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Code of Conduct (CoC)
for RM Components GmbH

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Code of Conduct (CoC) for RM Components GmbH

1. Introduction

1.1 Purpose and Objective of the Code of Conduct

RM Components GmbH (hereinafter referred to as “RM Components” or “the Company”) is committed to the principles of responsible, ethical, and sustainable business conduct. Our entrepreneurial actions are based on integrity, transparency, and respect for people, the environment, and society.

This Code of Conduct (hereinafter “CoC”) sets out binding principles and rules of conduct for all employees as well as for our business partners. It serves as a guideline for lawful and ethical behavior within the company and in our business relationships.

The objectives of this Code of Conduct are:

- Ensuring lawful, ethical, and sustainable conduct in all business activities.
- Promoting a corporate culture based on integrity, fairness, and respect.
- Protecting human rights, fair working conditions, and environmental protection.
- Preventing corruption, money laundering, and violations of competition law.
- Strengthening responsibility and transparency within our organization and towards our stakeholders.

This Code of Conduct forms the basis for the day-to-day conduct of our employees as well as for our collaboration with business partners and suppliers. We expect all parties involved to use this Code as a guide for their behavior and to actively uphold the values it sets forth.

1.2 Corporate Values and Ethical Principles

RM Components GmbH is committed to sustainable, responsible, and ethically sound business conduct. Our success is based on the core values that shape our corporate philosophy and guide our day-to-day actions. These values form the foundation for our behavior toward employees, business partners, customers, and society.

Our core values and ethical principles include:

Integrity and Transparency

We always act honestly, reliably, and transparently. Our decisions are based on objective and ethical considerations, ensuring that all business processes are lawful, traceable, and properly documented.

Fairness and Respect

We treat all people with respect, regardless of origin, gender, religion, age, disability, or other personal characteristics. Discrimination, harassment, or exclusion of any kind have no place in our company.

Sustainability and Environmental Awareness

We take responsibility for our planet and actively advocate for environmental protection. Our business practices are based on the efficient use of resources, the reduction of environmental impacts, and compliance with international sustainability standards such as ISO 14001.

Social Responsibility and Human Rights

We are committed to respecting international human rights and ensuring fair working conditions throughout our entire supply chain. This includes combating forced and child labor, ensuring humane working conditions, and complying with social standards in line with ILO conventions.

Legal Compliance and Integrity

Compliance with all applicable laws, regulations, and legal requirements is a matter of course for us. Corruption, bribery, money laundering, or any other unethical behavior are not tolerated. Our Compliance Management System (CMS) ensures that all employees are informed about the applicable rules and comply with them.

Responsible Business Practices

Our business decisions are geared toward long-term success. We make economically sound decisions that benefit not only the company but also society and future generations.

Support of International Sustainability Initiatives

RM Components GmbH officially supports internationally recognized sustainability initiatives and principles. These include in particular:

- The Ten Principles of the UN Global Compact (UNGC) in the areas of human rights, labor standards, environmental protection, and anti-corruption
- The Core Labor Standards of the International Labour Organization (ILO)
- The OECD Guidelines for Multinational Enterprises
- The UN Guiding Principles on Business and Human Rights and the United Nations 2030 Agenda (SDGs)

This commitment is an integral part of our corporate strategy and shapes our daily actions. We also expect our business partners to respect these principles and implement them within their own organizations.

1.3 Scope of Application

This Code of Conduct (CoC) applies to all employees, managers, and the executive management of RM Components GmbH. It is an integral part of our corporate culture and governs daily conduct within the

company. In addition, the scope of this CoC extends to our business partners, particularly suppliers and service providers who maintain a business relationship with RM Components GmbH. We expect them to respect the principles and standards set forth herein and to implement them within their own sphere of responsibility.

The Code of Conduct is binding for all employees of RM Components GmbH, regardless of their position or function. This includes both permanent employees and members of management and executive leadership. Interns, trainees, and external consultants working on behalf of RM Components are also required to adhere to the behavioral rules set out in this document.

For business partners and suppliers of RM Components GmbH, the principles of this Code of Conduct serve as a framework for sustainable and ethical collaboration. They are expected to implement the defined requirements in their own business operations and to ensure that their own supply chains also comply with these standards.

RM Components GmbH reserves the right to regularly review compliance with this Code of Conduct. This may be carried out through internal or external audits. If violations are identified, the company reserves the right to take appropriate action, which may range from a request to remedy deficiencies to the termination of the business relationship.

1.4 Supplementary Guidelines to Ensure Compliance, Sustainability, and Export Control

In addition to this Code of Conduct, RM Components GmbH has developed specific internal policies that systematically implement binding legal requirements and anchor them within the relevant areas of the company. These policies are designed to comprehensively meet the regulatory and ethical obligations applicable to the company, its supply chain, and its business partners.

As part of sustainable corporate governance, these policies expand upon the principles outlined in the Code of Conduct by addressing additional regulatory and environmental requirements. The following policies govern specific subject areas and supplement the company's general commitment to compliance with legal requirements and ethical principles:

Material Compliance Policy

This policy ensures that RM Components GmbH and its suppliers comply with all material-related regulations, particularly with respect to the REACH Regulation, the RoHS Directive, and the German Electrical and Electronic Equipment Act (ElektroG). It governs the use and declaration of hazardous substances in electronic components and ensures conformity with environmental and product safety requirements.

Sustainability and Environmental Management Policy

This overarching policy provides the framework for sustainable operations within RM Components GmbH. It outlines strategies for reducing negative environmental impacts, improving energy efficiency, and integrating sustainable principles into business activities. It also includes measures for promoting

sustainable corporate management and ESG (Environmental, Social, Governance) criteria.

Raw Materials, Chemicals, and Waste Management Policy

This policy defines the legal requirements for hazardous substance management, chemical storage, and waste disposal. It includes specific provisions for the safe handling of hazardous substances, storage of chemicals in accordance with the German Hazardous Substances Ordinance (GefStoffV), and compliance with the German Circular Economy Act (KrWG).

Product Lifecycle and Environmental Compatibility Policy

This policy sets out binding measures for the environmentally sound development, use, and disposal of products. It includes requirements for extending product lifespan, using sustainable materials, and implementing take-back and recycling programs in accordance with the ElektroG and the German Packaging Act (VerpackG).

Regulatory Environmental Requirements and CO₂ Management Policy

This policy defines statutory environmental obligations, particularly in the areas of packaging management, emissions control, and climate reporting pursuant to the EU Packaging Regulation and the German Federal Climate Protection Act (KSG). It also outlines methods for CO₂ accounting and measures for emissions reduction.

Supply Chain and Traceability Policy

This policy requires RM Components GmbH to ensure the traceability of materials and products along the entire supply chain. It implements the requirements of the German Supply Chain Due Diligence Act (LkSG) and outlines obligations regarding supplier assessment, risk analysis, and material compliance assurance.

Compliance and Risk Management Policy

This policy governs the identification, assessment, and control of compliance and corporate risks. It includes binding requirements for corruption prevention, anti-money laundering, anti-discrimination (AGG), data protection (GDPR), and product safety. Additionally, it includes grievance mechanisms and internal control systems.

Export Control Policy (Dual Use)

This policy ensures that all exported goods comply with statutory export control regulations. It covers the identification of dual-use goods under the EU Dual-Use Regulation, the application for export licenses, and measures for monitoring trading partners and obtaining end-use declarations.

1.5 Delimitation of Guidelines

While the Code of Conduct serves as the overarching framework defining the core principles of responsible corporate conduct, the supplementary guidelines are specifically designed to implement

particular legal obligations. Each guideline has a distinct focus and thematic scope, ensuring clear differentiation and targeted application.

The Sustainability and Environmental Management Policy emphasizes the company's overall sustainability strategy and ESG measures, whereas the Regulatory Environmental Requirements and CO₂ Management Policy defines specific legal environmental obligations and measures for reducing CO₂ emissions. The former serves as a strategic framework for sustainable business practices, while the latter governs the fulfillment of binding environmental regulations.

