



CODE OF CONDUCT

REO Group Code of Conduct



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“Sustainable economic success is based on social responsibility, integrity, and respect for people and the environment.”



This Code of Conduct describes our company's fundamental values, principles, and standards of conduct. It serves as a binding guide for all employees and managers and business partners.

Our goal is to combine sustainable economic success with social responsibility, integrity, and respect for people and the environment.

This document outlines the binding standards for lawful, ethical, and sustainable conduct in all companies, business units, and countries where REO operates.

The Code of Conduct applies worldwide to all employees, managers, executive management, and members of governing bodies, as well as - where contractually agreed - to business partners, suppliers, and service providers.

Every decision and every action should be guided by our values:

- Integrity: We act honestly, transparently, and responsibly.
- Respect: We treat one another with respect and without discrimination.
- Responsibility: We take responsibility for our actions.
- Sustainability: We take environmental and social impacts into account.
- Quality & Innovation: We strive for continuous improvement.

We comply with all applicable laws and regulations—particularly in the following areas:

- Labor Law
- Social Legislation
- Environmental Law
- Supply Chain Act
- Competition Law
- Data Protection
- Export Controls

The REO Quality Management Manual describes the fundamental and established policies of the REO Group. The goal is to ensure that all services meet customer requirements and comply with legal and regulatory requirements in terms of both content and deadlines.

Solingen, June 2026
- The Executive Board -

**Legal violations will not be tolerated.
We protect information, technologies, and resources.
We openly address risks and misconduct.**

This Code supports all employees in complying with legal requirements, making ethically sound decisions, minimizing risks to REO, our customers, and society, and to strengthen trust in our brand worldwide.

The personal conduct and behavior of every representative of the REO Group directly influences the company's reputation among customers, suppliers, investors, employees, and the general public.

This Code also defines the minimum requirements for all suppliers, business partners, and their subcontractors.



Fair Competition and Antitrust Law

REO is committed to free and fair competition.

The following are specifically prohibited:

- ✗ Price, capacity, or territorial agreements
- ✗ Market or customer allocation
- ✗ Coordinated conduct with competitors
- ✗ Exchange of sensitive competitive information
- ✗ Fake bids or cooperation that distorts competition
- ✗ Informal discussions, association activities, and contacts at trade shows are also subject to these rules.

Prevention of Corruption

We do not tolerate any form of bribery or improper influence.

Suppliers must act in accordance with the rules of fair competition. Bribery, corruption, and unfair business practices are strictly prohibited.

Potential conflicts of interest must be disclosed to us.

The following are prohibited:

- ✗ Cash payments or benefits in kind to secure contracts.
- ✗ Kickback schemes.
- ✗ Hidden commissions.
- ✗ Inappropriate invitations or luxury events.
- ✗ Granting benefits to public officials without explicit compliance approval.
- ✗ Gifts and invitations.

Only reasonable, transparent, and documented gifts with a legitimate Business Purpose. Internal approval processes and local thresholds (€50 per person per year in Germany) must be followed.



Supply Chain and Business Partner Integrity

Business partners are screened on a risk-based evaluation and are required to comply with the REO Group's Code of Conduct for Suppliers (COC) or an equivalent internal CoC.

The goal is to ensure ethical, social, and environmental standards throughout the entire supply chain.

Specifically:

Compliance

REO expects suppliers and partners to adhere to equivalent standards in relation to:

- Human Rights
- Labor and Social Laws
- Occupational Safety
- Environmental Regulations
- Supply Chain Act
- Anti-Corruption
- Data Protection
- Sanctions and Export Controls

Human Rights and Working Conditions

Child labor is strictly prohibited. At a minimum, the standards of the International Labor Organization (ILO) must be met. Any form of forced, compulsory, or debt-bonded labor is prohibited.

Working conditions must be fair. This includes:

- ✓ Reasonable compensation in accordance with applicable minimum wages
- ✓ Compliance with working hours and rest breaks
- ✓ Respectful treatment of all employees
- ✗ Discrimination based on gender, age, origin, religion, disability, or sexual orientation is not permitted.

Suppliers must ensure safe and healthy working conditions:

- Compliance with all occupational safety regulations
- Provision of Protective Clothing and Training
- Accident Prevention Measures

Environmental Responsibility

Suppliers commit to sustainable practices:

- ✓ Reducing emissions and waste
- ✓ Conserving resources
- ✓ Compliance with all environmental laws



Supply Chain and Subcontractors

Suppliers ensure that their subcontractors also comply with this Code of Conduct.

