

Supplier

Code of Conduct

At ROWA GROUP our global reputation as a trusted and ethical partner and employer is one of our most valuable assets.

We are committed to operating responsibly in everything we do, respecting people, our communities and the planet. This Supplier Code of Conduct sets out the minimum standards of behavior we expect from all our suppliers. It was created in 2025 to reflect the sustainability commitments we have made as part of our ESG strategy.

Our ambition is not limited to minimum standards. We encourage you, our suppliers, to look for opportunities to go beyond the expectations set out in this Supplier Code of Conduct so that together we can make a positive impact.

We also ask if you have a genuine concern or suspect that a violation of any law has taken place, please contact us directly. You can reach us at:

ROWA GROUP Holding GmbH – Siemensstraße 1 - 9 – 25421 Pinneberg or raise your concern confidentially by using our whistleblower system, called Integrity Line, which is also available for reporting any significant violations of our Code of Conduct - particularly illegal business practices.

This system operates in several languages and permits a confidential and encrypted dialogue with the Compliance Department (anonymous on request). You can access the Integrity Line via the following link or by phone:

<https://gnhgroupcompliance.integrityline.com>

Phone: +49-30-99257146 – Company Code 4125

We are committed to this journey and want to make a positive difference.



Kai Müller

CEO
ROWA GROUP Holding GmbH



Götz-Friedrich Wedde

CFO
ROWA GROUP Holding GmbH

Our Supplier Code of Conduct sets out the standards of behavior we expect of ROWA GROUP suppliers - those companies, service providers and business partners that engage in a direct business relationship with all our companies.

The Supplier Code of Conduct defines our responsible sourcing guiding principles set out below and articulates how we work with our trusted suppliers to source raw materials, products and services in a compliant, socially conscious and sustainable manner.

The Supplier Code of Conduct covers three areas:

- 1. Business Integrity** – Our suppliers are expected to conduct their business in an ethical and responsible manner and comply with all applicable laws and regulations.
- 2. Human Rights** – Our suppliers are expected to provide a fair and safe workplace, and demonstrate respect for human rights, diversity, equality and inclusion.
- 3. Environmental Sustainability** – Our suppliers are expected to adopt policies and practices that protect the planet and reduce negative impacts on the environment.

We expect our suppliers to meet the minimum standards outlined in this Supplier Code of Conduct and go further, where possible or required by contractual agreement. We also expect our suppliers to ensure that their own business partners meet standards comparable to those set out in our Supplier Code of Conduct.

- ✓ ROWA GROUP takes a continuous improvement approach to the implementation of these standards. We expect our suppliers to be able to demonstrate that they operate in a manner consistent with our Supplier Code of Conduct. Where a breach is suspected, we may request the supplier to cooperate with an internal or external review and to make improvements.
- ✓ We all benefit from responsible behavior as it is key to maintaining a functioning society and protects both our reputation and yours. Conformance with the Supplier Code of Conduct, and a supplier's willingness to address deficiencies, will be key to our decision to engage in or continue a business relationship.
- ✓ If you have any questions about the information in our Supplier Code of Conduct and what is expected of you, contact your procurement representative.
- ✓ If you observe or suspect any behavior that is not consistent with this Supplier Code of Conduct, we encourage you to speak up.
- ✓ Our whistleblower system is available to our own employees and all external stakeholders, including our suppliers and their employees. We encourage you to make use of it.

Our responsible sourcing guiding principles

We ask our suppliers and partners to join our shared commitment.

1. **We are committed to complying** with all applicable laws and regulations and committed to acting responsibly and with integrity in all areas of our business.
2. **We are committed to respecting** human rights and diversity, social equality and inclusion, including the right to a fair, healthy and safe workplace for all.
3. **We are committed to sourcing** raw materials, goods and services in an environmentally conscious and responsible manner, whilst collaborating with our suppliers to ensure continuous improvements in our sustainability efforts.

Summary of minimum standards expected of ROWA GROUP suppliers:

Business Integrity

- **Anti-bribery, corruption and embezzlement:** Act with integrity and comply with anti-bribery and corruption laws.
- **Gifts and hospitality:** Never offer or accept gifts, entertainment or hospitality that is, or may be viewed as, an attempt to influence business decisions. Do not offer gifts or hospitality to public government officials unless lawful and approved in advance.
- **Conflicts of interest:** Inform us of any actual or potential conflicts of interest.
- **Confidentiality, privacy and data protection:** Safeguard our confidential and personal information and notify us in the event of a breach or suspected breach.
- **Antitrust and fair competition:** Comply with all applicable anti-trust and competition laws; do not share our proprietary or confidential information.
- **Sanctions and export controls:** Understand and comply with all sanctions laws and export controls relevant to your business and the supply of any raw materials, goods and services to ROWA GROUP.

Human Rights

- **Child labour:** Suppliers must not employ any child and must not employ any person younger than the minimum local legal working age. Protect children from child labour as well as slavery, trafficking and sexual exploitation.
- **Modern slavery, forced labor and human trafficking:** All work must be performed voluntarily. Do not employ any worker based on fees or debt bondage. Allow all workers to retain identification and personal documents. Respect freedom of movement.
- **Working hours, wages and benefits:** Ensure that hours and remuneration are reasonable and aligned with local laws. Pay workers on time and provide all required leave.
- **Diversity, equality and inclusion:** Treat all employees with dignity, respect and fairness. Promote diversity, social equality and inclusion.
- **Grievance mechanisms and remedies:** Where possible, provide employees with a confidential channel to report complaints and grievances, without fear of retaliation or reprisal.
- **Health and safety:** Comply with all applicable health and safety laws and regulations in the workplace. Ensure facilities are clean and safe and provide workers with appropriate training and equipment.

Environmental Sustainability

- **Environmental laws:** Comply with environmental laws and regulations relevant to your business. Ensure access to affordable, reliable, sustainable and modern energy for all. Take urgent action to combat climate change and its impacts. Report any incidents or unsafe conditions to the local authorities and/or ROWA GROUP Integrity Line.
- **Continual improvements:** Familiarize yourself with our sustainable and responsible actions and let us look for ways to advance key environmental goals in our markets and on a global level to protect the planet.