

Code of Conduct for suppliers of the WIRTHWEIN Group

Foreword

Wirthwein SE and its subsidiaries are one of the world's leading manufacturers of high-quality and complex plastic parts and molds. With Winkler Design, the group of companies is also active in the field of interior design.

As a family company, we rely on entrepreneurial foresight as well as stability and reliability for our employees, customers and business partners. Integrity and a sense of responsibility as well as compliance with the law determine our daily actions.

We offer parts, components and system solutions for complex procedures and processes in highly sensitive areas of application. Therefore, we have high demands on our procurement and rely on long-term, stable partnerships. In addition to costs, quality, reliability and performance, sustainability criteria such as compliance with human rights, occupational health and safety and environmental protection are essential when selecting and evaluating our suppliers and other contractors (hereafter referred to as „suppliers“).

Scope

The WIRTHWEIN code of conduct for suppliers is based on the principles of internationally recognized standards for responsible corporate management. We expect that our suppliers, including their employees, representatives and subcontractors, respect and comply with the standards formulated below when doing business with, for or in relation to the WIRTHWEIN Group. It is the responsibility of the suppliers to introduce suitable processes that ensure compliance with these regulations and also guarantee them within their own supply chain.

1. Business Integrity

Our suppliers comply with applicable laws at local, national and international level.

Compliance with all applicable laws and regulations is one of our fundamental principles. In doing so, we are guided by international agreements and guidelines such as the conventions of the UN Global Compact¹ (UNGIC), the International Labor Organization² (ILO) and the OECD³ guidelines. As part of our corporate responsibility, we also expect the same from our suppliers. This is the only way to ensure a trusting, long-term business relationship.

Individual countries, business areas or markets may have stricter regulations than the standards described in this Supplier Code of Conduct. In the event that national and/or international laws, regulations or industry standards provide additional and/or stricter rules, these shall be observed with priority.

Prevention of bribery and corruption

Our suppliers must ensure compliance with the applicable anti-corruption laws. In particular, they ensure that their employees, subcontractors, agents or other representatives do not give, offer or accept any bribes, improper donations or other improper payments or benefits from customers, public officials or other third parties.

Avoiding Conflicts of Interest

We expect our suppliers to base their decisions solely on objective criteria and not allow themselves to be in-

¹ <https://unglobalcompact.org/what-is-gc/mission/principles>

² <http://www.ilo.org/>

³ <http://mneguidelines.oecd.org/>

fluenced by financial or personal interests or relationships, so that there is no conflict of interest between them and WIRTHWEIN employees. As soon as the supplier becomes aware of a potential conflict of interest, he is obliged to take internal measures to eliminate these conflicts and to inform WIRTHWEIN immediately.

Free and fair competition

We aim to always act as a fair and responsible market participant and comply with all relevant competition and antitrust regulations to ensure fair competition. In particular, we do not make any illegal arrangements or agreements with competitors, suppliers, customers or other third parties and do not abuse any dominant market position that may exist. We expect the same from our suppliers.

Money laundering

We expect our suppliers to comply with the relevant legal obligations to prevent money laundering and not to participate directly or indirectly in money laundering activities.

Confidentiality / Intellectual Property

Confidential information and any kind of sensitive data that WIRTHWEIN transmits to the supplier is properly secured in accordance with the relevant legal requirements. We also expect that the applicable regulations for the protection of intellectual property are respected and complied with.

Data protection and data safety

Our suppliers are obliged to guarantee the right to informational self-determination, the protection of personal data and the security of all business information and personal data in all business processes in compliance with legal requirements and the applicable data protection and information security laws.

Foreign trade regulations

Our suppliers strictly comply with all applicable laws and regulations for the import and export of goods, services and information. They also observe the relevant sanctions lists.

We strive to constantly improve our processes and want to ensure that we always comply with the requirements of export control law. We expect our suppliers to provide us with data relevant to export control law, especially if re-export regulations of third countries (e.g. USA) are affected.

2. Working conditions and social standards

Our suppliers respect and support the protection of universally recognized human rights and ensure they are not complicit in human rights abuses.

Non-discrimination and respect for human rights

We expect that our suppliers will not tolerate any form of discrimination, for example on the basis of skin color, ethnic origin, gender, age, nationality, social origin, disability, sexual orientation, religious affiliation, world view or political and trade union activities. The same applies to any form of harassment. In the case of comparable requirements and tasks, the principle of equal pay for work of equal value must apply regardless of gender. The ILO conventions must be observed.

Prohibition of forced and child labor

Our suppliers do not tolerate forced, slave or child labor, either directly or through their own subcontractors or suppliers. The ILO conventions apply as a minimum standard for the employment of young people.

Freedom of association

Our business partners must respect the fundamental right of employees to form trade unions and join them of their own free choice. Membership in trade unions or employee representatives must not be a reason for unjustified unequal treatment.

Fair working conditions

Our business partners undertake to guarantee the right to fair working conditions in accordance with the applicable ILO conventions. This includes, in particular, fair remuneration and social benefits that at least correspond to national and local legal standards, regulations or agreements. Legal regulations on the minimum wage in the respective countries as well as the applicable regulations on working hours, breaks and vacation must be adhered to.

