



# Code of Conduct

## Introduction

RAMA's Code of Conduct covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all employees and officers of all entities in RAMA. All of our employees and officers must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. In addition, our policies apply to various operations and you need to know and follow those policies that apply to your daily work. If a law conflicts with a policy in this Code, you must comply with the law. Also, if a local custom or policy conflicts with this Code, you must comply with the Code. If you have any questions about these conflicts, you should ask your manager how to handle the situation. Employees and officers are responsible for understanding the legal and policy requirements that apply to their jobs and reporting any suspected violations of law, this Code or RAMA's policy.

This Code of Conduct is valid for relevant interested parties including supply chain. The copy of this Code of Conduct is freely available on RAMA company web pages.

## Compliance with Laws, Rules and Regulations

Obeying the law, both in letter and in spirit, is the company on which this RAMA's ethical standards are built. All employees and officers must respect and obey the laws, rules and regulations of the cities, states and countries in which we operate. Although employees and officers are not expected to know the details of each of these laws, rules and regulations, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel.

## Conflicts of Interest

A "conflict of interest" exists when a person's private interest interferes in any way - or even appears to interfere - with the interests of RAMA. A conflict situation can arise when an employee or officer takes actions or has interests that may make it difficult to perform his or her work objectively and effectively. Conflicts of interest may also arise when an employee or officer, or a member of his or her family, receives improper personal benefits as a result of his or her position in RAMA. Loans to, or guarantees of obligations of, employees and officers and their family members by RAMA may create conflicts of interest and in certain instances are prohibited by law. It is a conflict of interest for an employee or officer to work for a competitor, customer or supplier. You should avoid any direct or indirect business connection with our customers, suppliers or competitors, except as required on our behalf.

## Privacy and personal data

Privacy and Personal data protection is a fundamental right. At RAMA, protecting the personal data of our employees, is critical, especially given the development of communication and information technologies. RAMA is committed to protecting personal data and to processing it only within the boundaries of applicable law.

“Personal data” means any information that can directly or indirectly associate individuals with an identification number or with one or more factors specific to their physical, physiological, mental, economic, cultural or social identity (e.g. name, date of birth, social security number, physical characteristics, email address, computer ID).

## Child Labour & Young workers

RAMA is committed to contributing to the prevention, identification, and remediation of child labour. Young workers of legal working age have, until the age of 18, the right to be protected from any type of employment or work which, by its nature or the circumstances in which it is carried out, is likely to jeopardise their health, safety or morals.

In the conduct of its business, RAMA:

- Will not employ children that falls into the definition as stipulated by ILO Convention, notwithstanding any national law or local regulation;
- Will comply with all other applicable child labour laws, including those related to wages, hours worked, overtime and working conditions;
- Is against all forms of exploitation of children. The company does not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities;
- Expects its business partners and associates to have and uphold similar standards and abide by country-governing laws in countries wherein they operate. Should violation of these Principles become known to RAMA and not be remediated, we will take serious action, including discontinuation of the business relationship;

## Discrimination and Harassment

The diversity of RAMA’s employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment based on race, color, religion, sex, national origin or any other protected class.

## Modern slavery

RAMA recognises that modern slavery and human trafficking is a serious global issue that affects all industries and sectors. We have policies and processes in place to safeguard against this within our organisation and require the same of our supply chain. RAMA endeavours to work with businesses who have adopted similar values and ethics. We expect them to comply with basic rules for human rights and implement this approach throughout their supply chain.

## **Hours of Work**

RAMA shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours. RAMA shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. RAMA shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

## **Wages and benefits**

Wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs, including some discretionary income. All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment. Deductions from wages as a disciplinary measure shall not be permitted.

## **Freedom of Association and Right to Collective Bargaining**

We respect our employee's rights to join or form a labor union and to obtain collective bargaining agreements. RAMA follows local laws and regulations, and gives the labor unions access to union members in line with local regulations. Representatives from the labor unions should not be discriminated against.

## **Corruption**

RAMA has zero tolerance for corruption including extortion and bribery. All employees must never offer to provide anything of value directly or indirectly to government officials and business partners to secure an undue advantage. RAMA prohibits payment, offers of payment as well as anything of value directly or indirectly with the purpose of influencing or obtaining undue business or personal advantage.

Third parties will only be contracted to perform tasks which aid business interests provided: fees to be paid are reasonable; all arrangements are clearly documented; arrangements are in compliance with company's policies.

