Introduction

The ROSEN Group is a privately held company that was founded in 1981 and has experienced rapid growth over the past three decades. Today, ROSEN is a technology enterprise with more than 2,200 employees in more than 120 countries. We deliver high-quality, extremely innovative products and services to the oil & gas and engineering industries. ROSEN is the market leader in inline inspection of pipelines, and works for mining, power, telecommunication and transport companies. We manage the inspection of industrial facilities such as long-distance lines, tanks, wind power plants, trains and transmission towers.

Our global presence carries with it global responsibility. We have earned a reputation for cultivating partnerships with our clients and suppliers that are characterized by mutual trust and fairness. ROSEN has made a commitment to always conduct itself in a morally and legally upright manner – or to strive to standards that are even more stringent than the pertinent laws.

And that is more important than ever today – not only because violations of anti-corruption laws are more closely monitored and more severely punished, but also because the reputation of the ROSEN Group is our most important asset. We must work together to ensure that the trust our clients place in us in this regard remains justified. Our high standards in all areas secure our competitiveness on an international level and are ultimately the foundation upon which we can continue to successfully conduct our business.

This Code of Conduct describes the rules and standards that we at ROSEN follow, and which we honor as the common guidelines for our behavior and our decisions.

A Code of Conduct can, of course, never include rules for every imaginable conflict situation. It does however help us to understand and adopt the philosophy and mindset that we wish to see prevailing at ROSEN. It supplies us with a framework inside of which we can breathe life into the attitude described therein as we go about our daily work and in our interactions with each other.

As a globally active company, we basically see it as our duty to always act in a socially and environmentally responsible manner. It is absolutely natural for us to always be fair and morally irreproachable in our interactions with colleagues, business partners and institutions – everyone, actually, with whom we collaborate in the course of our business activities. In this respect, we expect our employees to be living examples of the ROSEN Group values.

Kind regards,

Hermann Rosen
President of the ROSEN Group
Customer Orientation
We concentrate on the individual requirements of our customers. We help our customers to enhance their competitiveness and their strengths. We contribute to the success of our customers. We are committed to deliver excellent products and services. We combine our unique capabilities in customer care and the development of products and services with advanced technologies and innovations. We are close to our customers, when ever and where ever we are needed.

Ethics and compliance
We align our actions with ethical principles and criteria. We orientate ourselves on the principles of common moral responsibility and respect applicable laws, standards and rules.

Multi-Cultural
We are an internationally operating company. Our customers come from all over the world. We employ people from over 57 different countries and cultures. We do not accept any political, religious and racial discrimination.

Integrity
We are a trustful, loyal and respectful partner in all our internal and external relationships.

Competence
Competence is prerequisite for excellence. Technical competence is the basis of our company. Creative competence is our door to innovation. Social competence assures our long term success.

Innovation
An idea, an invention, a new product or a new service alone is not an innovation. A new service or a new product becomes an innovation as soon it is successful in the market and is profitable. We apply our total know-how and experience efficiently within the entire company in order to continuously bring new services and products to the market. We contribute to sustainability by equally balancing the protection of the environment and social and economic requirements.

Commitment
Personally Committed. We achieve our goals by everybody’s strong commitment, by continuously developing our personal capabilities and by acting as entrepreneurs.
Team Oriented. We trust in the power of working in teams. Teamwork helps us to use synergies and potentials in the company. Teamwork does not release from personal responsibility.

Communication
Communication and information are necessary for company coordination and are prerequisite of all our actions. Communication itself is not the value. Only what is created through communication is valuable. We prefer direct personal communication instead of writing E-Mails.

Trust
Trust is the foundation of our success. Our customers’ trust in our capabilities as well as trust in ourselves and in each other. Therefore, we believe in complete honesty, consistency, and reliability. Under any circumstance.
Who the Code of Conduct applies to:

The ROSEN Code of Conduct applies to all executives and employees of the ROSEN Group – worldwide and regardless of where these colleagues perform their current function. We expect employees in subsidiaries and foreign branches to follow the rules of conduct and guidelines described here, just as we expect the same of all business partners. This means that these rules are also to be honored by all suppliers and contractors, regardless of the nature of their collaboration with the ROSEN Group. A business partner is defined as any sales representative, agent, subcontractor, sales or marketing consultant, carrier or official that is not directly employed by ROSEN. The Code of Conduct may also apply to attorneys, tax advisors and auditors that have been commissioned by ROSEN or one of our joint ventures not controlled by ROSEN. Moreover, we expect that our business partners abide by all applicable local, national and international laws and regulations. Further, we will support them in implementing and adhering to the principles set forth in this Code of Conduct.
Our Commitment:

1. We abide by the law

ROSEN is a globally active company. Our employees must abide by the laws that apply where they live and work. This means, for example, that we respond to requests from government and public authorities correctly and punctually. If inappropriate demands, e.g. for gifts, monetary payments or other favors are made of them, they should report this immediately to their superior at ROSEN. ROSEN’s Code of Conduct is often stricter than local national law. In such cases the ROSEN Code of Conduct always takes precedence over national law.

