

Code of Conduct for WKW.group Suppliers and Business Partners

WKW.group is committed to fulfill its social responsibility in all corporate activities and expects this accordingly from its suppliers and business partners.

The supplier / business partner hereby declares the following:

- **Compliance with laws, recognized standards and guidelines**
 - to comply with the laws of the applicable legal system.
 - to adhere to the requirements of the Aluminum Stewardship Initiative Performance Standard (this applies only to suppliers who provide aluminum substrates).
- **Prevention of corruption and conflicts of interest**
 - to consequently reject corruption, any business damaging behavior or unfair business practices.
 - to comply with the applicable anti-corruption laws.
 - not to misuse invitations and gifts to WKW.group employees to influence them and not to demand undue favors from them.
 - to maintain an open, fair and reliable relationship with customers, suppliers and service providers.
 - to avoid conflicts of interest and any appearance thereof and to make business decisions in connection with WKW.group exclusively on a factual basis.
- **Money laundering**
 - to comply with the legal obligations to prevent money laundering.
 - not to participate in any activity of money laundering.
- **Fair competition**
 - to act in accordance with national and international competition laws and not to participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.
 - to conduct business in compliance with laws and integrity, to respect intellectual property rights and other industrial property rights of others as well as to comply with contracts.
 - to actively prevent plagiarized parts from entering the WKW.group supply chain, to immediately take all appropriate steps to prevent damage upon discovery of plagiarism and to inform WKW.group thereof.
- **Confidentiality and data protection**
 - to protect company and business secrets of WKW.group that become known to him in the course of the cooperation, to use them only in the course of the cooperation and to comply with the applicable data protection laws.
- **Import and export control**
 - to comply with the applicable foreign trade and customs regulations.
- **Occupational health and safety protection**
 - to create a safe, healthy and hygienic work environment to prevent accidents and illness in the workplace.
 - to contribute with preventive occupational safety and health promoting measures to the health, satisfaction and lasting performance of every employee.
 - to inform employees according to their function about applicable health and safety standards and measures as well as to ensure compliance with them.
- **Framework conditions for employees**
 - to comply with the applicable statutory provisions and operational regulations regarding working hours, paid vacation and national holidays, as well as the relevant conventions of the International Labor Organization.
 - to base remuneration, including social benefits, on the applicable legal and company regulations.
 - to respect the personal dignity of each individual fully and ensure that all employees treat each other fair and with respect.
 - to counteract and not encourage any form of bullying behavior as well as verbal, physical and / or sexual coercion, use of violence and / or harassment.

- **Framework conditions for human rights**
 - to respect the protection of international human rights within their sphere of influence and make sure that they are not complicit of any human rights abuses – this also applies when involving public or private security providers.
 - to respect the fundamental right to freedom of association and the right to collective bargaining within the framework of national laws as well as to assure that no negative consequences will arise for employees engaging in these activities.
 - to reject any form of child and forced labor and to respect the rights of children and adolescents.
 - to ensure the age limit for admissible employment is not below the required age to attend school and under no circumstances under 15 years of age.
 - to not expose employees to dangerous, unsafe or harmful situations.
 - to not tolerate discrimination, harassment or a hostile work environment.
 - to create a positive work environment free from discrimination and harassment.
 - not to discriminate against or favor anyone because of skin color, sex, disabilities, ideologies, culture, sexual orientation, age, religion, ethnic or social background, nationality, physical constitution, appearance, marital status and political or trade union activities.
 - to stand up for equal rights for women.
 - to be guided by international standards, such as UN conventions.
- **Indigenous people and local communities**
 - to respect and not violate the rights and interests of indigenous peoples and local communities and populations in accordance with international standards.
 - to take appropriate measures to eliminate or minimize impacts of its own activities on indigenous peoples and local communities.
- **Geopolitical neutrality**
 - to ensure not to participate in any form of armed conflict or human rights violations in potentially or already affected areas.
 - to respect the cultural and religious heritage of all people and, in cooperation with local decision-makers, to identify potential conflicts in order to avoid interference of any kind.
- **Conflict Minerals**
 - to take appropriate measures to avoid the knowing acquisition and use of conflict materials that are mined at the expense of environmental and social compatibility.
 - to comply with all applicable conflict minerals legislation.
 - to ensure immediate transparency about its supply chain up to the smelter upon request by WKW.group if a product contains conflict minerals (tin, tantalum, tungsten, gold or the corresponding ores).
- **Sustainability agreement / environmental and climate protection**
 - to comply with social, ecological and economic standards and to regard them as a basic prerequisite for successful cooperation.
 - to comply with applicable laws on climate and environmental protection at all costs in order to maintain the legal security of the company's activities and products.
 - to optimize sustainable resource management in order to increase energy efficiency, reduce greenhouse gas emissions, waste generation and water consumption, improve water and air quality, and make efficient use of raw materials and supplies.
 - to ensure the responsible procurement of raw materials.
 - to establish and apply an appropriate environmental management system.
 - to comply with the principles of non-discrimination with regard to supplier selection and treatment.
 - to communicate the sustainability requirements of the WKW.group also within its supply chain.
- **Supply chain**
 - to use reasonable efforts to promote compliance with this Code of Conduct among their employees and suppliers.
 - to comply with the principles of non-discrimination with regard to supplier and business partner selection and treatment.



Reporting of violations

Suppliers / business partners can report indications of compliance violations, including suspected corrupt practices, anti-competitive behavior or money laundering to the relevant contacts at WKW.group. In addition to the internal contacts, they can also confidentially contact the external ombudsperson as well as the electronic whistleblower system at <https://www.wkw.de/unternehmen/compliance>.

Declaration of the supplier

We hereby confirm:

1. We have received the „Code of Conduct for WKW.group Suppliers and Business Partners” (hereinafter “Code of Conduct”) and hereby undertake, in addition to our obligations under the supply agreements with WKW.group, to comply with the principles and requirements of the Code of Conduct.
2. We agree that this declaration is subject to the substantive law of the Federal Republic of Germany to the exclusion of the norms that refer to other legal systems.

Date:

Company:

Signature: