



Code of Conduct and Compliance Policy of REICH GmbH



REICH GmbH

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“It is easier to build a business than it is to sustain it over time.”

(Karl Reich, 30 July 1962)

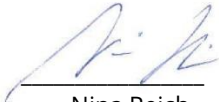
As a medium-sized family business firmly rooted in our Franconian-Thuringian home in Germany for over 100 years, our tradition alone gives us a great responsibility – not only towards our employees and their families, but also toward the entire region. For this reason, it has always been our endeavour to always act responsibly, future-oriented and sustainably in all things. Reliable, cooperative and innovative conduct is also required at all times in relation to our business partners, most of whom have been with us for many years, in order to achieve lasting economic success. Securing good jobs and working conditions and maintaining good business relations with our customers and suppliers is therefore not only an economic obligation for us, but also a personal concern. The responsibility arising from this self-image in its various forms is something we continue to accept in now the fourth generation.


An ever-increasing number of legal regulations and requirements, together with the ever-increasing needs and demands of our customers, bear witness to a world that is changing at an ever-faster pace.

Compliance in the narrower sense means adherence to laws, regulations and internal instructions in the respective area of application.

Our company founder's sentence from 1962 essentially already contains a quite clear echo of what we include under the term “compliance” today. Karl Reich's words therefore remind us of the values that have been lived in this family business for more than 100 years and are summarised in this policy, as well as the consistency and continuity that go hand in hand with these values. At the same time, however, these values are also an incentive for us to continue to master the challenges of a medium-sized company together with our employees and partners and to take advantage of the opportunities that present themselves.

Mellrichstadt, 31 July 2023


Nina Reich


André Reich



1 Corporate values and principles of our actions

Our actions and business activities are essentially shaped by five core values. These include the principles and guidelines that we, as a family-owned company, stand for and by which we will continue to be successful in the future.

1.1 Integrity and conduct in compliance with the law

Conduct in compliance with the law, regulations and contracts, and observance of all laws, regulations, contracts and other rules are key components of responsible corporate governance.

1.2 Competition and entrepreneurship

We are fully committed to the principles of the social market economy, to free and fair competition, and to social balance as the essential components of this economic order.

1.3 Family and social responsibility

We see ourselves as an active member of our region and acknowledge our social responsibility. Our mission statement includes being a "good neighbour" to the people and partners in our home country.

1.4 Partnership, cooperation and transparency

As a family business, we attach great importance to the well-being of our employees. By promoting our employees and transparency in communication, we increase the satisfaction, motivation and performance of the entire company.

We actively live partnership and fair cooperation with our partners, suppliers and customers.

1.5 Looking forward

REICH GmbH is focused on sustainability. Consistency and tradition combined with innovation and progress set the course for our growth and success.

1.6 Compliance with applicable law

In all its activities, REICH operates within the framework of applicable laws. This applies in particular with regard to rules and regulations under public law.

Compliance with the applicable legal system is a matter of course for REICH.



2 Interaction with our employees

REICH creates a working environment characterised by openness, trust and mutual respect, in which employees perform to the best of their ability and contribute to the success of the company.

2.1 Equal treatment and equal opportunities

Every employee is treated equally regardless of age, gender, religion, ethnic origin, skin colour, nationality, sexual orientation, social background and political views.

2.2 Promote and challenge

REICH requires employees to actively participate in training and to be willing to engage in personal and professional development.

2.3 Reconciliation of work and family life

As a family business, we pay particular attention to the reconciliation of work and family life.

2.4 Employee representation

Management and the Works Council work together constructively and in a solution-oriented manner for the benefit of the company and its employees.

2.5 Fair and attractive working conditions

We offer our employees attractive and secure jobs and comply with internationally recognised labour and social standards. Every employee has the right to join the employee representative bodies provided for by law.

2.6 Responsibility of the managers

Within their area of responsibility, managers ensure compliance with legal and regulatory requirements. In addition, they fulfil their role model function.

2.7 Child and forced labour

All measures that involve child labour or forced labour or in any way produce and/or promote them are prohibited. Furthermore, REICH condemns any form of exploitation of people.



3 Contact towards our business partners

We attach great importance to fair and lawful cooperation with our customers, suppliers and other contractual partners.

3.1 Fair competition

REICH is committed to compliance with all competition and antitrust regulations. Actions and measures that hinder competition and violate antitrust law are therefore prohibited. Every employee must refrain from actions and measures that give even the appearance of conduct that hinders competition or violates antitrust law.

