



## **RAPS CODE OF CONDUCT**

Guidelines for Responsible Conduct  
of the RAPS Group



As the RAPS Group, we are committed to acting responsibly, lawfully and sustainably. We have summarised our guidelines in this Code - in accordance with the contents of the OECD Guidelines, the BSCI Code of Conduct and the ILO Conventions. This defines our principles and thus also the requirements we place on our employees and our business partners.

This Code applies to all companies of the RAPS Group, which we will refer to as „RAPS“ in the following text. As an employee or business partner of RAPS, you undertake to impose these guidelines in an appropriate manner on suppliers, service providers and subcontractors, insofar as you are authorised to subcontract.



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### 1. COMMITMENT OF THE MANAGEMENT

This Code applies to all employees of the RAPS Group. The management, in particular, is committed to this Code and to complying with the guidelines described therein and is responsible for their implementation.

### 2. REQUIREMENTS

#### 2.1. ETHICAL BUSINESS PRACTICES

##### 2.1.1. WE COMPLY WITH LAWS AND REGULATIONS

RAPS respects the law and complies with laws and regulations – in accordance with the OECD Guidelines (chapters 7 and 10).

We expect the same from our employees and business partners. By „laws“ we mean German, foreign or supranational laws, ordinances, conventions or other regulations and expressly include laws on, for example, health, safety, the environment, competition, customs or individual or collective labour law. In addition, we would like to make it clear once again that it is prohibited by law to induce other persons, parties or companies to commit unlawful acts or to participate in such acts.

### 2.1.2. WE DO NOT TOLERATE ANY VIOLATION OF THE CORRUPTION ACT

Bribery and the acceptance of benefits are punishable - even if they were initiated or committed abroad. RAPS respects the international conventions - in accordance with the OECD Guidelines (chapter 7) - on combating corruption of public officials and employees of the public administration and in business dealings and also expects this of its own employees and business partners without exception. Accordingly, RAPS employees may neither demand nor accept personal benefits from business partners in the course of their work. As a business partner of RAPS, you acknowledge that you may not offer our employees any personal benefits or gifts that could be suitable to influence their business decisions. It is imperative that you comply with the record-keeping requirements of the corruption laws.

### 2.1.3. WE COMPLY WITH THE RULES OF FAIR COMPETITION

RAPS does not tolerate anti-competitive agreements and expects its business partners to comply with applicable antitrust laws. We reject unfair business practices such as price fixing, manipulation of sales volumes and artificial division of the market in cooperation with competitors with the aim of gaining competitive advantages.

### 2.1.4. OBLIGATION OF CONFIDENTIALITY AND PROTECTION OF BUSINESS SECRETS

As a business partner, RAPS may provide you with confidential information that you need for negotiations, offers and for the subsequent execution of the contract. You are obliged to maintain confidentiality about all company and business secrets and other internal matters of RAPS. However, not only information that is expressly marked as such is considered confidential, but also information that is assumed not to be publicly known and is not intended to become publicly known. This includes, among other things, information that could be useful to competitors or harmful to RAPS or other business partners. The obligation to maintain confidentiality exists both for the duration of the contractual relationship and after its termination. As an employee or business partner, you undertake to protect confidential information from unauthorised access by third parties. Especially as a business partner, you must ensure that confidential information is only passed on to employees if they need it to fulfil their tasks and if they are also bound to confidentiality by an employment contract or a non-disclosure agreement.

### 2.1.5. PRIVATE INTEREST AND THE INTERESTS OF THE COMPANY MUST BE KEPT SEPARATE

As an employee of RAPS, you undertake to make business decisions exclusively in the interests of RAPS and not to allow these to be influenced by personal interests. The following applies to business partners of RAPS: You may not influence the personal interests of RAPS employees or their close relatives. For RAPS, only objective criteria count when deciding on a business relationship: As a matter of principle, we only select suppliers on the basis of appropriate, objective criteria. These include in particular quality, quality management, reliability, price, sustainable management, technological standard and the suitability of products and services. Another important criterion for RAPS is the existence of a long-term and conflict-free business relationship. Our employees and business partners undertake not to let personal relationships or personal interests influence the conclusion of contracts. If a conflict of interest exists, you as an employee and as a business partner undertake to disclose it as described later.

