

## Code of Conduct and Ethics for Business Partners of Westfälische Drahtindustrie GmbH

Westfälische Drahtindustrie GmbH (WDI) stands for innovation, responsibility, fairness and customer orientation - values that guide our behaviour as a company. Adherence to these values is the basis for morally impeccable business relationships. We are committed to working with our business partners with honesty, integrity and trust. In return, we expect the same high standards of behaviour from our business partners.

The following Code of Conduct and Ethics is intended to clarify our values and help ensure that our expectations with regard to compliance with the law and ethical behaviour are met.

### **1. General principles, law and order**

WDI and our business partners are committed to complying with all applicable laws, ordinances, rules and regulations in the countries in which we operate.

### **2. Prohibition of corruption and other criminal offences**

Any form of corruption, bribery, extortion, fraud and other criminal offences is unacceptable. In particular, no attempt may be made to unlawfully influence business partners or public officials, to exchange gifts, either at home or abroad.

### **3. Respect for the fundamental rights of employees**

All forms of forced labour and human trafficking and do not hire any employees who have not reached the legal minimum age in the respective jurisdiction. We also undertake to observe the principle of equal opportunities in the selection and promotion of employees. Any discrimination on the grounds of age, disability, race, ethnic origin, skin colour, gender, pregnancy, sexual identity, nationality, religion or other characteristics of employees is prohibited. Discriminatory behaviour and sexual harassment will not be tolerated. We respect the right of employees to freedom of association within the framework of the applicable rights and laws. Members of employee organisations or trade unions are neither to be favoured nor disadvantaged.

### **4. Working hours, remuneration and paid holidays**

We are committed to complying with national laws, collective agreements and other regulations regarding working hours, pay and paid holidays.

### **5. Health, safety and environmental protection**

In order to operate in harmony with the environment and avoid hazards to people and the environment, all applicable health, labour and environmental protection regulations must be complied with.

### **6. Data protection**

The responsible handling of personal data is part of our social responsibility. When processing data, we apply the principles of transparency, purpose limitation, data minimisation and storage limitation, accuracy, integrity and confidentiality.

## **7. Compliance with antitrust law**

We must observe the rules of free and fair competition, in particular all legal requirements of antitrust law must be complied with.

## **8. Foreign trade**

We must observe the rules of foreign trade, tax and customs law of the countries in which the supplier does business.

## **9. Protection of trade / business secrets and data protection**

Business and trade secrets and all other confidential information must be kept strictly confidential. Such information must be protected in an appropriate manner against unauthorised access and disclosure to third parties. When using personal data, the protection of privacy must be observed and the security of this data must be guaranteed.

## **10. Supply chain**

WDI and our business partners undertake to comply with and implement the contents of this Code of Conduct and Ethics with their respective business partners, insofar as this is possible.

## **11. Internal communication**

We undertake not to discriminate against employees who report violations of this Code of Conduct and Ethics directly to the management or other supervisory bodies without complying with the usual information chains.

## **12. Handling errors**

It is part of our self-image that we as individuals and as an organisation learn from mistakes. We therefore deal with mistakes transparently and openly and share our experiences to enable further development and innovation. The prerequisite for this is to shape our corporate culture in such a way that mistakes are recognised, discussed and corrected. It is up to each and every one of us to take responsibility and create - or demand - a working environment in which employees have no inhibitions about speaking up about possible mistakes. We treat employees who disclose mistakes fairly and responsibly.

Katja Pampus      Wulf-Hendrik Pistorius

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