## **Financial Responsibility/Accurate Records**

All financial records and reports, whether internal or external, must be accurate and truthful. RAMA and its Suppliers are expected to act in accordance with applicable law and generally applicable accounting Principles, which require that data and other records always be complete, correct, up-to-date, and System-compliant.

## **Fair Competition/Anti-Trust**

RAMA and its suppliers will strictly comply with all applicable antitrust laws, trade practice laws and any other competition laws, rules and regulations dealing with unfair competition and restraints of trade. RAMA and its suppliers will not enter into agreements with competitors or

engage in other conducts that may unfairly impact competition, including, but not limited to, price fixing, bid rigging or improper market allocations.

## **Counterfeit parts**

The scope is to preclude the introduction of counterfeit product into our supply chain through strict avoidance, mitigation, and disposition processes. RAMA purchases material, measuring equipment, etc. from authorized manufacturers and suppliers. RAMA maintains traceability of purchases from Suppliers, retaining the original purchase orders and other receiving documentation, including manufacturers' Inspection certificates, for the required document retention periods. The disposition of any products returned by our customers will be identified. Any product that is deemed to be defective and not recoverable will be disposed of in accordance with the company's procedure.

## **Import/Export Controls and Economic Sanctions**

RAMA shall ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import / export of parts, components and technical data. RAMA shall provide truthful and accurate information for reporting purposes when requested, and obtain import and/or export licenses and/or consents where necessary. RAMA shall comply with applicable restrictions on the export or import of goods, equipment/tools, software, services and technology, as well as with all applicable economic sanctions and restrictions on doing business with and trade involving certain countries, regions, companies or entities and individuals.

## **Health and Safety**

RAMA strives to provide each employee and officer with a safe and healthy work environment. Each employee and officer has responsibility for maintaining a safe and healthy workplace for all employees and officers by following environmental, safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions. Violence and threatening behavior are not permitted. Page 3 Employees and officers are expected to perform their work in a safe manner, free of the influences of alcohol, illegal drugs or controlled substances. The use of illegal drugs in the workplace will not be tolerated.

## **Environmental**

RAMA expects its employees and officers to follow all applicable environmental laws and regulations. If you are uncertain about your responsibility or obligation you should check with your manager or unit manager.

## **Confidentiality**

Employees and officers must maintain the confidentiality of proprietary information entrusted to them by RAMA or its customers or suppliers, except when required by laws or regulations. Proprietary information includes all non-public information that might be of use to competitors or harmful to RAMA or its customers or suppliers if disclosed. It includes information that

suppliers and customers have entrusted to us. The obligation to preserve proprietary information continues even after employment ends.

## Intellectual property

Protect all intellectual property, whether it belongs to us or to someone else.

RAMA understands the effort required to create or invest in intellectual property, as well as its value to a business. We also know how much damage can be done when intellectual property is stolen, misused or mishandled. Allowing that to happen would clearly contradict our core values of honesty, caring and integrity. We hold ourselves and each other accountable for ensuring the proper use of all intellectual property.

Respecting the intellectual property of others means we:

- Obtain proper authorization and licensing agreements before using any intellectual property and strictly follow the terms of use
- Respect copyrights, trademarks, logos, likenesses and other intellectual property in our advertisements and marketing
- Refuse to misuse others' patents, trade secrets or other proprietary information

## Reporting any Illegal or Unethical Behavior, Whistle blower Protection and Non-Retaliation

Employees are encouraged to talk to supervisors, managers or other appropriate personnel about observed behavior, which they believe may be illegal or a violation of this Code of Conduct or RAMA policy or when in doubt about the best course of action in a particular situation. It is the policy of RAMA not to allow retaliation for reports made in good faith by employees of misconduct by others. Employees are expected to cooperate in internal investigations of misconduct.

## Compliance Procedures

We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem.

These are the steps to keep in mind:

Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.

Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.

Discuss the problem with your manager. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question, and will appreciate

being brought into the decisionmaking process. Remember that it is your manager's responsibility to help solve problems. If you are uncomfortable discussing the problem with your manager you can talk to your Plant director or human resources manager.

You may report violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected. RAMA does not permit retaliation of any kind against employees or officers for good faith reports of suspected violations.

Always ask first, act later: If you are unsure of what to do in any situation, seek guidance before you act.

All employees and officers are subject to RAMA's Code, which describes procedures for the internal reporting of violations of the Code. All employees and officers must comply with those reporting requirements and promote compliance with them by others. Failure to adhere to this Code by any employee or officer will result in disciplinary action, up to and including termination.