Conflict Minerals

Suppliers agree not to use any raw materials or other materials that directly or indirectly contribute to the financing of conflicts or human rights violations.

This includes, in particular, so-called conflict minerals such as tin, tantalum, tungsten, and gold (also known as "3TG").

Due Diligence

Suppliers must take appropriate measures to trace the origin of these materials throughout the supply chain and identify risks.

Transparency

Upon request, suppliers are required to:

provide information on the origin of the materials used and submit relevant documentation (e.g., due diligence reports).

Compliance with International Standards

Suppliers adhere to recognized frameworks, such as:

OECD Guidelines on due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas, and applicable legal regulations (e.g., the EU Conflict Minerals Regulation).

Risk Mitigation

If risks are identified, suppliers are required to

implement appropriate measures to minimize risks or use alternative sources of supply.

Data Protection and Confidentiality

Suppliers agree to protect confidential information, comply with applicable data protection laws, and refrain from any unauthorized disclosure of data.

Monitoring and Compliance

REO reserves the right to conduct audits and inspections at the supplier's premises and to request evidence of compliance.

Violations may result in the termination of the business relationship.

Reporting of Violations

Suppliers should report violations of this Code immediately. Whistleblowers shall not suffer any adverse consequences as a result.

Acceptance of This Code of Conduct

By entering into a business relationship, suppliers acknowledge this Code of Conduct as binding.

Responsible Corporate Governance

We manage REO with a long-term, value-oriented, and sustainable approach. Economic success and social responsibility are equally important goals.



Financial Integrity

All business transactions must be

- ✓ fully,
- ✓ accurately,
- ✓ traceable,
- ✓ and timely

documented.

The following are not permitted:

- ✗ deliberate false entries
- ✗ shadow accounting
- ✗ misleading reports
- ✗ manipulation of key performance indicators
- ✗ hidden side agreements

Anti-Money Laundering and Sanctions

REO complies with all applicable regulations regarding the prevention of money laundering, terrorist financing, embargoes, and sanctions lists.

Responsibilities of Managers

Managers lead by example, create an open work environment, and bear special responsibility for setting a positive example, early risk detection, fair decision-making, fostering development, and protecting against retaliation.

Diversity, Equal Treatment, and Respect

Discrimination, harassment, intimidation, and bullying will not be tolerated. We promote equal opportunity regardless of: gender, age, ethnic origin, nationality, religion, disability, sexual identity, or worldview

Health, Safety, and Well-being

Workplace safety is our top priority. All employees are required to follow safety rules, report hazards, and actively contribute to a healthy work environment.

Compensation and Working Hours

Compensation and adherence to working hours are based on and in compliance with applicable laws and regulations.

Conflicts of Interest

Personal interests must not influence business decisions. Conflicts may arise from side jobs, equity interests, family relationships with business partners, or personal procurement advantages. Potential conflicts must be disclosed immediately.





Data Protection

Personal data is processed exclusively in a lawful, purpose-limited, and secure manner. The requirements of the GDPR and local data protection laws are binding.

Protection of Know-How and Trade Secrets

Technologies, patents, development data, customer data, and production know-how are key assets of REO and must be accordingly protected.

Cybersecurity and IT Use

All employees are responsible for information security. This includes, in particular:

- Secure passwords and multi-factor authentication
- Protection against phishing and social engineering
- Secure mobile work
- Approval processes for software and cloud services
- Immediate reporting of security incidents

Artificial Intelligence and Digital Systems

The use of AI systems must be transparent, secure, non-discriminatory, and compliant with the law. The following are mandatory:

- Protection of confidential data
- Human oversight for critical decisions
- Review for biases and erroneous decisions
- Compliance with regulatory requirements

Human Rights

REO is committed to the UN Guiding Principles on Business and Human Rights. We strictly oppose the following and expect the same from our suppliers and other business partners:

- Child labor
- Forced labor
- Modern slavery
- Exploitation
- Inhumane working conditions

Environment and Climate

We are committed to resource-efficient business practices and the continuous improvement of our environmental performance. Our focus areas are:

- Energy efficiency
- Emissions reduction
- Waste prevention
- Circular economy
- Sustainable product development

Social Engagement

REO supports education, research, regional initiatives, and social projects. Donations and sponsorships are handled exclusively in a transparent and documented manner.





