

Ethics, Compliance and Conduct Guidelines of Willi Hahn GmbH and Its Suppliers **(Code of Conduct)**

Compliance is understood as the obligation of companies to ensure that laws and guidelines are observed in a company. It also means acting in accordance with the standards relevant to the company. The points of reference for compliance are domestic and foreign laws, regulations and other state standards as well as internal company guidelines.

Integrity and adherence to laws and ethical principles are essential elements in maintaining the authenticity of our company. This policy (Code of Conduct) defines how we conduct our business in an ethical and socially responsible manner.

Scope of application

The scope of application for the following regulations and principles covers all areas of Willi Hahn GmbH.

They apply to all employees and to all areas inside and outside the company, including mobile workplaces.

Furthermore, these regulations are – where applicable – also binding for external employees and for employees of external service providers who work for the company.

1. General principles

We as a company accept our social responsibility. We treat our business partners and third parties with respect and fairness.

We undertake to fulfill our social responsibility in all our business activities and to observe the applicable laws and other relevant regulations of the countries in which we operate in all business actions and decisions.

Willi Hahn GmbH will not tolerate any violations of laws, rules and regulations, neither by our employees nor by our products and services.

2. Principles on corruption

When dealing with business partners (customers, suppliers) and government institutions, the interests of the company and the private interests of employees on both sides are strictly separated. Actions and (purchase) decisions are made free of irrelevant considerations and personal interests. The applicable criminal law on corruption must be observed. Among other things, the following must be observed:

Offenses in connection with public officials

The granting of personal benefits (in particular of a monetary nature such as payments and loans, including the granting of small gifts over a longer period of time) by our company and our employees to public officials (such as civil servants or public employees) with the aim of obtaining benefits for the company or for themselves or third parties is not permitted.

Crimes in business transactions

Personal advantages of monetary value in return for preferential treatment in commercial transactions may not be offered, promised, granted or approved.

In business dealings, management and employees of the company may not offer, promise, demand, grant or accept gifts, payments, invitations or services which are granted with the intention of improperly influencing a business relationship or which are likely to jeopardize the professional independence of the business partner.

This is generally not the case with gifts and invitations that are within the bounds of customary hospitality, custom and courtesy. Our employees are obliged to give up all gifts they receive in the course of their professional activities.

Antitrust law

We respect fair competition and comply with applicable laws that protect and promote competition, in particular the applicable antitrust laws and other laws regulating competition.

Forced labor

We reject all forms of forced labor.

Child labor

We observe the United Nations regulations on human and children's rights. If a national regulation on child labor provides for stricter standards, these must be observed as a matter of priority.

3. Principles of social responsibility

Dealing with employees

We have a special duty of protection and care towards our employees. We are committed to ensuring that the protective regulations under labor law are observed.

Human rights

We respect and support respect for internationally recognized human rights.

Discrimination

We undertake to oppose all forms of discrimination within the framework of the applicable rights and laws. This applies in particular to discrimination against employees on the basis of gender, race, disability, ethnic or cultural origin, religion or belief, age or sexual orientation.

Land, forest and water rights as well as evictions

We pursue our business observing land-, forest- and water rights. We waive from evictions of land suitable for conducting our business.

Health protection

We guarantee occupational health and safety at the workplace within the framework of national regulations and support continuous development to improve the working environment.

Fair working conditions and working time

We respect the right of our employees to freedom of association within the framework of the applicable rights and laws. Additionally, we respect all regulations by law regarding the working time and documentation of working hours.

Salaries and social benefits

We respect all regulations of the MiLoG, especially regarding the minimum wages and its height as well as the social contribution and taxes.

Environmental protection

Our aim is to protect the environment in a sustainable manner for present and future generations. Laws enacted to protect the environment must be observed. We support the environmentally conscious action of our employees.

Trade secrets

We oblige our employees to observe company and business secrets. Confidential information as well as confidential documents may not be passed on to third parties without authorization or made accessible in any other way, unless an authorization has been granted or the information is publicly accessible.

Social networks

The use of social media (such as Facebook) harbors both opportunities and risks. It is therefore essential to deal with them responsibly.

Bullying

We do not tolerate any form of bullying. Indications of this include, in particular, defamation of the employee or their family, spreading rumors, threats, humiliation, insults, harassment, defamatory or unworthy treatment by superiors or colleagues, and deliberate withholding of information necessary for work.

