

## CODE OF CONDUCT



**WEIDMANN**

# CONSENT TO WEIDMANN'S CODE OF CONDUCT BY ITS BUSINESS PARTNERS

Dear Business Partners,

At Weidmann, we rely on trustworthy and open supplier relationships for the long-term success of our company. Therefore, we and all our employees commit to responsible and legally compliant business conduct based on our corporate values. Weidmann insists on honesty and fairness in all aspects of its business practices and expects the same from its business partners.

Our business partners are defined as suppliers of products and/or providers of services and know-how that enable us to run our operation, and production, as well as to fulfill our sales, service, or administrative activities.

The attached Code of Conduct outlines Weidmann's commitment to prevent, mitigate, and address adverse social and environmental impacts associated with our business activities. It is based on the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (Amendment of 2023) and incorporates the UN Global Compact's ten principles in the areas of human rights, labor, environment, and anti-corruption.

We require that all business partners consent and comply with this Code of Conduct, the OECD Guidelines for Multinational Enterprises, as well as all relevant national laws and regulations.

Specifically, Weidmann asks its business partners for the following:

- To cooperate with Weidmann to support the UN sustainability development goals together protect and uphold the right to freedom of speech and freedom of expression;
- to monitor, report, and transparently communicate with Weidmann on actual as well as potential negative social and environmental impacts in relation to its business conduct;
- to take adequate measures to prevent, mitigate, and remediate its negative social and environmental impacts.
- to share its sustainability-related data with Weidmann upon request;
- to train its employees and temporary workers on their rights and obligations as defined by Weidmann's Code of Conduct as well as all applicable laws. Tier 1 suppliers are responsible for ensuring that their supply-chain partners also adhere to the standards of Weidmann's Code of Conduct;
- to allow Weidmann access to conduct either virtual or physical on-site audits.

Weidmann asks its business partners to acknowledge their consent to our Code of Conduct by returning the signed appendix letter. This Code of Conduct replaces any previous contradictory provisions or regulations. It will be modified if required and modifications shall be communicated to the business partners in writing.

Weidmann assesses business partner's compliance with this Code of Conduct by using self-assessment questionnaires, reviews, and audits. Suppliers shall acknowledge that failure to comply with this Code of Conduct may damage or terminate their relationship with Weidmann.

By signing this document, the business partner undertakes to act responsibly and to comply with the principles and requirements incorporated in Weidmann's Code of Conduct. The supplier undertakes to communicate the content of this Code of Conduct to its employees, agents, and subcontractors in a way that is understandable to them and to take all necessary precautions to implement the requirements.

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COMPANY NAME AND ADDRESS

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PRINT NAME / TITLE / SIGNATURE

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DATE

## PREFACE

Innovations are not conceivable in our society without successful industrial companies. Companies like Weidmann Group contribute worldwide to social and economic development by creating products and applications that offer pioneering solutions in areas such as climate protection while conserving resources and by generating future-oriented workplaces. The entrepreneurial activities of our company are consistent with the current legal framework and a basic understanding of responsible and ethical behavior as formulated in this joint Code of Conduct. <sup>1</sup>

### 1 BASIC UNDERSTANDING

This Code of Conduct is based on a shared conception of socially responsible company management as defined by the following guiding principles. We, the undersigned **Weidmann Group**, accept responsibility for the consequences of our business decisions and activities in respect of the legal, economic, technical, social, and environmental implications as far as possible within our available scope of action. We thus contribute to the societal and economic development of the countries and regions in which we operate. Our actions are consistent with the relevant legal regulations.

We are guided by ethical values and principles, in particular integrity and honesty, as well as respect for the dignity of human beings as set out in the principles of the Universal Declaration of Human Rights of the United Nations, the OECD Guidelines for Multinational Enterprises, the Core Labor Standards of the International Labor Organization and the United Nations Guiding Principles on Business and Human Rights.

This Code of Conduct defines the basic principles of our actions, and we actively demand that it is observed by our employees worldwide. Its standards apply in all subsidiaries, branch offices, and business units within our company. We expect the same basic understanding from our business partners. It is not intended to constitute a basis for third-party rights.

### 2 COMPLIANCE WITH LEGISLATION

It is a matter of course for us that we will comply with current laws and other legal requirements in the countries in which we operate. In cases where local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct. Where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, the local laws shall take precedence. Nevertheless, we endeavor to comply with the content of this Code of Conduct.

