

Code of Conduct for Suppliers of the WIRTHWEIN Group

Preamble

Wirthwein SE and its subsidiaries (hereinafter collectively referred to as “WIRTHWEIN”) are a leading global manufacturer of high-quality, complex plastic parts and tools. Through Winkler Design, the WIRTHWEIN Group is also active in the interior design sector.

As a family-owned business, we are committed to entrepreneurial foresight, as well as stability and reliability for our employees, customers, and business partners. Integrity, a sense of responsibility, and compliance with the law guide our daily actions.

We offer parts, components, and system solutions for complex procedures and processes in highly sensitive application areas. As a result, we have high standards for our procurement and prioritize long-term, stable partnerships. In addition to cost, quality, reliability, and performance, also sustainability criteria, respect of human rights, occupational health and safety, and environmental protection are essential in the selection and evaluation of our suppliers and other contractors or business partners (hereinafter referred to as “Suppliers”).

Scope and objectives

The WIRTHWEIN Code of Conduct for Suppliers is based on the principles of internationally recognized standards for responsible corporate governance. Our Suppliers, including their employees, representatives, and subcontractors, must respect and comply with the standards set forth below when conducting business with, for, or in relation to the WIRTHWEIN Group. It is the responsibility of Suppliers to implement appropriate processes that ensure compliance with these regulations and guarantee such compliance within their own supply chain.

1. Business integrity

Our Suppliers shall comply with applicable laws at local, national, and international levels. Compliance with the laws and regulations applicable to WIRTHWEIN is one of our fundamental principles. In this regard, we adhere to international agreements and guidelines, such as the conventions of the UN Global Compact¹ (UNGC), the International Labor Organization² (ILO), and the OECD Guidelines³. As part of our corporate responsibility, our Suppliers must also comply with these standards. Only in this way can a trusting, long-term business relationship be ensured.

Corruption and bribery

Our Suppliers must ensure compliance with all applicable anti-corruption laws. In particular, our Suppliers ensure that their employees, subcontractors, agents, or other representatives do not grant, offer, or accept bribes, kickbacks, improper donations, or other improper payments or benefits from customers, public officials, or other third parties.

Avoiding conflicts of interest

Our Suppliers will make their decisions based solely on objective criteria and will not allow themselves to be influenced by financial or personal interests or relationships, so as to avoid any conflict of interest.

As soon as a Supplier becomes aware of a potential conflict of interest, they are required to take internal measures to resolve such conflicts and to notify WIRTHWEIN immediately.

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

² <http://www.ilo.org/>.

³ <https://unglobalcompact.org/what-is-gc/mission/principles>.

Free and fair competition

We are committed to always acting as a fair and responsible market participant and comply with all relevant competition and antitrust regulations to ensure fair competition. This applies equally to our Suppliers.

Anti-money laundering

Our Suppliers comply with the relevant legal obligations regarding anti-money laundering and will not participate in money laundering activities, either directly or indirectly.

Foreign trade

Our Suppliers strictly ensure compliance with all applicable laws and regulations governing the import and export of goods, services, and information. They also adhere to the relevant sanctions and embargo lists.

We strive for continuous improvement of our processes and aim to ensure that we always comply with export control regulations. Our Suppliers are required to provide us with all data relevant to export control regulations, particularly when re-export regulations of third countries (e.g., the U.S.) are involved.

Confidentiality and intellectual property

Confidential information and any other data requiring protection that WIRTHWEIN provides to the Supplier shall be treated as such in accordance with the relevant contractual and legal requirements. Furthermore, the Supplier shall respect and comply with the intellectual property rights of WIRTHWEIN and third parties.

Data protection and data security

Our Suppliers are required to comply with applicable data protection and information security regulations.

Financial responsibility

Our Suppliers are committed to managing their financial resources carefully and efficiently to ensure long-term stability and success. We encourage our Suppliers to adopt sustainable financial practices that promote long-term economic stability and growth.

Disclosure of information

Our Suppliers ensure that, where disclosure is required, all relevant financial information is made public and that applicable accounting standards are followed in order to ensure transparency and comply with legal requirements.

Compliance with antitrust laws / fair and free competition

Our Suppliers are committed to conducting their business in compliance with antitrust laws. With regard to antitrust rules of conduct for employees, we refer in this context to “BME Code of Conduct (German Association of Materials Management, Purchasing and Logistics) – in particular its provisions on antitrust and competition law compliance.

