

Compliance Guidelines of REA Elektronik GmbH



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Preamble

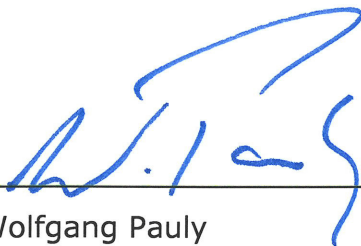
Dear customers and employees of REA Elektronik GmbH,

Since its establishment in 1982, REA has built up a solid reputation as a reliable, fair and responsible partner. These values made REA with its three business divisions and brands REA JET, REA LABEL and REA VERIFIER to a valued business partner and employer. We want to maintain and continue to expand this position also in the future.

In order to fulfill this task, the compliance guideline should be our ethical and legal compass. It contains the basic rules for our behavior within REA as well as towards our business partners and the general public.

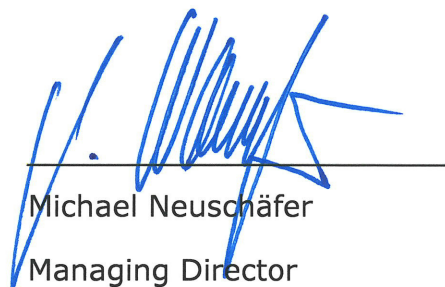
REA expects every employee and in particular the managers to strictly comply with the rules of the compliance guidelines. This way we want to preserve and expand our reputation and position in the international market of our sector.

Mühlthal, November 2020



Wolfgang Pauly
Managing Director

REA Elektronik GmbH



Michael Neuschäfer
Managing Director

REA Elektronik GmbH

Cooperation with customers and suppliers

REA Elektronik GmbH expects from its employees, suppliers and partners

- compliance with all applicable laws
- refraining from any form of corruption
- the respect of human rights
- compliance with laws against child labour
- compliance with the legal provisions of international economic transactions
- compliance with export and import bans and embargo regulations
- the protection of the health and safety of all employees
- compliance with the relevant national laws and international standards for work safety, environmental protection and data protection

Prohibition of corruption and bribery

Corruption causes damage to competition, prevents "fair play", does not correspond to our corporate values and sets REA Elektronik GmbH and each of its employees an unnecessary liability risk.

It is strictly forbidden

- to offer, promise or grant a personal advantage to domestic or foreign public officials in connection with their official position for the execution or non-execution of an official act
- to offer, promise or grant illegal personal advantages to employees or representatives of domestic or foreign companies
- to support illegal activities of other persons
- to have illegal activities carried out with the help of others, such as relatives, friends, agents, consultants, planners and mediators
- to demand or accept illegal personal advantages

Invitations, presents and events

Invitations and presents are part of human interaction and polite social relations.

Employees of REA Elektronik GmbH may invite business partners and offer presents, and accept invitations and presents from them, as long as they are within reasonable limits.

To avoid the appearance of corruption, the following rules apply:

- Employees of REA must decline invitations and presents if they are obviously or presumably associated with a concrete expectation of counter-performance
- They must also decline invitations and gifts if the acceptance of such gifts is contrary to laws and regulations
- Employees of REA may not demand any contributions

The same applies when granting privileges.

Participation by employees of REA in trade events is permitted and desired. The same applies to the organisation of trade events.

Invitations to and participation in social and free-time events in a business environment are permitted if they are within reasonable bounds. They must in no case give the impression of harming fair competition or causing a confusion of interests.

Health and Safety

Conscious of its responsibility towards its employees and partners, REA shows its commitment to health and safety in all its efforts by establishing awareness of potential sources of risk and how to avoid them at all levels. REA has therefore made "zero accidents" a tangible goal and a performance driver.

As REA is active in a variety of different sectors, the company remains constantly vigilant on safety issues. Risk forecasting and strict safety management are the foundation of the company's operations in every geographical region and location.

In addition to this approach, safety is a central managerial commitment that drives the company's performance: engaging and listening to everyone involved in our projects is a crucial part of strengthening this culture of prevention.

No matter whether permanent or temporary, leading or newly employed, every employee is a part of the company. Their safety is our top priority, whether at the workplace, at the customer's site or on the road. Our management contributes to this commitment through their exemplary behaviour.

Safety is an integral part of the REA's performance criteria.

The following measures have been implemented to meet the company's commitment of prevention of Health and Safety risks:

- Ensuring a safe, ergonomic workplace
- Organisation of training sessions on safety management (yearly) for all employees
- Appoint a health and safety prevention representative to coordinate all implemented procedures and standards

We also require from our service providers to comply with all company standards.

Data privacy protection

As a globally operating company, the use of state-of-the-art information and communication technologies is an essential part of REA's business processes.

Employees are obliged to handle personal data sensitively in all business processes. Personal data may only be obtained, used and kept in accordance with the applicable data protection laws. This applies to employees data as well as to data from customers, suppliers, competitions and other persons.

In particular, data may only be processed if the affected person has given his/her prior consent or if this is legally permissible for other reasons.

Personal data must be used with outmost care; its processing must be justified in any case.

To ensure effective data protection, REA has appointed data protection representatives and issued corresponding guidelines.

REA observes the legal provisions of the European General Data Protection Regulation (EU-DSGVO) The privacy policy can be found on our website: <https://www.rea-jet.com/en-un/data-protection-statement.html>