3.2 Corruption and other forms of influence

REICH does not tolerate any form of corruption or bribery, neither among its own employees nor among its business partners. Any unlawful interference is therefore prohibited.

3.3 Gifts and invitations

Employees are permitted to accept gifts, invitations and other benefits, provided that these are customary to maintain business contacts, are for customer acquisition or professional training and are appropriate and can be presented transparently.

3.4 Money laundering

REICH is committed to the principles of the Money Laundering Act (*Geldwäschegesetz – GwG*). Employees are required to stop or not to execute suspicious transactions or business operations.

3.5 Export control and sanctions law

REICH recognises the valid foreign trade regulations as well as the valid export and import control regulations and does not tolerate any violation – also by third parties – of the sanctions law.

3.6 Taxes and duties

REICH does not participate in any tax avoidance strategies and is committed to complying with all tax laws and customs regulations.



4 Environmental, climate, occupational and health protection

For REICH, the best possible protection of the environment and climate is of particular importance. We therefore apply all applicable laws on environmental, climate, occupational and health protection without restriction. With sustainability and the careful use of resources, we make a significant contribution to the environment.

4.1 Sustainability

REICH employees actively share responsibility in their respective areas of work for the careful use of all resources required. In this way, we strive to reduce resource consumption and further develop all relevant aspects of sustainability.

4.2 Environmental and climate protection

All relevant environmental and climate protection regulations and requirements are complied with by all employees.

To monitor all legal and regulatory requirements and to identify any opportunities for improvement or savings, REICH constantly reviews operational processes and uses appropriate measurement and testing systems to do so.

4.3 Occupational safety and health

REICH provides a safe working environment for all employees. The occupational safety specialists are continuously responsible for the improvement, implementation and execution of all measures relating to occupational safety.

Each employee shares responsibility for minimising any safety risks and promoting safe working practices.

4.4 Health protection

REICH complies with all legal requirements concerning the health protection of its employees and provides them with the legally required protective equipment. Managers ensure that all health and safety precautions are followed.

REICH also pays special attention to employees who are eligible for protection.



5 Handling of data and information

The special protection of data and information against unauthorised access is essential for REICH.

5.1 Data protection and data security

The European General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (*Bundesdatenschutzgesetz – BDSG*) apply without restriction at Reich. Personal data may only be processed if there is a legal basis for the specific processing. The management supports the continuous improvement of the security level. Employees are encouraged to immediately report any potential improvements or vulnerabilities to the Data Privacy Officer or the Information Security Officer.

5.2 Secrecy and information

REICH obliges its employees to maintain absolute secrecy about all information of a technical, commercial, organisational or economic nature concerning REICH and our business partners that is transmitted to them. The obligation to maintain confidentiality continues to apply after the end of the employment relationship.

5.3 Secrecy and information

The availability of all data in all areas of the company is secured against unauthorised access, loss or manipulation in compliance with the law in such a way that no significant impact on business operations is to be expected.

Malfunctions and irregularities in data and the IT system are not acceptable.

All employees of the company comply with the relevant laws, contractual and internal regulations and the information security policy.



6 Reporting and contact person

Each employee is encouraged to report any violations of this Compliance Policy or company-related violations of other laws and regulations.

6.1 Reporting misconduct

Misconduct as defined in this policy is not accepted at REICH. Employees, business partners and third parties are motivated to openly address violations. Each report will be treated confidentially.

Any employee who reports a legal or compliance violation or a reasonable suspicion of a violation will be protected from any reprisal or possible retaliation. This shall also apply if it should subsequently transpire that no violation has been committed.

6.2 Contact

Any employee may contact the following persons directly with questions or reports of violations:

- Management
- Division Manager
- Department Manager
- Data Protection Officer
- Information Security Officer
- Human Resources Department
- Equal Opportunities Officer
- Legal Department
- Employee Representation

6.3 Reporting procedure

Violations can be reported either verbally, in writing or by e-mail to the responsible named persons or to compliance@reich-gmbh.com.

REICH GmbH
Legal Department
Industriestrasse 1
97638 Mellrichstadt

compliance@reich-gmbh.com



REICH GmbH, Industriestraße 1, 97638 Mellrichstadt, Germany

mail@reich-gmbh.com