The Material Compliance Policy focuses on compliance with legal material restrictions and declaration requirements, particularly in relation to the REACH Regulation, the RoHS Directive, and the German Electrical and Electronic Equipment Act (ElektroG). In contrast, the Product Lifecycle and Environmental Compatibility Policy addresses the overall environmental impact of a product, including requirements for recycling and take-back obligations. While the Material Compliance Policy ensures that prohibited substances do not enter the supply chain, the Product Lifecycle Policy ensures that products are developed, used, and disposed of in an environmentally sound manner.

The Supply Chain and Traceability Policy focuses on transparency within the supply chain, ensuring that materials and products can be traced from origin to end use. It includes human rights due diligence obligations in accordance with the German Supply Chain Due Diligence Act (LkSG). In contrast, the Export Control Policy (Dual Use) exclusively regulates the control of export goods, especially with regard to security-critical components and dual-use items subject to international trade restrictions.

The Compliance and Risk Management Policy addresses general legal and ethical risks and includes measures for preventing corruption, combating money laundering, protecting against discrimination, and ensuring data protection and product safety. The Export Control Policy (Dual Use), on the other hand, focuses specifically on compliance with export control regulations and dual-use requirements, ensuring that export-controlled goods are not shipped without official authorization.

This clear separation enables the targeted implementation of all relevant regulations and ensures that there is no content overlap. RM Components GmbH is committed to the ongoing review and further development of these guidelines to ensure regulatory compliance and responsible conduct both within the company and throughout the entire supply chain.

1.6 Responsibility and Commitment of Employees and Business Partners

All employees of RM Components GmbH share a collective responsibility for complying with this Code of Conduct. Each individual is obligated to consider and actively implement the principles and rules of conduct set forth herein in their daily work. This applies to all internal activities as well as interactions with business partners and external stakeholders.

Managers have a particular role model function. They are responsible for ensuring that the principles contained in this Code of Conduct are consistently applied within their area of responsibility. They must ensure that their team members are informed about the behavioral standards, understand them, and actively adhere to them. Additionally, managers are encouraged to promote a culture of open

communication, in which violations or uncertainties regarding the Code of Conduct can be addressed early and without hesitation.

Business partners, particularly suppliers and service providers, are also expected to incorporate the principles of this Code of Conduct into their own business practices. RM Components GmbH expects them to commit to the ethical, social, and environmental standards outlined in this document and to ensure that these principles are respected throughout their supply chains.

If violations of this Code of Conduct are identified or uncertainties arise regarding compliance with specific rules, all employees and business partners are encouraged to contact the appropriate internal contacts or the designated compliance and whistleblower systems. The company ensures that all reports are handled confidentially and without any negative consequences for the reporting person.

The consistent implementation and adherence to this Code of Conduct is of central importance to RM Components GmbH. Therefore, it is expected that all employees, managers, and business partners actively support the enforcement of the principles set forth herein and do not tolerate any violations.

2. Legal Framework and Compliance with Laws

2.1 National and International Laws and Standards

RM Components GmbH is committed to strict compliance with all applicable national and international laws and regulatory requirements. Our business conduct is based on the prevailing legal framework and is guided by globally recognized standards and conventions.

Relevant legal provisions include, in particular, the German Supply Chain Due Diligence Act (LkSG), which obligates companies to observe human rights and environmental due diligence obligations throughout their entire supply chain. In addition, we align our practices with international norms and conventions, including:

- The Universal Declaration of Human Rights (UDHR) of the United Nations (UN)
- The Core Labor Standards of the International Labour Organization (ILO), particularly the conventions on freedom of association, forced labor, child labor, and non-discrimination
- The OECD Guidelines for Multinational Enterprises
- The International Covenant on Economic, Social and Cultural Rights (ICESCR) and the International Covenant on Civil and Political Rights (ICCPR) of the UN
- The UN Guiding Principles on Business and Human Rights
- The "Children's Rights and Business Principles" issued by UNICEF, the UN Global Compact, and Save the Children

These legal and ethical foundations are binding for our company and form the basis for the business practices we expect from our partners. We require our suppliers and business partners to adhere to these

principles and to implement appropriate measures to ensure compliance.

RM Components GmbH reserves the right to verify compliance with these requirements through internal reviews or external audits. If violations of national or international standards are identified, appropriate corrective actions will be taken.

2.2 Compliance with the German Supply Chain Due Diligence Act (LkSG)

RM Components GmbH is not directly subject to the legal obligations of the German Supply Chain Due Diligence Act (LkSG), but fully acknowledges its importance for responsible corporate governance. Regardless of any immediate legal obligation, the company adheres to the principles of the LkSG and integrates human rights and environmental due diligence into its business processes. This voluntary commitment also reflects the expectations of business partners and customers who are subject to the LkSG and must ensure corresponding standards within their supply chains.

RM Components GmbH ensures that human rights and environmental standards are considered across all relevant areas of the company. Special attention is given to preventing child and forced labor, upholding fundamental labor rights, and protecting the environment through sustainable resource use and measures to reduce emissions and environmental impacts.

To implement these requirements, the company regularly identifies and assesses potential risks within its business activities. Based on these analyses, preventive measures are taken to avoid human rights or environmental violations. In the event that violations do occur, appropriate corrective actions are taken immediately.

All employees and business partners are encouraged to actively contribute to the observance of these due diligence obligations. RM Components GmbH provides internal whistleblower systems for reporting potential violations, ensuring confidential and secure communication. All reports are carefully reviewed and addressed, with full protection against retaliation for the reporting individuals.

The implementation and continuous improvement of these measures is an ongoing process through which RM Components GmbH ensures the best possible adherence to human rights and environmental due diligence obligations.

2.3 Combating Corruption and Bribery

RM Components GmbH is committed to conducting business with integrity and ethics and does not tolerate any form of corruption or bribery. Corrupt behavior undermines trust in business relationships, distorts competition, and can result in serious legal and reputational consequences.

All employees are required to act in accordance with applicable anti-corruption laws and to refrain from any form of bribery, extortion, or improper granting of advantages. This includes both direct and indirect attempts to bribe, whether involving public officials or business partners. Any action intended to gain an improper business advantage is strictly prohibited.

The company does not tolerate the offering or acceptance of personal or business benefits intended

to improperly influence decisions. In particular, it is prohibited to offer or accept gifts, invitations, or other benefits if they exceed what is socially customary and legally permissible. In cases of doubt, the responsible compliance officers or executive management must be consulted.

Donations and sponsorships may only be made in accordance with applicable laws and the internal policies of RM Components GmbH. Financial contributions to political parties or public officials that could improperly influence business decisions are prohibited.

Employees are obliged to report any suspected cases or violations of these principles without delay using the established internal reporting channels. RM Components GmbH ensures that all reports are handled with strict confidentiality and that whistleblowers do not suffer any negative consequences.

The company actively promotes training and awareness among its employees to minimize the risks of corruption and bribery. Integrity and transparency are the foundation of all business decisions and are essential for sustainable success and long-term business relationships.

2.4 Material Compliance (REACH, RoHS, SCIP, Conflict Minerals, and Other Relevant Regulations)

RM Components GmbH is committed to complying with all legal and regulatory requirements in the area of material compliance to ensure that the materials and products we use meet applicable environmental and safety standards. The goal is to prevent negative impacts on people and the environment, ensure the safety of our products, and meet the expectations of our customers and business partners.

As part of our responsibility, we ensure that all materials used in our products and processes comply with relevant regulations. These include, among others, the REACH Regulation (EC) No. 1907/2006, the RoHS Directive 2011/65/EU, the SCIP database requirements of the ECHA, and other national and international material compliance regulations.

The REACH Regulation governs the registration, evaluation, authorization, and restriction of chemical substances within the European Union. RM Components GmbH is committed to using only materials that comply with REACH and do not contain any prohibited or Substances of Very High Concern (SVHCs).

