

CODE OF CONDUCT

ETHICAL CODE OF CONDUCT OF ROSENTHAL GMBH

Premises

The following set of rules, referred to as the "Code of Conduct / Ethical Code of Conduct of Rosenthal GmbH" (hereinafter referred to as the "Code") describes the code of ethics practised at Rosenthal GmbH.

This describes and regulates the rights, duties and responsibilities of Rosenthal GmbH, its employees *and representatives internally vis-à-vis interested parties in cooperation and mutual relations in the course of their business activities.

Rosenthal GmbH produces

Porcelain / fine ceramics

and markets / distributes

Porcelain / fine ceramics, glass, cutlery, furniture and other accessories for the table, kitchen, bathroom, office and living room

The products are marketed under the following brands:

- Rosenthal
- Rosenthal meets Versace
- Sambonet
- Thomas
- Hutschenreuther
- Arzberg
- Raynaud
- Ercuis
- Paderno

*) For reasons of better readability, the simultaneous use of masculine and feminine forms of language is dispensed with. All references to persons apply equally to both genders.

The corporate policy of Rosenthal GmbH is characterised by

- achieving and ensuring high quality in the production and marketing of products
- prompt adaptation to changing regulatory or other developments
- maintaining a high level of technical innovation
- safeguarding the managed corporate values

and contributes to

- ensuring customer satisfaction
- enabling the further development of employees
- increasing the company's value through value-adding activities

The human factor is very important to Rosenthal GmbH in this context. Appreciation and qualification of staff are an indispensable success factor for the company. Observance of and compliance with occupational safety regulations is of very high importance.

Many of Rosenthal GmbH's certifications support the company's appreciation of its employees and customers.

The company's

- Quality management system
- Energy management system
- Environmental management system
- Social responsibility management system

are all certified.

A constantly high and monitored product quality is ensured by our own testing laboratory and continuous testing of the products.

Rosenthal GmbH

- is aware of its social responsibility
- takes note of the economic, ecological and social debates
- acts in accordance with the internationally recognised principles of social responsibility

Social responsibility in all its components (social, economic and ecological) is appreciated in all of Rosenthal GmbH's decision-making and operational processes.

Rosenthal GmbH places particular emphasis on the individual aspects of the code which

- serve as basic principles
- stimulate activities of the company
- guide the behaviour of its employees
- apply to all its suppliers

to safeguard the function, reliability and image of the company.

Exemplary for the reliability and image of Rosenthal GmbH are

- Consideration of the principles and values of the code when setting corporate objectives
- Concretisation of the principles and values of the code by the company's managers within the scope of their responsibilities strengthens trust, cohesion and team spirit
- Aligning the actions and behaviour of staff with the principles, values, goals and commitments set out in the code

The ethical orientation is an indispensable component for the reliability of Rosenthal GmbH in the relationships with its customers and in the entire environment in which the company interacts.

The definition of specific rules of conduct to be observed in relations with public institutions, the market and third parties is an obligation of Rosenthal GmbH also with regard to discipline, corporate liability and the prevention of criminal offences.

ETHICAL CODE OF CONDUCT - PRINCIPLES AND GENERAL VALUES

Correctness and transparency

The greatest possible correctness and transparency characterise Rosenthal GmbH's dealings with all areas of public administration, customers, suppliers and other persons and institutions.

Rosenthal GmbH undertakes to provide reliable, correct, timely and accurate information to its interested parties concerned and, in the case of specific issues, to inform the individual groupings concerned.

This includes, among other things, information on decisions and activities of Rosenthal GmbH with regard to its social responsibility, as well as its goals and achievement of goals and probable and known effects on society and the environment.

Impartiality

Rosenthal GmbH respects and enables equal opportunities regardless of race, gender, religion, political affiliation, personal relationships, health, age, disability or other personal criteria. Specifically, this includes the prevention of any form of direct or indirect discrimination in recruitment, training, professional development and the violation of other related rights.

For persons and groups of persons who complain about disadvantages and lack of equal opportunities, complaint addresses are created and communicated in order to report such circumstances. These are then checked and equal opportunities are ensured.

