

Code of Conduct

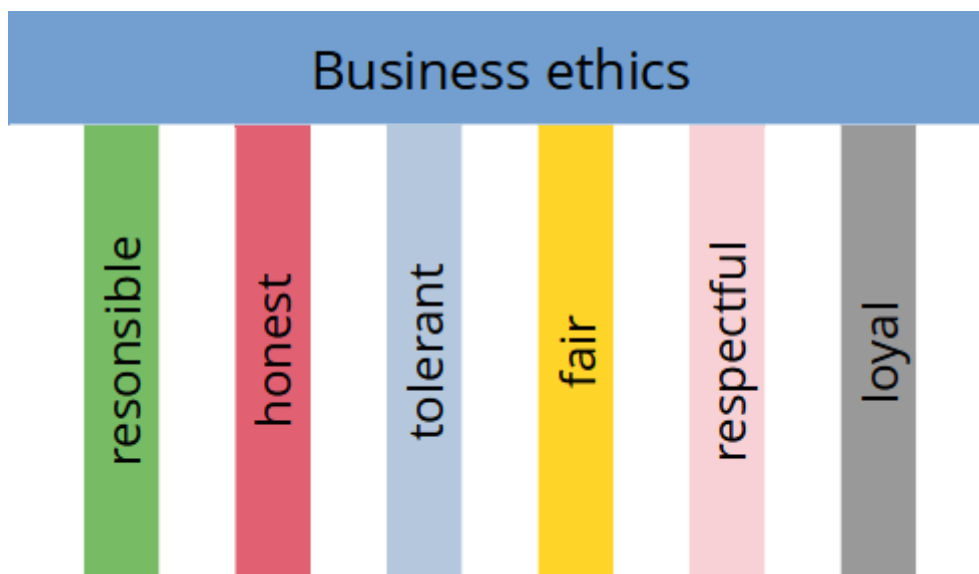
As of: 01.01.2021

Preamble

A catalogue of company-wide principles for behaviour was developed based on Wehberg Safety GmbH's understanding of values. This "Code of Conduct" serves as a binding guideline for our decisions and our actions in everyday professional life.

The Code of Conduct defines binding minimum standards for responsible, ethically and legally sound conduct, in particular towards third parties (e.g. business partners), but also concerns the interactions between company members. All employees are required to comply with the principles set out here. This includes in particular the management.

Our business ethics, reflected in the Code of Conduct, rely essentially on six pillars:



Corporate responsibility

Wehberg Safety GmbH is committed to always act in an economically, socially and environmentally aware manner. We strive to conduct our business on an ethical and moral basis and to behave fairly in competition. This includes compliance with the applicable laws and acceptance of anti-trust or competition restrictions. We do not gain any undue advantages against our customers, suppliers or competitors.

Behaviour towards customers

We behave in a fair and responsible manner towards our customers. We deal with their wishes, needs and expectations diligently in order to achieve a targeted implementation in products or solutions. Our primary goal is to build a long-term and stable business relationship based on mutual trust.

Fair competition

We are committed to fair competition and comply with the laws and regulations in force in this regard. We do not enter into any agreements with competitors or other business partners that hinder fair competition.

Corruption, bribery and gifts

We do not tolerate any form of corruption or bribery, regardless of whether this damages our company assets or the assets of third parties.

Our employees are forbidden to accept, offer or grant gifts and favours of any kind (cash, travel, free services, etc.), which are associated with an undue advantage (placing of order, project award, approval, etc.).

We have strict limitations for other gifts and favours. In principle, these may only be accepted, offered or granted by our employees if they are recognized as operating expenses and all tax regulations are observed.

We also expect our business to avoid any conflicts of interest that may arise in connection with gifts and favours.

Donations

In principle, Wehberg Safety GmbH does not donate to political parties, individuals or organisations whose goals contradict our corporate philosophy or damage our reputation. The allocation of donations is always transparent.

Data handling

We treat all personal data of our customers, business partners and employees with the utmost care. This includes names, addresses, telephone numbers and dates of birth or information about their current state of health.

All business information of our partners and their trade secrets are always treated in a sensitive and confidential manner. Required documents are stored properly and handed over or destroyed on request upon expiry of the cooperation.

Protection of the environment

The protection of the environment and the climate are important to us. Our employees are encouraged to treat all natural resources used in our company (e.g. energy, water and land) with care. Our employees are expected to act responsibly during the production and distribution of our products. To protect our employees, we comply with all laws and regulations concerning health and safety at work. To this end, our managers in particular take measures to create a healthy and risk-free working environment for our employees.

Occupational safety

To protect our employees, we comply with all laws and rules concerning health and safety at work.

Conflict materials

Our company forgoes the use of conflict minerals, i.e. gold, tantalum, tungsten and tin, which were mined during the armed conflict and human rights violations in the Democratic Republic of Congo (DRC) and its neighbouring countries.

We require that the suppliers who provide us with raw materials or semi-finished products do the same.

Child or forced labour

Our company complies with the United Nations regulations on human rights and children's rights. We strictly reject, without exception, children and forced labour and expect this from our business partners as well.

Discrimination

Our company prohibits any form of discrimination, bullying and oppression, whether on the basis of nationality, ethnicity, age, gender, sexual orientation, marital status, pregnancy, disability, religion or ideology of the person concerned.

Respect and tolerance

We expect our employees to treat business partners and colleagues with respect. This includes tolerating other opinions and views.

Dealing with employees and expectations

The management and executives of our company are committed to a healthy working environment, which is based on trust, openness and fairness. In return, we expect our employees to be motivated, honest and loyal. This includes, in particular, compliance with all requirements of this Code of Conduct and avoidance of conflicts of interest with regard to our company.

Complaints and reports

Every employee has the right to complain to their superiors or management without being penalised. This also applies if the complaint is ultimately not considered justified by the company.

Misconduct by employees or third parties acting for the company may be harmful to the company. We call on our employees to report any misconduct immediately and in no case to cover it up. If

employees report actual or suspected misconduct in good faith, we will not tolerate any attempts to intimidate or discriminate them.

The company is committed to the well-being of the employees and third parties who are on the premises. Therefore, all employees are required to immediately report safety deficiencies or other circumstances that pose a risk to life and limb to the safety officer or management.

Handling company assets

The tangible and intangible company assets are used exclusively to achieve the business goals of our company and are not used for non-company purposes.

It is important to us that all employees carefully and responsibly handle the premises, buildings, facilities, machines, work equipment, raw materials, finished products and intellectual property of our company.

Implementation and enforcement

The management is committed to take all necessary steps to enforce the principles and values described in this Code of Conduct.

Lüdenscheid, 22.12.2020

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