COMPLIANCE | BUSINESS PARTNER POLICY



ANNEX 2d | Code of Conduct for Sales & Cooperation Partners

A GENERAL

Rheinmetall AG ("Rheinmetall") is committed to the principles of ethics, integrity and legal compliance. In addition to the applicable law, a series of mandatory internal instructions and policies apply to all our corporate bodies and employees.¹

We also expect our sales and cooperation partners to act ethically, with integrity, and in compliance with the law. The following principles of conduct are therefore a minimum standard for the conduct of every business partner and therefore form the basis for any business relationship. A deviation from these principles of conduct by the business partner can lead to the termination of the contractual relationship.

B PRINCIPLES OF CONDUCT

1 Combating corruption

Business partners refrain from any attempt to influence decisions of Rheinmetall employees or employees of other companies in a criminal or unethical manner. They consistently take action against any bribery actions, conflicts of interest, and nepotism in their own company.

2 Combating prohibited agreements

Business partners do not participate in illegal anti-competitive agreements, and they combat prohibited cartels. Business partners comply with applicable procurement and tendering laws.

3 Preventing money laundering

Through suitable and appropriate measures, business partners actively work to prevent the funnelling of illegally acquired funds ("black money") into the economic system.

4 Transparency regarding ownership structure, registrations, approvals and permits

Business partners support the Rheinmetall Know-Your-Customer processes by disclosing their ownership structure. Business partners always possess the registrations, licenses, and permits required for their delivery of services / activities according to state law or official requirements.

5 Ensuring privacy and information security

Business partners observe the relevant data protection regulations and make adequate arrangements for protection of confidential business information.

6 Compliance with tax and levy regulations

Business partners pay the taxes/levies incurred in connection with Rheinmetall in their country or third countries and document this accordingly.

7 Combating illegal employment, child labour, forced labour and undeclared work

Business partners comply with the relevant statutory regulations on employment of workers and effectively combat illegal employment, child labour, forced labour and undeclared work in and within their own supply chain.

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See https://www.rheinmetall.com/de/rheinmetall_ag/group/Compliance/index.php



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8 Compliance with fundamental employee rights

Business partners pay attention to the health, safety and personality rights of their employees and are committed to the principles of respectful, fair and non-discriminatory conduct. They employ and reward their employees on the basis of fair and legally compliant contracts and comply with the international minimum working standards.

9 Respecting the environment

Business partners observe the relevant legal environmental standards and minimise environmental impact.

C DUTY OF CARE DURING THE BUSINESS RELATIONSHIP

Our business partners must actively report their own violations of this Code of Conduct for Sales and Cooperation Partners insofar as such violations pertain to the business relationship with Rheinmetall Group and must also provide any information about misconduct by Rheinmetall employees at Rheinmetall ("Reporting obligation"). The following reporting channels exist for reporting such Compliance violations:²

a. Rheinmetall Integrity Line (electronic whistle-blower system)

(Anonymous) notification channel for information regarding abuses, potential misconduct and breaches of rules (e.g. violations of applicable law, contractual rules of conduct, or this Business Partner Code of Conduct). In addition to Rheinmetall employees, this system for reporting is also explicitly available to external persons.

Website: https://rheinmetall.integrityline.org

b. Dr. Buchert and Partners, Attorneys at Law (external ombudsman)

Bleidenstrasse 1

60311 Frankfurt am Main

Tel. +49 69 710 33 330 or. +49 6105 921 355 | Fax. +49 69 710 34 444

E-mail: dr-buchert@dr-buchert.de

Website: https://www.ombudsperson-frankfurt.de/de/kontaktformular

c. Corporate Compliance (internal reporting)

Rheinmetall-Platz 1

40476 Düsseldorf, Germany

Tel. +49 211 473-4233 | Fax +49 211 473-4445

E-mail: speakup@rheinmetall.com

2 In addition, business partners are obliged to actively investigate any suspected cases and to cooperate with Rheinmetall without reservation ("Investigation and cooperation obligation").

² If desired, information can be submitted anonymously.



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- 3 If there is a reasonable suspicion that a business partner has violated this Code of Conduct for Sales and Cooperation Partners when working with Rheinmetall, or if a business partner does not adequately comply with this Reporting obligation and/or Investigation and cooperation obligation, Rheinmetall may terminate the business relationship with the affected business partner with immediate effect based on existing contractual or legal rights. In the case of a violation of this Code of Conduct for Sales and Cooperation Partners, Rheinmetall reserves the right to take further legal action, in particular by asserting claims for damages.
- 4 We expect our business partners to enforce and track compliance with these or comparable minimum standards with their own business partners.
- 5 From time to time, Rheinmetall may appropriately update this Code of Conduct for Sales and Cooperation Partners and expect their business partners to accept corresponding changes.

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CO	NFIRMATION	
The	e business partner hereby <u>confirm</u>	<u>ıs</u>
Nam	ne of the business partner	
		nduct for Sales and Cooperation Partners and hereby undertakens of conduct and due diligence contained therein.
	We agree that this declaration is some (excluding the standards of private	ubject to the substantive law of the Federal Republic of German ^e international law).
P	lace, date	Name Signature of authorised representative of business partner 1
P	lace, date	Name Signature of authorised representative of Business Partner 2 (if available)
	Company stamp	Name (in print), position(s)