



Supplier Code of Conduct RO SCoC September 2013

FOREWORD

ROTHENBERGER is a group of companies that is steeped in tradition. It has been operating internationally for a number of years and views itself as a cosmopolitan family with strong corporate values (<http://www.rothenberger.com/en/about-rothenberger/about-us/corporate-culture/values/>).

ROTHENBERGER produces the highest performance hand tools, machines, accessories and consumables in its sector, all with excellent functionality and clearly of great benefit to users.

With a view to maintaining sustainable growth and a solid financial foundation, ROTHENBERGER focuses on long-term objectives and entrepreneurial expertise. ROTHENBERGER offers its employees an interesting, varied and attractive working environment. The ROTHENBERGER Group acts responsibly in everything it does, in accordance with ethical principles and corporate values and in conformity with legal requirements.

ROTHENBERGER fulfils its responsibility towards customers, suppliers, partners, employees and society and considers itself bound by the UN global compact's ten principles (<http://www.csr-in-deutschland.de/en/about-csr/principles-and-instruments/united-nations-global-compact.html>).

The ROTHENBERGER Group also considers itself bound by the standards set out in the conventions of the International Labour Organisation (ILO), in particular what are known as the core labour standards (<http://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm>) and by the UN Convention on the Rights of the Child, the UN Convention on the Elimination of All Forms of Discrimination against Women and the OECD Guidelines for Multinational Enterprises.

This Supplier Code of Conduct (SCoC) defines the ROTHENBERGER Group's principles and its requirements of its suppliers and business partners, i.e. each contractual partner who supplies ROTHENBERGER with goods, materials and/or services, as well as their employees. In signing this SCoC they undertake to act responsibly and to abide by the basic principles contained in this SCoC. This SCoC represents a minimum standard that should prevent situations which might call into question the integrity of companies and their employees.

ROTHENBERGER reserves the right to change this SCoC as required. In this event, the ROTHENBERGER Group expects its suppliers to accept appropriate changes of this kind.



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I. COMPLIANCE WITH THE LAW AND OBSERVANCE OF ETHICAL PRINCIPLES

It is supremely important to ROTHENBERGER that it complies with the law. Similarly, ROTHENBERGER expects its suppliers and business partners to abide by the law as well.

1. REQUIREMENT TO COMPLY WITH THE LAW

Suppliers shall observe all laws, directives etc that apply to their companies. Suppliers support the principles of the United Nations Global Compact, the UN's Universal Declaration of Human Rights as well as the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work in accordance with national laws and customs.

2. OBSERVANCE OF HUMAN RIGHTS

The ROTHENBERGER Group and its suppliers bear responsibility for guaranteeing human rights, both at work and more generally within its sphere of influence.

3. BAN ON FORCED AND CHILD LABOUR

ROTHENBERGER does not tolerate any form of forced or compulsory labour, bonded labour, servitude or slave labour or conditions similar to slavery. No employee may be compelled directly or indirectly to work as a result of force and/or intimidation. Employees may only work if they have voluntarily made themselves available for employment.

ROTHENBERGER expects its suppliers and business partners to take a stand against any form of child labour and exploitation of young people under the Convention on the Rights of the Child and ILO conventions. Over and above this, ROTHENBERGER expects its suppliers and business partners not to appoint employees who are unable to show that they have reached the legal minimum age. National standards on the protection of children and young employees are to be observed. ILO exceptions shall apply.

4. BAN ON BRIBERY AND CORRUPTION

ROTHENBERGER does not tolerate any form of bribery or corruption. All suppliers and business partners and their employees must conduct themselves in a way that does not give rise to personal dependence, obligation or influence. Business conduct based on fairness and the observance of the respective national and international standards in force is expected from everyone. If giving and receiving gifts is in keeping with local custom and politeness in the respective country, care is to be taken that no obligations arise from this and that standards under the country's laws are observed.



5. INTEGRITY IN BUSINESS DEALINGS AND FAIRNESS IN COMPETITION

ROTHENBERGER expects its suppliers and business partners to prevent and prohibit extortion, embezzlement and misappropriation in any form, in addition to corruption and bribery, and not to practise it themselves or tolerate it.

ROTHENBERGER expects its suppliers and business partners to conduct themselves fairly in competition, to observe anti-trust laws in force and not to reach any agreements which are unfair or even prohibited.

