WECKERLE
BERLAC GROUP

Performance in paint.

Ethics and Conduct Policy

Our Commitment to Compliance, Integrity, and Ethics

WECKERLE stands for reliability, quality, sustainability, and innovation. We uphold these values together by acting—as employees and as management—with unwavering integrity, responsibility, and transparency, and by treating one another with respect. We are unreservedly committed to this, regardless of what others demand or expect of 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 their businesses. We also expect them to pass on our standards to their subcontractors.

Law-abiding behavior

We conduct our business in accordance with the law. Every employee is personally responsible for complying with the laws applicable to their area of work. Our managers always lead by example in this regard.
It is strictly prohibited to induce third parties to engage in unlawful acts or to knowingly participate in such acts. Any violation of this policy—regardless of any legal sanctions—will result in disciplinary action.

Plagiarism/Intellectual Property

The company's intellectual property must be protected. Plagiarized works must not be distributed or acquired and must be reported to management immediately. The theft of others' intellectual property is strictly prohibited.

Export Controls and Sanctions List Screening

WECKERLE complies with all applicable export controls and customs laws, as well as with existing economic sanctions and embargoes. To this end, all current SDN lists, as published by OFAC, are reviewed and adhered to for every export shipment.

Relationships with Business Partners

Business relationships between WECKERLE and its business partners should be characterized by fairness. We may not offer potential customers, government agencies, public institutions, or other representatives of such entities any rewards or benefits that are contrary to applicable law or sound business practices. Our employees may not accept any payments, gifts, or other compensation from third parties thatcould lead to the objectivity of the decisions being viewed with scepticism.

Our company has a zero-tolerance policy towards fraud, corruption, bribery, theft, sabotage, conflicts of interest, and any other illegal or rule-breaking actions. Fraud specifically includes deliberate deception for personal or someone else's gain. Corruption and bribery cover offering, giving, requesting, or accepting improper advantages to influence business

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Amtsgericht Stuttgart, HRB 720262
Ust.-Id.-Nr.: DE 814 457 759
Steuer-Nr. 99032 / 18515
Geschäftsführer:
Dr. Benjamin Stolz, Daniel Kesselring,
Christian Maron, Willy Scheuchenpflug

decisions. Conflicts of interest arise when personal interests could affect the objective handling of work duties.

Every employee and every supplier is required to comply with the rules of fair competition within the framework of applicable laws. We respect the principles of fair competition and do not engage in any anti-competitive agreements regarding prices, terms, customers, markets, quantities, or territories.

Data Protection and Information Security

The protection of privacy in the use of personal data and the security of all business data must be ensured in all business processes, in accordance with applicable legal requirements. Technical safeguards against unauthorized access must meet an appropriate standard that reflects the state of the art.

Records and reports (both internal and external) must be accurate and truthful. The principles of proper bookkeeping and accounting must be observed; accordingly, data entries and other records must always be complete, accurate, and timely, and must comply with established systems. The creation of records, files, and the like that use the company's confidential information is permitted only if it is directly in the interest of WECKERLE.

Confidential company information must be kept confidential. This obligation remains in effect even after the employment relationship has ended.

Respect for Human Rights and Social Standards

We reject all forms of forced labor. We comply with regulations protecting minors and the prohibition on child labor. Child labor is prohibited worldwide by national law and international law; employment is generally permitted only after a person reaches the age of 15, although international minimum standards under ILO conventions provide that individual countries may set a minimum age of 14, and the worst forms of child labor are strictly prohibited under international regulations; For young people under the age of 18, the relevant youth labor protection regulations also apply, which specifically provide for restrictions regarding working hours, rest breaks, night and weekend work, and the types of activities permitted. In addition, we conduct age verification checks. We also expect our suppliers to comply with and implement these requirements.

No one will be disadvantaged on the basis of age, gender, sexual orientation, pregnancy, disability, nationality, ethnic origin, skin color, religion, beliefs, or social background. Discrimination occurs when in cases where a person is disadvantaged based on the characteristics mentioned above or other circumstances that are not objectively justified. Equal opportunities for all genders are ensured in all aspects, starting with recruitment, through training, and extending to personal and professional development.

