



Supplier Code of Conduct

Corporate due diligence
in the supply chain

Preamble

Since its founding in 1948, the WEPA Group has consistently committed itself to assuming a high degree of social and societal responsibility. Our corporate philosophy is based on the clear alignment of our actions to the principles of social responsibility with respect to people and the environment. The times we are living in pose wide-ranging challenges, from the relentless advance of new technologies, to intensifying global competition, to growing demands with regard to social issues and climate policy concerns. Given these challenges, the following guiding principles, which form the foundation of our business activity, are taking on key importance.

The WEPA Group expects that its suppliers share these fundamental principles and, at the same time, commit themselves to respecting all applicable regulations and laws. In this context, the present Supplier Code of Conduct sets out the indispensable minimum requirements that our business partners must meet in order to fulfil their responsibility. This document takes orientation from the pioneering United Nations Guiding Principles on Business and Human Rights, the basic labour and social standards set out by the International Labour Organization (ILO), the groundbreaking guidelines of the Organisation for Economic Co-operation and Development (OECD) and the fundamental principles of the UN Global Compact.

In calling on our suppliers to follow the standards laid out in this Supplier Code of Conduct, we are striving, together with them, to shape the supply chain in an ethical and sustainable manner. We are firmly convinced that this collective commitment not only helps to strengthen long-term partnerships, but also makes a positive contribution to society and to the preservation of our environment. The WEPA Group is dedicated to these principles, and to the ongoing development and improvement of our joint efforts in this area.

To this end, in addition to observing all applicable laws and regulations, we expect you, as our supplier, to acknowledge and fulfil the standards set out in this document, to exercise according due diligence and to also ensure that these standards are implemented by your suppliers and/or subcontractors.

In recognition of the importance of our joint mission, we present this Supplier Code of Conduct and invite our suppliers to likewise commit themselves to this path of social responsibility. Together, we are contributing to creating a more sustainable future and to advancing in the world at large the values for which the WEPA Group stands.



Responsibility to people

WEPA places the highest value on the protection of human rights in conformance with the Universal Declaration of Human Rights of the United Nations. Accordingly, our suppliers are obligated to respect internationally recognised labour and social standards. These include the following principles:

Human rights and freedom from discrimination

- Respectful interaction with employees and creation of a workplace that is free of harassment, abuse and discrimination of any kind (ILO Nos. 111/100)
- Recognition of the right to organise and the right to collective bargaining to the extent permitted by law (ILO Nos. 87/98)
- Adherence to requirements with respect to minimum wages and working hours according to local laws, or to minimum standards of the respective national economic sectors and in compliance with ILO standards. Employees are paid wages that allow them to afford an adequate standard of living (ILO No. 100)
- Prohibition of child labour, forced labour and all forms of modern slavery and human trafficking, as well as enlisting or offering persons for illegal activities or acting as an intermediary to this end (ILO Nos. 29, 105, 138, 182)
- Respect of the right to free expression
- Ensuring of due diligence with regard to the promotion of responsible supply chains for minerals from conflict and high-risk areas, in accordance with OECD Guidelines

Safety and health

- Reduction of workplace accidents and occupational illnesses through the establishment and fulfilment of safety standards
- Execution of regular employee training to ensure workplace safety and increase risk awareness

Worker protection

- Protection of all employees, irrespective of gender or age, from excessive exposure to chemical, biological or physical hazards, as well as from activities that cause excessive strain, in the workplace and in company accommodations
- Provision of appropriate controls, safe work procedures, preventive maintenance and technical measures to minimise health and safety hazards
- Provision of adequate personal protective equipment in case hazards cannot otherwise be controlled
- Definition, evaluation and implementation of steps to prevent accidents in the framework of a continuous improvement programme

Emergency preparedness and response


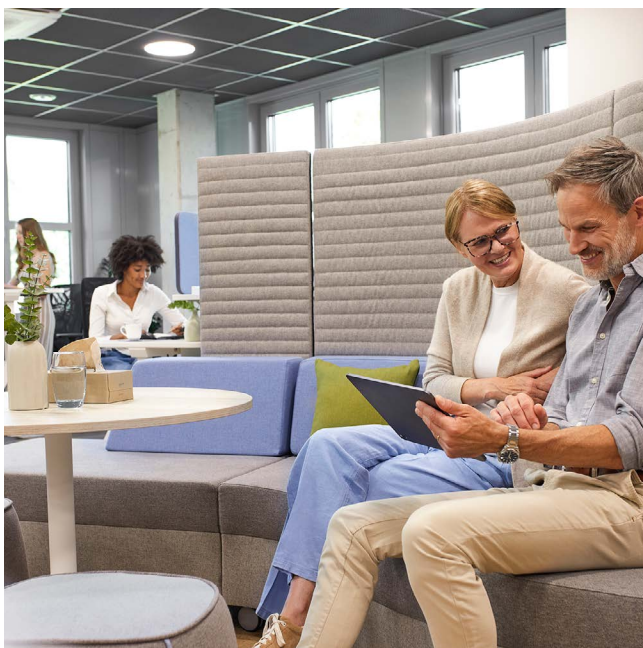
- Identification and evaluation of emergency situations in the workplace and in company accommodations
- Minimisation of the effects of emergencies through preventive measures, emergency plans and response procedures on the part of suppliers