II. SOCIAL RESPONSIBILITY TOWARDS EMPLOYEES

ROTHENBERGER expects its suppliers and business partners to observe human rights in their companies and treat employees fairly and with respect.

1. BAN ON DISCRIMINATION

Any discrimination during recruitment and employment is forbidden. In particular any differentiation, disqualification or preferential treatment on the grounds of race, caste, skin colour, gender, age, religious belief, political opinion, membership of a workers' organisation, physical or mental disability, ethnic, national and social origin, nationality, sexual orientation or other personal characteristic is forbidden. This applies regardless of whether the differentiation, disqualification or preferential treatment was intended by the business partner or not. Suppliers and business partners undertake to observe strictly the ban on discrimination.

2. FAIR EMPLOYMENT CONDITIONS AND FAIR TREATMENT

ROTHENBERGER expects suppliers and business partners to observe regulations in force concerning working hours. Over and above this ROTHENBERGER expects its suppliers and business partners to pay their employees remuneration that is in accordance with applicable laws and that ensures an appropriate standard of living. Reductions in wages as a disciplinary measure may only be made in accordance with applicable national law; any claim for compensation on a contractual or legal basis shall remain unaffected by this. ROTHENBERGER also expects its suppliers and business partners to ensure employees are paid on a regular and timely basis.

Suppliers and business partners undertake to ensure that their employees are treated fairly and in particular are not subjected to or threatened with sexual harassment, sexual abuse, physical punishment or torture, mental or physical duress or verbal abuse.



3. SAFETY AT WORK

ROTHENBERGER's suppliers and business partners must ensure that they provide a safe and healthy working environment, that they take the necessary steps to avoid accidents and risks to health that may arise in connection with their activity and that they observe the statutory provisions in force relating to health and safety at work. They support the active development and improvement of conditions of employment. Suppliers and business partners must establish systems in order to discover, avoid and respond to potential risks to the health and safety of employees. They must also ensure that employees are regularly informed and trained about the health protection and safety standards in force, as well as safety measures.

III. SOCIAL RESPONSIBILITY TOWARDS SOCIETY

Social responsibility means that the company is prepared to take responsibility and account for the impact of its activity on the environment. In particular it is important to take responsibility when decisions on significant economic, social and environmental issues also affect customers, employees, neighbours, the local community etc.

In order to reflect its responsibility, a company must also be willing and able to revise incorrect decisions, assume liability for any damage it has caused and take preventive measures.

In particular the ROTHENBERGER Group expects its suppliers and business partners to observe the following basic principles:

1. PROTECTION OF RESOURCES, THE CLIMATE AND THE ENVIRONMENT

The protection of nature and the environment is an integral part of ROTHENBERGER's business practice. Suppliers and business partners must observe the respective environmental standards in force. They are also required to work continually towards avoiding and reducing environmental pollution. Applicable processes and standards for waste management, the handling and disposal of chemicals and other dangerous substances, and emissions and wastewater treatment are to be observed. The protection and preservation of natural resources are to be taken into account in particular and environmentally and socially acceptable production promoted.

2. HEALTH PROTECTION, QUALITY, SAFETY

ROTHENBERGER expects its suppliers and business partners to observe all applicable regulations with regard to quality, health protection and safety. All the required authorisations, licences and registrations must be in place and maintained. Suppliers and business partners also undertake to meet their corporate commitments and obligations to notify the authorities.

IV. PROTECTION OF INTELLECTUAL PROPERTY AND TRADE SECRETS

Suppliers and business partners undertake only to use confidential information in appropriate ways and to protect it accordingly. They undertake to guarantee that data that requires protection and the valid intellectual property rights of its own employees and business partners are properly safeguarded and protected.



V. INCLUSION OF STANDARDS IN ITS PARTNERS' OWN SUPPLY CHAIN

ROTHENBERGER expects its suppliers and business partners to communicate and also apply the principles and minimum standards set out in this code of conduct in their own supply chain.

VI. OBSERVANCE OF THESE STANDARDS

Any infringement of the obligations mentioned in this SCoC is seen as a fundamental breach of contract on the part of the supplier or business partner.

The supplier/business partner hereby undertakes to observe the standards set out in this SCoC:

Name of
supplier/
business partner: _____

Address of
supplier/
business partner: _____

Internal manager: _____

Place, Date

Signature(s), Stamp