



Code of Conduct

Table of contents

I. General principles

1. Basic understanding
2. Compliance with the law / legal compliance principle
3. Orientation towards generally applicable values and principles

II. Principles of corporate and social responsibility

1. Human rights
2. Prohibition of discrimination
3. Health protection
4. Working conditions, ban on forced labour and child labour
5. Environmental protection / climate change
6. Communication

III. Principles of fair competition

1. Prohibition of corruption
2. Behaviour towards competitors
3. Trade secrets

IV. Scope of application, implementation, suppliers

1. Scope of application
2. Implementation and compliance
3. Complaints procedure
4. Suppliers / service providers

I. General principles

1. Basic understanding

The company recognises its social responsibility and undertakes to live up to this responsibility in all its business activities.

Our activities, actions and decisions always follow the principle of legal compliance, i.e. compliance with the relevant legal and official requirements and regulations. We are also guided by the principles of the United Nations (UN Global Compact).

- Human rights (in line with the Universal Declaration of Human Rights):
Protection of human rights, no complicity in human rights violations.
- Labour (in line with ILO principles): e . g. protect freedom of association, abolish forced labour, child labour and discrimination.
- Environment: Ecological and responsible action support, promote environmentally friendly technologies.
- Anti-corruption: Avoid corruption in all forms, including extortion and bribery.

2. Compliance with the law / legal compliance principle

In all its business activities and decisions, the company undertakes to comply with the relevant statutory regulations and official requirements as well as the other relevant provisions of the countries in which it operates (principle of local legal compliance). Business partners are to be treated fairly. Contracts are honoured, whereby changes to the framework conditions are taken into account.

3. Orientation towards generally applicable values and principles

The company bases its actions on generally applicable ethical values and principles, in particular integrity, honesty, respect for human dignity and non-discrimination.

II. Principles of corporate and social responsibility

1. Human rights

The company respects and supports compliance with internationally recognised human rights. In particular, it observes human rights in accordance with the UN Human Rights Charter (Universal Declaration of Human Rights, General Assembly Resolution 217 A (III) of 10 December 1948). These include in particular the 5 principles of the International Labour Organisation (ILO for short): Freedom of association, forced labour, child labour, discrimination and occupational health and safety. The resulting 10 ILO core labour standards, which are intended to guarantee social standards within the framework of the World Trade Organisation for decent working conditions and adequate occupational health and safety, are listed here with the number of the corresponding international convention:

1. ILO 29 Forced labour (1939)
2. ISO 87 Freedom of association and protection of the right to organise (1948)
3. ILO 98 Right to organise and collective bargaining (1949)
4. ILO 100 Equal Remuneration (1951)
5. ILO 105 Abolition of forced labour (1957)
6. ILO 111 Discrimination (Labour & Employment) (1958)
7. ILO 138 Minimum age of employees (1973)
8. ILO 182 Prohibition of the evil consequences of child labour (1981)
9. ILO 155 Occupational health and safety and working environment (1981)
10. ILO 187 Framework for the promotion of occupational health and safety (2006)

2. Prohibition of discrimination

The company rejects any form of discrimination within the framework of the applicable rights and laws. This refers in particular to discrimination against employees on the basis of race, ethnic origin, gender, religion or ideology, disability, age or sexual identity.

3. Health protection

The company ensures occupational health and safety in the workplace within the framework of national regulations, including mandatory compliance with the relevant regulations Occupational Health and Safety Act (ASchG), Occupational Safety Act (ASiG), Working Hours Act (ArbZG), the sub-legal regulations (e.g. technical rules) and trade association regulations (e.g. DGUV'en, ASR). The company supports continuous further development to improve occupational health and safety.

4. Working conditions, ban on forced labour and child labour

The company respects the right of its employees to freedom of association and assembly within the framework of the applicable rights and laws. The company complies with the labour standards with regard to the maximum permissible working hours and remuneration, in particular with regard to the level of remuneration, in accordance with the applicable laws and regulations.