### 3 INTEGRITY AND COMPLIANCE

We have implemented suitable compliance<sup>2</sup> measures so that the following areas are covered appropriately:

#### 3.1 CORRUPTION

We do not tolerate corruption, bribery, or blackmail; they impede fair competitive conditions. Gifts made with the intention of influencing business decisions or which could give the appearance of doing so or to obtain some other undue advantage are neither promised, offered, granted, requested nor accepted in our business relationships. Nor do we allow these to be promised to us. Especially strict standards must be applied when dealing with people for whom particular rules apply under criminal and liability law (e.g. public officials).

<sup>1</sup> The Code of Conduct is based on the public template of the German Engineering Federation (VDMA), a partner association of the Swiss Association of the Tech Industry (mechanical, electrical and metal industry/Swissmem).

<sup>2</sup> Compliance refers to observance of legal regulations, regulatory standards, voluntary self-imposed commitments and internal guidelines.

### 3.2 FAIR COMPETITION

We operate in compliance with national and international competition and anti-trust legislation and do not participate in price agreements, sharing markets, or collusion with respect to customers, markets, and bids.

### 3.3 PREVENTION OF MONEY LAUNDERING

Money laundering is the term used for bringing money obtained illegally or from illegally acquired assets into the legal financial and economic system. We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to disguise or integrate criminal or illegally acquired assets.

### 3.4 PROTECTION OF INFORMATION AND INTELLECTUAL PROPERTY

We protect confidential information and respect intellectual property; transfers of technology and know-how must be made in a way that protects intellectual property rights, customer information, business secrets, and information that is not in the public domain. We observe the current laws to protect business secrets and treat our business partners' confidential information accordingly.

### 3.5 DATA PROTECTION

We process, store and protect personal data in compliance with statutory regulations. Personal data is therefore treated confidentially and only collected for legal, previously defined purposes in a transparent manner. We only process personal data if it is protected against loss, modification, and unauthorized use or disclosure using appropriate technical and organizational measures.

### 3.6 EXPORT CONTROLS

We undertake to comply with legal standards relevant to export controls, including but not limited to approval requirements, export bans, and support bans in the course of shipping and exporting our goods.

### 3.7 AVOIDANCE OF CONFLICTS OF INTEREST

We avoid internal and external conflicts of interest which could illegitimately influence business relationships. Where this is not successful, we disclose these conflicts.

## 4 HEALTH AND SAFETY

We protect our employees' health by taking suitable measures in relation to health and safety at work (e.g. the implementation of a company health and occupational safety management system) that provide appropriate cover in the following areas:

- Compliance with current laws and guidance set out in international standards relating to health and safety at work;<sup>3</sup>
- suitable workplace design, safety regulations and provision of suitable personal protective equipment;
- implementation of preventive checks, emergency measures, an accident reporting system and further suitable measures for continuous improvement;
- provision of access to adequate quantities of drinking water and access to clean sanitary facilities for employees.

We ensure that our employees have received adequate instruction.

<sup>3</sup> Compare ILO Guidelines on Occupational Safety and Health; ISO 45001 Occupational Health and Safety Management System

## 5 REMUNERATION AND HOURS OF WORK

Remuneration is based on current laws and, if applicable, current binding collective labor as well as bar-gaining agreements and is supplemented by the relevant national legislation on minimum wages. Employees are given clear, detailed, and regular information on the composition of their remuneration. We comply with current laws and (international) working standards<sup>4</sup> in respect of the maximum permissible working hours and ensure that working time, including overtime, does not exceed the relevant legally permissible maximum limits.

## 6 OBSERVANCE OF HUMAN RIGHTS

We pay attention to and support compliance with internationally recognized human rights and:

- Respect the personal dignity, privacy and personal rights of each individual;
- protect and uphold the right to freedom of speech and freedom of expression;
- do not tolerate unacceptable treatment of employees such as physical and psychological hardship, sexual and personal harassment or discrimination.

### 6.1 PROHIBITION OF CHILD LABOR

We do not tolerate any child labour<sup>5</sup>. We do not employ any employees who cannot prove that they are at least 15 years old, and we require proof of age to be submitted. For countries which fall within the exception for developing countries according to ILO Convention No.138, the minimum age can be reduced to 14 years. We do not hire employees for dangerous work who, according to ILO Convention No.182, cannot prove that they are at least 18 years old.

### 6.2 PROHIBITION OF FORCED LABOR

Forced labor, modern slavery or comparable acts that involve the deprivation of liberty are forbidden.<sup>6</sup> All work must be voluntary, and it must be possible to end the employment relationship.