2. Human Rights and working conditions

Our Suppliers respect and support the protection of universally recognized human rights and ensure that they do not participate in human rights violations.

Prohibition of discrimination

Fundamental human rights should be given the highest priority and must be upheld to the utmost degree. Our Suppliers will not tolerate any form of discrimination, for example based on skin color, ethnic origin, gender, age, nationality, social background, disability, sexual orientation, religious affiliation, ideology, or political and union activities. The same applies to any form of harassment.

The prohibition against discrimination and any form of harassment also applies to the hiring (recruitment), development, and compensation of employees. These processes are based solely on their skills and qualifications and are conducted in a fair and transparent manner. Objective criteria and standardized procedures are used for evaluation to eliminate discrimination and personal bias. The ILO Conventions must be complied with.

Prohibition of forced labor 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 serve as the minimum standard for the employment of young people.

Respect for the freedom of association

Our Suppliers must respect the fundamental right of employees to form unions and to join them of their own free will. Membership in unions or employee representative bodies must not be grounds for unjustified unequal treatment.

Compliance with fair working conditions, social standards, and fair compensation

Our Suppliers are committed to ensuring the right to fair working conditions in accordance with applicable ILO conventions. This includes, in particular, fair compensation and benefits that meet at least the national and local legal standards, regulations, or agreements. Legal regulations regarding the minimum wage in the respective countries must be complied with, as must the applicable regulations regarding working hours, breaks, and vacation time.

Occupational safety and health

Our Suppliers must comply with the relevant national standards for a safe and hygienic work environment and, within this framework, take appropriate measures to ensure health and safety in the workplace so that working conditions that promote good health are guaranteed.

Promoting personal development

We encourage our Suppliers to continuously train and develop their employees. This includes setting individual growth goals and providing opportunities for professional development, as well as offering training, mentoring, and access to resources.

Protection against eviction and land expropriation

Our Suppliers agree not to carry out any unlawful evictions. Furthermore, they agree not to unlawfully appropriate land, forests, or water bodies through acquisition, development, or other forms of use.

Use of private or public security forces

Our Suppliers agree to refrain from hiring or using private or public security forces if, due to a lack of training or oversight by the company regarding the deployment of such forces, there is a risk of torture or cruel, inhuman, or degrading treatment, injury to life or limb, or the infringement of the freedom of association and the right to form unions.

Product safety

Our Suppliers shall comply with all applicable product safety laws and regulations, in particular the legal provisions regarding product safety and labeling, as well as the use of hazardous substances and materials.

3. Environmental standards

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

Environmental protection

Our Suppliers are required to comply with all applicable national and international environmental and noise control laws and standards. We also expect our Suppliers to make every effort to continuously work toward preventing and reducing environmental and noise pollution, so that future generations may also benefit from the sustainable use of resources and the environment.

Reuse and recycling

We encourage our Suppliers to take steps to maximize the reuse of materials and products and to incorporate recycled materials into their products and packaging. In addition, we ask our Suppliers to actively identify environmentally and economically sound options and opportunities for improvement to optimize and/or reduce the demand for raw materials. Furthermore, our Suppliers will ensure that all recyclable materials generated are properly sorted and recycled. This includes compliance with local and international recycling standards.

Climate protection

Our Suppliers will actively pursue sustainable climate protection, for example by improving energy efficiency or by generating or purchasing energy from renewable sources. In doing so, they will ensure transparency regarding their CO₂ emissions and set ambitious CO₂ reduction targets.

Protection of water

Our Suppliers are committed to using water responsibly. Particularly in areas where water is scarce, water withdrawal must be minimized, and access to drinking water and sanitation facilities must be ensured. Within the framework and in accordance with applicable legal and regulatory requirements, standards for wastewater quality must be defined and monitored.

Protection of air and soil quality

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

Handling of prohibited substances

Our Suppliers are committed to complying with the Minamata Convention⁴. This convention prohibits the manufacture of products containing mercury, the use of mercury and mercury compounds in manufacturing processes, and the treatment of mercury waste. This prohibition also applies to the production and use of chemicals covered by the Stockholm Convention⁵, specifically persistent organic pollutants (POPs), the export of hazardous waste, and the handling, collection, storage, and disposal of waste in a manner that is not environmentally sound.

Handling conflict minerals

Our Suppliers will take appropriate measures to ensure that their products do not contain raw materials that directly or indirectly contribute to the financing and support of armed conflicts and serious human rights violations, including child labor, forced labor, and slavery. Appropriate measures to mitigate these risks must be taken and also required of their own suppliers.