Employees must be protected from corporal punishment and from physical, sexual, psychological and verbal harassment. The privacy of employees is respected.

5. Environmental protection / climate change

The company is committed to the goal of protecting the natural foundations of life for present and future generations. Laws and regulations enacted to protect the environment must be observed. In particular, the transition to a sustainable economy, efforts to save energy and CO₂ and to limit global warming to 1.5° C in accordance with the Paris Agreement are given greater consideration and integration in corporate management and the decision-making processes for corporate policy, objectives and programmes.

6. Communication

The company communicates openly and in a dialogue-oriented manner about the requirements of this CoC and its implementation to employees, customers, suppliers and other interest and stakeholder groups. All employees of the company are regularly sensitised to the CoC.

III. Principles of fair competition

1. Prohibition of corruption

The company rejects corruption and bribery. When dealing with business partners and state institutions, the interests of the company and the private interests of employees on both sides are strictly separated. Decisions are made free of extraneous considerations and personal interests. The applicable criminal law on corruption must be observed. Among other things, the following must be observed:

The granting of personal benefits by the company and its employees to domestic or foreign public officials (such as civil servants or employees in the public sector) with the aim of obtaining benefits for the company or themselves or third parties is not permitted.

Personal advantages of monetary value in return for unfair favouritism in business dealings between companies may not be offered, promised, granted or approved. Similarly, personal benefits of value may neither be demanded nor accepted in exchange for unfair favouritism in business dealings with business partners. The company's management and employees may not offer, promise, demand, grant or accept any gifts, payments, invitations or services in business dealings that are granted with the intention of unfairly influencing a business relationship or that could jeopardise the professional independence of the business partner. This is generally not the case with gifts and invitations that are within the scope of customary business hospitality, custom and courtesy.

2. Behaviour towards competitors

The company respects fair competition. It therefore complies with the applicable laws that protect and promote competition, in particular the applicable antitrust laws and other laws regulating competition.

When dealing with competitors, these regulations particularly prohibit agreements and other activities that unfairly influence prices or conditions, unlawfully allocate sales territories or customers or unlawfully impede free and open competition.

Furthermore, these regulations prohibit unfair agreements between customers and suppliers that are intended to restrict customers in their freedom to determine their prices and other conditions for resale (price and condition fixing). In view of the fact that the distinction between prohibited cartels and authorised cooperation can be problematic, the company should appoint a contact person for its employees who can be contacted in case of doubt. This is the managing director responsible for sales.

3. Trade secrets

The company respects and protects the business and trade secrets of others. Confidential information and confidential documents may not be passed on to third parties without authorisation or made accessible in any other way, unless authorisation has been granted, the information is publicly accessible or an enforceable decision by an authority or court requires this.

IV. Scope of application, implementation, suppliers

1. Scope of application

This CoC is primarily a voluntary commitment on the part of the company and applies to all branches and business units.

2. Implementation and compliance

The company will publicise the contents of this WSM-CoC and the resulting obligations to its employees in an appropriate and effective manner (including homepage, intranet). It will take appropriate measures to ensure that the WSM-CoC is complied with and that appropriate corrective or remedial action is taken in the event of non-compliance. These are reviewed for effectiveness as part of the internal management processes.

3. Complaints procedure

The company has set up an appropriate and internal complaints procedure. This enables individuals to report risks, violations and breaches of the CoC. The receipt of the complaint is treated confidentially and anonymously, with an acknowledgement of receipt and an internal discussion with the whistleblower.

4. Suppliers, service companies

We expect the company's direct suppliers (i.e. those with whom business relationships exist within the framework of contracts) to comply with the WSM-CoC. In addition, they are requested to promote and comply with the WSM-CoC among their suppliers (upstream suppliers) to the best of their ability and to request that they also comply with the WSM-CoC. The organisation expects its immediate suppliers in the supply chain to effectively implement this chain of custody.

Status:
November 2024