Rosenthal GmbH facilitates the maintenance of equal opportunities through training and / or other activities. When designing the workplace, care is taken - if possible - to avoid discrimination on the grounds of disability.

Confidentiality

Information, personnel data and business data are treated confidentially.

Full and timely compliance with data protection regulations must be ensured.

Responsibility towards the general public

A continuous improvement of the information provided to all public institutions (such as the district administration, trade supervisory office, etc.) is to be strived for.

Importance of the knowledge and skills of the employees in the company

The knowledge and skills of the employees in the company are to be maintained; for this purpose, training and further education are also to be carried out to expand the professional and technical skills.

Integrity

The integrity of employees shall be promoted through a healthy and safe working environment. Social responsibility, according to efficiency criteria that are in line with the need to create added value in the company, helps Rosenthal GmbH to improve in the medium and long term.

Entrepreneurship

The management of Rosenthal GmbH aims to provide high-quality and cost-effective solutions and services (taking into account cost and efficiency criteria) and to achieve comprehensive customer satisfaction.

Technical quality and innovation

The technological development of Rosenthal GmbH is carried out with the objective of achieving the highest quality standards of innovative products and services.

Products and services on the national and international market are used as a reference.

Rosenthal GmbH consistently ensures that national and European law as well as the law of the countries in and with which it interacts and the code are complied with.

The justification for behaviour contrary to this is in no way in the interest of the company.

Business ethics

Rosenthal GmbH believes that respect for ethical rules and transparency in business conduct are both a necessary prerequisite and provide a competitive advantage in the pursuit and achievement of objectives, increase the value of the company and are for the benefit of customers and the general public.

Rosenthal GmbH thus promotes an environment created by ethical integrity and believes that it can satisfy even the most demanding monitoring mechanisms.

ETHICAL CODE OF CONDUCT - ADOPTION / CONTENT / ADDRESSEES

Adoption of the Ethical Code of Conduct, its contents and addressees

Rosenthal GmbH

- claims this code for itself
- expresses in it its rules of conduct
- enables it to use this as a reference standard in all aspects of its business activities

Regardless of religious, cultural and social particularities, the code is valid in Germany as well as abroad (if necessary with necessary and appropriate adaptations due to the different circumstances in other countries in which Rosenthal GmbH and its subsidiaries interact). In the event that any of the provisions of the code conflict with any other internal rules or procedures of Rosenthal GmbH, the code will override such provisions.

The code is addressed to all divisions of Rosenthal GmbH, its employees, temporary workers, consultants, agents, representatives and other persons acting for or on behalf of Rosenthal GmbH. In the following, this group of persons is referred to as the "recipients of the code".

ETHICAL CODE OF CONDUCT - PRINCIPLES OF CORPORATE GOVERNANCE AND RELATIONS WITH SHAREHOLDERS

Administration and finances

Rosenthal GmbH consistently observes and complies with the applicable legal provisions, accounting principles and applied valuation criteria when preparing the annual financial statements and other business management activities.

The annual financial statements reflect the current state of the economic situation and are prepared in accordance with the criteria of clarity, truthfulness and fairness. Accounting and settlement systems enable individual business transactions to be properly reconstructed (also for the purpose of identifying the reasons for their execution and the respective responsibilities).

Internal controls

Rosenthal GmbH has the necessary auditing facilities for addressing, carrying out and verifying that

- Its business processes comply with the internal agreements and procedural instructions
- Its assets are protected and efficiently managed
- Truthful accounting and financial data are drawn up

Internal audits are divided into two parts:

- "Top down" control - control / monitoring of the individual company processes
- "Internal audits" with systematic sample monitoring and reporting

Internal controls include:

- Review of the assurance of the adequacy of the various business processes in terms of effectiveness, coherence, efficiency, cost-effectiveness and fairness
- Review of business processes for compliance with regulations and internal guidelines
- Ensuring the accuracy and completeness of the accounting records, including safeguarding the assets of the company

Relations with shareholders

Rosenthal GmbH acts to create corporate value and is guided by its ethical criteria stated in the code as well as the striving for the greatest possible transparency.