### 6.3 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect the right of employees to freedom of association, freedom of assembly and to engage in collective bargaining and pay negotiations<sup>7</sup>, providing this is legally permissible and possible in the relevant country in which we are operating. If this is not permissible, we look for appropriate compromises for our employees. Our fundamental aim is to find mutually satisfactory solutions through a partnership-based relationship with our employees, even without the involvement of a third party.

### 6.4 PROMOTION OF DIVERSITY, EQUAL OPPORTUNITIES

We encourage equal opportunities and do not tolerate discrimination.<sup>8</sup> We treat all people equally regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, worldview or other personal attributes.

<sup>4</sup> ILO Convention No. 1 (Hours of Work (Industry) Convention, 1919)

<sup>5</sup> ILO Convention Nos. 79, 138, 142 and 182

<sup>6</sup> ILO Convention Nos. 29 and 105; Uyghur Forced Labor Prevention Act; UK Modern Slavery Act 2015

<sup>7</sup> ILO Convention Nos. 87, 135 and 154

<sup>8</sup> ILO Convention No. 111

## 7 ENVIRONMENT, ENERGY AND CLIMATE PROTECTION

We act in compliance with current legislation and are guided by international standards<sup>9</sup> in order to minimize negative impacts on the environment and continuously improve our activities in respect of environment and climate protection. All employees are made aware of environmental issues and the necessary training is offered. We have implemented appropriate environmental protection measures (e.g. the implementation of a company environmental management system) that cover the following topics appropriately:

- Setting objectives, defining and implementing measures and ensuring the continuous improvement of these;
- environmental aspects such as the reduction of CO2 emissions, increasing energy efficiency, using renewable forms of energy, safeguarding the quality of water and reducing water consumption, safeguarding air quality, encouraging resource efficiency, reducing waste and disposing of waste in the proper way and responsibly handling substances that are dangerous to human beings and the environment.

## 8 DEALING WITH CONFLICT MINERALS

We exercise the necessary care to take measures<sup>10</sup> to avoid using conflict minerals in our products in order to prevent human rights violations, corruption and financing armed groups or similar via this route.

## 9 SUPPLY CHAIN

We expect our suppliers to comply with the principles of this Code of Conduct or to apply comparable codes of conduct. Furthermore, we encourage them to implement the criteria in this Code of Conduct in their own supply chains. We reserve the right to systematically apply this Code of Conduct with our suppliers and to carry out checks as warranted. This may take the form of questionnaires, assessments, or audits. Should this cause doubts as to whether this Code of Conduct is being followed, the supplier is requested to take suitable measures to counter this and to notify its contact in our company of the course of action. If required, the cooperation arrangement will be ended.

## 10 CONSUMER INTERESTS

Where the interests of consumers are affected, we follow consumer protection provisions and appropriate sales, marketing and information practices. Special attention is paid to groups that require particular protection (e.g. young people or pregnant women).

## 11 EXECUTION AND IMPLEMENTATION

We make suitable and reasonable efforts to continuously implement, document and apply the principles and values in the Code of Conduct. All employees are made aware of what this Code of Conduct contains and receive training on relevant topics as required. Violations of the Code of Conduct are not tolerated and can have consequences under employment law. In addition, this Code of Conduct is subject to regular reviews to ensure that it is up to date.<sup>11</sup>

<sup>9</sup> ISO 14001 and Standards of OECD Guidelines/COP21

<sup>10</sup> Swiss Bonds Law Article 964, U.S. Dodd-Frank Wall Street Reform Section 1502 and Consumer Act 2010, EU Conflict Minerals Regulation 2017/821 (2021)

<sup>11</sup> At least one annual review by the Executive Board

## 11.1 COMMUNICATION

We communicate openly in dialogue with employees, customers, suppliers and other interest and stakeholder groups regarding the requirements of this Code of Conduct and its implementation.

## 11.2 INFORMATION ON INFRINGEMENTS

We offer our employees and business partners access to a protected mechanism that will allow them to confidentially report possible violations of the principles of this Code of Conduct. As far as legally possible and within our sphere of influence, we ensure that people who report information are protected from any reprisals or negative consequences as a result of their report. We are committed to a culture of openness and safety in which concerns or violations can be reported without fear of retaliation.

If you have a report, please use the following channels:

[Speakup@weidmann-group.com](mailto:Speakup@weidmann-group.com) or [www.weidmann-group.com/confidential-whistleblower-reporting](http://www.weidmann-group.com/confidential-whistleblower-reporting)

Board of Directors/Executive Board Weidmann Group

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