



## Code of Conduct

STATUS: -January 2018

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**CODE OF CONDUCT, A GUIDELINE WHICH PROVIDES US WITH  
ORIENTATION FOR DAILY ACTIONS**

**Preamble**

The key to business success is in a company-wide, company culture, characterised by integrity, ethics and personal responsibility. The ethical requirements for corporate behaviour and in the workplace are increasingly demanding.

Our Code of Conduct is the guiding framework for all of management, employees and business partners at Rohde Schmuckwaren GmbH. It links our standard of legal and legislative compliance to our special requirements for ethical behaviour. It is a both a demand on us, as well as a promise to others.

The Code of Conduct for Suppliers provides our suppliers with a framework for action and aims to prevent undesirable actions. Our suppliers are instructed to follow the following ground rules. Misconduct and violations against the conduct requirements regarding integrity and esteem, as well as violations of statutory provisions and guidelines can have severe consequences, not only for individuals, but the entire company. Therefore, we cannot tolerate any misconduct.

**Uwe Rohde**  
*Managing Director*

**Annette Wiedermann**  
*Managing Director*

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## 1. Scope of application and responsibility

The Code of Conduct applies to all management and employees of Rohde Schmuckwaren GmbH including temporary employees and contract workers, as well as all persons who act on behalf of Rohde Schmuckwaren GmbH.

The conduct guidelines are displayed next to the time clock.

All employees of Rohde Schmuckwaren GmbH may neither violate the provisions of the Code of Conduct, nor may they encourage others to do so, even if these violations may seem to be in the interest of Rohde Schmuckwaren GmbH.

In order to be able to report such misconduct, we wish to create a climate where no one is afraid of negative consequences of reporting something.

For our management team, this results in the obligation to act as a role model and to live out this demand on employees in a believable way.

The management team obliges itself, to remind employees of the Code of Conduct and to monitor compliance. Both skills and diversity, as well as global network and tradition form the basis of our performance and make us leaders in our markets. We created added value for our customers, employees and suppliers.

Our customer's requirements determine our thoughts and actions. We break new ground and develop innovative products and services for sustainable infrastructure and resource efficiency. We act in a business oriented manner, with confidence, courage and performance-orientation - with the aim to be the best. Commitment and ability from each individual forms its basis. Employee development is particularly important for us. Health and safety at the workplace have the highest priority.

We act in the overall interest of our company. Openness and mutual appreciation characterise the time we spend together. This also includes reliability, honesty, trustworthiness, and integrity. We take responsibility for the company.

## 2. Conduct in the business environment

### a. Legal and legislative compliance

Rohde Schmuckwaren GmbH obliges itself to fulfil its social responsibilities in all corporate activities. Rohde Schmuckwaren GmbH obliges itself, to comply with the applicable laws as well as any other regulatory provisions in the countries in which they are active in all corporate activities and decisions. Business partners must act fairly. Contracts are complied with, however changes to framework conditions must be taken into account.

### b. Prevention of conflicts of interest

At Rohde Schmuckwaren, business decisions are exclusively made on the basis of the company's best interests. Conflicts of interest with private interests or other economic or other activities, also those of family members or other close persons or organisations should be avoided from the start. If these occur anyway, they should be solved by considering the statutory provisions and guidelines as well as the current version of the Rohde company guidelines. The condition for this is the transparent disclosure of the conflict.

### c. Fair competition

Compliance with respective competition laws is mandatory. In general, the relevant statutory provisions prohibit making agreements with competitors, regarding prices and conditions, market or customer allocations, sales areas, as well as unfair business practices. In all affairs in which Rohde Schmuckwaren GmbH or its subordinates may be subject to a risks regarding competition law, it is necessary to alert management.

### d. Corruption and cartel violations

This is not tolerated. Bribery and cartel agreements are not a means for us to achieve the conclusion of a

contract. Violations are not tolerated and will lead to sanctions against the respective persons. The managing directors, all management and all employees must be aware of the extraordinary risks a corruption or cartel case could pose for Rohde Schmuckwaren GmbH, but also for them personally. Every employee is instructed to participate actively in the implementation of the Code of Conduct in his area of responsibility.

#### **e. Prevention of money laundry**

Rohde Schmuckwaren GmbH fulfil their legal obligations relating to money laundry and does not participate in money laundering activities.

#### **f. Press**

In order to ensure coordinated communication with external parties, including the media, only management or specifically authorised employees may make public declarations regarding Rohde Schmuckwaren GmbH.

#### **g. Forced labour and child labour**

We strictly reject all forms of forced labour and child labour. The undersigned company pays special attention to the convention relating to minimum age for admission to employment (Convention 138, ILO) as well as the convention regarding the prohibition and immediate measures to eliminate the worst forms of child labour. To comply with Convention 182, ILO. In the case that the national regulation contains more stringent guidelines, then these shall take precedence.

### **3. Conduct towards colleagues, employees, customers and suppliers**

#### **a. Human and labour rights**

We respect and support compliance with internationally recognised human rights.

We recognise the right of all employees, unions, and employee representatives to the form domestic regulations on a democratic basis. The right to adequate compensation is recognised for all employees. The remuneration any other benefits are in accordance with the minimum respective national and local statutory standards, or the level of the national economic areas/industries and regions.