ETHICAL CODE OF CONDUCT - PRINCIPLES OF BEHAVIOUR IN DEALING WITH EMPLOYEES

Personnel selection

Personnel recruitment and selection is based on the criteria of objectivity, competence and professionalism, the guarantee of equal opportunities, the avoidance of any form of favouritism and the objective of providing the company with the best possible qualified employees on the labour market.

Human resources management and development

Rosenthal GmbH is establishing an integrated personnel management and development system (as far as feasible) - based on the existing personnel controlling - that offers equal opportunities and professional development opportunities to all employees based on performance criteria. Within the framework of budget planning, further qualification measures in the form of training courses / training programmes are to be taken into account.

Rosenthal GmbH creates and maintains an internal environment that incorporates employee participation in achieving the company's goals (e.g. communication of quality, energy and environmental goals).

Internal communication processes include defined opportunities for complaints and suggestions for improving the working environment and, if possible, evaluation possibilities on employee satisfaction.

Rosenthal GmbH undertakes preventive measures (e.g. workshops to determine mental stress in the workplace, determination of mental and physical stress in workplace hazard analyses) to protect employees from mental, physical stress and any form of sexual harassment.

Occupational safety and health

Rosenthal GmbH undertakes not to employ or continue to employ persons against their will, not to engage in child labour (children under 16 years of age), not to employ young employees (young people under 18

years of age) in unhealthy or dangerous situations or during their school years.

Any form of verbal, physical or psychological violence inside or outside the company is frowned upon.

For this reason, we only work with service providers and companies that do not violate these principles.

Rosenthal GmbH ensures through suitable mechanisms (e.g. declarations of commitment to compliance with the Rosenthal GmbH Code of Conduct by suppliers) that forced labour is not used either within the organisation or outside in the supply chain. This applies to all affected businesses, both at home and abroad. The forms of forced labour also include, among others, involuntary labour and / or unpaid labour of prisoners as well as forced employment through pledging of labour. Exceptions to this are employment relationships based on valid legal rules and regulations.

Health and safety at work

Rosenthal GmbH attaches particular importance to the creation and maintenance of environmentally friendly workplaces and to compliance with occupational health and safety regulations based on national and international standards.

Smoking bans are in place in some areas and smoking zones are designated.

There are also working rules on dealing with addictive substances (such as alcohol, drugs and medication).

Rosenthal GmbH is committed to risk prevention, planning preventive measures and adopting necessary measures to protect the health and safety of its employees (including setting up the necessary organisational structure and appropriate training measures), as well as to ensuring that, in the event of accidents and occupational illnesses, workplaces are - if necessary - adapted in accordance with the applicable regulations.

Rosenthal GmbH definitively takes the following requirements into account:

- Determination of / compliance with all legal requirements concerning occupational safety and health protection
- Identify and assess the risks concerning occupational safety and health in the company and at the workplaces
- Introduction of an occupational health and safety programme
- Provision of protective equipment (including personal protective equipment) and the necessary infrastructure for the prevention of accidents, illnesses and occupational injuries
- Offer specific training courses on occupational safety and health protection
- Documentation and investigation of all occupational accidents and occupational health and safety problems in order to minimise / prevent them

- Have contingency planning in place

Protection of personal rights

Rosenthal GmbH observes the data protection regulations for personal data.

With reference to the data protection regulations on the processing of personal data of employees, the company informs its employees, within the framework of the legal requirements, about the scope of the data processed, the purposes of use and takes appropriate measures to ensure confidentiality.

Right to form interest groups

Rosenthal GmbH respects employees' rights to collective representation by trade unions, the right to collective bargaining and ensures that no discriminatory measures are taken against unionised employees or trade union representatives.

Pay and working conditions

Rosenthal GmbH adopts a wage policy that supports a decent standard of living. Necessary measures have been taken to ensure that employees can be adequately informed about their remuneration, its composition and changes.

The company facilitates decent conditions in terms of working hours, rest periods and holidays.

National laws, agreements of the collective bargaining parties - if applicable - as well as other individually agreed regulations are complied with, both within regular working hours and in the case of extraordinary working hours. Overtime hours shall be remunerated in accordance with statutory provisions and voluntary regulations.