The RoHS Directive restricts the use of certain hazardous substances in electrical and electronic equipment, particularly heavy metals such as lead, mercury, and cadmium, as well as brominated flame retardants. RM Components GmbH ensures that all relevant products comply with RoHS restrictions and do not exceed permissible concentrations of these substances.

In addition to complying with these requirements, the company is also committed to fulfilling the SCIP database obligations by reporting all relevant products and materials containing SVHCs to the EU-wide SCIP database of the European Chemicals Agency (ECHA).

Furthermore, RM Components GmbH complies with the regulations on conflict minerals in accordance with EU Regulation 2017/821 and the U.S. Dodd-Frank Act provisions. This means we avoid using raw materials such as tantalum, tin, tungsten, and gold originating from conflict or high-risk areas—or procure

them exclusively from demonstrably responsible sources.

Our business partners and suppliers are also expected to adhere to the highest standards in the area of material compliance. They must ensure that their materials and products comply with all applicable regulations and provide appropriate documentation or certificates upon request.

RM Components GmbH regularly reviews its internal processes and collaboration with suppliers to ensure that material compliance requirements are consistently met. This is an essential component of our sustainable and responsible business practices.

3. Human Rights, Diversity, and Labor Rights

3.1 Respect for Human Rights in Accordance with International Standards (UN, ILO, OECD)

RM Components GmbH is fully committed to respecting human rights and aligns its actions with internationally recognized standards and conventions. This includes, in particular, the Universal Declaration of Human Rights (UDHR) of the United Nations, the Core Labor Standards of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights.

The company ensures that its business practices are consistent with these standards and does not tolerate any violations of fundamental human rights. This includes, among others, the right to physical integrity, fair working conditions, and freedom of association. RM Components GmbH actively opposes discrimination, forced labor, child labor, and inhumane working conditions.

The company is committed to identifying and assessing human rights risks in its business activities and relationships at an early stage and to taking appropriate action. This includes considering the potential impacts on employees, business partners, and indirectly affected groups. Awareness of human rights is promoted through internal training, clear codes of conduct, and continuous review of company practices.

RM Components GmbH expects its business partners to likewise commit to these international standards and to ensure within their own organizations that human rights are respected and protected. If violations are identified, the company is committed to taking appropriate measures to counteract them and to ensuring long-term human rights-compliant business practices.

3.2 Diversity, Equal Opportunity, and Anti-Discrimination

RM Components GmbH actively promotes a working environment characterized by respect, fairness, and equal opportunity. Diversity is an asset and essential to our business success. All employees must be treated equally, regardless of their origin, skin color, gender, sexual orientation, religion, beliefs, disability, age, or other personal characteristics. Any form of discrimination, harassment, or disadvantage will not be tolerated.

The company is committed to ensuring equal development opportunities for all employees. This applies in particular to recruitment processes, professional development, promotions, and compensation structures. Decisions are made solely based on qualifications, performance, and competence.

Special attention is given to fostering an inclusive corporate culture in which all employees feel respected and valued. The company actively supports initiatives that promote gender equality, inclusion of people with disabilities, and integration of minorities and other disadvantaged groups.

Managers have a special responsibility to prevent discrimination and unequal treatment by fostering an open and respectful working atmosphere. Violations of these principles will be consistently investigated and addressed. Confidential and secure complaint mechanisms are available for affected employees.

RM Components GmbH also expects its business partners to respect the principles of diversity, equal opportunity, and anti-discrimination and to implement them within their own organizations. A discrimination-free working environment is a prerequisite for sustainable and successful collaboration.

3.3 Fair Working Conditions, Remuneration, and Working Hours

RM Components GmbH is committed to ensuring fair working conditions based on the principles of respect, equity, and social responsibility. Every employee has the right to a safe, healthy, and dignified working environment.

The company ensures that all working conditions comply with applicable national and international standards. Employee remuneration is fair and performance-based. At a minimum, the statutory minimum wage is paid—or, where no such legal requirement exists, a wage that covers basic living needs and meets the customary minimum standards of the respective industry. The structure of compensation is communicated in a transparent and understandable manner.

Social security is an essential component of fair working conditions. RM Components GmbH ensures that all legally required social benefits are granted. These include, among others, pension and health insurance as well as other benefits in accordance with applicable legal provisions. In addition, RM Components GmbH regularly reviews the possibility of offering supplementary voluntary social and additional benefits, such as occupational pension schemes or health promotion programs, to further support employee well-being and long-term security.

Working hours comply with legal requirements and are aligned with internationally recognized labor standards, particularly those of the International Labour Organization (ILO). Excessive workloads are avoided, and employees are entitled to adequate rest periods and paid leave. Working time arrangements are designed to ensure that neither the physical nor mental health of employees is compromised.

RM Components GmbH is committed to fostering a working environment characterized by mutual respect and responsibility. This also includes measures to promote a healthy work-life balance. Flexible working models, where operationally feasible, support employees' needs and encourage a balanced integration of work and personal life.

All managers are responsible for ensuring fair working conditions within their respective areas and for addressing any violations of these principles without delay. Employees are encouraged to confidentially report any concerns or violations to the appropriate departments.

3.4 Freedom of Association and Collective Bargaining

RM Components GmbH recognizes the right of all employees to freely organize in trade unions or other employee representations and to engage in collective bargaining. This right is a fundamental principle of international labor standards and is particularly protected by the conventions of the International Labour Organization (ILO) and the UN Guiding Principles on Business and Human Rights.

The company ensures that employees can exercise their right to freedom of association without fear of reprisal or discrimination. Employees have the right to join trade unions, participate in collective bargaining, or collectively represent their interests. At the same time, employees are free to choose not to organize if they so wish.

RM Components GmbH is committed to communicating with elected employee representatives in a fair and respectful manner. The company promotes constructive dialogue to continuously improve working conditions and ensure transparent cooperation between management and employees.

If national laws or specific legal frameworks restrict the right to freedom of association or collective bargaining, RM Components GmbH will establish alternative mechanisms for employee participation and dialogue. The goal is to foster an open and trustworthy corporate culture in which employees can voice their concerns without fear of negative consequences.

The company also expects its business partners to respect the rights to freedom of association and collective bargaining and to enable them within their own structures. This contributes to stable and fair working conditions throughout the entire value chain.

3.5 Prohibition of Human Trafficking, Child Labor, and Forced Labor

RM Components GmbH is fully committed to respecting human dignity and strictly rejects any form of human trafficking, child labor, and forced labor. These practices constitute serious violations of human rights and are contrary to international agreements, in particular the Core Labor Standards of the International Labour Organization (ILO), the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

The company ensures that child labor and forced labor are not used in its own operations and actively works to prevent such practices throughout the value chain. Only individuals who have reached the legal minimum age for employment are hired. Compliance with these requirements is strictly verified during all recruitment processes.

Any form of labor carried out under coercion, threat, deception, or restriction of personal freedom is prohibited. Employment must be entered into voluntarily, and employees have the right to terminate their employment in accordance with legal or contractual provisions without retaliation. Employment relationships must not be controlled through the withholding of identification documents, debt bondage, or forced dependency.

The company raises awareness among its employees on these issues and promotes understanding of the

risks and consequences of forced labor and human trafficking. If employees or business partners raise concerns or report possible violations, RM Components GmbH ensures that such reports are handled confidentially and without negative consequences for the reporting individual.

RM Components GmbH also expects its business partners to actively oppose human trafficking, child labor, and forced labor. Suppliers and other partners are required to establish mechanisms for identifying and preventing these practices. If it becomes known that a business partner is violating these principles, the company will take appropriate measures to ensure that no business relationship is maintained with entities involved in human rights violations.

3.6 Measures to Promote Diversity, Equality, and Inclusion

RM Components GmbH views diversity, equality, and inclusion as essential components of responsible and forward-looking corporate governance. A diverse work environment fosters innovation, strengthens cohesion, and contributes to sustainable business success.

The company is committed to promoting a culture of openness and appreciation, where all employees—regardless of gender, origin, age, disability, religion, sexual orientation, or other personal characteristics—are given equal opportunities. Any form of discrimination or disadvantage is not tolerated.