All employees and external stakeholders can report violations—either openly or anonymously.

Reports can be submitted via:

- Managers
- HR
- or anonymously to the external reporting office at LegalTegrity GmbH

Every report is reviewed confidentially. Retaliation against whistleblowers is strictly prohibited.

External parties have another option for reporting violations, tips, or complaints: Hinweisgeber@reo.de

Access to this account is restricted exclusively to the CEO and a representative designated by him.

DECISION-MAKING GUIDELINES FOR DIFFICULT SITUATIONS

Before making any critical decision, we ask ourselves five questions:

Is my action legal?

Is it fair and consistent with integrity?

Is it consistent with our values?

Could I explain the decision transparently?

Would I feel comfortable if it became public?

If the answer to any of these questions is “no”, consultation with a manager or the Compliance department is required.

We ensure that no business is conducted with sanctioned individuals, organizations, or countries, and that business partners are screened against relevant sanctions lists.

Licensing Requirements

We are committed to obtaining the necessary export licenses and to not making any shipments without the required licenses.

Transfer of Goods and Technologies

The transfer of goods, software, or technology may only take place in accordance with applicable export control regulations, subject to re-export restrictions.

IMPLEMENTATION, RESPONSIBILITY, AND SANCTIONS

Compliance with this Code of Conduct is mandatory.

Responsibilities:

Board of Directors/Executive Management:	Overall responsibility
Management:	Operational implementation
HR:	Consulting, training, monitoring
Employees:	Personal compliance and reporting of risks

Violations may result in the following consequences:

- Employment-related measures
- Termination of employment
- Claims for damages
- Criminal or administrative consequences

Violations by suppliers may result in the termination of the business relationship.

APPENDIX TO THE CODE OF CONDUCT

Further rules and scopes of application for the REO Group can be found in the Quality Management Manual and the associated documents. If a document applicable to the REO Group has not yet been included in the Quality Management Manual, it is nevertheless valid.

ENTRY INTO FORCE

This version enters into force upon approval by the Executive Board and supersedes all previous versions of the Code of Conduct.

REO Holding AG

Brühler Straße 100 · D-42657 Solingen
Tel.: +49 (0)212 8804 0 · Fax: +49 (0)212 8804 188

Email: info@reo.de Website:
www.reo.de

**DIVISIONS:****REO AG**

Brühler Straße 100 · D-42657 Solingen
Phone: +49 (0)212 8804 0 · Fax: +49 (0)212 8804 188
Email: info@reo.de

REO Train Power Magnetics GmbH

Brühler Straße 100 · D-42657 Solingen
Phone: +49 (0)212 8804 0 · Fax: +49 (0)212 8804 188
Email: info@reo.de

REO Digital Connect 4.0 GmbH

Brühler Straße 100 · D-42657 Solingen
Phone: +49 (0)212 8804 0 · Fax: +49 (0)212 8804 188
Email: info@reo.de

REO Branches Worldwide:**France**

REO VARIAC S.A.R.L.
Email: reovariac@reo.fr · Website: www.reo.fr

Great Britain

REO (UK) Ltd.
Email: main@reo.co.uk · Website: www.reo.co.uk

Italy

REO ITALIA S.r.l.
Email: info@reoitalia.it · Website: www.reoitalia.it

Poland

REO CROMA Sp. z o.o.
Email: croma@croma.com.pl · Website: www.croma.com.pl

Spain

REO ESPAÑA 2002 S.A.
Email: info@reospain.com · Website: www.reospain.com

Switzerland

REO ELEKTRONIK AG
Email: info@reo.ch · Website: www.reo.ch

Turkey

REOTURKEY ELEKTRONİK San. ve Tic. Ltd. Şti.
Email: info@reo-turkey.com · Website: www.reo-turkey.com

USA

REO-USA, Inc.
Email: info@reo-usa.com · Website: www.reo-usa.com

China

REO Shanghai Inductive Components Co., Ltd.
Email: info@reo.cn · Website: www.reo.cn

India

REO GPD INDUCTIVE COMPONENTS PVT. LTD
Email: info@reogpd.com · Website: www.reo-ag.in

United Arab Emirates

REO INDUCTIVE COMPONENTS FZCO
Email: info@reo-middle-east.com · Website:
www.reo-middle-east.com

If you have any further questions, please visit our website at www.reo.de