Work-and Health protection

Our suppliers must comply with the respective national standards for a safe and hygienic working environment and, within this framework, appropriate measures must be taken to ensure health and safety at work so that health-friendly working conditions are guaranteed.

Protection against evictions and confiscation of land

Our suppliers undertake not to carry out any illegal forced evictions. In addition, they undertake not to illegally deprive land, forests and bodies of water through acquisition, development or other use.

Use of private or public security forces

Our suppliers undertake to refrain from commissioning or using private and public security forces if there is a risk of torture and cruel, inhuman or degrading treatment, injuries or danger for life due to a lack of training or control on the part of the company when using security forces or there is interference with the freedom of association.

3. Ecological standards

Environmental and climate protection as well as the responsible use of natural resources form an essential part of our responsibility towards the environment and society.

Environmental Protection

Our suppliers undertake to comply with the applicable national environmental laws and standards. Our suppliers are also required to ensure that they work continuously to avoid and reduce environmental pollution so that future generations can also benefit from the sustainable use of resources and the environment.

Climate protection

We expect our suppliers to practice sustainable and active climate protection, for example by increasing energy efficiency or generating or purchasing energy from renewable sources. The aim is to create transparency about their CO₂ emissions and set ambitious CO₂ reduction targets.

Water consumption and quality

Our suppliers undertake to use water carefully. In arid areas in particular, water withdrawal must be minimized and access to drinking water and sanitary facilities must be granted. Within the framework and in the design of applicable legal and official requirements, standards for waste water quality must be defined and monitored.

Air quality and soil quality

Our suppliers comply at least with the relevant legal requirements and the requirements of the local authorities.

Dealing with forbidden substances

Our suppliers undertake to adhere to the Minamata Convention⁴. This prohibits the production of products containing mercury, the use of mercury and mercury compounds in manufacturing processes and the treatment of mercury waste. This ban also applies to the production and use of chemicals under the Stockholm Convention⁵ in particular for persistent organic substances (POPs), the export of hazardous waste and the handling, collection, storage and disposal of waste in a manner that is not environmentally sound.

Conflict minerals

We expect our suppliers to take reasonable steps to ensure their products do not contain any raw materials that contribute directly or indirectly to the financing and support of armed conflict and serious human rights abuses, including child and forced labor and slavery. Appropriate measures to reduce these must be taken and also demanded from your own suppliers.

We also expect to ensure due diligence to promote responsible supply chains for minerals from conflict and high-risk areas in accordance with the OECD Guidelines⁶.

Product safety

We expect our suppliers to comply with all applicable product safety regulations and specifications, in particular the legal regulations regarding safety and labeling of products and the use of hazardous substances and materials.

4. Implementation

Our business partners ensure the implementation of and compliance with the WIRTHWEIN code of conduct for suppliers.

Compliance with the WIRTHWEIN code of conduct for suppliers

We expect our suppliers to guarantee the implementation of and compliance with the WIRTHWEIN Code of Conduct for Suppliers. It is the supplier's responsibility to train their employees, agents and subcontractors accordingly.

Controls

WIRTHWEIN reserves the right to check compliance with the standards defined in the code of conduct for suppliers. The supplier is obliged to actively support the necessary controls. To this end, WIRTHWEIN will coordinate the scope, period and location with the supplier. The supplier must respond to inquiries and requests for information within a reasonable time and in compliance with the specified formalities within the framework of the applicable data protection laws.

Remedial actions

Violations, particularly of human rights or environmental obligations, must be stopped immediately. If this is not possible in the foreseeable future, the supplier must immediately create and implement a concept for termination or minimization. The concept must contain a concrete timetable. Initiated measures must be documented and checked for their effectiveness. In addition, if a violation is suspected, the supplier must immediately clarify possible violations and inform WIRTHWEIN about the investigation measures that have been carried out.

⁴ <http://minamataconvention.org/en>

⁵ <http://www.pops.int/>

⁶ OECD-Guidelines: <http://mneguidelines.oecd.org/mining.htm>

Consequences of violations

A violation of the obligations described in this code of conduct represents a breach of contract towards WIRTHWEIN and a significant impairment of the business relationship between WIRTHWEIN and the supplier. The supplier has to inform WIRTHWEIN within a reasonable period of time which internal measures he has taken to prevent future infringements. If the supplier does not meet these obligations within a reasonable period of time, if the supplier does not initiate suitable improvement measures within a reasonable period of time, or if the violation is so serious that it is unreasonable for WIRTHWEIN to continue the business relationship, WIRTHWEIN reserves the right, without prejudice to further rights, to terminate the affected contractual relationship without notice or to withdraw from the affected contract.

WHISTEBLOWER SYSTEM

Every supplier – their employees or those affected – is called upon to report possible suspected cases and violations of this code of conduct. In this way, the consequences of such violations are to be limited and comparable misconduct avoided in the future. For this purpose, the supplier should set up its own whistleblower system or join an industry-wide system. Misconduct at the expense of WIRTHWEIN and other violations of regulations, laws and the WIRTHWEIN Supplier Code of Conduct can be reported confidentially and anonymously, to the independent position of trust we have set up, the atarax group of companies, via email (compliance@atarax.de), telephone (0049 / 160 / 96210839, Monday - Friday from 08.30 - 17.00, except on public holidays) or via the WIRTHWEIN whistleblower system <https://wirthwein.whistleblower-system.de/>.