To ensure equal opportunity, RM Components GmbH implements measures that promote equality. These include transparent recruitment and promotion processes based on qualifications and performance, as well as programs to support women, minorities, and people with disabilities. Flexible work models, training opportunities, and mentoring programs also contribute to the professional development of all employees.

The company actively fosters an inclusive corporate culture by establishing a respectful working environment and enforcing a zero-tolerance policy toward discrimination and harassment. Managers have a particular responsibility to support and embed diversity and equality within their teams.

Employees who observe or experience discrimination or unequal treatment may report such incidents confidentially through internal reporting channels. RM Components GmbH ensures that all reports are taken seriously and handled appropriately, without negative consequences for the reporting person.

The company also expects its business partners to actively support diversity, equality, and inclusion and to implement appropriate measures within their own organizations. A diverse and inclusive working environment is not only a social responsibility but also an economic necessity for sustainable success.

When selecting candidates, RM Components GmbH ensures that recruitment processes are non-discriminatory and accessible. Applications are evaluated based on objective criteria, and personal data can be anonymized upon request during the initial stage. Job postings are worded in gender-neutral and inclusive language.

3.7 Inclusion of Minorities and Employees with Disabilities

RM Components GmbH firmly believes that diversity and inclusion are essential elements of sustainable and successful corporate governance. The company actively promotes equality and the integration of

minorities and people with disabilities, creating a work environment that offers equal opportunities for all employees.

Every individual has the right to be treated with respect, regardless of ethnic origin, religion, gender, sexual orientation, or physical or mental condition. Discrimination, disadvantage, or denial of professional opportunities based on these characteristics will not be tolerated.

RM Components GmbH is committed to identifying and eliminating structural barriers to enable people with disabilities to participate equally in the workplace. This includes providing appropriate workstations, addressing individual needs, and ensuring access to assistive technologies and accessible work tools. Flexible working hours and remote work options are offered, where operationally feasible, to accommodate individual requirements.

The company supports programs and initiatives aimed at raising awareness and providing training to foster an inclusive work environment. Managers are trained to actively support diversity and to create a workplace in which all employees can realize their full potential.

Employees who observe or experience discrimination or unfair treatment are encouraged to report their concerns confidentially to the appropriate internal departments. RM Components GmbH ensures that all reports are taken seriously and handled without negative consequences for the reporting individuals.

The company also expects its business partners to actively promote diversity and inclusion and to implement corresponding measures within their own organizations. Inclusive workplaces help to build a fairer, more productive, and more innovative work environment.

3.8 Measures to Prevent Workplace Harassment

RM Components GmbH is committed to maintaining a work environment characterized by respect, safety, and fairness. Harassment, intimidation, or bullying in any form will not be tolerated. Every employee has the right to work in an environment free from physical, verbal, or psychological harassment.

Harassment can take many forms, including sexual harassment, discrimination, bullying, or other behaviors that create a hostile, intimidating, or degrading atmosphere. This includes unwanted physical contact, inappropriate comments, offensive jokes, threats, or discriminatory statements and actions.

RM Components GmbH implements clear preventive measures to avoid harassment in the workplace. These include training for managers and employees to raise awareness, clarify behavioral expectations, and provide tools to recognize and prevent harassment. Managers carry a particular responsibility to foster a working environment where every employee feels safe and respected.

Employees who feel harassed or witness inappropriate behavior can report it at any time to the appropriate internal departments. RM Components GmbH ensures that all reports are taken seriously and handled confidentially. Every complaint is investigated impartially and promptly, and appropriate action is taken if necessary to resolve the issue. Employees who file a complaint or report harassment will not face any negative consequences. Retaliation against whistleblowers will not be tolerated.

The company also expects its business partners to actively promote a harassment-free work environment and to implement appropriate prevention and awareness measures within their own organizations.

A respectful and safe workplace is essential for the satisfaction, motivation, and performance of all employees. RM Components GmbH is therefore committed to continuously developing its corporate culture and ensuring that respect, fairness, and equal treatment are actively upheld.

3.9 Remedy Procedures for Victims of Discrimination and Harassment

RM Components GmbH is committed to providing all employees with a safe and respectful work environment where discrimination and harassment have no place. Should such incidents occur, the company offers clear and effective remedy procedures to ensure rapid support and fair resolution for those affected.

Employees who experience or witness discrimination or harassment can report their concerns confidentially and without fear of negative consequences to the appropriate internal departments. Several reporting channels are available, including direct contact persons in the HR department, designated internal confidants, or the company's internal whistleblower system. All complaints are handled with the utmost confidentiality, fairness, and impartiality.

Upon receipt of a complaint, a thorough investigation of the incident is conducted by qualified and neutral personnel. All parties involved are given the opportunity to be heard, and the facts are assessed objectively. If the allegation is substantiated, appropriate measures are taken to resolve the situation—ranging from internal mediation and training to disciplinary actions.

RM Components GmbH ensures that victims of discrimination and harassment are actively supported. Support may include counseling, psychological assistance, or organizational adjustments to restore their safety and well-being in the workplace.

The company expects its managers and employees to actively participate in preventing discrimination and harassment and to foster a work environment based on respect, fairness, and mutual support.

RM Components GmbH also expects its business partners to implement comparable procedures within their own organizations to ensure that discrimination and harassment are consistently prevented and addressed.

4. Labor Rights, Health, and Safety

4.1 Workplace Safety and Occupational Health Measures

RM Components GmbH is committed to ensuring a safe and healthy working environment for all employees. Occupational health and safety is a core element of the company's culture and contributes to the long-term well-being and performance of its workforce.

The company complies with all national and international occupational safety laws as well as recognized standards such as ISO 45001 (Occupational Health and Safety Management Systems). All workplaces

are designed to minimize physical and mental health risks. This includes accident prevention measures, ergonomic workplace design, and the provision of safe and functional work equipment.

All employees have the right to receive appropriate instruction and training on workplace safety and health protection. These trainings are conducted regularly to ensure that safety policies are followed and hazards are identified early. The company also ensures that necessary protective equipment is available and used correctly.

Special attention is given to the prevention of work-related illnesses. Measures include the prevention of musculoskeletal disorders, mental stress, and occupational health risks. Regular health checks and counseling services on ergonomic and health-promoting work practices support the long-term well-being of employees.

Managers have a particular responsibility for the safety and health of their teams. They are required to identify risks, implement preventive measures, and ensure that their employees understand and follow safety protocols.

The company also expects its business partners to maintain high occupational safety standards and to ensure that their own employees work under safe and health-conscious conditions.

Employees may report safety-related concerns or violations at any time through designated reporting channels. RM Components GmbH ensures that all reports are treated confidentially and that whistleblowers do not face any negative consequences.

4.2 Protection of Employees' Physical and Mental Health

RM Components GmbH recognizes the importance of a healthy work environment and is committed to sustainably protecting and promoting the physical and mental health of its employees. Health protection goes beyond the prevention of workplace accidents and also includes measures to reduce work-related stress, psychological strain, and health risks.

The company takes appropriate measures to ensure that all workplaces are designed to avoid any negative impact on employees' health. This includes ergonomic working conditions, measures to reduce noise and environmental stress, and programs promoting physical activity and healthy nutrition. Regular health checks and personalized counseling services help identify and minimize health risks at an early stage.

Particular attention is given to the prevention of mental stress in the workplace. Work overload, high demands, or a poor working atmosphere can negatively affect mental health. RM Components GmbH therefore promotes an open corporate culture that takes mental health seriously and offers training and support programs focused on stress management and resilience building.

Employees have the right to respectful treatment and to leadership that values and supports health. Managers carry a special responsibility to monitor their teams for signs of overload, set realistic expectations, and ensure healthy working conditions.

To sustainably promote employee well-being, RM Components GmbH offers various measures including flexible working hours, remote work options (where operationally feasible), and programs supporting work-life balance and access to psychological support.

Employees who have health concerns or require support can confidently reach out to the appropriate internal departments at any time. Complaints and suggestions for improving health measures are taken seriously and addressed promptly.

