



Code of Conduct

Transparent compliance rules that create trust

Wicke GmbH + Co KG is committed to ecologically and socially responsible corporate governance. We expect the same behaviour from all our suppliers. We also require that our employees observe the principles of ecological, social and ethical behaviour and integrate these into the corporate culture. Furthermore, we are always striving to optimise our entrepreneurial activities and our products with a view to sustainability and we invite our suppliers to do likewise and contribute towards a holistic approach.

For future cooperation, the contracting parties shall agree on the application of the following rules for a common code of conduct. This agreement shall form the basis of all future deliveries. The contracting parties shall undertake to comply with the principles and requirements of the Code of Conduct and to endeavour to contract their subcontractors to comply with the standards and regulations listed in this document. This agreement will enter into force upon being signed. A violation of this Code of Conduct may ultimately be a reason for the company to put an end to business relationships, including all associated supply contracts.

The Code of Conduct is based on national laws and regulations such as the Supply Chain Due Diligence Act (LkSG) and international conventions such as the United Nations Universal Declaration of Human Rights, the Children's Rights and Business Principles, the United Nations Guiding Principles on Business and Human Rights, the International Labour Organisation's international labour standards and the United Nations Global Compact.



Social responsibility:

Exclusion of forced labour

There must be no forced labour, slave labour or similar. All work must be undertaken voluntarily and without threat of punishment. Employees must be able at all times to terminate their work or the employment relationship. In addition, there must be no unacceptable treatment of workers, such as psychological hardship, sexual or personal harassment or humiliation. The commissioning or use of security forces is not permitted if this leads to people being treated in an inhumane or degrading way or being injured, or if their freedom of association is restricted.

Prohibition of child labour

Child labour may not be used at any stage of production. Suppliers are called upon to adhere to the ILO conventions' recommendation on the minimum age for the employment of children. According to this, the age shall not be lower than the age at which general compulsory education ends under the law of the country in which the employment takes place, and in all cases it shall not be lower than 15 years of age. If children are found to be working, the supplier must document the measures needed to remedy the situation and to enable the children to attend school. The rights of young workers must be protected. Workers under 18 years of age must not be used for work that can adversely affect children's health, safety or morals. Special protection regulations must be observed.

Fair remuneration

The remuneration for regular working hours and overtime must be paid in accordance with the national statutory minimum wage or the industry's customary minimum standards, whichever is higher. Remuneration for overtime must, in all cases, exceed the remuneration for regular hours. If the remuneration is not sufficient to cover the cost of ordinary living and to allow for minimum savings, the supplier is obliged to increase the remuneration accordingly. Employees are entitled to all legally prescribed benefits. Deducting wages as a punitive measure is not permitted. The supplier must ensure that the employees have clear, detailed and regular written information on how their remuneration is made up.

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Fair working hours

Working hours must comply with applicable laws or industry standards. Overtime is only permitted if it is provided voluntarily and does not exceed 12 hours per week, during which employees must be granted at least one day off after six consecutive working days. Weekly working hours may not regularly exceed 48 hours.

Freedom of association

The right of employees to set up organisations of their choice, to join these organisations, to conduct collective bargaining and to strike shall be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative options for an independent and free association of employees for the purpose of collective bargaining shall be provided. Employee representatives shall be protected from discrimination. Employees may not be discriminated against for establishing or being members of such an organisation. Employee representatives shall be granted free access to their colleagues' workstations to ensure that their rights are respected in a lawful and peaceful manner.

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Non-discrimination clause

All forms of discrimination against, or unequal treatment of, employees are prohibited, insofar as they are not based on the requirements of the employment. This applies, for example, to discrimination due to gender, race, caste, national, ethnic or social origin, colour, disability, state of health, political conviction, world view, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of all individuals must be respected.

Health and safety at work

The supplier is responsible for a safe and healthy working environment. By developing and using appropriate occupational safety systems, the supplier takes the precautionary measures needed to prevent accidents and injury to health arising from the work. Excessive physical or mental fatigue must be prevented by taking appropriate measures. In addition, employees must be kept regularly informed and trained with regard to current health and safety standards and measures. Employees must have access to adequate supplies of drinking water and to clean sanitary facilities.

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Preservation of natural resources

The supplier shall not, in violation of legitimate rights, take away land, forests or bodies of water, the use of which ensures individuals' livelihoods. The supplier shall refrain from causing harmful soil changes, water or air pollution, noise emissions or excessive water consumption if this harms the health of individuals, detracts from the natural prerequisites for food production or prevents access to proper drinking water or sanitary facilities.

Complaints mechanisms

The supplier shall pass on to its employees in a suitable format the information from Wicke GmbH + Co KG on how a complaints procedure is instigated, on who is authorised to conduct it and on how it is carried out. Employees must be able to access the complaints procedure in the knowledge that confidentiality with regard to identity and effective protection against discrimination will be maintained. If no information is given to the contrary, the supplier is responsible at company level for establishing an effective complaints mechanism for individuals and communities who might be adversely affected.

