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## Code of Conduct for social responsibility

### **Fundamental understanding of socially-responsible management**

This CoC<sup>1</sup> is based on a common fundamental understanding of socially-responsible management. Within our possibilities and scope of activities, we, the undersigned company, Eugen WOERNER GmbH & Co KG, assume responsibility by giving consideration to the economic, technological, social and ecological impacts of our corporate decisions and actions. In this way, we contribute to the social and economic development of the countries and regions in which we operate. Our actions are geared towards the principles of the UN General Declaration on Human Rights, the OECD Guidelines for Multinational Enterprises and the Core Labour Standards of the International Labour Organisation (ILO) as well as the UN Principles on Business and Human Rights.

### **Application**

We undertake to apply the content of this CoC in all our company's branches and business units. Furthermore, we make every appropriate and reasonable effort to disseminate the content of this CoC worldwide among our business partners.

### **Observance of laws and international agreements**

We regard the observance of the relevant laws and the other legal stipulations of the countries in which we operate as a matter of course. Where national legislation and other legal stipulations fall short of this CoC, we undertake to observe the relevant international standards.

### **Corruption**

We reject corruption, extortion and bribery within the meaning of the relevant UN Convention<sup>2</sup>. We promote transparency, integrity and responsible management and oversight in the company.

### **Fair competition/ intellectual property rights**

We act in compliance with national and international competition regulations and cartel law and do not involve ourselves in price-fixing agreements, allocation of markets, collusive customer or market agreements or collusive tendering.

### **Protection of information, intellectual property rights and counterfeits.**

We protect confidential information and respect intellectual property; the transfer of technology and know-how must ensue in a way which ensures that intellectual property rights, business secrets and non-public information are protected.

### **Combating money laundering and terrorism financing**

We reject money laundering and the financing of terrorism.

### **Data protection**

We process, store and protect personal data in observation of the statutory stipulations.

### **Data security**

We observe the respective relevant laws regarding the protection of trade secrets and treat confidential information of our business partners accordingly.

### **Export regulations**

We comply with the statutory export and customs regulations.

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<sup>1</sup> CoC: Code of Conduct

<sup>2</sup> United Nations Convention against Corruption of 2003, in effect since 2005

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### Avoiding conflicts of interest

Both internally and externally, we avoid all conflicts of interest which could impact business relationships. Where they do occur, we disclose these conflicts.

### Health and safety

We act in accordance with the relevant laws and international standards<sup>3</sup> relating to health and safety at the workplace and ensure safe working conditions. To this end, we offer training courses and ensure that all employees are correspondingly instructed. An appropriate health and safety management system is to be developed, applied and documented which, among other aspects, takes into consideration:

- Suitable design of the workplace
- safety regulations and availability of suitable personal protective equipment
- Implementation of preventative inspections, emergency measures, an accident reporting system and further measures for continuous improvement.

### Access to clean sanitary facilities and drinking water

We provide the employees in our operations with access to drinking water in adequate quantities and clean sanitary facilities.

### Remuneration and working hours

#### Remuneration

Remuneration is based on the relevant laws and augmented by the respective applicable national minimum wage legislation. Employees are informed clearly, in detail and regularly on the make-up of their wages.

#### Working hours

We observe the relevant laws and (international) labour standards with regard to the highest permissible number of working hours and ensure that working hours, including overtime, do not exceed the upper limit. Employees have at least one whole day off per week.

### Observance of human rights

We espouse and support the observance of internally-recognised human rights and respect the dignity, privacy and personal rights of each individual. We do not employ persons against their will and force nobody to work. We do not tolerate unacceptable treatment of workers such as physical force, sexual or personal harassment or discrimination.

### Prohibition of child labour

We do not employ persons unable to prove a minimum age of 15. In countries which fall within the exception for developing countries pursuant to ILO Convention 138, the minimum age may be reduced to 14. We do not employ workers for dangerous tasks who, as specified in ILO Convention 182, cannot prove a minimum age of 18.

### Prohibition of forced labour

No forced labour, modern slave labour or comparable practices may be deployed. Every employment contract must be based on free will and include the option of termination<sup>4</sup>.

### Freedom of association and collective negotiation

We respect the right of employees to freedom of association, freedom of assembly and collective wage bargaining provided this is legally permitted and possible in the respective country.

### Prohibition of discrimination

We promote equal opportunities and do not tolerate any form of discrimination. We treat everyone equally, irrespective of gender, age, colour, ethnic origin, sexual identity, handicap, religious affiliation, philosophy or other personal characteristics.

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<sup>3</sup> Such as the ILO Labour and Social Standards, SA 8000 Social Accountability or ISO 45001 Occupational Health and Safety Management System, etc.

<sup>4</sup> ILO Conventions 29 and 105

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### **Environmental management**

We act in compliance with the relevant laws and orient ourselves towards international standards<sup>5</sup> in order to minimise negative environmental impacts and continuously improve our environmental protection activities. Every employee is made aware of environmental protection and the necessary training measures and awareness programmes are offered. An appropriate environmental protective management system is to be developed, applied and documented, taking the following into account:

- Pursue and constantly improve goals and measures and their implementation
- Environmental aspects such as the reduction of carbon emissions, increase of energy efficiency and use of renewable energies, securing of water quality and reduction of water consumption, securing of air quality, economical use of resources, reduction of waste and correct disposal and responsible handling of chemical substances

### **Dealing with conflict minerals**

With all due care, we take measures to avoid the use of conflict minerals in our products in order to avoid human rights infringements, corruption and the financing of armed groups of similar.

### **Supply chain**

We encourage our suppliers to observe the principles of this CoC or apply an equivalent code of conduct. Furthermore, we call on them to enforce the content of this CoC in their supply chains. We reserve the right to carry out checks to ensure the observance of this CoC among our suppliers. These may take the form of questionnaires, assessments or audits. Where doubts arise regarding the observance of this CoC, the supplier will be asked to take suitable measures and report the procedure to their contact person in our company.

### **Consumer interests**

Where consumer interests are involved, we comply with the consumer-protection stipulations and with appropriate sales, marketing and information practices. Particular attention is paid to vulnerable groups (e.g. minors).

### **Implementation and enforcement**

We make suitable and reasonable efforts to implement, document and apply the principles and values described in this CoC. All employees are made aware of and appropriately trained on the relevant CoC topics.

### **Communication**

We communicate in an open and dialogue-oriented way with staff, customers, suppliers and other interest groups and stakeholders on the requirements of this CoC.

### **Dealing with infringements and reporting**

We offer our employees access to a protected mechanism to confidentially report possible violations of the principles of this CoC (whistleblower system). Deliberate misuse of the complaints system will not be tolerated.

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<sup>5</sup> ISO14001 and Standards of the OECD Guidelines/ COP21