

CODE OF CONDUCT FOR SUPPLIERS

Version 2/2021



Contents

1. Preamble
2. Requirements for suppliers
 - 2.1 Social responsibility
 - 2.2 Environmental responsibility
 - 2.3 Ethical business conduct
3. Implementing the requirements
4. Confirmation that supplier has read and accepted the code of conduct

1. Preamble

WITZENMANN is committed to managing its business in an environmentally friendly and socially responsible manner. We expect all our suppliers to comply with the same standards of behaviour. Likewise, we require that all our employees respect the principles of sound environmental, social and ethical behaviour and that these principles are integrated in our corporate culture. We also strive to optimise the sustainability of our entrepreneurial activities and our products [or services] and require that our suppliers contribute to these efforts in the context of an integrated approach.

Our contractual partners agree that the following provisions for a shared code of conduct will apply in our future working relationship. This agreement forms the basis for all future deliveries. The contractual partners undertake to fulfil the principles and requirements of the code of conduct and shall strive to contractually obligate their subcontractors to comply with the standards and provisions described in this document. This agreement enters into force when signed. Any breach of this code of conduct may serve as reason and occasion for the company to terminate the business relationships including all the associated supply contracts.

The code of conduct is based on national laws and instructions as well as international conventions such as the Universal Declaration of Human Rights adopted by the United Nations, the guidelines for children's rights and entrepreneurial activity, the United Nations Guiding Principles on Business and Human Rights, the international labour standards of the International Labour Organization and the Global Compact of the United Nations.

2. Requirements for suppliers

2.1 Social responsibility

- **Exclusion of forced labour**

Forced labour, slave labour or any comparable type of labour are prohibited. All work must be voluntary, and employees must be free to leave their job or terminate the employment relationship at any time. Besides this, there must be no unacceptable treatment of the workforce, such as psychological hardship or sexual and personal harassment.

- **Prohibition of child labour**

Child labour must not be used in any phase of production. Suppliers are required to comply with the recommendation from the ILO conventions regarding the minimum age at which children may be employed. According to this recommendation, the age should not be lower than the age at which general compulsory education ends and, in any case, must not be less than 15 years of age. If children are found to be working at the supplier's company, the supplier must document measures taken in order to remedy the situation and to enable the children to attend school. The rights of young employees must be protected, and special protective provisions must be complied with.

- **Fair remuneration**

Remuneration for regular working hours and for overtime must correspond to the national statutory minimum wage or the minimum standards typical in the sector, depending on which amount is higher. If the remuneration is not adequate to cover the costs for ordinary subsistence and to set aside a minimum amount of savings, the supplier is obliged to increase the remuneration to an appropriate extent. Employees must be granted all benefits prescribed by law.

- **Freedom of association**

The right of employees to establish organisations of their choice, to join these and to enter into collective negotiations must be respected. In cases where freedom of association and the right to collective negotiations are restricted by law, alternative opportunities for the free and independent association of employees for the purposes of collective negotiations must be granted. Employee representatives must be protected against discrimination. These individuals must be granted free access to their colleagues' workplaces in order to ensure that the representatives can safeguard employee rights in a legal and peaceful manner.

- **Prohibition of discrimination**

Discrimination against employees in any form is impermissible. This applies, e.g., to discrimination due to gender, race, caste, skin colour, disability, political convictions, origins, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of every individual must be respected.

- **Occupational health; safety in the workplace**

The supplier is responsible for establishing a safe and healthy working environment. The necessary precautions to prevent accidents and damage to health that could occur in relation with employment will be taken by designing and applying appropriate occupational safety systems. Moreover, employees are to receive regular information and training regarding the applicable occupational health and safety standards and measures. Employees will be provided with access to drinking water in sufficient quantities as well as access to clean sanitary facilities.

- **Complaints procedures**

The supplier is responsible for setting up an effective complaints procedure at the company level for individuals and communities that could be affected by negative impacts.

