Compliance Statement

Corporate Values

NiRoSec Components GmbH is fully committed to compliance, i.e. to conduct that conforms to laws and regulations. Reliability, integrity and regulatory compliance are the foundations of our business. As a trading and sourcing partner for technical components, spare parts, assemblies, and industrial supplies for industrial, security-related, governmental, defence, and dual-use applications, we bear a particular responsibility: our products may reach authorised recipients only lawfully and in a traceable manner.

Through a compliance management system tailored to its size and risk profile, NiRoSec Components GmbH ensures the effective and sustainable implementation of its preventive structures. This includes regular training for all employees, an internal export control programme (Internal Compliance Programme, ICP), documented screening of business partners, and clearly defined processes to safeguard compliance.

Our Guiding Principles

1. Fair Competition

We are committed to competing fairly and to complying with German and European competition law. Agreements on prices, terms, capacities, territories or customers, as well as bid coordination in tenders and public procurement procedures, are prohibited. We do not exchange competitively sensitive information with competitors.

2. Business Integrity

We reject all forms of corruption. We do not offer, promise or grant any advantage in order to improperly influence decisions, nor do we accept such advantages. This applies to public officials, procurement agencies, and the armed forces, as well as to private business partners. Gifts and hospitality are permitted only to a modest, socially appropriate extent and transparently. Intermediaries, sales agents and consultants are screened before engagement, bound in writing and remunerated only appropriately. We do not take part in money laundering or terrorist financing.

3. Compliance with Foreign Trade Law

We comply with all national and international foreign trade regulations, in particular the German Foreign Trade and Payments Act (AWG) and Ordinance (AWV), the War Weapons Control Act (KrWaffKontrG), the EU Dual-Use Regulation (EU) 2021/821, the Common Military List of the EU, EU embargo and sanctions regulations and – where applicable – US (re-)export law (EAR/ITAR) and customs law.

- Every delivery is screened by goods, country, recipient and end use before an order is accepted.
- All business partners are screened against the relevant sanctions lists.
- Where required, we obtain licences from the Federal Office for Economic Affairs and Export Control (BAFA) and end-use certificates and pass them on along the supply chain.
- We appoint an export control officer from among the management. We do not carry out transactions where there are indications of unlawful use or circumvention.

4. Cooperative Relationship with Authorities

A cooperative relationship with authorities is of particular importance to us. It is characterised by open, honest and transparent dealings with public bodies, in particular BAFA, customs authorities, procurement authorities and the bodies responsible for the protection of classified information. We provide complete and truthful information and support audits in accordance with the legal framework.

5. Respect for Third-Party Rights

We respect the industrial property rights, copyrights and trade secrets of third parties. We trade only in genuine goods from traceable sources. We actively counter the placing on the market of counterfeit or unauthorised parts through supplier qualification, traceability and verification of manufacturer documentation.

6. Separation of Corporate and Private Interests

Members of NiRoSec Components GmbH strictly separate their private interests from those of the company. In business relationships with third parties, only objective criteria such as quality, price, reliability and compliance are relevant. Potential conflicts of interest, e.g. through shareholdings in or personal relationships with business partners, are disclosed.

7. Respectful and Fair Treatment

NiRoSec Components GmbH values friendly, respectful and fair treatment of one another and of business partners. This includes the commitment to combating all forms of discrimination, e.g., on the grounds of ethnic origin, gender, religion or belief, disability, age, or sexual identity, as well as respect for human rights, fair working conditions, and occupational health and safety.

8. Confidentiality, Information Security and Classified Information

We adequately protect the confidential information of our customers and suppliers. Classified information is handled in accordance with the German Classified Information Protection Manual for Industry (GHB) and the respective governmental requirements. Personal data is processed in compliance with the GDPR.

9. Responsibility in the Supply Chain

We expect our suppliers and business partners to comply with equivalent standards and bind them to do so through our Supplier Code of Conduct. Human rights and environmental risks are taken into account when selecting partners.

10. Reporting Concerns

Information about possible violations can be submitted confidentially and, if desired, anonymously to compliance@nirosec-components.com. Whistleblowers are protected from retaliation under the German Whistleblower Protection Act (HinSchG).

Our Self-Image

We are convinced that NiRoSec Components GmbH can only conduct prosperous, sustainable and successful business by adhering to these principles. These principles form the basis for professional performance at the highest level.

Babenhausen, 09.11.2026



Niklas Julius Rothdach, CEO, NiRoSec Components GmbH