Rosenthal GmbH is a member of the VKI (Association of the Ceramic Industry) and applies the relevant collective agreements.

Conditions of employment

Rosenthal GmbH adopts a recruitment policy that is in compliance with the applicable legal provisions and includes the social protection rights contained therein (sickness and occupational accident, pension insurance, unemployment insurance, etc.).

Education, training and career development

Rosenthal GmbH supports the employees in further training measures to improve their professional perspectives, to increase productivity and to improve the competitiveness of the company. As far as feasible, Rosenthal GmbH offers opportunities for in-house career development.

Work-life balance

Rosenthal GmbH aims to achieve an appropriate balance between work and private life and to take into account the expectations of its employees as far as possible. However, this must not limit the competitiveness of the company.

Job rotation and changes in work organisation to take into account the personal circumstances of their employees (especially for employees with responsibilities for the care of children and other dependants) will be considered.

Respect for the human dignity of employees

Rosenthal GmbH promotes respect for human dignity and takes action against associations that directly attack the human dignity (particularly in relation to sexual harassment, workplace violence and moral harassment) of its employees in the context of their employment.

ETHICAL CODE OF CONDUCT - EMPLOYEE / WORKER DUTIES

Diligence / good faith

Each employee must act honestly and in good faith, respect contractually agreed obligations and ensure that the required performance is delivered.

The staff must be aware of the content of the code and act accordingly. For this reason, it must be made generally available to them and it must be specifically pointed out that it is obligatory to observe it and not to violate it.

Rosenthal GmbH ensures in relevant contracts by stipulations how to proceed in case of serious violations

of the Code.

Employees of Rosenthal GmbH, irrespective of the function performed and / or their scope of responsibility, must be familiar with and comply with the company's regulations, in particular for the protection of the environment, occupational safety, the Ethical Code of Conduct and the protection of privacy.

They must also ensure - if necessary - that correct and timely reporting on their activities is carried out, as certain information must be prepared on a statutory basis.

Conflicts of interest

All employees must carry out their activities in the interest of the company. Any conflict between business and personal interests (including those of close family members) that could prejudice the company and their interests or result in obtaining unlawful benefits or favours must be avoided.

For example, such situations could arise from:

- Accepting gifts and favours from persons, companies or enterprises that are in business relations or negotiations with the company
- Using business position or obtaining official information to gain private advantage
- Initiating and / or concluding negotiations and / or contracts in the name of and / or on behalf of the company with contractual partners (who are family members, related persons or companies) in which the employee is involved

The company shall be informed before taking up any other external advisory, managerial, administrative or other activities.

Confidentiality

Employees are obliged to treat information, documents, studies, initiatives, projects, contracts, plans, etc. confidentially, paying particular attention to information that could affect the appearance or interests of customers and Rosenthal GmbH.

Rosenthal GmbH takes appropriate measures to protect the managed information and to prevent access by unauthorised persons.

All information, especially that obtained in the course of customer contacts, must be considered confidential and may not be disclosed to third parties for personal gain.

Protection of the assets of Rosenthal GmbH

Every employee is obliged to protect the company's assets from improper or incorrect use.

In particular, this applies to all tangible and intangible assets of the company.

Likewise, with regard to IT applications, every employee is obliged to strictly adhere to the requirements of the company's security guidelines in order not to impair the functionality and protection of IT systems (this is already documented for some employees in declarations of commitment to data protection and

telecommunications).

Every employee is also obliged:

- not to make unauthorised copies of licensed programmes for the company or for third parties
- ensure that the safety regulations of Rosenthal GmbH are complied with, also for activities carried out by employees of external companies or other persons working on behalf of Rosenthal GmbH
- Use company e-mail and company social media only for their intended purposes and under no circumstances send outrageous or offensive e-mails or postings that are damaging to the business

RULES OF CONDUCT FOR DEALING WITH AUTHORITIES, SUPERVISORY AUTHORITIES, ADMINISTRATIONS AND JUDICIAL AUTHORITIES

Relations with the public administration

Rosenthal GmbH shall cooperate with all agencies of the public administration in strict compliance with applicable laws and regulations and shall in no way compromise the integrity or reputation of the public administration.

