

行为守则

Xíngwéi القواعد السلوكية

Zásady správania sa

shǒuzé Нормы поведения

**Code of Conduct**

Código de  
Conducta

Uppförandekod  
**Verhaltenskodex**

Code de conduite Codice di condotta

Oppførselskode

Cod de conduită Adfærdskodeks

Kodex chování  
Kodeks postępowania



# Foreword

In 1981, after more than 20 years of experience in the ventilation industry, Karl Rosenberg gives up his managerial position to become self-employed. The foundation stone for Rosenberg Ventilatoren GmbH was laid.

Over the next 40 years, a globally active company with approx. 1,400 employees emerges from this. Today the company is represented in more than 45 countries. With international production sites, the Rosenberg Group serves a production depth that is unique in this industry. From the cast part of the motors to the fan to the air-conditioning unit - everything from one single source.

The family-like cooperation within the group enables the optimal use of this broad know-how and the expansion of the core competences. Because Rosenberg stands for high flexibility and customer proximity.

This is part of the individual corporate philosophy.

The focus here is on people. Because only a motivated employee can internalise our values and carry them to the outside world. That is why we encourage an environment characterised by personal freedom, respect, honesty and reliability. An encounter at eye level.

The Rosenberg Code of Conduct sets out the minimum requirements that all employees worldwide must observe. Our managers bear a special responsibility in this regard, acting as role models for this conviction.



A handwritten signature in black ink, appearing to read 'Karl Rosenberg'.

Karl Rosenberg

# 1. Principles

## **Lawfulness, fairness and responsibility**

Our actions are always legal and in accordance with the laws and legal systems of the countries in which we do business. We strictly reject bribery, corruption or money laundering. We obtain the necessary permits and pay our taxes and customs duties. Violations of the law are to be avoided at all costs.

We apply the highest standards of integrity in our business activities and do not deceive customers or the public. We also put these values before economic interests. Illegal actions must not be considered and will lead to criminal prosecution, fines and claims for damages, as well as damage to our image and loss of orders.

Every employee is jointly responsible and required to check their area of work for legality, responsibility and fairness. In case of doubt, the supervisor or the compliance office is involved.

## **Mutual respect, honesty and integrity**

We work with people of different ages, ethnic origins, skin colour, culture, religion and gender. Rosenberg is committed to diversity. Therefore, we protect the privacy, personal dignity and rights of every individual regardless of sexual orientation, disability, world view or other characteristics.

Discrimination against individuals on the basis of these characteristics, as well as sexual harassment or other mental or physical coercion, will not be tolerated.

These principles apply both to internal cooperation and to conduct towards external partners.



**„Our principles.“**

# 2. Responsibility

## Leadership responsibility

As managers, we have a role model function. We communicate the rules of this Code of Conduct to our employees and are available as contact persons in addition to the Compliance Office. We ensure that in our area of responsibility, compliance with the legal regulations and internal rules is continuously monitored and that employees are aware of disciplinary consequences in the event of violations.

If an employee draws our attention to possible violations, we ensure that they are protected against any form of discrimination because of a report made in good faith. Even if this report turns out to be unfounded in retrospect.

## Responsibility for Rosenberg's reputation

Every employee shapes the image of Rosenberg. Fairness in cooperation within the company and with our business partners is an essential basis of our success. That is why we always act in a coordinated and law-abiding manner and only make promises that we can keep.



„We take  
responsibility.“

# 3. Avoidance of conflicts of interest

Conflicts of interest arise when employees pursue personal interests at the expense of Rosenberg's interests. Therefore, every employee is obliged to make business decisions in the best interest of Rosenberg at all times. If there is a personal interest that is related to our official duties, we inform our supervisor. This also applies, for example, to close family members or spouses who are employed by a competitor, supplier or customer.

## **Secondary activities and equity investments**

We only engage in sideline activities with the consent of the employer and with the greatest possible transparency. No legitimate interests of the company are affected. We only make equity investments in business partners or competitors after prior written information to the employer.

## **Commissioning business partners for private purposes**

We avoid engaging business partners for private purposes. Business partners must not be favoured for private interest.



**„We preserve the interests of Rosenberg.“**

# 4. Dealing with business partners and third parties

## Competition and antitrust law

We believe in fair competition. Therefore, we do not collude with competitors or exchange information on business strategies. This applies in particular to information on pricing, profit margins and costs, capacities, supply relationships and conditions, sales and distribution methods, as well as the division of markets, customers or regions.

## Customer and supplier relations

We document agreements with customers and suppliers in full, including all subsequent changes and additions such as the payment of bonuses and subsidies. We do not influence our customers in the pricing of resale or in any other way. We select suppliers solely on an objective basis by comparing prices, quality, performance and suitability of the products.

## Corruption

We strictly reject corruption and bribery. Both lead to a distortion of competition and a high risk to the company and are therefore to be avoided at all costs. In our dealings with business partners, public officials and other third parties, we do not accept or offer any gratuities or other means of obtaining an improper advantage. Invitations to meals or gifts must always be within appropriate limits.



**„We shape our business relationships honestly and fairly.“**

# 5. Dealing with information

## Documentation of business transactions

We document business processes completely and promptly. We always keep our records and reports truthful. This applies in particular to financial reporting. In doing so, we always follow the legal national and international requirements.

## Secrecy

We keep confidential company information secret. This also applies after termination of the employment relationship with Rosenberg.

## Data protection

For us, the protection of data has top priority and we always follow the legal requirements for the protection of personal data. We handle personal data of employees and business partners confidentially and only use it for the purposes for which it was provided to us.



**„We handle information and data with responsibility.“**

# 6. Environment, safety and health

## Occupational safety

A safe working environment is a top priority for us. Safety and fire protection regulations must be complied with at all costs, and risks and grievances must be eliminated immediately. We promote a working environment that encourages accident prevention and minimises health risks.

## Safety of our products

We take responsibility for our products towards our customers. That is why we place the highest demands on quality and safety. As early as the planning stage, we incorporate these aspects as far as possible. We take our customers' feedback seriously and use it for continuous improvement.

## Environmental protection

We comply with all applicable laws for the protection of the environment. It is our goal to keep environmental pollution as low as possible and to always use resources efficiently and sustainably. We strive to constantly improve in this area.



„We act  
conscientiously.“



# 7. About this Code of Conduct

## Application of the Code

This Code of Conduct applies to all employees of Rosenberg Ventilatoren GmbH and represents binding instructions for action. The management of the respective business unit is responsible for compliance with the regulations contained herein.

Please do not hesitate to contact the central compliance office if you have any questions or comments, or if you wish to report violations of this code:

[Compliance@rosenberg-gmbh.com](mailto:Compliance@rosenberg-gmbh.com)

## Compilation of this Code

This code was drawn up on the basis of the Responsible Business Alliance Code of Conduct and is guided by internationally recognised standards on labour standards, ethical trade, human rights and environmental management.



„We address risks  
openly.“