- **Handling conflict minerals**

The company is to establish processes in conformance with the guiding principles of the Organisation for Economic Cooperation and Development (OECD) for the conflict minerals tin, wolfram, tantalum and gold, as well as for additional raw materials such as cobalt, in order to fulfil its due diligence with respect to promoting responsible supply chains for minerals from high-risk areas and those affected by conflicts and will also expect the same from its suppliers. Melting and refinery activities without appropriate, audited due diligence processes are to be avoided.

2.2 Environmental responsibility

- **Treating and discharging industrial wastewater**

Wastewater from business processes, production processes and sanitary facilities is to be classified, monitored, checked and, if necessary, treated before discharge or disposal. Measures are also to be taken to reduce the amount of wastewater produced.

- **Handling air emissions**

General emissions from business processes (air and noise emissions) as well as greenhouse gas emissions must be classified, routinely monitored, checked and, if necessary, treated before their release. It is also the duty of the supplier to monitor their waste gas cleaning systems, and they are required to identify economical solutions in order to avoid all emissions.

- **Handling waste and hazardous substances**

The supplier must apply a systematic approach to determine, handle, reduce and responsibly dispose of or recycle solid waste. Chemicals or other materials that present a hazard when released into the environment must be determined and treated so that safety is ensured when handling, transporting, storing, using, recycling or reusing these substances as well as during their disposal.

- **Reducing consumption of raw materials and natural resources**

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, are to be reduced or avoided. This must either be done directly at the point of origin or via procedures and measures, for example, by modifying the production and maintenance processes or by means of processes in the company, using alternative materials, making savings, recycling or reusing materials.

- **Handling energy consumption/efficiency**

Energy consumption is to be monitored and documented. Economical solutions must be identified to improve energy efficiency and minimise energy consumption.

2.3 Ethical business conduct

- **Fair competition**

Standards for fair business activities, fair advertising and fair competition must be complied with. In addition, the relevant antitrust laws that, in particular, prohibit agreements and other activities that influence prices or conditions in the context of dealings with competitors must be applied. Moreover, these regulations prohibit agreements between customers and suppliers that aim to restrict the freedom of customers to autonomously determine their prices and other conditions in the event of resale.

- **Confidentiality/privacy**

The supplier is obliged to meet the appropriate expectations of its purchaser, the suppliers, customers, consumers and employees with respect to the protection of private information. The supplier must observe laws regarding privacy and information security and official regulations when collecting, storing, processing, transmitting and passing on personal information.

- **Intellectual property**

Intellectual property rights are to be respected; transfers of technology and expertise must take place in such a manner that intellectual property rights and customer information are protected.

- **Integrity/bribery, personal advantage**

All business activities must be carried out in accordance with the highest standards of integrity. The supplier must pursue a zero tolerance policy in terms of prohibiting all forms of bribery, corruption, blackmail and embezzlement. Procedures to monitor and implement the standards are to be applied in order to guarantee compliance with anti-corruption laws.

- **Conflict of interest**

The supplier must conduct its business activities openly and transparently. A conflict of interest could arise if an employee of the supplier or a family member maintains a close relationship with Witzenmann and can influence the business relationship with Witzenmann with his decisions. Therefore, this relationship must be disclosed to Witzenmann before negotiations are entered into. The supplier should establish guidelines on conflicts of interest due to personal relationships to ensure such notification.