Use of private or public security forces

The use of private or public security forces is only used for building or access control. We refuse any use of security forces to surveillance the employees or other persons.

4. Principles in dealing with suppliers

We communicate our principles to our direct suppliers and are particularly committed to ensuring that our suppliers comply with the following principles:

- Prevent corruption
- Promote fair competition
- Strengthen environmental protection
- Ensure health & safety
- Protect human rights
- Prevent discrimination
- Ethical recruiting
- Rights of minorities and indigenous peoples
- Land, forest and water rights as well as evictions
- Use of private or public security forces
- Financial responsibility
- Disclosure of information
- Conflicts of interests
- Plagiarism
- Intellectual property

- Export controls and economic sanctions
- Reduction of greenhouse gas emissions
- Reporting of greenhouse gas emissions
- Energy efficiency
- Renewable energy
- Decarbonization
- Water quality, water usage and water management
- Air quality
- Responsible chemical management
- Sustainable management of resources
- Waste prevention
- Reusage and recycling
- Animal protection
- Biodiversity, land use and deforestation
- Soil quality
- Noise emission
- Diversity, equality and inclusion

Our suppliers are encouraged to agree and adhere this policy with their suppliers. This particularly includes compliance with legal standards such as the Supply Chain Act.

5. Data protection principles

We respect and protect the personal data and privacy of individuals. Personal data may only be collected, processed and used by Willi Hahn GmbH, and by each of its employees, under the conditions of the applicable data protection laws.

In our view, data protection is of great importance for protecting of the rights and freedoms of those concerned, i.e. within the company by handling employee data but also by handling the personal data of our business partners.

6. Sanctions and consequences in the event of infringements

It is pointed out that violations of these compliance rules and other specification documents not only have consequences under labor law (warning, admonition, termination with or without notice), but may also be subject to a fine and/or be punishable by law (e.g. in the case of a negligent or intentional breach of confidentiality in accordance with Art. 83 GDPR (General Data Protection Regulation), § 42 BDSG (Federal Data Protection Act), § 17 UWG (Act against Unfair Competition), GeschGehG (German Business Secret Protection Act), especially in the case of data subject to the duty of confidentiality under § 203 StGB (German Criminal Code)). In addition, violations of these or other guidelines may result in claims for injunctive relief and damages (within the meaning of Art. 82 GDPR). In the case of violations of this Code of Conduct, it is not possible to claim that one has acted in the interests of the company, as all violations always harm the company in the long term.

7. Compliance and contact persons (escalation policy)

In the present Code of Conduct the Willi Hahn GmbH describes their values in dealing with employees, external business partners and the society. For questions regarding the application or interpretation, as well as reporting of potential violations, our employees contact their respective supervisor or the appropriate designee.

As an employee of the Willi Hahn GmbH you can find the representative regarding the individual scopes in the central IMS under "organization representatives".

You can contact us regarding the following issues based on maintaining confidentiality:

Data Protection: Datenschutz@wiha.solutions

Violations of applicable law:

(EU 2019/1937)

<https://whistleblowersoftware.com/secure/9b370f19-6bd5-4df0-a193-d7d0461f4dba>

Furthermore, the employees and all external persons can report any signs of rule violations via the Willi Hahn whistle blower system. You can indicate violations either by stating the name or also anonymously without identifying yourself. We expressly state that we resign from retaliation against complaints in any way.

Please consider the following steps by reporting your concern:

- 1) Report of the issue to one of the above mentioned email addresses or via the link
- 2) Your request will be consulted anonymously from our representative
- 3) If necessary, our representative will contact you to evaluate open questions.
- 4) You will receive a feedback to your request within 14 days.
- 5) Additionally you will receive an email to get your feedback.
- 6) You give us feedback on how satisfied you were with the handling of your request.
- 7) Your feedback will be evaluated and used to assess the effectiveness of our complaint process.

Change history:

Revision	Change	Changed from:	Examined/released on:	Examined/released by:
19.1.23	Creation	K. Seidemann	19.1.23	P. Bleich
21.2.24	Adjusting Supplier management and escalation management reporting channel	P. Bleich	21.2.24	D. Eichin
27.2.24	Reduction of the greenhouse gas emissions, added diversity, equality and inclusion to the requirement to suppliers	P. Bleich	27.2.24	D. Eichin