The company also expects its business partners to implement measures to protect the physical and mental health of their employees and to actively support the importance of a healthy work environment.

4.3 Structured Social Dialogue and Career Management

RM Components GmbH recognizes the importance of open, structured, and respectful dialogue between management, leadership, and employees. Transparent communication fosters a positive work environment, strengthens mutual trust, and enables collaborative efforts to drive the company's development.

The company promotes a participatory corporate culture in which employees are encouraged to actively share their concerns, suggestions for improvement, and ideas. Regular employee discussions, feedback sessions, and internal communications support open dialogue and help identify challenges early and develop solutions collaboratively.

The professional development of employees is a key component of sustainable business success. RM Components GmbH therefore supports the technical and personal growth of all employees through targeted qualification measures, training, and development programs. Every employee should have the opportunity to continuously expand their skills and pursue internal career development.

The company ensures that career paths are designed transparently and that advancement opportunities are open regardless of gender, age, origin, or other personal characteristics. Promotions and personnel decisions are based solely on performance, qualifications, and potential.

Managers have a special responsibility to support and advance their employees. They are expected to recognize potential, promote it purposefully, and ensure fair and equitable personnel development. In addition, they should foster a culture of appreciation and supportive leadership to strengthen team motivation and engagement.

RM Components GmbH encourages employees to take ownership of their career development and to actively participate in training opportunities. The company supports this through internal and external training, mentoring programs, and coaching offers.

A structured social dialogue and targeted career management help increase employee satisfaction, strengthen loyalty to the company, and create long-term development opportunities.

4.4 Training on Labor and Safety Regulations

RM Components GmbH considers training and regular continuing education to be essential components of a safe and compliant working environment. All employees have both the right and the obligation to familiarize themselves with applicable labor and safety regulations and to apply them in their daily work.

The company ensures that all relevant labor and safety regulations are regularly covered in training sessions. These include, in particular, topics such as accident prevention, fire protection, the safe use of work equipment, ergonomic workplace design, and the protection of physical and mental health. New employees receive comprehensive onboarding at the beginning of their employment to familiarize them with safety standards. Existing employees are regularly trained to stay informed about current legal requirements and internal safety measures.

Training is conducted in various formats, including in-person sessions, e-learning modules, and hands-on instruction directly at the workplace. Particular attention is given to safety-critical tasks that require specialized training.

Managers have a special responsibility for ensuring compliance with safety regulations and raising awareness within their teams. They are required to ensure that their employees participate in training sessions regularly and apply what they have learned in practice. Violations of occupational safety guidelines or insufficient safety knowledge may result in disciplinary action if they endanger workplace health and safety.

Employees are encouraged to raise concerns or provide suggestions for improving training measures and safety standards at any time. The company ensures that all feedback is taken seriously and that necessary adjustments are made.

Business partners are likewise expected to provide their own employees with appropriate training on occupational safety and health regulations and to ensure their proper implementation.

4.5 Emergency Measures and First Aid Guidelines

RM Components GmbH is committed to establishing appropriate emergency measures and first aid guidelines at all company locations and workplaces to ensure the safety of employees and business partners. Effective emergency management can save lives and minimize damage.

All company sites are equipped with clearly defined emergency plans and evacuation procedures that are regularly reviewed and updated. These measures include rapid alert systems, evacuation routes, emergency contact details, and specific protective protocols for hazardous areas. All employees are required to familiarize themselves with these procedures and to act calmly and responsibly in case of emergency.

To enable swift responses in critical situations, RM Components GmbH ensures that a sufficient number of trained first aid responders are available in all work areas. These first aiders receive regular training to stay current in first aid techniques, resuscitation procedures, and the use of emergency equipment such

as defibrillators.

All workplaces are equipped with easily accessible first aid supplies, fire extinguishers, and emergency exits. The availability and functionality of this equipment are regularly checked to ensure readiness.

To prevent accidents and emergencies, regular emergency drills and safety training sessions are conducted for all employees. This ensures that everyone involved can respond quickly and appropriately in an actual emergency.

Managers have a particular responsibility for enforcing and implementing emergency procedures. They are required to inform their teams about safety regulations regularly and to ensure that all employees are familiar with existing emergency protocols.

Employees who identify safety risks or deficiencies in emergency equipment are encouraged to report them immediately. The company ensures that all reports are handled confidentially and that necessary measures are implemented promptly.

RM Components GmbH also expects its business partners to implement comparable emergency measures and first aid guidelines and to train their employees accordingly, thereby ensuring a high level of safety throughout the entire value chain.

5. Environmental Protection and Sustainability

5.1 Environmental Responsibility according to ISO 14001

RM Components GmbH considers environmental protection a fundamental responsibility and is committed to conducting its business in a sustainable and resource-efficient manner. Effective environmental management helps minimize negative environmental impacts while achieving ecological, economic, and social benefits.

The company is committed to complying with all applicable environmental protection laws, regulations, and international environmental standards. In particular, ISO 14001 serves as a guiding framework, defining globally recognized requirements for environmental management systems. RM Components GmbH actively works to reduce emissions, minimize waste, and use resources efficiently.

As part of its environmental management system, the company regularly analyzes environmental impacts, sets improvement goals, and implements corresponding measures. These include reducing energy and water consumption, promoting renewable energy, and designing environmentally friendly production and logistics processes.

The company fosters environmental awareness at all organizational levels. All employees are trained in environmentally responsible work practices and are encouraged to actively contribute to reducing negative environmental impacts. Managers carry a particular responsibility for implementing and further developing the company's environmental strategy.

RM Components GmbH also expects its business partners to adhere to comparable environmental

standards and take action to improve their environmental performance. Sustainable procurement and compliance with environmental due diligence obligations are key criteria in the selection of suppliers.

Regular internal audits and environmental reports ensure that progress is documented and opportunities for improvement are identified. The company follows a process of continuous improvement to systematically optimize environmental performance and strengthen its long-term ecological responsibility.

5.2 Supplier Sustainability Code of Conduct

RM Components GmbH is committed to the principles of ecological, social, and economic sustainability and expects its suppliers to incorporate these principles into their business practices. Since sustainable business conduct is a shared responsibility throughout the entire supply chain, RM Components GmbH seeks partnerships with suppliers who are also committed to high environmental, social, and governance (ESG) standards.

Suppliers are expected to ensure that their business operations comply with international human rights and environmental standards. These include, in particular, the Universal Declaration of Human Rights of the United Nations, the Core Labour Standards of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights. They should also align with the requirements of the German Supply Chain Due Diligence Act (LkSG), where applicable.

RM Components GmbH assumes that suppliers treat their employees fairly, provide safe and healthy working conditions, and do not tolerate child or forced labor. Environmental responsibility is central to supplier relationships. Suppliers are expected to take measures to minimize negative environmental impacts, including the responsible use of natural resources, the reduction of emissions and waste, and compliance with relevant environmental regulations such as REACH, RoHS, and SCIP.

Ethical business conduct is the foundation of every business relationship. Corruption, bribery, and anti-competitive behavior contradict the values of RM Components GmbH. Suppliers are therefore expected to implement mechanisms to prevent such practices. Transparency in production and procurement processes is essential. RM Components GmbH expects suppliers to disclose information about their production methods and the origin of raw materials, particularly in relation to conflict minerals or high-risk supply chains.

Suppliers are also responsible for ensuring that their own business partners and subcontractors comply with comparable sustainability standards. It is expected that suitable management systems or internal control mechanisms are in place to ensure consistent compliance with these standards.

RM Components GmbH takes a collaborative approach and strives to develop sustainable solutions jointly with its suppliers. Violations of key sustainability standards should be proactively addressed to enable appropriate improvement measures. Partnering with responsible suppliers is a key element of RM Components GmbH's sustainability strategy, as it contributes to long-term stability and shared success.