#### **b. Discrimination**

Rohde Schmuckwaren GmbH is committed to an integrative working environment and recognises, that all humans are unique, deserve respectful treatment and should be appreciated for their individual abilities . This is in particular with regard to discriminating against employees based on their sex, race, disability, ethnic or cultural origin, their religion or world view, age or sexual orientation.

With regards to employment, Rohde Schmuckwaren GmbH, ensures equal opportunities and treats all its employees fairly. With regards to personnel decisions, for example due to employment, training, payment and promotion - Rohde employees and company divisions may only orientate themselves according to personal performance, qualification, and other purely expertise-related criteria.

We protect the right to freedom of association and expression.

#### **c. Health protection**

Rohde Schmuckwaren GmbH ensures health and safety protection in the workplace according to national provisions. We support constant development to improve the workplace.

Every manager is obliged to instruct and support employees in assuming this responsibility.

#### **d. Personal conduct**

Rohde Schmuckwaren GmbH expects its employees, to behave impeccably in their work and interactions with business partners, colleagues and others in general. This includes sensitivity and respect towards other cultures and customs.

Harassment, discrimination or behaviour which colleagues or business partners could see as offensive or degrading is not acceptable.

#### **e. Complaints, information and grievances**

Rohde Schmuckwaren GmbH would like to encourage open debate regarding responsible conduct. In relation to this, it is your responsibility to inform management regarding grievances. A report can be made verbally or in writing, or anonymously via the "suggestion box". The discrimination or harassment of persons who make a report is a violation of the Code of Conduct. If you have the impression that your information regarding a violation may be used against you in any way, you should inform management. However, fake information with the obvious purpose of harassing others can result in disciplinary measures.

### **4. Conduct within the company**

#### **a. Sustainability environment and climate protection**

Sustainable environment and climate protection as well as resource efficiency are important corporate goals. Laws enacted for the purpose of protecting the environment must be followed. Rohde Schmuckwaren GmbH supports the environmentally conscious actions by employees.

#### **b. Endangered or protected species**

Suppliers comply, without limitation, to international and local provisions such as for example the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), in relation to the procurement, import, use and the export of raw materials, extracted from endangered or protected species.

#### **c. Manufacture of leather products**

Suppliers who are active in the leather dying and processing sector, follow the European Confederation of the Leather Industry (COTANCE) within the framework of their company activities with regards to labour rights, health law and employee safety regarding the environmental impacts as well as relating to customer health and safety.

#### **d. Responsible gold procurement**

Rohde Schmuckwaren GmbH complies with the principles of responsible gold procurement. As far as is possible and according to industry practice, Rohde GmbH demands that suppliers supply an assurance that the gold delivered by them was mined under compliance of human and labour rights and that there was no environmental damage through direct impacts or leaking of chemicals.

## **5. Handling information**

### **a. Trade secrets**

Rohde Schmuckwaren GmbH obliges its employees to comply with company and trade secrets. Confidential information as well as confidential documents may not be passed on to unauthorised third parties or made accessible in any other way unless authorisation to do so was provided or if it is publically accessible information.

### **b. Data protection and security**

We take the necessary steps to protect confidential information and company documents against access and insight by non-participating colleagues and other third parties.

The protection of personal data, in particular that of employees, customers and supplies is especially important to Rohde Schmuckwaren GmbH.

We only record or process data if it is absolutely necessary or legally required to fulfil a task. It is prohibited, to record or process data without the affected person's agreement or legal admissibility.

## **6. Protection of company property**

We use the company property and resources as intended, in a considerate way and protect against loss, theft or misuse. Our company's intellectual property is a competitive advantage for Rohde Schmuckwaren GmbH and therefore is something worth protecting, that we defend against unauthorised access by third parties. We use the company's material and immaterial property exclusively for company purposes and not for personal purposes, unless this has been expressly permitted. Our employees carry joint responsibility with their superiors, that the type and scope of business trips are always in adequate relation to the respective travel purpose and time and cost aspects are included in planning and implementing the trip in an economic manner.

## **7. Implementation and contact persons**

Rohde Schmuckwaren GmbH actively encourages the communication of the Code of Conduct. We ensure that no employee is discriminated or disadvantaged through compliance with the guidelines/agreements. Our management team have a special role model function and their actions can be measured based on the Code of Conduct. They are the first contact person in case of questions regarding comprehension of the regulations and ensure that all employees know and understand the Code of Conduct. Within the scope of their management activities, they prevent unacceptable behaviour, or take suitable measures in order to prevent violations of the regulations in their area of responsibility.

Trusting and good cooperation between employees and management can be seen in honest, open information and mutual support.

In case of further questions regarding the Code of Conduct, all employees and third parties (customers, suppliers, etc.) can use the [info@rohde-schmuck.com](mailto:info@rohde-schmuck.com) email address.

I hereby agree to act according to the Code of Conduct of Rohde Schmuckwaren GmbH.

I hereby commit to conveying the principles of the Code of Conduct to my suppliers and to monitor compliance thereof. Furthermore, I demand my suppliers to oblige their suppliers to behave in accordance with the Code of Conduct.

Company:	
Address:	
First and surname: (Signatory)	Role:
Tel.:	E-Mail:

Place:

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Date:

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Signature / Company stamp:

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