



Code of Conduct

for the Rottendorf Group

Last updated November 2025

www.rottdorf.com





Inhalt

I.	Introduction and scope	3
II.	Our value system	4
III.	Respect for and Protection of human rights	7
1.	Discrimination and Harassment	7
2.	Working and workplace conditions	7
3.	Data protection and privacy	7
IV.	Fair labor practices and working conditions	8
1.	Health and safety in the workspace	8
2.	Fair pay and working hours	8
3.	Freedom of association and collective bargaining	8
V.	Enviromental protection and sustainability	9
1.	Enviromental consciousness	9
2.	Nachhaltigkeit und Ressourceneffizienz	9
VI.	Business ethics and the fight against corruption	9
1.	Behaviour as a competitor	9
2.	Curruption and bribery	9
3.	Gifts, invitations, and other benefits and perquisites	10
4.	Relations with business partners and suppliers	10
VII.	Compliance with laws, regulations and industry standards	10
VIII.	Enforcement and reporting	11
1.	Enforcement	11
2.	Reporting and whistleblowing	11
IX.	Review and updates	11
X.	Conclusion	12





I. Introduction and scope

This Code of Conduct (CoC) sets out guidelines and requirements pertaining to ethical conduct on the part of all employees, managers, contractors, partners, and the executive management of the Rottendorf Group. The shareholder and executive management of Rottendorf firmly believe that lasting economic success is inseparably linked to observing these principles and corporate values. This Code of Conduct extends to all activities and operations of all Rottendorf companies, regardless of location. It reflects the principles of the United Nations Global Compact and underscores our commitment to law and ethics.





II. Our value system



Customer focus

**Customer success drives
us day in, day out.**

Our customers are our top priority, and they are at the heart of everything we do. We continuously strive to offer our customers added value, meet their needs, and enhance their satisfaction. We actively listen to our customers in order to understand their needs and achieve solutions that exceed their expectations. Our success is based on our customers' satisfaction and success, since ultimately, lives and quality of life depend on our work.

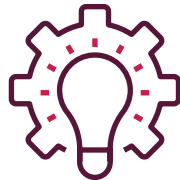


Quality consciousness

**Top quality in
everything we do**

At Rottendorf, we strive for top quality in everything we do and make every effort to carry out our tasks on time and reliably. We firmly believe that top quality is the foundation of our work, making it a fundamental aspect of our relations with customers and partners. We continuously invest in improving our processes and procedures to ensure consistent quality in our products and services. This is the only way to ensure that we can always fulfill our obligations toward our customers and business partners.





Entrepreneurship

**Take initiative, shape
the future through
innovation**

We foster a culture of entrepreneurship. To that end, we encourage our employees to engage in lifelong learning and develop new ideas to advance innovations and improvements. Through continuous further education and creativity, we maintain our position of leadership in the pharmaceutical industry, which allows us to ensure the best possible care for our customers. Every employee is an integral element of our entrepreneurial ecosystem, and all employees are urged to use all available avenues to identify opportunities and forge new paths.



Belonging

**We are a strong
community**

At Rottendorf, we value a culture of belonging where all employees feel they are part of a team. We treat everyone with respect and appreciation and foster clear and effective communication. We recognize and value the contributions made by each and every individual and create an atmosphere that fosters open dialogue and sharing of knowledge. These values are the foundation of our corporate culture, and they help to ensure that we are successful together.





Empowerment

The courage to take responsibility and make decisions

We encourage all employees to take responsibility, make targeted decisions, and achieve their aims. We enable them to develop this sense of responsibility, identify innovative solutions, and then make courageous decisions. We also set clear, measurable goals and encourage our employees to pursue and achieve them with determination and a sense of purpose. This commitment to responsibility, empowerment, and goal orientation is a key, building block in our corporate culture and a crucial factor in our success.



Integrity

Every day, for a better world

We are aware of both our social and ecological responsibilities and our ethical commitments. We recognize the effects of our actions on society and strive to make a positive contribution. Our commitment to integrity is reflected in our dedication to ethical standards, transparency, and honesty as we do business. Our employees are proud to be part of this organization, which is based on integrity and social responsibility, and are committed to upholding these values each and every day.





III. Respect for and Protection of human rights

Our responsibility for upholding human rights and labor and social standards applies throughout our value chain. We have signed the United Nations Global Compact, pledging to uphold its principles.

