

APPENDIX II

COMPLIANCE REQUIREMENTS AND OTHER STANDARDS OF RHEINMETALL AG

Our stakeholders judge us on how Rheinmetall conducts its business. Therefore, our reputation is critical to the continuity and profitability of our Group. No violation of law is justified by appealing to alleged business needs. For this reason, the Rheinmetall Group requires impeccable business conduct from its suppliers and their employees, subcontractors, intermediaries and consultants in the form of compliance with all applicable laws, regulations and industry standards. Corruption or attempts at corruption of any kind and other unlawful practices such as fraud, extortion, embezzlement, theft, misappropriation, tax evasion or money laundering are not tolerated in the business relationship.

Our suppliers shall ensure the following measures:

1. Compliance Management

Establishment of processes to monitor compliance with and continuously review all applicable laws, sanctions, regulations and industry standards.

2. Gifts & Benefits

- 2.1 No gifts or benefits will be accepted, requested or offered that might create a conflict of interest. These include, in particular, illegal donations, bribes, kickbacks or other unlawful payments (e.g. to expedite routine administrative matters) to government officials or other persons in business relationships.
- 2.2 Introduction and implementation procedures to enforce and monitor these requirements.

3. Dealing with authorities

- 3.1 Compliance with legal requirements when dealing with governments, authorities and public institutions.
- 3.2 Compliance with the relevant legal requirements when participating in public tenders and the rules of fair and free competition.

4. Use of intermediaries and consultants

- 4.1 Intermediaries and consultants shall only be used in accordance with the respective national law.
- 4.2 The compensation paid shall only be granted for actually rendered brokerage and consulting services and shall be proportionate to the rendered service.

5. Antitrust

- 5.1 Compliance with the provisions of currently applicable antitrust and competition laws.
- 5.2 No anti-trust collusive agreements shall be made (e.g. to fix prices or to share markets) with competitors, suppliers, customers or other third parties.

- 5.3 A potentially dominant market position shall not be exploited in an unlawful manner.
- 5.4 Any actions which merely suggest collusive behaviour shall be refrained from.

6. Foreign trade regulations

Compliance with all currently applicable laws, for the import and export of goods, services and information, and the provision of funding, including sanctions, embargoes, regulations, government orders and policies.

7. Prevention of money laundering

The introduction of illegally acquired funds into the economic cycle shall be counteracted by suitable and appropriate measures.

8. Tax honesty

Taxes and duties incurred in the country of domicile or third countries as a result of the assignment shall be paid in accordance with the regulations and this shall be documented accordingly.

9. Automotive industry standards

Suppliers that supply Rheinmetall Automotive divisions shall comply with the Guiding Principles of the European Automotive Working Group on Supply Chain Sustainability¹ and the AIAG Automotive Industry Action Group.²

10. Plagiarism

Introduction and implementation of appropriate processes that reduce the risk of the use of counterfeit materials or minimise plagiarism. These are intended to ensure that any counterfeit parts and materials are detected and excluded from the supplied product.

11. Conflicts of interest

- 11.1 Decisions shall be made solely on the basis of factual, business-related criteria that are not influenced by personal or financial interests or personal relationships.
- 11.2 Internally and vis-à-vis Rheinmetall, all conflicts of interest that could influence business relationships shall be avoided and/or disclosed. Even the appearance of such conflicts of interest shall be avoided.

12. Intellectual Property / Confidentiality / Privacy / Product Security

- 12.1 Company and trade secrets, know-how and patents of Rheinmetall and third parties shall be respected.
- 12.2 Data/information provided shall only be used within the framework of the business relationship for the agreed purpose and for the fulfilment of the services for Rheinmetall,

¹ See <https://www.csreurope.org/>.

² See <https://www.aiag.org/>.

unless explicit written consent has been given for other purposes. Confidential information and content shall be protected from internal and external misuse and shall not be published, disclosed to third parties, or otherwise made available without authorisation.

12.3 Compliance with all applicable data protection laws and ensuring the protection of personal data through appropriately implemented processes.

12.4 Compliance with all applicable laws and standards to ensure product safety

13. Conflict minerals and raw materials from high-risk areas

13.1 The Supplier shall ensure compliance with the Conflict Minerals Regulation in accordance with Appendix II of the OECD Guidelines with regard to the supply of tin, tantalum, tungsten and gold as well as the corresponding ores³ as well as all other applicable legal regulations on conflict materials. Compliance with the Rheinmetall standards also applies in the conflict mineral supply chain, especially with regard to avoiding that

- a) Any contribution to the funding of conflicts is made;
- b) In the extraction, transport and trade of minerals, the company accepts, profits from, participates in or assists in the commission of serious human rights violations and abuses, such as the widespread occurrence of sexual violence, war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide;
- c) The provision of direct or indirect support to non-state armed groups (including the procurement of minerals from, the provision of numbers to, and the provision of logistical support or equipment to non-state armed groups);
- d) Goods have been sourced directly or indirectly from non-government armed groups;
- e) Money laundering occurs in connection with minerals; and
- f) Bribes are offered in connection with the supply of minerals, the origin of conflict minerals is concealed or inaccurate representations of taxes, duties or royalties paid are made and, if necessary, such duties are handed over to governments.

13.2 In particular, the Supplier shall ensure the traceability of the supply of the conflict minerals tin, tantalum, tungsten and gold by informing Rheinmetall of all market participants within the supply chain. In addition, it shall pass on to Rheinmetall all other essential information about the relevant circumstances in the supply chain, such as the country from which the minerals originate, the quantity imported and the time of extraction, the names and address of their sub-suppliers and, in the case of minerals originating from conflict and high-risk areas, the mine from which the minerals originate, the place

³ Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down obligations to fulfil due diligence obligations in the supply chain for Union importers of tin, tantalum, tungsten, their ores and gold from conflict and high-risk territories.

where the minerals are brought together, traded and processed as well as the taxes, duties and fees paid.

- 13.3 By contrast, direct suppliers of metals must provide the name and address of the smelters and refineries in the supply chain, as well as third party audit reports, records of test reports or evidence of compliance, as appropriate.