### 2.1.6. WE ENSURE DATA PROTECTION, PROTECTION OF COMPANY PROPERTY AND INTELLECTUAL PROPERTY

The personal rights of our employees and business partners are respected in accordance with applicable legal requirements. Company property is used exclusively for business purposes, and careful handling is just as much a matter of course as protection against loss or misuse. In particular, when exchanging knowledge and technologies, the intellectual property rights of both our employees and business partners must be protected by appropriate measures.

At a time when cybercrime and data breaches are becoming increasingly common, a holistic approach is essential in order to identify security risks and minimise them through appropriate measures. We see this as a shared responsibility of all employees and business partners, and we urge you to establish regulations that ensure IT security.

### 2.1.7. MARKETING/SOCIAL MEDIA

Our market presence is characterised by factual information, transparent communication and clear, value-oriented positioning. We do not make promises we cannot keep and avoid any form of misleading statements – especially with regard to product characteristics, efficacy claims or legally regulated information such as health or nutrition claims. We use social media responsibly. Our presence on social networks is professional, respectful and always factual.

We expect our employees and business partners to apply the same standards when using social media if there is a direct or indirect reference to RAPS – even on private accounts. Confidential information must not be published. Criticism should be expressed internally, not publicly.

Our communication guidelines apply to all channels – from product brochures and websites to trade fairs, LinkedIn, Instagram and industry platforms.



## **2.2. ENVIRONMENTAL RESPONSIBILITY**

### **2.2.1. WE ARE COMMITTED TO PROTECTING THE ENVIRONMENT AND THE CLIMATE**

One of our core values at RAPS is to use environmental resources as carefully and consciously as possible. Our top priority is to avoid hazards for people and the environment. We are constantly working on improving all procedures and processes in such a way that we save resources and keep emissions as low as possible in order to reduce environmental pollution even further and contribute to species conservation.

## 2.2.2. WE ADDRESS KEY ISSUES

a) from environmental and energy standards (emissions, discharges into water bodies, energy consumption/efficiency, waste generation, land use/biodiversity),

b) from the German supply chain due diligence act (LkSG), Section 3 – compliance with certain obligations under the Minamata Convention (mercury), the Stockholm Convention on persistent organic pollutants (POPs) and the Basel Convention on the export of hazardous waste, if applicable,

and

c) from EU Regulation 2023/1115 against deforestation – if wood, coffee, cocoa, rubber, palm oil, cattle or soy are present in the supply chain

and expect the same from our business partners.

In accordance with Section 2 (2) Nos. 9 and 10 of the LkSG, we ensure that our business activities do not adversely affect the natural livelihoods of those involved in the value chain. Our business partners are also subject to this obligation: the acquisition and use of land, as well as the use of forests and water bodies, must be carried out in accordance with applicable laws and with the free and prior consent of local communities and affected interest groups.

Sustainability is also an important criterion in the selection of our suppliers. For our employees, sustainable action is obligatory: please be aware that every contribution, no matter how small, counts.



### 2.3. SOCIAL RESPONSIBILITY

#### 2.3.1. HUMAN RIGHTS AND SOCIAL RESPONSIBILITY

RAPS expects its business partners to observe internationally recognised human rights in compliance with the applicable laws, in particular those concerning the protection of employees. Business partners undertake towards RAPS to work towards ensuring that these standards are also observed by their sub-suppliers. These standards include: no toleration of any form of forced labour<sup>1</sup>, no physical punishment<sup>1</sup>, freedom of assembly<sup>2</sup>, no child labour<sup>3</sup> as defined by the conventions

of the International Labour Organization ILO or the applicable national laws and in accordance with the BSCI Code.

<sup>1</sup>: ILO conventions nos. 29 and 105

<sup>2</sup>: ILO conventions nos. 11, 87, 98, 135 and 154

<sup>3</sup>: ILO conventions nos. 10, 79, 138, 142 and 182 and ILO recommendation 146.

Regulations regarding employment relationships (remuneration<sup>4</sup>, working hours<sup>5</sup>) are made in accordance with the BSCI code and ILO conventions.