The assumption of obligations and the handling of documents of any kind of public administration are only permitted to the authorised departments of Rosenthal GmbH and the employees authorised therein. In the context of relations, even of a non-business nature, between Rosenthal GmbH and the public administration, authorised employees are obliged to comply with the code and may not under any circumstances:

- Offer money, benefits or other advantages (including providing employment or commercial opportunities) to employees of the public administration. This also applies to family members or other persons who are in any way connected with the representatives of the authorities
- Seek or bring about unlawful relationships in favour of influence or interference that may affect the outcome of the relationship between the company and the institution

Funding and public subsidies

Rosenthal GmbH must not gain any advantages from its relations with the public administration. The

exception to this is the obtaining of legal or otherwise entitled funds, advantages or other benefits, which may only be used as intended.

It is strictly forbidden for the recipients of the code to gain unjustified advantages / profits at the expense of the public administration.

Therefore, the recipients of the code must not under any circumstances:

- Receive for the company any support, loan or other remuneration granted by the public administration on the basis of false or misleading representations and documents, as well as by omitting to produce documents and withholding relevant information
- Not using subsidies granted to the company for the intended purpose
- Generating unjustified profits (from e.g. licences, authorisations, non-payment of health insurance and social security contributions, etc.) for the company at the expense of the public administration by acting fraudulently (e.g. providing false documents and issuing false certificates)

Relations with supervisory authorities

The recipients of the code are obliged to strictly comply with the applicable laws, official regulations and the requirements of other control authorities in their area of responsibility.

Recipients of the code must respond promptly to requests from supervisory authorities and work cooperatively with them.

Relations with judicial authorities, supervisory authorities and other regulatory authorities

Rosenthal GmbH acts in compliance with the law and promotes, within its possibilities, just action.

In carrying out its business activities, Rosenthal GmbH cooperates with the representatives of the aforementioned authorities and other supervisory bodies in a legally supported and correct manner.

Rosenthal GmbH requires all recipients of the Code to cooperate to the best of their ability with the aforementioned authorities in their inspections and controls.

In anticipation of legal proceedings, investigations and inspections, it is prohibited to destroy or alter records, accounting documents and any other kind of relevant documents, to lie or to provide false information to the authorities.

No one may persuade others to provide false or misleading information to competent authorities.

No person shall have any economic connection with, promise or give any gift or money to the employees of these authorities in the performance of their duties.

If employees receive penalties in the course of surveillance / inspections, including personally, and / or you are known to be under investigation, the employer must be informed.

Abuse of power

All recipients of the code must act in accordance with applicable laws, regulations and professional ethics.

In detail, this means:

- Professional position or authority may not be abused to coerce or induce anyone to give money, gifts or other benefits to themselves or to a third party on behalf of the company in order to gain advantage in working with their department
- Not accept / receive money, gifts or other benefits privately from third parties or from the company in order to permit, delay or act in contravention of any applicable professional duty of the department and thereby generate or confer benefits on others.

RULES OF CONDUCT

TOWARDS CUSTOMERS, SUPPLIERS, BUSINESS PARTNERS AND CONSULTANTS

Relationships with customers

The primary goal of Rosenthal GmbH is to meet the requirements of its contractual partners and to create a solid form of cooperation characterised by fairness, honesty, efficiency and professionalism.

In this context, Rosenthal GmbH assures its customers the best possible fulfilment of orders and continuously strives to always offer advanced and innovative products with a good price-performance ratio.

Contractual agreements with customers, communications addressed to them as well as advertising are based on simplicity, clarity and completeness without misleading information / practices.

When Rosenthal GmbH places products and services on the market, it only engages in advertising activities that respect human dignity, health and safety, are not misleading and do not promote dangerous or illegal behaviour or contradict the principles of social responsibility.

The organisation shall take appropriate measures to ensure that in customer, user and consumer relationships any form of bribery, corruption or abuse of authority is excluded that could compromise the objectivity and independence of individual groupings.

Rosenthal GmbH defines procedures for addressing suggestions, complaints and claims from customers.

Responsibilities are defined within the framework of these procedures.

Furthermore, Rosenthal GmbH communicates the existence of these possibilities and explains how to use them.

