

wieland



# Code of Conduct

Wieland Group

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# Introduction

In an increasingly complex economic and business world, the trust of our business partners, owners of our business partners, owners, employees and the public depend largely on the behavior of each individual.

The yardstick for our actions is constant respect for the law and all our internal company rules.

**Our Code of Conduct is derived from the Wieland corporate policy and summarizes the most important mandatory standards which apply to all employees of the Wieland Group. It thus continues the values of honesty and respect which have always been lived in the Wieland Group.**

Our Code of Conduct thus sets a generally applicable framework and obliges all employees to act in a legally compliant and responsible manner and supports our employees in acting on their own responsibility. It is intended to help them make the right decision at all times.

Each individual employee is responsible within his or her area of responsibility for ensuring that his or her actions are in line with the rules and values of our Code of Conduct. Our managers play a special role as role models - they not only communicate and live by the rules and values, but also actively demand them.

The Code of Conduct applies to all employees of the Wieland Group. However, we also expect all others working on behalf of Wieland (e.g., consultants, temporary staff) to comply with the rules and values within this Code of Conduct.

Violations of the law, the Code of Conduct and internal corporate guidelines can not only have negative consequences for each individual but can also have serious consequences for the Wieland Group.

Therefore, we assume all responsibility to act in accordance with the rules and thus make a significant contribution to the corporate success of the Wieland Group.



## Foreword by the Executive Board

Dear colleagues,

Wieland looks back on a very successful history of more than two hundred years. This sustained success of our company is based to a large extent on outstanding performance, reliability, honesty and integrity.

The personally honest and legally impeccable conduct of all colleagues not only contributes to maintaining and further strengthening Wieland's reputation among business partners, shareholders and employees, but is also a prerequisite for the sustainable continuation of our company's success story.

As members of the Wieland Executive Board, we have, therefore, decided to summarize our fundamental values in this Code of Conduct, which applies throughout the Group, in order to provide you with clear guidelines for conduct with integrity and in accordance with the law. We expect that all colleagues worldwide comply with the provisions laid down in this Code of Conduct and, also beyond the provisions, behave reliably, honestly and in accordance with the law at all times. Only that way we can all live up to our great responsibility for the reputation, competitiveness and long-term well-being of our company.



Dr. Erwin Mayr  
CEO



Gregor Tschernjavski  
CFO

# Employees

Our employees, their commitment, experience and knowledge are the essential basis of our entrepreneurial success. As an attractive employer, we can therefore offer a working environment that not only promotes performance but is also personally appreciative.

## Health and safety

The health and safety of our employees has the highest priority. Occupational health and safety is a natural part of all our operational processes and decisions. Our aim is to continuously develop occupational health and safety at all locations and to prevent accidents completely and sustainably. We expect our employees to behave in a safety-conscious manner and to report any safety violations - regardless of hierarchy or position in the company. Our goal is to be the industry's model company in the area of occupational health and safety.

## Equal treatment and respectful treatment

We respect the fundamental rights of people worldwide. When dealing with colleagues, customers and business partners, we respect the personal dignity, privacy and personal rights of each individual. We do not tolerate any unlawful unequal treatment, insults and (sexual) harassment. Misconduct will be punished accordingly. Equal opportunities and tolerance are for us essential elements of successful cooperation.

## Fair working conditions

We offer our employees appropriate remuneration and fair working conditions that, at a minimum, meet the legal requirements, e.g., regarding working hours. The legally guaranteed minimum wages in the respective labour markets are regularly exceeded.

## Continuous improvement

We secure and strengthen our position on the world market through a continuous improvement process in which all employees are involved. We take a holistic view of all procedures and processes. In order to adapt to the increasing global requirements, a high willingness to perform and a continuous improvement of work and plant productivity is fundamental. Within the framework of a culture of trust, every employee is required to accompany and help shape change processes with a high level of motivation.

# Business Partner

Trust in competence, performance and reliability are the basis of every business relationship.

## Customers

We are always a reliable partner to our customers and offer excellent quality and outstanding service worldwide. With our products and services, we enable the success of our customers. The needs of our customers are our focus. Only when the customer is satisfied are we satisfied. We strive for a long-term relationship based on partnership. With passion we work together with our customers on innovative, sustainable solutions and product developments.

## Suppliers and service providers

We select our suppliers and service providers fairly and impartially and expect the highest quality and best service at competitive conditions.

We demand that our suppliers also respect and comply with the values of our Code of Conduct and, within the scope of their possibilities, work to ensure that the values of our Code of Conduct are also respected and complied with throughout the supply chain by their suppliers and service providers.

A violation can lead to termination of the business relationship.

# Corporate Responsibility

**We are committed to free and fair competition. Unlawful restrictions of competition are forbidden, and employees engaged in such unlawful behavior will be sanctioned. We expect that our customers, suppliers and competitors also adhere to this principle.**

## Cartels, collusion and non-competition

Every employee of the Wieland Group is obliged to comply with the relevant laws against restraints of competition; a dominant market position may not be illegally exploited.

In particular, it is prohibited to enter into formal or informal agreements with competitors - including potential competitors - which have as their object or actual effect the unlawful hindering of competition. This also applies to tacit, deliberately concerted practices. In particular, agreements reached between competitors on the allocation of territories or customers as well as the exchange of information on prices, supply relationships, terms and conditions, capacities, market shares, margins, costs, special customer information and the content or conduct of offers are, therefore, prohibited.

## Corruption and bribery, conflict of interests

We strictly reject all forms of corruption, whether active or passive, and take appropriate measures in our area of responsibility to ensure that the applicable anti-corruption laws are strictly adhered to. We do not accept bribes (e.g., when making supplier decisions) and we do not bribe others (e.g., to obtain orders or other advantages). This prohibition applies not only to members of government and public officials, but also to employees (and persons close to these groups) of business partners and colleagues, both at home and abroad.