<sup>4</sup>: ILO conventions nos. 12, 26, 101, 102 and 131

<sup>5</sup>: ILO conventions nos. 1 and 14 and ILO recommendation 116

### 2.3.2. WE LIVE DIVERSITY, INCLUSION AND EQUALITY

The RAPS Group is explicitly committed to diversity, inclusion and equality. We are deeply convinced that the diversity and individuality of our employees is a great potential that must be promoted and protected. Therefore, we see it as a central task to create a working environment in which diversity is appreciated and in which every individual is valued.

The commitment to diversity, inclusion and equality is expressed in many ways in our everyday work: Individual skills, qualifications and commitment are the only things that count in the selection, development, promotion and remuneration of our employees.

### 2.3.3. WIR REJECT DISCRIMINATION

We reject any form of open or subtle discrimination<sup>6</sup>. This refers to characteristics such as gender, identity and sexual orientation, national and ethnic origin, skin colour, religion, age as well as disabilities, and includes other individual characteristics. The management of RAPS does not tolerate any structural or individual violations of these values.

<sup>6</sup>: In accordance with the BSCI Code of Conduct and ILO conventions nos. 100, 111, 143, 158, 159, 169 and 183.

As an employee of RAPS, you are required to contribute to respectful cooperation. This also includes not ignoring possible violations against third parties. You, just like any other person working for the RAPS Group, should be protected against any form of personal harassment such as harassment, unwanted sexual advances or physical contact, indecent solicitations and offers, lewd, offensive or demeaning "jokes", remarks or actions. We are equally clear in our stand against intimidating or threatening behaviour, assault and violence in the workplace. The RAPS leadership team pledges to take any violations of these values extremely seriously, to treat them confidentially and to protect the people who report or are victims of such violations.

### 2.3.4. HEALTH AND SAFETY

Your health and safety as an employee is a high priority<sup>7</sup>. Accordingly, we attach great importance to your strict compliance with our health and safety guidelines in addition to legal regulations and industry standards.

We expect our managers in particular to provide a working environment that is conducive to physical, mental and psychological health. As an employee, you can make a significant contribution to this by acting with a high degree of personal

responsibility and self-care. Respect working hours and rest periods, address stressful situations and ask for support if necessary.

<sup>7</sup>: in accordance with ILO convention no. 155 and ILO recommendations 164 and 190

### 2.3.5. PRODUCT QUALITY AND PRODUCT SAFETY

High-quality, authentic and safe raw materials are the basis for our company's success. We continuously ensure that our products are safe for human health. We are happy to pass on this competitive and quality advantage to our customers for our mutual business success. Food safety and legality are non-negotiable.

We expect our business partners to apply the same high standards.

### 2.3.6. COMMUNICATION, MOTIVATION AND COMMITMENT

As a company, we are only successful if we can attract and retain motivated and committed employees for our company. Appreciation and recognition are prerequisites for motivation and commitment. An open and fear-free communication culture and fair feedback play an important role in this. We value discussions at eye level and regard different perspectives and opinions as enrichment. We know that we can only achieve common goals if trusting communication is possible.



### **3. IMPLEMENTATION**

#### **3.1. THE CODE MUST BE COMPLIED WITH - BREACHES OF IT MUST BE MADE TRANSPARENT**

The RAPS management team is responsible for ensuring compliance with this Code and takes this responsibility very seriously. If you, as an employee or business partner within your supply chain, become aware of any suspected violations of these guidelines, RAPS expects to be informed immediately and in full - regardless of whether this concerns you, your direct employees and colleagues or other employees of RAPS. You can contact your contact person at RAPS or send an e-mail to

[anonym-raps@raps.com](mailto:anonym-raps@raps.com)

at any time. If you assume that you could suffer disadvantages as a result of the notification, we assure you that the possible violation will initially be investigated confidentially.

In the event of actual violations, we expect our business partners to remedy the situation and inform us. If no measures are taken to remedy the situation, we will consider terminating the business relationship as a last resort.



### **3.2. ACKNOWLEDGEMENT AND AGREEMENT**

As a business partner, you receive this code as part of the contract and undertake to act responsibly, adhere to the principles/ requirements listed and take all necessary measures to implement and monitor the code. Business partners agree that RAPS will verify compliance by means of appropriate measures.