Rosenthal GmbH only offers goods and services that meet the legal requirements as well as the criteria of quality, safety, environment, reliability and universal design criteria.

Relations with suppliers

Supplier selection

Rosenthal GmbH purchases products and services only on the basis of and in accordance with the relevant national and, if applicable, international legal provisions.

Rosenthal GmbH undertakes to provide all potential suppliers with equal opportunities in the submission and selection of bids.

Ensuring integrity and independence in supplier relationships requires the highest transparency and efficiency in the purchasing process, in particular:

- Separation of requesting and procuring organisational unit entering into contractual commitments (if possible)
- Adequate documentation of decisions taken (e.g. traceability of negotiation / procurement phase)
- Retention of information and documents in accordance with commercial law and internally defined retention periods.

Furthermore, it must be ensured that the relevant organisational units and their employees:

- Do not induce suppliers to enter into unfavourable contracts with the prospect of rework
- Allow services to be provided on a fee basis only after the contract has been concluded or written permission has been obtained
- Not accept gifts or other forms of gratuities that exceed the de minimis level

In order to ensure the fairness of tendering procedures, the staff of the awarding organisations are obliged to:

- Ensure the greatest possible transparency of the activities carried out
- Ensure impartiality at all stages of the procurement process
- Ensure confidentiality of information not to be disclosed
- Immediately report and prevent any potential conflict of interest

Relationships with suppliers during service provision / contract execution

The relevant organisational units and their employees must check the following during contract execution / service provision:

- Consistent compliance with internal regulations in dealing with suppliers
- Compliance with the applicable legal provisions and contractual terms of the delivery notes

Ensuring compliance with the ethical principles in procurement

Rosenthal GmbH shall make the code available to its suppliers and shall have them confirm that they have read the code and comply with the principles contained therein when supplying goods and services for Rosenthal GmbH.

Rosenthal GmbH ensures in relevant contracts by stipulations how to proceed in case of serious violations of the Code.

Consultancy activities

Rosenthal GmbH sets criteria for verifying the competence, economic efficiency, transparency and fairness as well as the moral and professional integrity of the consultants.

In any case, any remuneration paid to consultants must be appropriately documented, commensurate with the service provided and be in line with conditions that are usual on the market.

Gifts from and for customers, suppliers and persons with whom we cooperate in any other way

The company attaches importance to maintaining friendly but correct relations with all business associates. Employees of the company may not demand gifts or other benefits from persons or companies that maintain or seek business relations with the company, nor may they allow such gifts or benefits to be promised or accepted, or allow them to be granted to third parties in their own interest or in the interest of third parties. The only exceptions to this are items (promotional gifts) of low value. Items of low value are items up to an amount of € 50.00. Should this amount of € 50.00 per year be exceeded, the company must be notified within one week. Acceptance is only permitted with the prior consent of the company.

This also applies to the granting of gifts or other benefits to customers, suppliers and persons with whom the company cooperates in any other form.

Under no circumstances may even permitted minor benefits, for example customary tips, lead to the company's image being tarnished.

Even the most insignificant benefits must not be interpretable as the acceptance or granting of an advantage in accordance with the prevailing circumstances.

RULES OF CONDUCT

VIS-À-VIS BUSINESS PARTNERS

Institutions and mass media

Relations with institutions and mass media by Rosenthal GmbH:

- without discrimination and on the basis of stable communication channels with all national and international contact persons
- representing the interests of the company in a transparent, binding and conclusive manner

Economic connections to parties, trade unions and associations

Rosenthal GmbH does not make any direct or indirect contributions to political parties, political or trade union organisations, interest groups or their representatives or candidates, either in Germany or abroad. This does not apply to contributions based on specific agreements, e.g. association contributions.

Recipients of the code may not engage in political activities within the company or use company goods and facilities for such activities.

They must also make it clear that any political statement made by them to third parties is purely private and does not reflect the position and attitude of the company.

Donations and sponsorship

The company restricts donations and sponsoring to non-commercial as well as charitable and cultural purposes. Sponsorship activities can include social, environmental, amateur sports and entertainment / artistic activities.

