

RAICO

Compliance

Fair Dealing. The **BASICS**.



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Dear colleagues,

Every day, we work together for the success of our company. Our motivation and shared goals have made RAICO what it is today. The success that our company currently enjoys is the fruit of the sound decisions that we make every single day. Two important considerations govern this decision-making process: a sense of responsibility and strict adherence to the letter of the law. Our unconditional compliance with these principles is the foundation of all our business activities.

This clear commitment to our ethical principles protects both RAICO and its employees. In so doing, we set the bar high for both management and staff; that is the bedrock of the company culture here at RAICO.

We have created RAICO Compliance and adopted the compliance behavioral guidelines in order to help you to recognize potential legal risks specific to your area of responsibility so that you can avoid possible violations of the law.

Our goal is to treat the topic of compliance in an open atmosphere based on mutual trust. We, the managing directors of RAICO, are responsible for impeding and preventing legal infractions by setting a good example and by exercising prudent supervision. We cannot do this without the help of every single member of the team. We're counting on you!



Handwritten signature of Hagen Weber in blue ink.

Hagen Weber

Handwritten signature of Bernd Schweinberger in blue ink.

Bernd Schweinberger



COMPLIANCE

A New Word for Long-Held Values

Human beings are capable of telling right from wrong. It follows, then, that we always have a choice between right and wrong.

Compliance helps us to make these choices in our daily business operations. It ensures that all of our decisions have a solid legal foundation. Obeying the law represents the minimum requirement for good corporate citizenship. Naturally, good corporate citizenship also implies a respectful, non-discriminatory workplace. These principles are at the core of RAICO's identity and are the basis for the trust that characterizes RAICO, both within the company itself and in our dealings with our customers and partners.

Compliance – The Basics is the constitution of RAICO.

These general principles are clarified by additional specific conduct guidelines. Practical examples and rules provide further clarification of these principles.

Compliance – The Basics applies to the whole RAICO group throughout the entire world. Please read these rules attentively and follow them carefully. Your actions must always be legal: this is more important than either RAICO's economic interests or the wishes of any one of our customers. Be aware that your actions always have consequences, both for you personally and for the company as a whole.

***Think twice before acting!
Do you need help with your decision?
Then contact RAICO Compliance!***

RAICO TEAM

Compliance with labor laws



Our staff is the key to our success. Every single employee matters. Everyone deserves respect. Only in an open, non-discriminatory environment can people fully develop their abilities. That is why a tolerant workplace is essential to a company's success.

It is forbidden to disadvantage, favor or harass anyone on the grounds of ethnicity, gender, religion, ideology, disability, age or sexual orientation. At RAICO, we protect our employees against discrimination and punish discriminatory behavior.

Senior staff members have a special responsibility to fight discrimination. As role models, they play a crucial role in shaping the work climate here at RAICO.

FAIR DEALING

Fair Competition

Our corporate activities are guided at all times by the principles of fair competition. These principles protect the general interest in fair and undistorted competition. This means avoiding both unfair business practices, such as misleading statements about the main features of products or services, and collusive practices that violate antitrust law.

The basic rules of antitrust law mean no collusion with competitors, especially regarding prices, offers, business terms and conditions, sales quotas or market share. These activities are forbidden. It is also forbidden to exchange confidential market or company information outside of the workplace. Every deliberate act of collusion between competitors is prohibited.

Free competition may not be discouraged by placing illegal restrictions on either the selection of business partners or the arrangement of business terms and conditions. RAICO is not allowed to accept or to initiate any sort of restriction on free and undistorted competition.

Violation of antitrust law has very serious consequences: These violations can be punished with high civil fines and possibly even stiff criminal fines and imprisonment as well as claims for damages. Economic crime is not a trivial offense.

ETHICAL DECISION-MAKING

Corruption

RAICO makes its decisions based on merit. This means that our corporate decisions are based on the quality and scope of the products and services on offer. Extraneous considerations do not play a part in our decision to conclude a business transaction. The best offer wins the contract.

That is why we do not allow ourselves to be influenced by material or immaterial considerations. We must never violate established business practice by accepting excessive gifts or hospitality. Moreover, these gratuities must never influence a concrete business decision such as the conclusion of a contract.

By the same token, we are obliged to win over customers through the quality of our products and services and not by exerting inappropriate influence. The details are regulated by the RAICO Anti-Corruption Guideline.

Business relationships with relatives or close persons could lead to a conflict of interest. RAICO Compliance must be informed of such business relationships in writing before a conflict of interest can arise.

***"But everyone else is doing it"
is never an acceptable excuse.***



OBSERVING STRICT CONFIDENTIALITY

Protection of Information

RAICO's most important raw material is information. Our know-how, our experience and our business contacts are our capital. This mainstay of our business must be protected.

RAICO protects its industrial property rights through the registration of patents and trademarks. However, this protection is dependent on our employees' discretion. When cooperating with partners, suppliers or customers, confidential information or know-how must be protected to the best of our abilities. This can be achieved through security measures and non-disclosure agreements.

The same degree of care must be exercised when dealing with the personal data of RAICO's employees or business

partners. Personal data may only be collected, processed or used when this does not violate privacy laws or when the people concerned have given their consent. Without exception, the amount of data collected must be kept to the absolute minimum required to complete the task at hand. In addition, the principles of transparency and relevancy should guide our use of any data collected. That means that only the data necessary for any one particular collaboration are to be collected, and that the use of those data is restricted to that one collaboration.

The RAICO Data Protection Officer (e-mail: datenschutz@europajurist-schenk.com) is responsible for the coordination of data protection.

FEEL FREE TO ASK

Compliance Organization

RAICO supports its employees in all matters concerned with compliance. This can be done either in the form of individual discussions or through workshops on special topics.

Information regarding compliance infringements can be reported to hinweisgeber-raico@seitzpartner.de.

Regardless of whether or not whistleblowers wish to remain anonymous, the information they provide will be treated in the strictest confidence. If the whistleblowers act in good faith, their actions will have no negative consequences for themselves. This is true even if a suspicion proves to be unfounded.

RAICO

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