5.3 Resource Conservation, Waste Reduction, and Emission Control

RM Components GmbH recognizes its responsibility to use natural resources efficiently, minimize waste, and reduce emissions. Sustainable business practices aim to prevent environmental pollution across the entire value chain and to continuously reduce the company's ecological footprint.

The company is committed to complying with all relevant environmental laws, regulations, and internationally recognized standards, including the requirements of ISO 14001. The goal is to use raw materials, energy, and water as efficiently as possible to minimize environmental impact. Measures are implemented in production, logistics, and across all business operations to ensure sustainable resource use.

Special attention is given to the reduction of waste and emissions. RM Components GmbH takes systematic action to avoid waste, promote the reuse of materials, and optimize recycling processes. Hazardous substances are handled, stored, and disposed of in accordance with legal requirements to minimize risks to people and the environment.

To reduce emissions, the company uses modern, environmentally friendly technologies and optimizes its operations to lower CO₂ output. Energy consumption is continuously monitored to identify savings potential and increase the use of renewable energy.

Employees are regularly trained in resource-conscious behavior and sustainable work practices. Managers are responsible for promoting and implementing sustainability measures.

RM Components GmbH also expects its business partners and suppliers to use natural resources responsibly and to implement their own measures to reduce waste and emissions. A sustainable procurement policy and compliance with environmental regulations are key criteria in supplier selection and cooperation.

The company follows a process of continuous improvement and regularly reviews its measures for resource conservation and emission reduction. Through close collaboration with stakeholders, innovative solutions are developed to contribute to environmentally responsible business in the long term.

5.4 Climate Protection and CO₂ Reduction

RM Components GmbH recognizes climate protection as a core responsibility and aims to conduct its business activities as climate-neutrally as possible. As a company committed to sustainable business practices, targeted measures are implemented to reduce greenhouse gas emissions and continuously minimize the ecological footprint.

A key component of the climate protection strategy is the continuous monitoring and reduction of CO₂ emissions throughout the entire value chain. The company regularly analyzes its direct and indirect emissions and identifies targeted reduction measures. These include improving energy efficiency, increasing the use of low-emission technologies, and optimizing logistics to reduce transport-related emissions.

RM Components GmbH works closely with suppliers and business partners to promote sustainable and climate-friendly solutions. The company expects its partners to track their own CO₂ emissions and implement measures for reduction. A sustainable procurement policy and climate-conscious production processes play a crucial role in this effort.

Employees are actively involved in the company's climate protection measures. Through training and awareness campaigns, consciousness for climate-friendly behavior is strengthened. Managers carry special responsibility for implementing climate-related initiatives in their areas.

RM Components GmbH follows a science-based approach to CO₂ reduction and regularly reviews and adapts its climate strategy. Progress is documented transparently to make sustainable developments measurable. The goal is to operate climate-neutrally in the long term and to make a positive contribution to global climate protection.

5.5 Water Consumption and Energy Efficiency

RM Components GmbH is committed to managing water usage and energy consumption across all business processes as efficiently and sustainably as possible. The mindful use of natural resources is a key component of the company's sustainability strategy and contributes to reducing environmental impacts while developing economically viable long-term solutions.

The company aims to continuously reduce water consumption through targeted efficiency measures. This includes optimizing production and operational workflows, introducing water-saving technologies, and promoting recycling and reuse processes. RM Components GmbH ensures compliance with environmental regulations in the area of water management and guarantees that its operations do not cause water pollution.

Equally important is the enhancement of energy efficiency. The company relies on modern, energy-saving technologies and continuous process optimization to reduce energy consumption in production, logistics, and administration. Where feasible, the company increasingly uses renewable energy sources to further lower CO₂ emissions.

RM Components GmbH raises employee awareness for the responsible use of water and energy. Training programs and internal initiatives promote awareness of conservation potential and environmentally friendly behavior in everyday work. Managers are responsible for implementing efficient measures in their areas and supporting sustainable solutions.

RM Components GmbH also expects its business partners to adopt measures to reduce their water and energy consumption. The use of sustainable technologies and the responsible handling of these resources are essential criteria in the selection and cooperation with suppliers.

The company pursues a continuous improvement process in water management and energy efficiency. Regular environmental impact assessments and the implementation of new technological innovations support the achievement of sustainability goals and help further reduce the company's ecological footprint.

5.6 Sustainable Consumption (Sustainable Production, Circular Economy, Product Lifecycle)

RM Components GmbH is committed to promoting sustainable consumption in all areas of its business activities. This includes initiatives for sustainable production, circular economy practices, and optimization of the product lifecycle in order to use resources as efficiently as possible and minimize environmental impact.

The company focuses on sustainable production processes that reduce raw material consumption, lower energy requirements, and minimize emissions and waste. Whenever possible, environmentally friendly materials and procedures are prioritized. The use of recycled and renewable raw materials is promoted to ensure a sustainable value chain.

A central element of the sustainability strategy is the circular economy. RM Components GmbH aims to design products that are durable, repairable, and reusable. From the development stage onward, the company ensures that materials can be recycled or disposed of in an environmentally responsible manner at the end of their lifecycle. Continuous efforts are made to develop innovative recycling concepts and to increase the proportion of recyclable materials in the company's products.

To promote conscious consumption, RM Components GmbH is committed to transparency regarding the environmental impact of its products. Information on environmental compatibility, energy consumption, and sustainable product use is openly communicated. Customers and business partners are encouraged to choose resource-efficient and sustainable alternatives.

Employees are actively involved in the sustainability strategy. Training and awareness campaigns promote responsible resource use and encourage sustainable purchasing decisions in daily work life. Managers are expected to identify and implement sustainable innovations and improvements within their areas of responsibility.

RM Components GmbH also expects its business partners and suppliers to promote sustainable production practices, implement circular economy concepts, and take action to minimize environmental impact. Collaboration with suppliers is based on ecological, social, and economic sustainability criteria.

To continuously improve environmental performance, the product lifecycle is regularly analyzed and optimized. Through a systematic approach to sustainability evaluation, RM Components GmbH ensures that its products become more environmentally friendly and resource-efficient.

5.7 Compliance With Regulations to Prevent Air Pollution and Environmental Impact

RM Components GmbH is actively committed to environmental protection and strictly adheres to all relevant regulations aimed at preventing air pollution and environmental degradation. The sustainable protection of air, water, and soil is a core component of the company's environmental strategy.

The company is dedicated to minimizing the emission of pollutants into the environment as much as possible. Across all facilities and processes, measures are implemented to reduce greenhouse gases, harmful substances, and hazardous materials. RM Components GmbH follows both national and

international environmental standards, including ISO 14001, and complies with applicable environmental laws.

A particular focus is placed on preventing air pollution. The company utilizes modern technologies to reduce harmful emissions and ensures that production and operational processes are designed to minimize negative effects on air quality. This includes the use of low-emission technologies, optimized energy consumption, and environmentally friendly logistics practices.

In addition, RM Components GmbH is committed to minimizing the impact of its business activities on water and soil. All waste and hazardous substances are stored, transported, and disposed of in accordance with legal requirements to prevent soil contamination and water pollution. Special care is taken in the handling and disposal of chemicals, heavy metals, and other environmentally critical substances.

The company promotes environmentally conscious behavior among its employees through training and clear internal guidelines. Employees are encouraged to actively contribute to reducing environmental impacts and to share suggestions for optimizing operational processes. Managers bear a special responsibility for ensuring compliance with all relevant environmental regulations and for implementing sustainable practices within their departments.

RM Components GmbH also expects its business partners and suppliers to actively prevent environmental pollution, comply with legal requirements, and implement measures to reduce air, water, and soil contamination. A sustainable procurement policy and adherence to ecological standards are essential criteria for collaboration with suppliers.

To continuously improve its environmental performance, RM Components GmbH conducts regular environmental analyses, measurements, and evaluations. The goal is to identify potential risks at an early stage and proactively implement measures to mitigate negative environmental impacts.

5.8 Waste Management Policy (Including Hazardous Waste and Dangerous Substances)

RM Components GmbH is committed to responsible waste management that ensures the environmentally sound handling, minimization, and proper disposal of waste. The goal is to reduce the environmental impact of business activities as much as possible and to promote a sustainable circular economy.