PROTECTION OF THE ENVIRONMENT

The organisation identifies and assesses the environmental aspects of its activities, takes measures to avoid

or minimise impacts on climate change, and minimises the consumption of materials, fuel, energy, water and other resources. Rosenthal GmbH contributes, within the scope of its possibilities, to avoiding negative impacts on ecosystems that lead to the loss, reduction or extinction of natural species and/or habitats. It also promotes initiatives or measures that have a positive impact on ecosystems and biodiversity.

INTRODUCTION AND MONITORING PROGRAMME

Supervisory body

Rosenthal GmbH has reviewed its organisational model with regard to the consideration of the code and appoints an office in the company, the Ethics Team, which is responsible for the implementation of the code as well as:

- ensuring that the supervisory activities entrusted to managers are in line with the organisational model and that any deviations are actually and promptly reported
- monitoring the application of and compliance with the code and promoting initiatives for its dissemination
- observing / verifying the compliance of the code with the recognised principles of the best practice standard with regard to organisational processes and control systems concerning information to interested parties
- sustainably promoting the flow of information
- taking care of the development and implementation of the monitoring programme according to the principles of the organisation within the different business activities
- requesting audits of whistleblowing reports and taking care of the preparation of preventive measures
- identifying and classifying corporate risks by means of continuous risk assessment
- contributing to the establishment of internal regulations for risk prevention and the continuous improvement of ethics in the business environment
- participating in updating the organisational model in the event of regulatory developments, organisational changes and business development
- notifying the relevant departments of breaches of the ethical principles, thereby enabling the imposition of disciplinary measures
- promoting initiatives for knowledge, training and awareness of the company's ethical principles

The recipients of the code are obliged to cooperate with the supervisory body in the implementation of the code and to ensure free access to all documents deemed necessary.

Communication and training

This code is brought to the attention of all internal and external departments significantly involved in the business processes with the necessary communication measures.

To ensure that the code is properly understood by all staff, HR will work to promote knowledge of ethical principles and standards.

Notifications / information

The "recipients of the code" can report violations of the code to the supervisory body (head of the ethics team) at any time.

Subsequently, the supervisory body makes a timely assessment of the notification.

The person reporting the violation, the person responsible for the violation and any persons involved are questioned about the facts of the case.

The supervisory body undertakes to treat the identity of the person making the report as confidential, except in the case of legal obligations.

Disciplinary proceedings

It is the responsibility of the supervisory body to verify and identify any breach of the duties provided for in the code.

The supervisory body shall forward the results of the investigations directly to the management and to the head of the human resources department.

The procedure for breaches of the code and the imposition of disciplinary measures shall be in accordance with employment law and employment contract agreements and there shall be the right of defence by the accused party.

Sanctions

Rosenthal GmbH will take appropriate measures in view of the seriousness of the violations of the code carried out by the defendant, notwithstanding the legal steps.

In particular, any violation of the code committed by employees and / or managers will be punished according to the possibilities provided by the employment contract, taking into account severity and / or repetition.

The provisions of the code also apply to agency workers.

Violations of the code will be punished through disciplinary measures by the respective temporary employment agencies / employee leasing companies in accordance with the contractual agreements with Rosenthal GmbH.

As far as subcontractors and / or external consultants are concerned, the violation of the provisions of the code (depending on the severity) will be punished by termination of the contracts (subject to the contractual possibilities of Rosenthal GmbH) and assertion of claims for compensation for damages incurred.

Notifications / information to the supervisory body can be sent to the following address:

- By e-mail to Compliance@rosenthal.de
- By mail to
Rosenthal GmbH
Kontrollorgan Code of Conduct
Philip-Rosenthal-Platz1
95100 Selb
Germany

The envelope must be marked confidential.

Consideration of the prevailing framework conditions

Rosenthal GmbH strives in its activities - taking into account the prevailing local conditions - to promote economic growth, generate wealth and improve the business environment in the region by seeking to employ people from the region and to consider suppliers from the region.

In addition, business activities are conducted in a manner that is beneficial to the company and society in terms of employment.

There is respect for the cultural heritage and way of life of the general public involved in the organisation's activities.

Measures to improve social aspects and sustainability development are promoted.
