treated discreetly and confidentially. Similarly, we deal fairly with colleagues who are accused of misconduct. In doing so, we will all succeed in acting in the spirit of our Code of Conduct.



"Within RATHGEBER Group and especially in development, one may and must be bold, because the possibilities are almost unlimited."

– Stephanie Scherübl, Sales Department

"The Code of Conduct is a project which employees of all locations and companies help to shape."

– Andrea Schrägle, Managing Partner

