

Ethics and Conduct Guidelines

Our Commitment to Compliance with the Law, Integrity, and Ethics

WECKERLE stands for reliability, quality, sustainability, and innovation. We uphold these values together by acting with unrestricted integrity, responsibly, and transparently as employees and management, and by treating each other with respect. We commit to this unconditionally, regardless of what others demand or expect from us. We expect our suppliers and service providers to comply with applicable national and international laws, rules, and regulations, as well as the standards relevant to the company. We also expect our standards to be passed on to subcontractors.

Law-abiding Behavior

We adhere to laws and regulations in our business activities. Every employee is personally responsible for complying with the laws in their area of work. Our managers always lead by good example.

It is strictly prohibited to induce third parties to commit illegal acts or to knowingly participate in such acts. Deviating behavior will, regardless of legally prescribed sanctions, lead to disciplinary consequences.

Plagiarism / Intellectual Property

The company's intellectual property must be secured. Plagiarism must neither be circulated nor acquired and must be reported to management immediately. The theft of others' intellectual property is strictly prohibited.

Export controls and sanctions list checks

WECKERLE complies with all prescribed export controls and customs laws as well as existing economic sanctions regulations and embargoes. For this purpose, all current SDN programs are checked and adhered to for every export shipment in accordance with the publications of the OFAC.

The Relationship with Business Partners

The business relationships between WECKERLE and its business partners should be characterized by fairness. We must not offer potential customers, authorities, governmental institutions, or other representatives of such institutions any rewards or benefits that are contrary to applicable law or good business practice. Our employees must not accept payments, gifts, or other remuneration from third parties that could lead to decisions being considered questionable in terms of objectivity. Every employee is required to comply with the rules of fair competition within the framework of legal regulations. We respect the principles of fair competition and do not make anti-competitive agreements regarding prices, conditions, customers, markets, quantities, or territories.

Data protection and information security

The protection of privacy when using personal data as well as the security of all business data must be ensured in all business processes, taking applicable legal requirements into account. When technically securing against unauthorized access, an appropriate standard

that corresponds to the state of the art must be maintained.

Records and reports (both internal and external) must be accurate and truthful. The principles of proper accounting and financial reporting must be followed; accordingly, data collection and other records must always be complete, correct, and timely as well as system-compliant. The creation of records, files, and the like, in which confidential company information is used, is only permitted if this is directly in the interest of WECKERLE.

Confidential company information must be kept secret. This obligation continues even after the employment relationship ends.

Respect for Human Rights and Social Standards

We reject any form of forced labor. We observe the regulations for the protection of minors and the prohibition of child labor. Child labor is legally and internationally prohibited worldwide; employment is generally only permitted from the completion of the 15th year of life, whereby international minimum standards according to ILO conventions provide that individual countries may set a minimum age of 14 years, and the worst forms of child labor are strictly prohibited according to international regulations; for adolescents under 18 years, the relevant youth labor protection regulations also apply, which in particular provide restrictions regarding working hours, rest breaks, night and weekend work, as well as the type of permissible activities. In addition, we conduct age verification checks. We also expect our suppliers to adhere to and implement this.

No one will be disadvantaged based on their age, gender, sexual orientation, pregnancy, disability, nationality, ethnic origin, skin color, religion, belief system, or social background. Discrimination occurs when a person is disadvantaged because of the aforementioned characteristics or other circumstances that are not objectively justified. Equal opportunities for all genders are ensured in all aspects, starting with recruitment, through training, as well as personal and professional development.

As part of our commitment to equal opportunities, we do not accept or demand any financial benefits or other advantages in connection with the awarding of positions. It is forbidden to charge potential employees recruitment fees. The organization must bear the costs incurred in recruitment.

WECKERLE ensures occupational safety and health protection in the workplace within the framework of legal regulations and supports continuous development to improve the working environment.

The applicable legal and industry-specific regulations regarding working hours, overtime, payment of wages and benefits, including the statutory regulations on minimum wages, are complied with.

We recognize the right of all employees to form unions and employee representations on a democratic basis within the framework of national regulations.

Reporting of Irregularities

Every employee has the right to point out to their supervisor circumstances that may indicate a violation of the regulations contained in this Code of Conduct. This can also be done anonymously.

Preservation of identity and protection against retaliatory measures

In our work environment, employees must feel free to report known or suspected misconduct. Any retaliation against a person who, in good faith, reports an actual or suspected violation is strictly prohibited. The preservation of identity must be ensured.

Responsible Raw Material Sourcing

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 in accordance with applicable laws. Our suppliers are specifically required to comply with the Dodd-Frank Act Section 1502 (US law) as well as the European Regulation on Conflict Minerals (EU) 2017/821 (establishing obligations to fulfill due diligence requirements in the supply chain for Union importers of tin, tantalum, tungsten, their ores, and gold from conflict and high-risk areas).

Environmental Protection

We rely on a balanced relationship between ecology and economy. Therefore, we comply with all environmental laws and requirements and expect the same from our suppliers. Already in the design of our production facilities and processes, we pay attention to environmentally optimized procedures. This also influences the selection of suppliers. We consider sustainable resource management to be our social obligation. Certification of our suppliers according to ISO 14001 is desirable.

The reduction of environmental impacts also includes the reduction of wastewater, emissions, and noise, which we ask our suppliers to continuously reduce and to develop ways to capture and recycle used resources such as water. Air and soil pollution must also be avoided. A responsible handling – sparingly and carefully – of chemicals is mandatory and must also be recorded in a chemical management system.

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

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

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

Biodiversity

The company is committed to avoiding negative impacts on biodiversity and, within the framework of the applicable legal and internal company regulations, to promoting measures that support the protection and sustainable use of biological diversity.

Water Protection

The company commits to considering the protection of water bodies as a central environmental obligation and to ensuring that all activities, processes, and supply chains are carried out in accordance with international environmental standards in order to prevent pollution, promote the responsible use of water resources, and maintain the integrity of aquatic ecosystems.

Softening Clause

To the extent that this compliance policy contains requirements that go beyond the minimum standards set out in the principles of the UN Global Compact as well as the applicable national and international legal standards, deviations may be permitted in justified exceptional cases through a written approval by the company body authorized for this purpose, provided that this does not impair the core principles of the UN Global Compact, particularly in the areas of human rights, labor standards, environment, and anti-corruption, and the exception is documented in a comprehensible manner.

Monitoring Compliance with the WECKERLE Ethics and Conduct Guidelines

By signing, the supplier confirms that it complies with all legal requirements, acts ethically and fairly, and does not demand, offer, or accept any financial or other benefits in connection with the awarding of contracts. WECKERLE reserves the right to verify compliance through audits on-site by appointment. In the event of detected violations, a binding action plan with deadlines will be required. In the case of serious or repeated violations, we reserve the right to restrict business relations.

WECKERLE Lackfabrik GmbH

Company name:

Dr. Benjamin Stolz
Managing DirectorSignature / Stamp of the supplier:
place, Date:

Revision number	Revision date	Description
001	21.01.2018	Creation
002	05.02.2019	Supplement Conflict Minerals
003	21.12.2020	Integration of the suppliers
004	18.09.2025	Complete revision and update
005	04.07.2026	Addition of prohibition on personnel recruiting costs, age verification to prevent child labor, approval of suppliers
006	04.07.2026	Supplementing the legal obligation of suppliers, on-site audits, and sanctions in case of detected non-compliance