In addition, the Supplier shall comply with due diligence requirements to promote responsible supply chains for minerals from conflict-affected and high-risk areas in accordance with the OECD Guidelines⁶.

Protection of forests

Our Suppliers in the woodworking industry must take measures to prevent deforestation by adopting sustainable forestry practices and complying with international standards. We require our Suppliers to preserve and promote biodiversity, including the protection of endangered species and their habitats. In addition, the Supplier will adhere to sustainable land-use practices, including the prevention of illegal land grabs and respect for the land-use rights of local communities.

Protection of Animals

Our Suppliers recognize that animals have rights and that their dignity must be respected. All applicable international and national laws regarding animal protection and welfare must be fully complied with. Species-appropriate husbandry and the concept of the “Five Freedoms” serve as guiding principles, and unnecessary suffering must be avoided.

4. Implementation and compliance with the Code of Conduct

Our Suppliers ensure the implementation of and compliance with the WIRTHWEIN Code of Conduct for Suppliers.

Compliance with the WIRTHWEIN Code of Conduct for Suppliers

Our Suppliers shall ensure the implementation of and compliance with the WIRTHWEIN Code of Conduct for Suppliers. Furthermore, the Supplier undertakes to ensure that the human rights and environmental requirements set forth in the Code of Conduct are also communicated to its suppliers within the supply chain. It is the responsibility of the Suppliers to provide appropriate training to their employees, representatives, and subcontractors.

Inspections

WIRTHWEIN reserves the right to verify compliance with the standards defined in the WIRTHWEIN Code of Conduct for Suppliers. In this regard, the Supplier is obligated to

⁴ <http://minamataconvention.org/en>.

⁵ <http://www.pops.int/>.

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

actively support any necessary inspections. To this end, WIRTHWEIN will coordinate with the Supplier regarding the scope, timeframe, and location of such inspections. The Supplier must respond to inquiries and requests for information within a reasonable time and in accordance with the specified formalities.

Remedial measures

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 develop and implement a plan to eliminate or minimize such violations. The plan must include a specific timeline. Any measures taken must be documented and reviewed for effectiveness. Furthermore, if a violation is suspected, the Supplier must immediately investigate possible violations and inform WIRTHWEIN of the investigative measures taken.

Consequences of violations

A violation of the obligations set forth in this WIRTHWEIN Code of Conduct for Suppliers constitutes a breach of contract with WIRTHWEIN and a material impairment of the business relationship between WIRTHWEIN and the Supplier. The Supplier must inform WIRTHWEIN within a reasonable period of time regarding the internal measures the Supplier has taken to prevent future violations. If the Supplier fails to fulfill these obligations within a reasonable period of time, if the Supplier fails to implement appropriate corrective measures within a reasonable period of time, or if a violation is so serious that continuing the business relationship becomes unreasonable for WIRTHWEIN, WIRTHWEIN reserves the right, without prejudice to any further rights, to terminate the relevant contractual relationship without notice or to withdraw from the relevant contract.

Whistleblower system

Every Supplier – as well as its employees or other relevant parties – is encouraged to report any suspected cases or violations of this WIRTHWEIN Code of Conduct for Suppliers. This is intended to limit the consequences of such violations and prevent similar misconduct in the future. To this end, the Supplier should establish its own whistleblower system or join an industry-wide system. Misconduct to the detriment of WIRTHWEIN, as well as other violations of regulations, laws, and the WIRTHWEIN Code of Conduct for Suppliers, can be reported to the independent ombudsman office we have established, the atarax Group, via email at compliance@atarax.de, phone +49 160 96210839 (during the service provider's business hours), or via the WIRTHWEIN whistleblower system at <https://wirthwein.whistleblower-system.de> confidentially or, if necessary, anonymously.

[signature page follows]



Supplier's acknowledgment and consent

The Supplier hereby confirms that it has read and understood the WIRTHWEIN Code of Conduct for Suppliers. The Supplier undertakes to act responsibly and to comply with the principles and requirements set forth herein. The Supplier undertakes to communicate the content of this Code of Conduct – or a comparable Code of Conduct with equivalent content – to employees, agents, and subcontractors in a manner they can understand, and to take all necessary measures to implement the requirements.

Place, date

Supplier's name, including legal form and company seal

Signature

Name:

Title:

This document must be signed by an authorized representative of the Supplier and returned by email to lksg@wirthwein.de.