Dealing with conflict minerals / Ecological responsibility

For the conflict minerals tin, tungsten, tantalum and gold as well as for other raw materials such as cobalt, the company shall establish processes in accordance with the Organisation for Economic Cooperation and Development (OECD)'s guiding principles for exercising due diligence to promote responsible mineral supply chains from areas of conflict and high-risk areas; the company also expects this from its supplier. Blast furnaces and refineries without adequate, audited due diligence processes should be avoided.

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Ecological responsibility

Treatment and discharge of industrial waste water

Waste water from operating processes, production processes and sanitary facilities must be typed, monitored, checked and, if necessary, treated before discharge or disposal. Measures should also be introduced to reduce the production of waste water.

Dealing with air emissions

General emissions from operating processes (air and noise emissions) and greenhouse gas emissions must be typed, routinely monitored, checked and, if necessary, treated before discharge. The supplier also has the task of monitoring its exhaust gas purification systems and is obliged to find cost-efficient solutions for minimising all emissions.

Handling of waste and hazardous substances

The supplier shall take a systematic approach to identifying, handling, reducing and responsibly disposing of or recycling solid waste. The Basel Convention ban of 22 March 1989 on the export of hazardous waste must be observed in its current version. Chemicals or other materials that present a hazard when released into the environment must be identified and handled in such a way that safety is guaranteed when they are being transported, stored, used, recycled/re-used or disposed of. Mercury must be used in accordance with the Minamata Convention's bans of 10 October 2013 and persistent organic pollutants in accordance with the Stockholm Convention of 23 May 2001, in their current versions.

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, shall be reduced or avoided. This may be done directly at the place of origin or by implementing procedures and measures, for example by changing the production and maintenance processes or processes within the company, by using alternative materials, by making savings, by recycling or by reusing materials.

Dealing with energy consumption / energy efficiency

Energy consumption must be monitored and documented. Cost-efficient solutions must be found to improve energy efficiency and minimise energy consumption.

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Ethical business behaviour

Fair competition

Fair business, fair advertising and fair competition standards must be observed. In addition, when dealing with competitors, current antitrust laws must apply which prohibit, in particular, agreements and other activities that affect prices or conditions. These regulations also prohibit agreements between customers and suppliers which lead to a restriction of the customers' freedom to set their own prices and other conditions at the time of resale.

Confidentiality/data protection

With regard to the protection of private information, the supplier shall undertake to meet any reasonable expectations on the part of its client, subcontractors, customers, consumers or employees. The supplier shall comply with the laws on data protection and information security and with the official guidelines when collecting, storing, processing, transmitting and transferring personal information

Intellectual property

Intellectual property rights must be respected; technology and knowledge transfer must take place in such a way that intellectual property rights and customer information are protected.

Integrity / Bribery and personal gain

All business activities must be based on the highest standards of integrity. The supplier shall pursue a zero tolerance policy in prohibiting all forms of bribery, corruption, blackmail and embezzlement. There must be procedures for monitoring and enforcing standards to ensure compliance with anti-corruption legislation.

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Implementation of requirements

We expect our suppliers to identify the risks within supply chains and to take appropriate measures. In the event of suspected violations and to secure supply chains with increased risks, the supplier shall inform the company promptly and, if necessary, regularly of the identified violations and risks and of the measures taken. The company shall check for compliance with the standards and regulations listed in this document using a self-assessment questionnaire and risk-based audits at suppliers' production sites. The supplier shall agree to the client carrying out such audits once a year or, for concrete reasons, verifying compliance with the Code of Conduct at the supplier's business premises during normal business hours, following reasonable advance notice and using persons instructed by the client. The supplier may object to individual auditing measures if these are likely to violate mandatory data protection regulations.

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If a violation of the rules of this Code of Conduct is found to exist, the client shall notify the supplier of this in writing within one month and provide the supplier with a reasonable grace period in which to bring its behaviour into line with these regulations. If remedial action is not possible in the foreseeable future, the supplier must state this without delay and work with the company to draw up a concept with a timetable for terminating or minimising the violation. If such a violation was a culpable act and the grace period expires without result, if the implementation of the measures contained in the concept have no remedial effect at the end of the timetabled period, if continuation of the contract until ordinary termination is unacceptable to the client and if no less restrictive remedy is available, the client may terminate the contract/business relationship and terminate all contracts after the unsuccessful expiry of the set period if it has threatened to do so at the time of extending the deadline. A statutory right to extraordinary termination without setting a grace period, in particular in the event of very serious violations, as well as the right to compensation remain unaffected.

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Supplier's acceptance and consent

By signing this document, the supplier shall undertake to act responsibly and to comply with the listed principles and requirements. The supplier shall undertake to communicate, in an understandable form, the contents of this Code of Conduct to its employees, agents and subcontractors and to make all necessary provisions for implementing the requirements.

This document can be found on the website of Wicke GmbH + Co. KG.

www.wicke.com

Signature / Company / Stamp

Place / Date

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