



Code of Conduct





REFKO is a leading company in the development and provision of innovative, high-quality fireproof products. We define our mission as targeted research, customer service, application technology and development in close contact with our customers' key personnel. Our corporate behaviour is characterised by a sense of responsibility and ethical principles. Our guiding principle is customer-orientated logic. We are committed to sustainable development that serves the needs of our customers, suppliers and employees to an equal extent.

REFKO's reputation is a key element of our business success. Our customers, suppliers and employees expect us to behave properly. For this reason, at REFKO the maintenance and protection of our excellent reputation are our highest priority.

In clear words, the REFKO code of conduct codifies the values that REFKO upholds as a supplier, customer and employer and in turn, expects from its business partners.

REFKO is convinced that integrity is the basis of our sustainable, successful business activity now and will remain so in future.

Herbert Hönl
Managing Director

This code is
based on our
guiding principle

"Customer-orientated logic."

Our guiding principle is customer-orientated logic. Intensive contact, our local presence and our knowledge of our customers' technical processes and problems are the foundation upon which we implement this guiding principle.

With our expert knowledge, we always create superior benefits for our customers.

In all of the business units of our company, we have certified specialists available. The services our experts provide feature excellent quality. In this way, we safeguard the benefits that our customers expect from us.

We are convinced that customer-orientated behaviour is the only way to act in accordance with this code of conduct.

The guiding principle is orientation of our daily work

Due to this guiding principle, we have committed ourselves to values that are not a matter of course in today's world:

- Fair competition
- Careful use of the resources that are available to us
- Environmental protection
- Respect for individuals

As a committed, interested partner, we are available to regional and national institutions at all times and enable social, humanitarian, athletic and cultural organisations to share in our success. A commitment to which we have gladly devoted ourselves.



**LAWS
REGULATIONS
CONVENTIONS**

We obey laws and international conventions. We respect and follow the rules of competition, environmental laws, labour laws, agreements and other stipulations that form the framework of our activities.

CONTRACTS AND AGREEMENTS

REFKO behaves in honest, open behaviour vis-à-vis our business partners. We honour agreements. Once concluded, contracts are binding. We want our business partners to recognise that this establishes the key conditions for entering into mutual business activities based on trust and reliability as successfully as possible.

COMPETITION-RELATED ISSUES

REFKO does not allow price fixing, the forming of cartels or the misuse of its market position in any form. In all fields of activity, it encourages proper, free competition with regard to offers, calls for tender and purchasing.

CONFLICTS OF INTEREST

REFKO employees are not permitted to become involved in activities that could lead to conflicts of interest or use their contacts to business partners to their own advantage. This includes the acceptance of personal gifts or services whose value exceeds a maximum of €50 per giver per calendar year.

BRIBERY AND CORRUPTION

In the context of business activities of all sorts, REFKO employees are not permitted to procure or attempt to procure improper advantages for business partners, their employees or other third parties. In particular, this may be assumed to be the case if the type and extent of the advantage are suitable to improperly influence the actions and decision of the recipient. We take particular care to observe the compliance rules of our business partners.



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CONFIDENTIALITY

All operational and business secrets must be treated as confidential. This also applies to other information that REFKO, its contractual partners and customers have an interest in keeping confidential. This sort of information may not be forwarded to third parties without permission. This obligation will remain intact even after the business relationship has terminated.

DOCUMENTATION OF BUSINESS INCIDENTS

All business transactions must be documented completely and perfectly, in agreement with the legal stipulations, and above and beyond them, with the stipulations in effect at REFKO.

TREATMENT OF COMPANY PROPERTY

All employees are obligated to treat the property and assets of the company according to their intended purpose, frugally and with a sense of responsibility in every respect.

LABOUR LAW

All of the obligations vis-à-vis company employees resulting from the national laws and agreements on social welfare and security must be respected and complied with. Wages and salaries must satisfy at least the legal stipulations, valid agreements and the standards typical of the sector.

REFKO will not tolerate any form of mental or psychological punishment or threat of punishment, discrimination during the course of hiring or work, workplace mobbing, sexual or any other form of harassment, compulsory labour or other forms of involuntary or unpaid work.



COMPLIANCE AND CONTROL

RESPONSIBILITY OF EMPLOYEES AND THE COMPANY

Compliance with the CODE OF CONDUCT is part of the job description of company management and each individual employee.

All employees are obligated to ensure that within their areas of responsibility, the colleagues and business partners have been informed of the contents of the CODE OF CONDUCT and the requirement to comply with it.

CONTROL

As part of our ongoing business activities, we will permanently ensure that this CODE OF CONDUCT is being implemented. REFKO employees who are aware of violations of the code will be able to report them using a clearly defined process.

If one of our employees or business partners violates our guidelines repeatedly and seriously, we will punish this misbehavior regarding the actual legal regulations in Germany.



REFKO Feuerfest GmbH

Concordiastraße
D-56235 Ransbach-Baumbach

Tel.: (+49) (0) 26 23 - 2075
Fax: (+49) (0) 26 23 - 1738
E-Mail: info@refko.de

Managing Director:
Dipl.-Ing. (FH) Herbert Hönl

Court of registry: Montabaur
HRB 5233 Ident Nr.148724687

