reflects.

Code of Conduct for business partners

State as of 1.1.2024

reflects.

Table of Contents

reflects.

Foreword

Code of Conduct

Promotional products are our world. Since 1988, we have been buying, developing, customising and distributing a wide range of promotional products that make advertising messages tangible. We are passionately dedicated to sourcing, designing, producing and marketing high class promotional products. With our brands RETUMBLER®, REEVES® & RE98, we now concentrate on a few, deliberately selected product groups and are among the recognised specialists in the industry. Starting with our own design, sourcing in Asia where the products are manufactured by our suppliers, trading within Europe and customising promotional products in Cologne, we have the most important value-adding processes in our own hands.
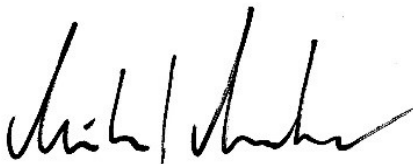
Our corporate and brand mission statement describes our future path in detail. It takes into account the expectations of stakeholders, our own capabilities and those of the competition. It provides a framework for the people acting within the company and supports them in their daily work. It ensures transparency internally and a professional image externally. With a Code of Conduct, a Health and Safety Policy, the Data Protection Policy, an Environmental Policy and an Anti-Corruption Policy, we set our compliance standards within the company.

Integrity and trusting cooperation are also important to us when working with our suppliers and business partners.

Honest, responsible, reliable behaviour creates the basis for long-term and successful business relationships.

Responsible corporate governance is something that we also expect from our business partners. This Code of Conduct therefore sets binding minimum requirements for ethically correct behaviour for our business partners.

Responsible for the Code of Conduct:

Meinhard Mombauer

Managing Director

reflects.

1. Safe and fair dialogues, labour conditions and environmental protection

As a business partner of REFLECTS GmbH, you ensure compliance with human rights in all aspects of your business activities, including your supply chain, and place particular emphasis on environmental protection:

- As a business partner, you guarantee health protection and safety in the workplace.
- As a business partner, your employees are protected from any physical, sexual or psychological harassment, discrimination and abuse.
- You will always respect the right to form workers' representative bodies and to engage in collective bargaining.
- Employees of your business partners will always be paid according to their performance and in accordance with the law.
- Forced labour, in whatever form, will not be tolerated by you as our business partner.
- You will refrain from any form of child labour.
- As a business partner of REFLECTS GmbH, you respect freedom of expression. You commit yourself to an open, social dialogue and refrain from any form of unlawful exertion of pressure on employees, business partners and customers.
- You as a business partner are always guided only by objective criteria in your dealings with your business partners and ensure a fair working environment that does not discriminate against anyone on the grounds of race, ethnic origin, gender, religion or belief, disability, age or sexual orientation.
- They are committed to promoting diversity in the workplace, equality for people of different genders, inclusion of people with disabilities and support the integration of young people into the work process.
- As business partners of REFLECTS GmbH, they do not allow any form of bullying in the company and take appropriate measures to prevent it.
- As a business partner of REFLECTS GmbH, you refrain from all conduct that could endanger the lives and health of employees, suppliers and customers.
- As a business partner, you are familiar with the environmental legislation applicable to your company, you are aware of the law and you comply with the regulations, also with regard to your supply chain. Hazards to people and the environment are avoided. Furthermore, you always endeavour to minimise the impact on the environment caused by you and to take appropriate measures.

reflects.

2. Fair and equitable competition

As a business partner of REFLECTS GmbH, you are committed to the principles of fair and honest competition.

You comply with the relevant laws on the regulation of competition. In particular, price agreements, conventions and other forms of concerted behaviour aimed at restricting competition are prohibited. Any non-disclosure agreements entered into will be complied with and sensitive company data will remain protected.

3. Avoidance of conflicts of interest

Personal interests such as familial, monetary, association-related or political obligations are not taken into account during your decision-making process. You will be guided solely by objective considerations and avoid situations that could conflict with the interests of REFLECTS GmbH.

4. Corruption and bribery

Corruption is behaviour contrary to contractual or normative requirements due to the receipt of money or benefits in kind by a third party who hopes to gain advantages from this. It is unethical behaviour which runs counter to the values of REFLECTS GmbH. The direct or indirect solicitation, granting, acceptance or promise of advantages to managers and employees, commissioned parties or business partners or decision-makers at the customer can be regarded as corruption.

We as REFLECTS GmbH condemn any form of corruption and influence. Our anti-corruption guideline regulates the procedure within our company.

As our business partner, you, for your part, ensure that you do not accept any form of bribery and avoid corruption and that you comply with all relevant anti-corruption laws in your country.

In the event of donations, invitations or hospitality, you as our business partner will ensure these take place within the usual, legally permissible framework.

5. Data protection

You as a business partner respect all applicable laws and rules when collecting, storing, processing and transmitting data. In general, the principle of confidentiality applies to all business partners.

Company data which you receive from REFLECTS GmbH shall be used exclusively for the fulfilment of the present order and shall be protected against unauthorised use, in whatever manner. To this end, your company takes all technical and organisational measures.

6. Compliance with laws, regulations and guidelines

As a business partner of REFLECTS GmbH, you confirm that you are aware of all laws, regulations and guidelines relevant to the contractual relationship and that these will be complied without restriction.

You also inform your subcontractors and other third parties involved about the specifications from this Code of Conduct, relevant laws, regulations and guidelines and demand their compliance.

7. Verification of the specifications

REFLECTS GmbH reserves the right to check compliance with the Code of Conduct directly or through third parties in coordination and agreement with you.

If the result of the inspection shows that the Code of Conduct is not being complied with, you as our business partner will undertake remedial action and eliminate any deficiencies as quickly as possible.

Reports of violations of the requirements set out in this Code of Conduct can be made anonymously via our representative, Mr Johann Böhmer, at complaint@reflectscompliance.com. Of course, all reports can also be made to us via conventional reporting channels, e.g. via the contact person or the management.

With your signature, the business partner confirms that he/she has read the Code of Conduct for Business Partners and will comply with the requirements set out therein:

Place, date   Seal, signature