1. Discrimination and Harassment

All employees are called on to contribute to an atmosphere of respectful interpersonal dealings and to foster an inclusive and diverse work environment in which every person is respected and appreciated. We reject all forms of discrimination, harassment, or other dishonorable conduct, especially based on sex or gender, age, race, religion, sexual identity, nationality, disability, philosophical beliefs, or any other protected category and have zero tolerance for these forms of conduct.

2. Working and workplace conditions

The safety, health, and well-being of our employees are top priorities for us. We are committed to compliance with existing occupational health and safety guidelines and industry standards. We expressly reject all forms of child labor and forced labor, along with working conditions and forms of treatment that violate national laws or international agreements.

3. Data protection and privacy

Protecting the personal data of our employees, customers, business partners, and other interested parties and processing these data in compliance with the law are top priorities for us. To achieve these aims, we follow all applicable data protection and privacy laws and regulations and respect each and every individual's right to privacy.





IV. Fair labor practices and working conditions

1. Health and safety in the workspace

Our goal is to minimize accidents, injuries, and occupational illness by achieving continuous improvement of occupational safety. With this in mind, we have pledged to create and maintain a safe and healthy work environment.

2. Fair pay and working hours

We recognize the right to fair pay for all employees. Wages, salaries, and other benefits comply with applicable national and local laws at a minimum, or are in keeping with the fundamental level of comparable national economic sectors, industries, and regions. Rules for working hours are set in accordance with applicable laws and standards. We expect our business partners to do the same.

3. Freedom of association and collective bargaining

We respect all employees' rights of freedom of association and collective bargaining and will never discriminate against anyone based on membership in a trade union or other association of workers.





V. Environmental protection and sustainability

1. Environmental consciousness

Environmental protection is a top priority for the Rottendorf Group. We are aware of our responsibility for the environment and have pledged to keep our environmental impact to a minimum as a result. We satisfy all relevant environmental protection laws and regulations and strive to exceed those standards wherever possible.

2. Nachhaltigkeit und Ressourceneffizienz

Rottendorf strives to use resources efficiently and to promote sustainable-business practices. This is why we handle resources and harmful substances responsibly and take the development and spread of environmentally friendly technologies into account, among other measures.

VI. Business ethics and the fight against corruption

1. Behaviour as a competitor

The aim of antitrust law is to ensure and maintain free, undistorted competition in the interest of all market participants. All employees at Rottendorf are obligated to comply with applicable antitrust laws and other laws regulating competition.

2. Corruption and bribery

Corruption, including extortion and bribery, is rejected in all our business dealings in Germany and other countries. All employees are required to conduct themselves ethically and in compliance with the law and to prevent any and all forms of corruption, bribery, and unfair competition.





3. Gifts, invitations, and other benefits and perquisites

Offering or accepting gifts, invitations, or other benefits or perquisites that could affect a business decision is strictly prohibited. All employees must follow the rules and regulations of Rottendorf for gifts and invitations.

4. Relations with business partners and suppliers

We expect our business partners and suppliers to observe similar ethical standards. We conduct regular audits to ensure that they comply with the standards we have set down.

VII. Compliance with laws, regulations and industry standards

All employees are obligated to observe all applicable laws, regulations, and industry standards. This applies to local and international laws and regulations alike.





VIII. Enforcement and reporting

1. Enforcement

The Rottendorf Group will ensure, actively and in an ethically responsible manner, that the Code of Conduct is observed. All employees are required to support this code. Violations of the Code of Conduct are taken seriously and may result in disciplinary action, including termination of employment. Rottendorf will investigate all reports of violations thoroughly and respond appropriately.

2. Reporting and whistleblowing

All employees are urged to report violations of this Code of Conduct. Rottendorf provides suitable channels via which concerns can be reported anonymously and confidentially. No employees will be punished or discriminated against for reporting violations in good faith.

IX. Review and updates

This Code of Conduct is reviewed and updated regularly to ensure that it remains relevant and effective. All changes are communicated to employees in a timely manner.





X. Conclusion

This Code of Conduct is a document reflecting our commitment to ethical and lawful behavior. All employees of Rottendorf are called on to embrace and promote the principles of this Code of Conduct and to contribute to a culture of integrity, transparency, and accountability. If you have any questions or concerns, please consult your supervisor or HR.

The shareholder and executive management

Last updated November 2025





Rottendorf Pharma GmbH

Ostenfelder Str. 51–61
59320 Ennigerloh
Germany

T +49 2524 268-0
E info@rottendorf.com

www.rottendorf.com