



CODE OF CONDUCT

june 2023

Statement of Principles

We align our business actions and decisions with generally applicable ethical values, in particular integrity, credibility and respect for human dignity, and thus promote transparency, responsible management and control in the company in an appropriate manner.

We expect our employees and suppliers to comply with the aforementioned guidelines and, if necessary, to adjust their behavior.

In event of a violation of the Code of Conduct, consequences may be imposed.

As a company, we see it as our responsibility to strengthen human rights, prevent human rights violations, and prevent or mitigate the effects of the risks we have identified and prioritized through various measures.

This commitment applies both to our own business activities and to our supply and value chains. Our understanding of responsible action in this context encompasses the impacts that arise indirectly from our trade or that are influenced by our actions.

We respect all aspects of internationally recognized human rights. This includes in particular discrimination, occupational health and safety, freedom of association, fair pay, working hours, child labor and forced labor.

We are aware of implementation of human rights due diligence is an ongoing obligation. In this sense, we are committed to continuous improvement. Our Statement of Principles on Respect for Human Rights is also reviewed on an ongoing basis and developed accordingly.

Management of Willbrandt KG is responsible for implementation of and compliance with this declaration.

1. Human Rights

We and equally our suppliers ensure the following measures:

Prohibition of forced labor, slavery, servitude, human trafficking, illegal employment and moonlighting, child labor, child prostitution or child pornography, drug trafficking,

Prohibition of disregard for occupational health and safety,

Prohibition of disregard for freedom of association,

Prohibition of discrimination in employment and in the employment relationship,

Prohibition of withholding a decent wage,

No repression against human rights defenders,

Protection of local communities,

Compliance with Conflict Minerals Regulation in line with Annex II of OECD Guidelines,

Compliance with internationally recognized human rights standards based on the declarations of the United Nations and the OECD.

2. Environmental Protection

We and equally our suppliers ensure the following measures:

Prohibition of causing harmful soil change, water pollution, air pollution, environmental pollution through harmful noise emission or excessive water consumption,

Prohibition of unlawful eviction and prohibition of unlawful deprivation of land, forests and waters,

Prohibition of production of mercury-added products, use of mercury in accordance with Minamata Convention,

Prohibition of production and use of chemicals and non-environmentally sound handling, collection, storage and disposal of wastes according to Stockholm Convention (including POPs Convention),

Prohibition of export of hazardous wastes and other wastes according to Basel Convention,

Compliance with current REACH Regulation and RoHS Directive.

3. Compliance

We and equally our suppliers have installed processes to monitor and comply with all applicable laws, sanctions, regulations and standards.

This includes the protection of intellectual property, product safety, the prohibition of corruption, bribery and conflict of interest.

We are committed to observing the prohibition of anti-competitive and anti-trust agreements, money laundering and terrorist financing.

We also follow data protection laws and information security and documentation standards.

We ensure proper compliance with tax laws and applicable customs and export control laws.

4. Implementation of Code of Conduct

We and equally our suppliers have the responsibility to implement the applicable Code of Conduct.

We reserve the right to verify compliance with the guidelines at our suppliers.

Reporting a specific suspicion of a violation of this Code of Conduct or in case of questions regarding the Code of Conduct, there is the possibility of contacting the Compliance Officer at compliance@willbrandt.de.

Reports of a violation of the Code of Conduct will be treated in strict confidence and will not have any negative impact on the reporter, unless an untrue fact has been deliberately alleged. Violations of this Code of Conduct constitute an impairment of the cooperation and, depending on their severity, may result in consequences in the cooperation.

5. Business meals, gifts, business trips and events.

We assure that invitations (e.g. business meals or events) are in accordance with the usual business practices and are appropriate, accepted or may be issued.

6. Confirmation

I hereby confirm that I have received and acknowledge the Code of Conduct and will conduct myself in accordance with it.