Environmental responsibility

Our suppliers commit to taking appropriate precautions in the context of their business activities with respect to the environment. This includes the following principles:

- Efficient use of natural resources and the use of recycled materials wherever possible, as well as of energy-efficient, climate-neutral and environmentally friendly technologies
- Preservation of natural resources such as land, forests and bodies of water
- Stoppage or curtailing of production in the event of the release of persistent organic pollutants
- Classification and designation of hazardous properties of substances and mixtures in order to allow the safe use of chemicals
- Appropriate disposal, control and processing before the release of: solid waste, including the observation of bans on the export of hazardous waste; waste water; emissions; chemicals; or other materials with potentially negative effects on the health of human beings or the environment. This includes the reduction of waste volumes and emissions, as well as the observation of restrictions in dealing with products containing mercury



Together with our suppliers, WEPA contributes actively to climate protection along the entire supply chain.

Responsibility as business partners

In their business relationships with WEPA, our suppliers are obligated to engage in fair competitive conduct. The following principles are to be observed:

- Prohibition of all forms of corruption, fraud, extortion, breach of trust, embezzlement, money laundering and financing of terrorism
- Adherence to the relevant provisions of competition law
- Respect for the applicable customs and export regulations as well as sanctions
- Confidential handling and protection of personal data and private information as well as WEPA trade secrets
- Provision of information to WEPA about situations that could potentially lead to conflicts of interest in the business relationship
- Provision of products that are consistent with applicable laws and regulations as well as with WEPA's quality requirements

Responsibility for compliance

Our suppliers commit themselves to establishing an appropriate compliance management system that adequately supports the observance of these principles and the fulfilment of applicable laws and regulations.

This includes the implementation of an effective internal or external whistle-blower system that enables the reporting of violations of these principles or their associated hazards.

As part of our responsibility for ethical and trustworthy cooperation in the supply chain, all companies, employees and affected third parties who are involved in the supply chain are invited to contact the WEPA whistle-blower system ([whistle-blower policy – WEPA](#)) in suspected cases of compliance violations.

WEPA will review this Code of Conduct at regular intervals and modify it as necessary. In the case of significant changes to the code, WEPA will give its suppliers due notice.

Because the integrity and trustworthiness of our business partnerships is of great importance to WEPA, we support our suppliers as needed in fulfilling the standards and due-diligence requirements that are defined in this document.

To ensure compliance with these standards, we reserve the right to verify our suppliers' adherence to this Code of Conduct in an appropriate manner.

During such a verification process, the supplier is obligated to grant WEPA access to all data and information that is necessary for the implementation of this Code of Conduct.

To this end, the supplier allows the WEPA Group, under the condition of adequate prior notice, to verify its compliance with the standards and due diligence requirements set out in this Supplier Code of Conduct, either directly or through third parties who are bound to secrecy, by means of inspections in the facilities that are involved in the production/delivery of the articles for WEPA that are covered by the contract. This also encompasses the inspection of the supplier's plants, its business premises and the records that document its compliance with the standards in the Code of Conduct. The supplier is obligated to correct all deviations from the requirements in accordance with the standards and due diligence requirements defined in the Code of Conduct.

In case of a suspected violation of this Code of Conduct, the supplier commits to adequately review the facts and circumstances in question. WEPA reserves the right to conduct its own investigation into suspected violations in cooperation with the suppliers. In case of a violation of this Code of Conduct or the principles defined in it, WEPA additionally reserves the right to take appropriate legal steps.

This includes in particular the right of WEPA to terminate specific individual or all existing agreements between the supplier and WEPA without notice, or to withdraw from these, should the supplier fail to comply with one or more of the above standards and due diligence requirements and, despite the setting of an appropriate deadline, fail to redress the point or points at issue.

Our suppliers commit to adequately informing their employees, representatives and subcontractors about the content of this Code of Conduct and to taking all measures necessary for the implementation of the defined principles.

Other, in particular farther-reaching, contractual obligations remain unaffected by this Supplier Code of Conduct and take precedence over the standards and due diligence requirements laid out in this document. This applies in particular to terms of the contract that obligate the supplier to comply with or implement certain standards and/or requirements for the supply chain in accordance with applicable legal provisions.

Legal information

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