The company ensures that all waste generated is handled in accordance with applicable legal requirements and international environmental standards. Waste is avoided, reduced, reused, or recycled wherever possible. Where this is not feasible, disposal is carried out according to the highest environmental and safety standards.

A particular focus is placed on the proper handling of hazardous waste and dangerous substances. All hazardous waste and chemicals are safely identified, stored, transported, and disposed of in compliance with relevant regulations such as the REACH Regulation (EC) No. 1907/2006, the RoHS Directive (2011/65/EU), and the Basel Convention on hazardous waste. The release of substances harmful to the environment or human health into air, water, or soil is actively prevented.

To implement efficient waste management, clear internal processes are defined. These include measures for the separation, storage, and safe disposal of waste, regular monitoring of waste streams, and the identification of savings potential and recycling opportunities. Employees receive regular training to ensure the conscious use of resources and proper waste handling.

RM Components GmbH also expects its business partners and suppliers to practice responsible waste management. Suppliers are encouraged to use environmentally friendly procedures and to minimize the generation of hazardous waste. Compliance with legal regulations regarding the handling of dangerous substances and special waste is a basic prerequisite for cooperation.

RM Components GmbH follows a continuous improvement process in the field of waste management and aligns with established environmental management systems such as ISO 14001. Regular reviews and audits ensure that progress is documented and opportunities for improvement are identified. The aim is to actively contribute to environmental protection through sustainable waste management and to leave a positive ecological footprint in the long term.

6. Fair Business Conduct and Competition Law

6.1 Fair Competition and Antitrust Law

RM Components GmbH is fully committed to complying with all applicable antitrust and competition laws. Fair competition is the foundation of a functioning market economy, in which innovation and quality are key factors for business success. Unlawful agreements and anti-competitive practices are strictly prohibited.

The company is committed to refraining from and not supporting any price-fixing, market or customer allocation, bid-rigging, or any other form of cartel formation. Likewise, anti-competitive exclusive agreements or abusive practices that exploit a dominant market position or unlawfully restrict competition are not tolerated.

Extreme caution is required in dealings with business partners and competitors, especially regarding the disclosure and exchange of information. Confidential or competition-sensitive information must not be unlawfully disclosed or used for personal or corporate gain.

Employees of RM Components GmbH are obligated to report any suspected violations of competition law immediately to the appropriate internal departments. Training programs and internal guidelines ensure that all employees understand the relevant legal requirements and implement them in their daily business conduct.

RM Components GmbH also expects its business partners and suppliers to adhere to antitrust regulations. Collaboration with companies that violate these rules will not be tolerated.

6.2 Prohibition of Insider Trading and Market Manipulation

RM Components GmbH is committed to full compliance with all regulations aimed at preventing insider trading and market manipulation. The unlawful use of confidential information not only violates the law

but also undermines trust in the integrity of markets and companies.

All employees and business partners who have access to non-public, price-sensitive information are required to treat such information confidentially and not to use it for personal or commercial gain. The purchase or sale of securities or other financial instruments based on insider knowledge is strictly prohibited.

The company does not tolerate any form of market manipulation, such as the dissemination of false or misleading information intended to influence prices or market values. All financial activities must be conducted transparently and in full compliance with applicable legal requirements.

RM Components GmbH regularly raises awareness among its employees about the risks and legal consequences of insider trading and ensures that internal monitoring and compliance mechanisms are in place.

6.3 Protection of Intellectual Property

RM Components GmbH respects and protects intellectual property as a valuable asset for innovation and economic growth. This includes patents, copyrights, trademarks, trade secrets, and other protected information.

Employees are required to respect internal intellectual property as well as that of business partners and third parties and must not disclose or use it without authorization. This applies in particular to research and development data, technical specifications, software, designs, and strategic business information.

The company implements appropriate measures to safeguard its intellectual property, including confidentiality agreements, secure IT systems, and access controls. RM Components GmbH likewise expects its business partners to take similar protective measures and to prevent any unauthorized use or distribution of protected information.

In the event of suspected violations of intellectual property rights by third parties, the company will promptly take legal action to defend its rights.

6.4 Data Protection and IT Security

The protection of personal data and sensitive corporate information is a top priority for RM Components GmbH. The company is committed to complying with applicable data protection laws, in particular the EU General Data Protection Regulation (GDPR) and national data protection regulations.

Employees and business partners are required to handle personal and confidential information with the utmost care. Unauthorized disclosure, storage, or processing of such data is strictly prohibited.

To ensure a high level of security, RM Components GmbH employs state-of-the-art IT security measures. These include firewalls, encryption technologies, access controls, and regular security audits. In addition, all employees receive regular training on data protection and IT security policies.

Business partners and suppliers are expected to implement comparable data protection and security standards and to take appropriate safeguards. In the event of a data protection violation or security breach, immediate measures must be taken to mitigate damage, and RM Components GmbH must be informed without delay.

The company ensures that all data processing activities are transparently documented and meet the highest ethical and legal standards.

7. Responsibility in the Supply Chain

7.1 Selection and Evaluation of Suppliers

RM Components GmbH pursues a responsible procurement policy and places great importance on the adherence to high social, ethical, and environmental standards when selecting its suppliers. Business partners are carefully vetted to ensure that they apply sustainable and legally compliant business practices. In addition to economic factors, aspects such as working conditions, environmental responsibility, human rights, and legal integrity play a key role in the decision to enter into a partnership.

The company expects its suppliers to comply with national and international regulations and to integrate the values and principles of RM Components GmbH into their business operations. Ongoing evaluation of supplier relationships ensures that jointly defined standards are maintained and improved as necessary.

7.2 Compliance with Social and Environmental Standards in the Supply Chain

RM Components GmbH is committed to a socially and environmentally responsible supply chain. Suppliers are required to align their business practices with international human rights and environmental standards. This includes, in particular, compliance with the core labor standards of the International Labour Organization (ILO), the principles of the UN Guiding Principles on Business and Human Rights, as well as national due diligence obligations, such as those outlined in the German Supply Chain Due Diligence Act (LkSG).

The company expects suppliers to ensure fair working conditions, to prohibit any form of child or forced labor, and to consistently implement occupational health and safety measures. In addition, environmentally friendly production processes, resource-efficient use of materials, and measures for reducing emissions are essential requirements for business partners.

7.3 Supplier Code of Conduct for Sustainability

RM Components GmbH requires its suppliers to adhere to a Supplier Code of Conduct for Sustainability that makes the principles of sustainable business practices binding. This code includes aspects such as environmental management, fair working conditions, integrity, and transparency. Suppliers are encouraged to continuously improve their own sustainability management and to enforce comparable standards along their own supply chains.

The company takes a partnership-based approach to support suppliers in implementing sustainable practices. At the same time, RM Components GmbH reserves the right to discontinue cooperation with

business partners who repeatedly fail to meet fundamental sustainability requirements.

7.4 Dual-Use Goods and Export Control

RM Components GmbH recognizes the responsibility associated with the international trade of sensitive goods. The company ensures that all business activities comply with applicable export control and sanctions regulations.

Dual-use goods—products that can be used for both civilian and military purposes—are subject to strict legal requirements. Suppliers and business partners must ensure that they comply with all relevant export control regulations and that their products do not enter unauthorized supply chains. Violations of export control or sanctions laws may result in the termination of the business relationship.

7.5 Material Compliance and Environmentally Responsible Procurement in the Supply Chain

RM Components GmbH is committed to complying with all regulations related to material compliance. This includes legal requirements such as the REACH Regulation, RoHS Directives, and SCIP database obligations, which govern the safe handling of materials.

The company expects its suppliers to adhere to these regulations and to provide verifiable assurance that their products do not contain prohibited or harmful substances. In addition, RM Components GmbH follows an environmentally responsible procurement policy that promotes the use of sustainable materials and prioritizes resource-efficient alternatives.

