

# **Supplier Code of Conduct**

## **Our Commitment to Law, Integrity and Ethics**

WECKERLE stands for reliability, quality, sustainability and innovation. We share these values by acting with full integrity, responsibly and transparently, and by treating each other with respect. We commit ourselves to this without reservation and regardless of what others demand or expect from us. We expect our suppliers and service providers to comply with the applicable national and international laws, rules and regulations as well as the standards relevant to the companies and to demand the same from subcontractors.

## **Acting in accordance with the law**

We comply with the law in our business activities. Each supplier is obliged to inform its employees about their personal responsibility to comply with the laws in their field of work. Managers must always set a good example. It is strictly prohibited to induce third parties to commit unlawful acts or to knowingly participate in such acts. Acting differently will result in disciplinary consequences, regardless of the sanctions provided for by law.

## **Plagiarism / Intellectual Property**

The intellectual property of the data or information provided by us must be secured. Plagiarism may neither be circulated nor purchased and must be reported immediately to the contact person of WECKERLE. The theft of WECKERLE's intellectual property is strictly prohibited.

## **Export Controls and Sanctions List Screening**

WECKERLE complies with all prescribed export controls and customs laws as well as existing economic sanctions and embargoes. To this end, all current SDN programs are reviewed and adhered to in accordance with OFAC publications for each export shipment. As a matter of principle, WECKERLE's supplier must also ensure that the goods ordered and delivered comply with the legal and official requirements of the exporting country, the importing country and, if mentioned, the country of destination.

### **Relationship with business partners**

The business relationships between WECKERLE and its business partners should be characterized by fairness. We do not offer any rewards or benefits to prospective customers, authorities, government agencies or other representatives of such entities that are contrary to applicable law or good business practice.

Our employees may not accept any payments, gifts or other remuneration that could cause the objectivity of the decisions to be considered doubtful. Our suppliers are therefore prohibited from offering such bonuses to our employees.

Every supplier is obliged to comply with the rules of fair competition within the framework of the statutory provisions. We respect the principles of fair competition and do not enter into anti-competitive agreements on prices, conditions, customers, markets, quantities or territories.

### **Data protection and information security**

The protection of privacy in the use of personal data as well as the security of all business data must be ensured in all business processes, taking into account applicable legal requirements. When it comes to technical protection against unauthorized access, an appropriate standard must be maintained that corresponds to the state of the art.

Records and reports (internal and external) must be accurate and truthful. The principles of sound bookkeeping and accounting must be complied with; thereafter, data collection and other records must always be complete, accurate, and timely and system-oriented. The production of records, files and the like, for which confidential information of the company is used, is only permitted if this is done directly in the interest of WECKERLE.

Confidential information of the company must be kept secret. This obligation must continue even after the end of the supplier relationship.

### **Respect for human rights and social standards**

The supplier must reject any form of forced labour and comply with the legal regulations for the protection of minors and the prohibition of child labour. No one may be discriminated against on the basis of age, gender, sexual orientation, pregnancy, disability, nationality, ethnic origin, skin colour, religion or belief or social background. Discrimination occurs when a person is disadvantaged on the basis of the above-mentioned characteristics or other objectively unjustified circumstances. Equal opportunities for all genders must be

guaranteed in all aspects, starting with recruitment, through training and personal and professional development.

The supplier must comply with all necessary measures for occupational health and safety at the workplace within the framework of the legal provisions and must provide verifiable training for employees at regular intervals.

Comply with applicable legal and sectoral regulations relating to working hours, overtime, payment of wages and benefits, including legal regulations on minimum wages.

The supplier must recognise the right of its employees to form trade unions and workers' representatives on a democratic basis within the framework of national regulations.

### **Reporting of irregularities (Whistleblower Protection Act)**

Every employee of the Supplier shall be granted the right to point out circumstances that may lead to the conclusion that there has been a violation of the provisions contained in this Code of Conduct. For this purpose, the supplier must set up or maintain an internal reporting office in accordance with the Whistleblower Protection Act. Employees should be able to report anonymously. Third parties should also be given access to the reporting system.

### **Preservation of identity and protection against retaliation (Whistleblower Protection Act)**

In their work environment, employees must feel free to report known or suspected misconduct. Any retaliation against a person who reports an actual or suspected violation in good faith is strictly prohibited. Identity must be preserved.

### **Responsible sourcing of raw materials**

Due to the enormous impact on the environment and local communities, WECKERLE is aware of its responsibility in sourcing natural raw materials. We want to ensure that the natural raw materials used in our finished products are produced on the basis of the applicable laws. In particular, our suppliers undertake to comply with the Dodd-Frank Act Article 1502 (US law) as well as the European Regulation on Conflict Minerals (EU) 2017/821 ("Establishment of supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores and gold from conflict and high-risk areas").

## **Environmental protection**

We focus on a balanced relationship between ecology and economy. That is why we comply with all environmentally relevant laws and requirements and expect this from our suppliers. Right from the design of our production facilities and processes, we pay attention to environmentally optimized processes. This is also reflected in the selection of suppliers. We consider sustainable resource management to be our social obligation. Certification according to ISO-14001 of our supplier is desirable.

Reducing environmental impact also includes reducing wastewater, emissions and noise, which we encourage our suppliers to continuously reduce and develop ways to capture and recycle used resources such as water, among others. Air and soil pollution must also be avoided. The responsible use of chemicals – sparingly and carefully – is mandatory and must also be recorded in a chemicals management system.

The supplier is required to use energy sparingly and reduce its greenhouse gas emissions. Based on the ISO 14064-1:2018 / GHG protocol, we aim to reduce 50% of our global GHG emissions from Scope 1 and 2 and 15% of our GHG emissions in combination with Scope 3 by 2030 (compared to 2019) in cooperation with our suppliers.

The resulting waste must be disposed of or recycled responsibly. The aim is to continuously reduce waste and protect soil quality.

We encourage our suppliers to promote the environmental awareness of their employees through appropriate education or training measures.

WECKERLE Lackfabrik GmbH - 2023

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