

<div>Title:</div> <div>Export Compliance Policy at Rittal Co., Ltd.</div>			<div>No.:</div> <div>KR20250926-01</div>	<div>Rev.:</div> <div>0 – 2025</div>	
			<div>Scope:</div> <div>Rittal Co., Ltd.</div>		
<div>Created by:</div> <div>Simon Jung</div>	<div>Department:</div> <div>Sales Operations</div>	<div>Approved:</div> <div>Justin Lee</div>	<div>Approval date:</div> <div>2025.09.26</div>		<div>Page:</div> <div>1 of 9</div>



Export Compliance Policy for

Rittal Co., Ltd.

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Business activities of Rittal

Innovative strength has been woven into the Rittal DNA since its foundation. In 1961, Rudolf Loh Elektrogerätebau was founded in Rittershausen by the entrepreneur Rudolf Loh, with one simple guiding principle: “Enclosures off the shelf, immediately.” In its founding year it launched the world’s first standard enclosure on the market. In 1969, the company was renamed Rittal, in honour of its roots in Rittershausen in Dietzhölztal. Within just a few years, Rittal enclosures had become established as a global standard, and have remained so to this day. Rittal is a leading global supplier of enclosure systems, automation and infrastructure with its industrial, IT, energy and power, cooling and service units. Rittal products and solutions are used in over 90% of global industries – standardised, customised, and always of the very best quality.

What does export control mean?

In principle, the cross-border trade in goods, services, capital, payment transactions and other types of trade (hereinafter referred to as “foreign trade and payment transactions”) is free from state controls.

However, certain goods, countries, organisations or persons are subject to restrictions in the form of bans or authorisation requirements. These restrictions are necessary in order to avoid jeopardising the peaceful coexistence of peoples as well as foreign relations and the security interests of the Federal Republic of Germany and to combat global terrorism. Violations of bans or authorisation requirements can have negative consequences for Rittal and their employees.

The consequences that Rittal face in the event of a violation include in particular

- fines or prison sentences,
- damage to the good reputation of Rittal and its member companies,
- withdrawal of customs authorisations,
- delay in delivery and contractual penalties.

The senior management and employees involved in such violations risk

- fines- and custodial sentences
- sanctions under labour law
- claims for damages.

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Geographical scope of these minimum requirements

The minimum requirements for compliance with export control regulations apply to every Rittal worldwide. Each Rittal is responsible for the actual implementation of the regulations.

Corporate policy

Excerpt from the Rittal Code of Conduct

"We undertake to comply with the relevant legal standards governing import and export controls – in particular licensing requirements, export and support bans – when shipping- and exporting our goods."

Fundamental principles

Rittal does not tolerate any violations of foreign trade and payments legislation. The company management is aware that the illegal export or transfer of goods can have a serious negative impact on Germany's foreign trade relations and therefore also on the Group's business interests. Rittal is therefore committed to strict observation of national export regulations as well as the regulations of the EU and – where applicable – the USA. In cases of doubt, transactions will not be executed.

To achieve this objective, the company checks and ensures that

- the relevant embargoes (see intranet link) are observed;
- none of the companies and persons named in the U.S. Denied Persons List, the U.S. Warning List, the U.S. Entity List, the U.S. Specially Designated Nationals List, the EU Terrorist List and the lists of names in the individual embargo regulations and the national lists of companies and persons are supplied;
- the requirements of the internal control programme of the individual companies are complied with and, upon request, presented to the executive board or the senior management, the internal audit department, the Head of Export Compliance or the company's Export Control Officer;
- contracts for deliveries and services that are subject to authorisation under export regulations are concluded on condition that the necessary authorisation is granted.

These minimum requirements have been drawn up in order to comply with the legal export control requirements and to avoid violations. They apply to the entire Rittal and also if Rittal employees perform activities relevant to foreign trade and payments legislation for Rittal subsidiary companies that do not have their work and organisational instructions for export controls. All Rittal employees must observe these minimum requirements, which are always available in updated form at [F.L.G. Minimum Requirements Export Compliance – Export Compliance \(rittal.com\)](#)

All employees whose work involves foreign trade and payments legislation confirm with their signature that they have received and will comply with the current version of the Export Compliance work and organisational instructions applicable to their company. The confirmation record is kept in the personnel file.

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Purpose of the minimum requirements

These minimum requirements for export compliance specify the principles communicated by the executive board or senior management for Rittal's conduct when participating in foreign trade, in particular by outlining the organisational structure and procedural organisation for export controls within Rittal. The minimum requirements serve as a template for the drafting of work instructions and organisational ordinances concerning export compliance at the individual companies of Rittal for a systematic and standardised approach to internal export controls. The measures aim to

- recognise risks;
- solve problems;
- enable responsible action;
- create legal certainty and
- ensure that the processes are practicable and effective.

The minimum requirements correspond to the requirements of export control legislation and are always adapted to conform with the currently applicable stipulations. The Head of Export Compliance is responsible for the content of the minimum requirements and adapting them as necessary.

Obligation of the subsidiaries

The subsidiary companies independently nominate an export officer and undertake export compliance activities on a largely independent basis. For its day-to-day operations, the respective Export Manager (EM) of the company nominates an Export Control Officer (ECO) and, if required, a Trade Compliance Manager (TCM). For its day-to-day operations, the respective Export Manager (EM) of the company nominates an Export Control Officer (ECO) and, if required, a Trade Compliance Manager (TCM).

The subsidiary companies report once a quarter in text form to the head office (Head of Export Compliance), specifically during the first week after the end of the quarter.

Organisation

General information about export compliance checks:

Bans and authorisation requirements arise from, inter alia, the German Foreign Trade and Payments Act (AWG) and the German Foreign Trade and Payments Ordinance (AWV). At European level, in particular Regulation (EU) No. 821/2021 "setting up a Community regime for the control of exports, transfer, brokering and transit of dual-use items" (EU Dual-Use Regulation) contains authorisation requirements. In addition, the Export Administration Regulations of the USA and national export control regulations of the countries in which the individual Rittal companies operate must be observed.

It must be noted that all regulations relevant to foreign trade are subject to continual amendments. The current versions of the relevant regulations are available on the website of the German Federal Office of Economics and Export Control (BAFA) at

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[BAFA – Export control](#)

[Export Administration Regulations \(EAR\) \(doc.gov\)](#)

[Office of Foreign Assets Control – Sanctions Programs and Information | U.S. Department of the Treasury](#)

As far as national regulations are concerned, the websites of the local export control authorities should be consulted.

Country embargo check

Business relations with critical destination countries such as Russia or Iran are restricted by coercive measures imposed by state authorities to prevent trade in goods.

For more details, see the annex "Country embargoes".

Sanctions list check/embargo on persons

In addition to the country-specific embargoes, the EU has adopted measures to combat terrorism.

The corresponding regulations contain lists in which specific persons, companies and organisations are named. Business transactions and any transfer of assets with these natural persons and legal entities are prohibited.

For more details, see annex "Sanctions list check/embargo on persons".

Goods check

Despite the freedom of foreign trade, not all goods may be transported to all destinations without prior checks or export authorisation.

Due to performance parameters, individual goods may be subject to authorisation.

For more details, see annex "Country embargoes".

End-use check

Even goods that are initially exempt from authorisation may be subject to a ban or an authorisation requirement if there is a critical combination of the end use and destination.

For more details, see annex "End-use check".

Documentation and retention obligations

Just the suspicion of a violation of foreign trade and payments legislation is sufficient for the authorities to initiate investigative proceedings against Rittal, its representatives or its employees. To be able to effectively counter any suspicions, it is important to properly document the checks that have been performed. Documentation is also required for any pending foreign trade audits.

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Saying: "An export control that has not been documented has not taken place."

Consequently, all performed checks are documented at Rittal. A distinction must be made here between:

- sanctions list checks using sanctions list screening software;
- other checks (embargo and goods checks) and
- applications and decisions/directives by the ECO or their deputy.

All checks performed using the screening software together with the results are documented and stored in the system archive. They can be retrieved from the system at any time.

All other checks, in particular manual checks, and their results, as well as applications and decisions/directives, are stored in electronic form or, in the case of paper copies, as scans in the ECO/TCM section. These documents may only be accessed by senior management (EM), the ECO/TCM and their deputies, and any official auditors. All facts relevant to export compliance must be documented in an audit-secure manner and kept available for inspection and retrieval at all times for the duration of the nationally regulated retention periods.

Audits/internal audit

Internal audits pertaining to the department in question are performed at regular intervals in every department whose work involves matters concerning foreign trade and payments legislation. The purpose of the audit is to check whether all regulations, processes and procedures described in the internal control programme are being complied with and "lived." The audit can be carried out by the Exports Manager, the Export Control Officer, the Trade Compliance Manager, or by a central department responsible for audits (Internal Audit).

If any violations are identified, these must be documented and addressed with an action plan. A systematic follow-up check must be carried out depending on the seriousness of the violation.

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Conduct in the event of detected violations

The following actions must be taken immediately after a transgression becomes known:

- stop the process;
- inform the EM and the ECO/TCM;
- involve the central legal department;
- completely clarify the facts;
- resolve all issues;
- develop an action plan (e.g. training);
- if necessary, notify the responsible authorities (voluntary disclosure with exemption from prosecution; after involving the central legal department and with its approval);
- monitor the "new" process;
- perform random checks or otherwise monitor the success of the action plan.

Training

Export control law is an extremely fast-moving field. The EMs of the respective companies must ensure that they and their colleagues receive continual further training in the export field (training courses, literature).

For this purpose, training courses are organised at regular intervals by the ECO/TCM, their deputies or external companies (e.g. Hagemann TCC). Participation in the training courses is mandatory. Participants' names are recorded in an IT system and any unexcused absences are reported to the disciplinary supervisor. The participant lists are then archived for reference purposes. After completing the training courses, the participants have the opportunity to evaluate the quality of the training.

In addition to the training courses, circulars in the form of newsletters are sent to the persons or departments concerned in the event of changes to foreign trade and payments legislation.

New employees whose work involves export control-related topics are trained by the Export Control Officer or the Trade Compliance Manager as soon as possible after joining the company.

To maintain the highest possible level of expertise and to keep up to date with the latest developments in foreign trade and payments legislation, the ECO and their deputy partake in further training at regular intervals with external providers (e.g. Hagemann TCC, AWA, Creydt Law).

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