As part of our commitment to equal opportunity, we do not accept or solicit any financial

payments or other benefits in connection with the filling of positions. It is prohibited to charge potential employees recruitment fees. The organization is responsible for covering the costs associated with recruitment.

WECKERLE ensures occupational safety and health protection in the workplace in accordance with legal requirements and supports continuous improvement to enhance the working environment.

The company complies with all applicable legal and industry-specific regulations regarding working hours, overtime, payment of wages and benefits, including statutory provisions on minimum wages.

We recognize the right of all employees to form labor unions and employee representative bodies on a democratic basis, in accordance with national regulations.

We respect the rights of indigenous peoples and ethnic and religious minorities. We neither tolerate nor support any form of discrimination, exclusion, forced labor, exploitation, or violation of their internationally recognized human rights. This applies in particular to potential human rights risks within our supply and value chains.

Furthermore, we condemn all forms of discrimination, forced labor, and human rights violations against the Uyghurs. We are committed to identifying such risks in our business relationships as well as in our supply and value chains, and to addressing them as part of our due diligence obligations.

Reporting Irregularities

Every employee has the right to bring to the attention of their supervisor any circumstances that suggest a violation of the provisions contained in this Code of Conduct. This may also be done anonymously.

Preservation of Identity and Protection Against Retaliation

In our 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. The anonymity of the reporter must be ensured.

Responsible Sourcing of Raw Materials

Given the enormous impact on the environment and local communities, WECKERLE is mindful of its responsibility when 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. In particular, our suppliers are committed to complying with Section 1502 of the Dodd-Frank Act (U.S. 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-affected and high-risk areas") to comply with due diligence obligations in the supply chain for Union importers of tin, tantalum, tungsten, their ores, and gold from conflict-affected and high-risk

areas."

Environmental Protection

We are committed to striking a balance between environmental protection and economic efficiency. Therefore, we comply with all environmental laws and requirements and expect

the same from our suppliers. We prioritize environmentally optimized processes right from the design phase of our manufacturing facilities and processes. This also influences our selection of suppliers. We view sustainable resource management as our social responsibility. ISO 14001 certification for our suppliers is desirable.

Reducing environmental impact also includes reducing wastewater, emissions, and noise; we urge our suppliers to continuously reduce these and to develop ways to collect and recycle used resources, such as water, among others. Air and soil pollution must also be avoided. The responsible use of chemicals—economically and carefully—is mandatory and must also be documented in a chemicals management system.

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

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

We encourage our suppliers to promote environmental awareness among their employees through appropriate educational and training programs.

Biodiversity

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

Water Protection

The company is committed to treating the protection of water bodies as a core environmental responsibility and to ensuring that all activities, processes, and supply chains are conducted in accordance with international environmental standards in order to prevent pollution, promote the responsible use of water resources, and preserve the integrity of aquatic ecosystems.

Soft Clause

To the extent that this Compliance Policy contains requirements that go beyond the minimum standards set forth in the Principles of the UN Global Compact and the applicable national and international legal norms, exceptions may be permitted in justified cases upon written approval by the authorized company department, provided that such exceptions do

not compromise the core principles of the UN Global Compact, particularly in the areas of human rights, labor standards, the environment, and anti-corruption, and the exception is documented in a transparent manner.

Monitoring Compliance with the WECKERLE Code of Ethics and Conduct

By signing this document, 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 the contract. WECKERLE reserves the right to verify compliance through on-site audits by appointment. If violations are identified, a binding action plan with deadlines will be required. In the event of serious or repeated violations, we reserve the right to restrict our business relationship.

Stuttgart, September 11, 2026

WECKERLE Lackfabrik GmbH

Company Name:



Dr. Benjamin Stolz
Managing Director

Supplier's signature / stamp:
Location, Date:

Revision Number	Revision Date	Description
001	21.01.2018	Creation
002	05.02.2019	Addition regarding conflict minerals
003	21.12.2020	Supplier engagement
004	18.09.2025	Complete revision and update
005	04.07.2026	Addition of a ban on personnel recruitment costs, age verification to prevent child labor, and supplier consent
006	04.07.2026	Addition of legal obligations for suppliers, on-site audits, and sanctions in the event of non-compliance
007	10.09.2026	Addition of the rights of indigenous peoples and protection of the Uyghurs.
008	01.10.2026	Expansion to include anti-corruption and bribery