Remuneration paid to third parties (e.g., agents such as sales representatives, brokers or consultants) in the form of commissions, or in any other form, must be commensurate with the service provided and must be of an appropriate value.

Gifts and invitations are only acceptable if their nature and scope are not such as to unduly influence the actions and decisions of the recipient or to create an obligatory dependency.

Personal interests must not unduly influence our professional judgment. We disclose actual and potential conflicts of interest in accordance with our internal guidelines and conduct a neutral evaluation to ensure our employees are not engaged in conflicted relationships.

## Data protection and information security

Compliance with national and international regulations for the protection of personal data is a matter of course in the Wieland Group. We take suitable precautions to protect the privacy of our customers, employees, suppliers and other parties concerned in a professional manner in accordance with the legal requirements. We create trust in our data processing by transparency, risk-oriented protective measures, and employee training.

The unauthorized disclosure or transfer of confidential information is prohibited both internally and externally in accordance with all applicable laws. By confidential information we mean all non-public strategic, financial, technical and business information, including business and trade secrets, both from us and from our business partners.



## Patents and other industrial property rights

Our inventions and technologies make an important contribution to the success of the Wieland Group. The protection of these assets through intellectual property rights is essential for our competitiveness. No employee may disclose any Wieland intellectual property, including inventions, new findings, and trade secrets, to third parties without authorization.

We respect equally effective intellectual property rights of third parties; no employee may obtain or use their trade secrets without authorization. We reject the unlawful use, further processing or placing on the market of plagiarized products.

## International trade and combating money laundering

As an international group of companies, cross-border trade is a matter of course for us. In doing so, we observe the applicable legal requirements, e.g., for import, export, intra-community transfers, applicable sanctions and sanction lists.

We take appropriate measures to comply with the respective regulations for the prevention of money laundering. To minimize the risk of money laundering, cash payments are generally neither made nor accepted.

## Human rights, forced labour and child labour

Within our sphere of influence, we respect the internationally established human rights of all individuals. We respect the fundamental principles of the Universal

Declaration of Human Rights in accordance with the UN Guiding Principles on Business and Human Rights and the 10 principles of the UN Global Compact.

Therefore, we reject any form of forced labour and child labour and are fundamentally opposed to any form of forced or compulsory labour. We respect collective rights guaranteed by law.

We also expect this understanding and strict compliance from our business partners.

## Keeping accurate records and disclosure

We maintain accurate, complete, timely, adequate and understandable records in accordance with applicable legal and regulatory requirements. To the extent that legal provisions require the disclosure of records, we comply with this obligation.

## Climate and Environment

In addition to the protection of our employees and our commitment to society, environmental and climate protection is a central aspect of business decisions as part of our sustainability strategy. We promote the efficient use of energy and other valuable resources. We make an important contribution in this respect by recycling metals that arise in our production or at a customer's site. We consistently invest in state-of-the-art, environmentally friendly and energy-efficient technologies. We continuously improve our processes with the help of environmental and energy management systems.

# Implementation of the Code of Conduct

**A Code of Conduct is only part of the corporate culture if its values are actively lived. Setting a good example in conjunction with an active compliance organization that takes employees along with it ensures that it is firmly anchored in the consciousness of each individual.**

## Executive Board and Management

The Executive Board, the members of the Executive Committee, the managing directors of our Group companies and all our managers act in full responsibility for the employees and take into account the circumstances and effects on the respective economic region in which our companies are located when making decisions. Cultural differences are treated with recognition and respect, provided they do not violate company regulations and internal guidelines.

## Compliance organization

The Compliance Management System is part of the established integrated management systems. It focuses on six core areas (antitrust prevention, corruption prevention, export control compliance, supply chain compliance, data protection and money laundering prevention) which have been identified on a risk-oriented basis. Other identified compliance-relevant areas are controlled by corresponding specialist departments or management systems.

Our employees receive regular and risk-oriented training on the contents of this Code of Conduct and other relevant topics. We are convinced that this will make an important contribution to avoiding legal violations and preventing them in the long term.

For the purpose of implementing, training and monitoring the compliance management system, a Group Compliance Officer has been established in the Wieland Group, who does not act according to instructions in his function and has direct access to the Executive Board, the Management and the Supervisory Board.

In addition, it maintains a Compliance Committee which meets regularly. As part of its duties, this committee, together with the Group Compliance Officer, supports the group divisions and their organizational units in the fulfilment of duties of care and supervision (organizational, selection, instruction and monitoring duties) and monitors compliance with this Code of Conduct. The corresponding structures and measures are anchored in the Group-wide Compliance Management System (CMS), which is continuously reviewed and further developed. The strategic and operational management of the CMS is the responsibility of the Group Compliance Officer. He is supported operationally by compliance coordinators in the risk-relevant Corporate Functions and in the respective Group companies. The respective supervisor, the respective Compliance Coordinator, the Group Compliance Officer or the Compliance Committee are available to answer questions on compliance.

## Whistleblower system

Every employee, but also persons outside the Wieland Group, have the right and the possibility to report violations, or suspected violations, of this Code of Conduct or other regulations. For this purpose, we have set up an external reporting office, through which anonymous reporting is also possible.

No whistleblower who, on the basis of concrete evidence, is of the good faith opinion that a violation of this Code of Conduct or other regulations has occurred, or may occur, need fear disadvantages or retaliation, in whatever form, as a result of his or her report. To the extent permitted by law and actually possible, any report will be treated confidentially; the same applies to the identity of the person making the report or the identity of other people who are involved in a possible investigation.

We expressly request that employees report any relevant information.

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