The company works closely with its suppliers to increase transparency within the supply chain and to advance environmentally friendly production methods. Sustainable procurement is not only an ethical obligation but also contributes to long-term value creation and risk mitigation.

8. Compliance and Grievance Mechanisms

8.1 Implementation of a Compliance Management System (CMS)

RM Components GmbH is committed to implementing and continuously developing an effective Compliance Management System (CMS) that ensures adherence to all legal requirements, ethical standards, and internal company policies. This system serves to minimize risk, prevent violations, and promote a corporate culture based on integrity and responsibility.

The CMS is built upon clearly defined compliance processes that are integrated into all areas of the business. Managers bear a particular responsibility for implementing and enforcing compliance requirements within their areas of responsibility. Regular training and awareness measures ensure that all employees are aware of their obligations and can identify potential risks at an early stage.

RM Components GmbH ensures that appropriate control mechanisms are in place to monitor compliance with these requirements. These include internal audits, regular risk assessments, and the possibility to report violations anonymously.

8.2 Whistleblower System and Reporting Channels

To identify violations of legal regulations or internal policies at an early stage and respond appropriately, RM Components GmbH has established a secure and confidential whistleblower system. Employees, business partners, and other stakeholders can report potential violations of the Code of Conduct, legal requirements, or ethical principles through various reporting channels.

Reports can be submitted anonymously to ensure the best possible protection for whistleblowers. All incoming reports are reviewed and processed by an independent compliance unit. The company is committed to taking all reported incidents seriously and investigating them through a transparent and structured process.

It is ensured that whistleblowers do not suffer any negative consequences as a result of their report. Any form of retaliation against whistleblowers is strictly prohibited and will be consistently sanctioned.

8.3 Confidentiality and Protection of Whistleblowers

The protection of whistleblowers is a key component of RM Components GmbH's compliance strategy. All reports received are treated with strict confidentiality and are only forwarded to the responsible parties as far as necessary for the investigation.

The company guarantees that no reprisals will be taken against individuals who report violations in good faith. Retaliatory actions such as discrimination, bullying, or termination resulting from a report are prohibited and will lead to disciplinary consequences.

The whistleblower system is regularly reviewed and improved to ensure a safe and effective protection mechanism for all parties involved.

8.4 Measures in Case of Violations

Violations of the Code of Conduct or applicable legal regulations are consistently pursued and sanctioned. Depending on the severity of the violation, measures may range from a warning or training to labor law consequences or the termination of business relationships.

The company is committed to thoroughly investigating identified violations and implementing appropriate corrective measures to prevent future breaches. If necessary, external experts or authorities will be involved in the investigation.

RM Components GmbH also expects its business partners and suppliers to take violations seriously and to establish their own effective measures for the prevention and sanctioning of misconduct.

9. Implementation, Training, and Sanctions

9.1 Commitment to Training and Awareness

RM Components GmbH is committed to regularly informing all employees and relevant business partners about the requirements and principles of the Code of Conduct. This is achieved through training sessions,

informational events, and targeted awareness-raising measures. The goal of these trainings is to provide a deep understanding of the Code of Conduct and to ensure that all stakeholders are aware of their individual and collective responsibilities and apply them in their daily work.

The training covers key topics such as ethical business conduct, anti-corruption policies, environmental responsibility, human rights, as well as data protection and IT security. Managers have a particular responsibility for compliance with the Code of Conduct and serve as role models for lawful behavior. They are also expected to actively support their teams and ensure adherence to the behavioral guidelines.

The company ensures that new employees are familiarized with the Code of Conduct as part of their onboarding process. In addition, the training program is regularly reviewed and adapted to reflect new legal developments and internal company insights.

9.2 Consequences of Violations of the Code of Conduct (Revised)

RM Components GmbH relies on close and trusting cooperation with its suppliers and therefore has a strong interest in ensuring that the principles set forth in the Code of Conduct are adhered to. Since the company has no direct legal means to sanction suppliers, RM Components GmbH emphasizes dialogue and collaboration to address violations and jointly develop solutions.

If violations of the principles described in the Code of Conduct are identified, RM Components GmbH will initiate discussions with the affected supplier to clarify the situation. The focus is on cooperative problem-solving to ensure that the required standards are met again. Depending on the nature and severity of the violation, the company may propose measures to achieve improvements, such as additional training, process adjustments, or increased monitoring of the relevant areas.

The company values transparency and long-term partnerships. However, if no improvement is achieved despite joint efforts or if violations of fundamental principles persist, RM Components GmbH reserves the right to reassess the business relationship within the framework of contractual possibilities and economic circumstances.

The goal is to ensure a sustainable and ethically responsible supply chain through partnership-based cooperation without the need to impose immediate sanctions. RM Components GmbH places great importance on guiding suppliers on this path and working together toward continuous improvement of standards.

9.3 Reporting and Regular Review

RM Components GmbH is committed to systematically monitoring the implementation of the Code of Conduct and continuously further developing it. This includes regular internal audits, risk analyses, as well as the evaluation of compliance incidents and reports received through the whistleblower system.

The company prepares regular reports on compliance performance to ensure transparency and identify areas for improvement. These reports serve as the basis for the ongoing development of the Compliance Management System and for adapting the Code of Conduct to new legal and societal requirements.

Employees and business partners are actively encouraged to provide suggestions for improving the implementation of the behavioral guidelines. The goal is to foster a corporate culture in which ethical behavior is taken for granted and compliance is understood as an integral part of business operations.

Through these regular reviews, RM Components GmbH ensures that the Code of Conduct remains up to date and is effectively lived throughout the organization and along the supply chain.

10. Commitment to Compliance with the Code of Conduct

10.1 RM Components GmbH's Commitment to Adhering to the Code of Conduct

RM Components GmbH expressly commits to adhering to the principles set forth in the Code of Conduct and pledges to actively implement them in its business processes. Compliance with legal requirements as well as ethical, social, and environmental standards is not only a legal obligation for the company but also a fundamental part of its corporate philosophy.

The company is dedicated to ensuring that all employees and business partners know, understand, and consider the requirements formulated in the Code of Conduct in their daily actions. This commitment goes beyond mere rule compliance to fostering a corporate culture based on integrity, responsibility, and sustainability.

10.2 Implementation Through Training and Awareness Measures

RM Components GmbH ensures that all relevant employees are informed about the Code of Conduct and receive regular training. These trainings serve to raise awareness of ethical business principles, prevent violations, and ensure a consistent understanding of compliance requirements within the company.

Special emphasis is placed on training in the areas of corruption prevention, data protection, occupational health and safety, human rights, environmental responsibility, and fair competition. These trainings are mandatory not only for new employees but are also regularly updated for existing staff.

Managers have a particular responsibility for implementing the behavioral guidelines within their respective departments. They are expected to act as role models and ensure that corporate values are actively practiced.

10.3 Reference to the Regular Review and Update of the Code of Conduct

RM Components GmbH regularly reviews the Code of Conduct to ensure that it reflects current legal developments as well as societal and economic changes. This review takes into account internal insights, external regulatory requirements, and best practices within the industry.

If necessary, adjustments are made to ensure that the Code of Conduct remains an effective tool for promoting ethical and sustainable business practices. All relevant changes are communicated and integrated into training programs to ensure smooth implementation.

The continuous development of the Code of Conduct is a key component of RM Components GmbH's

compliance strategy and helps to establish a legally secure and sustainable foundation for the company in the long term.

15.07.2025

Schwabach, [Date]



Philipp Kappes

17.7. 2025

Schwabach, [Date]



Katharina Rupprecht

23.07.2025

Schwabach, [Date]



Claus Grabinger

Attachments:

1. Material Compliance Policy
2. Sustainability and Environmental Management Policy
3. Raw Materials, Chemicals, and Waste Management Policy
4. Product Lifecycle and Environmental Compatibility Policy
5. Regulatory Environmental Requirements and CO₂ Management Policy
6. Supply Chain and Traceability Policy
7. Compliance and Risk Management Policy
8. Export Control Policy (Dual-Use)