3. Implementing the requirements

With regard to supply chains, we expect our suppliers to identify the risks within these supply chains and to take appropriate measures. If a breach of these requirements is suspected, as well as to protected supply chains with higher risk levels, the supplier will provide the company with prompt and, if applicable, regular information regarding the identified breaches and risks as well as the measures taken. Any complaints or suggestions concerning a potential violation of the Code of Conduct can be reported without any retaliation of Witzmann anonymously and/or confidentially to our external representative Mr. Christian Brenner (Tel. 0711 16445-430), who will ensure anonymous disclosure on request (Whistleblowing). The company will review compliance with the standards and provisions described in this document by means of a self-assessment questionnaire as well as sustainability audits at the supplier's production sites. The supplier agrees that the purchaser shall carry out such audits to verify compliance with the code at the supplier's production sites during normal business hours, after appropriate advance notice and by persons it has commissioned. The supplier can object to individual auditing measures where they would violate mandatory data protection regulations. If a violation of the provisions in this code of conduct is ascertained, the purchaser will inform the supplier of this in writing within one month and specify an appropriate grace period so the supplier can modify their behaviour to comply with these provisions. If such a violation occurred intentionally and makes the continuation of the contract until the due point of termination unacceptable for the purchaser, the purchaser can terminate the contract after the specified deadline has expired without a satisfactory result, provided that such action was threatened when setting the grace period. The legal right to extraordinary termination without specifying a grace period remains unaffected, as does the right to compensation for damages.

4. Confirmation that supplier has read and accepted the code of conduct

The supplier undertakes to conduct its business in a responsible manner and to comply with the described principles/requirements. The supplier undertakes to communicate the content of this code to its employees, agents and subcontractors in a manner comprehensible to them and to take all measures necessary for the implementation of the requirements.

EUROPE

Witzenmann GmbH
75175 Pforzheim
Germany
www.witzenmann.de

Witzenmann Sachsen GmbH
08056 Zwickau
Germany
www.witzenmann-sachsen.de

Witzenmann-Speck GmbH
75249 Kieselbronn
Germany
www.witzenmann-speck.de

Witzenmann Hamburg GmbH
22145 Stapelfeld
Germany
www.witzenmann-hamburg.de

Witzenmann Rhein-Ruhr GmbH
46509 Xanten
Germany
www.witzenmann-rhein-ruhr.de

Witzenmann Benelux nv
2520 Oelegem-Ranst
Belgium
www.witzenmann.be

BT FLEX S.r.l.
64030 Basciano TE
Italy
www.bt-flex.com

Witzenmann France S.A.R.L.
77400 Thorigny-sur-Marne
France
www.witzenmann

Witzenmann Española S.A.
19004 Guadalajara
Spain
www.witzenmann.es

Idrosapiens S.r.l.
10040 Leini TO
Italy
www.idrosapiens.it

Witzenmann Polska Spółka z o.o.
32-300 Olkusz
Poland
www.witzenmann.com.pl

Witzenmann Slovakia spol. s r.o.
976 31 Vlkanová
Slovakia
www.witzenmann.sk

Witzenmann Opava, spol. s r.o.
74601 Opava
Czech republic
www.witzenmann.cz

Witzenmann Sverige AB
14146 Huddinge
Sweden
www.witzenmann.se

Witzenmann Russia
450000 Ufa
Russia
www.witzenmann.ru

Witzenmann UK Ltd.
ML4 3LW Bellshill
Scotland
www.witzenmann.co.uk

ASIA

**Witzenmann Metal Products
(Jiangyin) Co. Ltd.**
214442 Jiangyin City
China
www.witzenmann.cn

Witzenmann India Private Limited
600044 Chennai
India
www.witzenmann.co.in

Witzenmann Japan K.K.
2-6-1, Shin-Yokohama,
Kohoku-ku Yokohama, Kanagawa
222-0033
Japan
www.witzenmann.co.jp

Witzenmann Korea Co. Ltd
Chungcheongnam-do
South Korea
www.witzenmann.co.kr

AMERICA

Witzenmann do Brasil Ltda.
83325-000 Pinhais
Brazil
www.witzenmann.com.br

**Witzenmann Metal Products
Mexico S.A.de C.V.**
38180 Guanajuato
Mexico
www.witzenmann.com.mx

Witzenmann USA LLC
48083 Troy, MI
United States of America
www.witzenmann-usa.com