

## **Code of Conduct of Wirthwein AG**

### **Assumption**

Wirthwein AG is a leading global manufacturer of top-quality and complex plastic parts and mold construction. Moreover, with its company Winkler Design the group of companies does business in the field of interior fittings. By means of our guidelines we commit ourselves to act responsibly and according to law towards our employees, customers, business partners and the general public.

The business principles at hand are a worldwide binding system of rules for us to act sustainably and responsibly in the business organization in addition to statutory regulations and internal agreements.

### **Area of validity**

These guiding principles are binding for all employees of Wirthwein AG worldwide and can be considered as a standard internal system of rules how to treat staff and partners.

### **Laws and provisions**

The relevant legal provisions of the respective countries Wirthwein AG is active in are the superior framework of any activity and binding for all employees of Wirthwein AG.

### **Corruption and bribery**

Open competition is crucial for our liberal basic order and market economy and has to be protected and preserved by our entrepreneurial activities. Any influence of the competition in the form of corruption or bribery has to be disapproved and refrained from at any time.

We exclusively choose our suppliers on the basis of quality, delivery reliability, price and extraordinary problem-solving skills. On the other hand, we acquire our orders by our top-quality products, cost awareness and innovative strength.

Neither may our employees grant any unlawful advantages (active bribery) to third parties nor accept such (passive bribery). Among others, this implies monetary payments and any other services which influence free decision-making for one's own or any external advantage.

Any action that influences the competition infringes our guidelines and will be taken sanctions against.

### **Antitrust law**

Management board and Personnel Management of Wirthwein AG explicitly admit to corporate governance in compliance with antitrust law. With regard to an antitrust code of conduct for employees, we refer to the "Code of conduct with respect to competitors" published by the German Association of Materials Management, Purchasing and Logistics (BME). All employees of Wirthwein AG have to consider and comply with both the rules and standards at hand and the applicable antitrust regulations.

### **Forced labor**

Forced labor is the severest form of compulsory work. It contradicts our liberal thinking according to which staff can independently and without any compulsion decide whether they want to close an employment contract with Wirthwein AG based on contractually agreed upon employment obligations. We reject any form of forced labor. We guarantee our employees fair working conditions in accordance with the respective national standards in order to create optimum conditions for a motivated and efficient workforce to realize our business objectives.

### **Freedom of assembly**

We recognize our employees' right of assembly, which we respect in terms of our free basic order that we feel very strongly committed to.

### **Child labor**

In order to meet our social awareness and responsibility at all sites of Wirthwein AG, we regard it as our duty to particularly protect children against excessive workload and perils within the framework of an employment relationship.

This is the reason why we reject any form of child labor as long as children are in compulsory school age still or have not reached the age of 15 yet. Moreover, employees under the age of 18 may not perform any hazardous work and are allowed to perform night-shift work to a limited extent only and with regard to the vocational training requirements. This rule only applies if the national legal provisions do not define any higher age regulations.

### **Harassment**

The free basic human rights are of paramount importance and have to be protected at all sites of Wirthwein AG by any means. In this context, personal dignity, privacy and personal rights of each individual have to be protected and respected in particular. This is why we refrain from any form of harassment, be it of physical, sexual, psychological or also verbal nature. We pursue a fair cooperation based on mutual respect.

## Working time

Our working time regulations comply with the national legal provisions to meet our social responsibility towards our employees.

## Payment

Apart from job security, fair payment of our employees is of top priority. The remuneration we pay for the service our employees provide conforms at least to the national legal standards and regulations.

## Nondiscrimination rule

Through its international orientation as well as its global and sustainable growth strategy, Wirthwein AG takes social and cultural responsibility in particular resulting from its cooperation with employees and business partners of different origin, religion, skin color and ideology. Therefore we cultivate a relationship with foreign cultures which is based on respect and dignity. We refrain from any form of discrimination.

Apart from that, we guarantee equal opportunities and equal treatment of all employees, regardless of gender, age, sexual orientation or handicap. Employment, further development and payment of our employees depend on their own skills and personal qualifications only.

Each individual employee is committed to refrain from any form of discrimination in order to provide for a fair cooperation which is based on respect both inside the organization as well as for business partners.

## Physical health and safety

We feel particularly committed to protecting our employees against work-related hazards and caring for their well-being, which are the key aspects of our internal safety and health care policy.

Within the framework of our duty of care, we take all necessary measures to ensure our employees' safety and health at work according to national provisions. By means of this, we want to create a safe and healthy workplace environment as well as care for satisfied and high-performing employees.

Apart from that, each individual employee is committed to substantially contribute to safety at work and health protection. This particularly implies the respective behavior at the workplace which fulfils all the relevant provisions to avoid accidents and any work-related health risks.

## Environmental protection

Due to our sites in ecologically valuable areas we commit ourselves to feel particularly responsible for nature and environment. This is the reason why we abide by national provisions and agreed environmental protection standards. Within the framework of our production processes we particularly see to it that our products are manufactured in a resource-conserving way by applying environmentally efficient and innovative technologies. Already in the development process we consider any environmentally relevant aspects for a conservative use of natural resources and in order to protect the environment in the best possible way. Waste has to be avoided to the greatest possible extent and has to be either recycled in the production process through innovative technologies or disposed of in an environmentally compatible way.

Each employee is requested to contribute to our environmental policy objectives within the bounds of his or her possibilities and to continuously improve them.

## Supply chain

We encourage our suppliers and business partners to orient by the guidelines of Wirthwein AG at hand and act accordingly.

## Responsible for the implementation

Management Board and Personnel Management of Wirthwein AG are responsible for publishing and implementing the guidelines at hand. Each manager has to make sure that all employees will observe and actively support the principles of action in these guidelines. Each individual employee has to observe both the relevant legal provisions and the principles of action determined in the guidelines and act accordingly.

Infringement on the guidelines at hand can be reported to both managers and the responsible Local Compliance Officer of the respective site and can lead to respective consequences within the framework of in-house and legal provisions. Reporting such infringement will not bring about any disadvantages to the reporting employees.

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Frank Wirthwein  
Chief Sales Officer  
Speaker of the  
Executive Board



Marcus Wirthwein  
Chief Technical Officer



Rainer Zepke  
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