2. We respect human rights

We protect human rights and promise to respect the social and cultural standards of the countries in which we do business. We also promote cultural variety within the ROSEN Group and are opposed to any form of discrimination, whether in regard to age, sex, physical limitations, nationality, descent, skin color, religion, sexual orientation, political affiliation or union membership. We absolutely do not tolerate sexual harassment or derogatory behavior. We know that the variety of perspectives in interdisciplinary teams whose members interact with each other in a respectful and appreciative manner contributes to the success and innovative strength of the company. It is completely natural for us to treat all people equally. This means that no individual may be put at a disadvantage or be favored. We expect the same from our business partners.

3. We take responsibility for our employees

In order to ensure that the ROSEN Group can grow successfully in the long term and secure jobs, we place great importance on occupational health and safety. The prevention of accidents and the avoidance of anything in the work environment that could lead to injuries or negatively impact people’s health is one of our top priorities.

All employees must abide by the applicable occupational health and safety regulations. Our workplace is alcohol and drug-free. It is forbidden to consume alcohol on ROSEN premises or during work hours, except for during ROSEN events at which this has been explicitly allowed. It is prohibited under any circumstances to purchase, offer, consume or possess drugs during work hours or on ROSEN premises.

4. We conserve natural resources

We protect the environment and take measures to ensure that our business activities have the least possible impact on our natural resources. To this end, we constantly work to reduce pollutant emissions, avoid waste and wastewater, consume as little water as possible, and promote natural resource recovery. ROSEN operates sustainably, in regard to both economics and ecology. Our employees have a duty to adhere to the applicable environmental and safety regulations while performing their work duties.

5. We promote fair competition

ROSEN does not participate in the restriction or circumvention of competition. We also expect our business partners to always conduct their business in an ethically irreproachable manner, congruent with the rules of fair competition and in line with the applicable anti-trust laws. For this reason, we avoid everything that could give rise to the impression that we are acting in an anti-competitive manner or disregarding the conventions of the respective market. Most provisions of competition law prohibit agreements or arrangements between competitors regarding prices, price changes, discounts, sales, margins or customers. We abide by these laws.

We promise to keep precise and complete records of every business transaction we conduct. We are bound by law to do this, e.g. through financial reporting regulations and tax law. Our balances, documents and other company files must not contain false or ambiguous data. Manipulation of balances is prohibited.
6. We avoid conflicts of interest

ROSEN does not tolerate corruption or other unfair business practices. Transparency and openness are essential in order to uphold our credibility and retain the trust of our business partners.

To this end, our employees avoid situations in which their personal, individual interests could come into conflict with the interests of the ROSEN Group. Principally, the interests of the ROSEN Group are to be given due consideration – personal interests should never influence our business decisions.

Our decisions are always based on objective criteria regarding the quality of service, competitiveness of prices, reliability of partners and their orientation toward laws and regulations.

This means that employees must inform their superiors immediately if public officials, business partners or other relevant contact people directly or indirectly inquire about personal concessions, whether monetary payments, gifts, trips, invitations to meals or other entertainment, discounts, employment or investment opportunities.

It is forbidden to make or accept bribe payments, or to offer or hold out the prospect of bribe payments. Gifts or invitations from business partners, whether to meals or other entertainment, may only then be accepted if it is clearly a simple courtesy and within the limits of ordinary business practice.

It is considered corruption when

• customers, officials or other contractual partners attempt to effect or prevent a decision at ROSEN
• ROSEN Group employees use monetary payments to influence an administrative act or administrative decision
• ROSEN Group employees use monetary payments to gain business benefits
• ROSEN Group employees make monetary payments in return for an illegal action

It can also be corruption to

• accept gifts
• accept invitations to meals, events or trips
• accept donations or sponsorship money
• take advantage of job offers or investment opportunities
• take advantage of personal discounts or credits
• take advantage of other personal benefits

In the event that a business partner offers inappropriate gifts or other benefits that cannot be declined in a diplomatic, friendly manner, ROSEN and the company in question must work together to find a solution.
7. We protect our know-how

We are operating in highly competitive markets. For this reason it is imperative that internal affairs and trade secrets are kept just as secure as the rest of the ROSEN Group’s business assets.
We maintain strict confidentiality regarding our intellectual property, trade secrets, nonpublic information and especially our know-how. This applies particularly to information about prices, bids and the corresponding contracts.
We do not share confidential information with third parties.

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Do you have questions?
Do you need to report a violation of the Code of Conduct?

If you know or suspect that an employee or business partner of the ROSEN Group has violated a law or a stipulation of our Code of Conduct, it is your duty to report it immediately.
Reports are kept confidential and there is no need for the informer to fear being laid off, degraded, suspended, threatened, harassed or discriminated against in any way.
If you have questions or would like to report a possible misconduct, or if you have suggestions as to how we might improve our compliance structure, please contact us.

Your contact partner is the ROSEN Group
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