



## CODE OF CONDUCT

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## **Code of Conduct**

### **Preamble**

Our Code of Conduct is intended to be a guideline for the entire Wölfle GmbH company and therefore applies equally to each and every one of us. Specifically, it is aimed at the top management, the managers and all our employees and our suppliers. On the one hand, it represents the demand we place on ourselves to live up to the values and principles listed therein, and at the same time it signals to the outside world responsible behaviour towards our business partners, customers and employees.

### **Commitment of the company management**

Wölfle GmbH considers it its duty to act in an economically, socially and environmentally conscious manner. Wölfle GmbH strives to conduct its business competently and on an ethical and moral basis and to compete fairly in all markets in which it operates. This includes compliance with applicable laws and the acceptance of cartel prohibitions and restrictions on competition. We want to avoid gaining undue advantages over customers, suppliers or competitors.

## **Team spirit, constructive cooperation**

We constantly question existing solutions and develop new ideas for the benefit of our customers. To this end, we promote constructive teamwork among our employees. Your interests and requirements for us are decisive for our work and further development. We are successful in our collaboration due to the diversity of our employees and their commitment to the business areas.

## **Cooperation standards**

We expect all our employees to always act according to the highest professional standards as well as guidelines of our company. If employees violate existing guidelines, rules or regulations in the course of their work or through their behaviour, they will be subject to disciplinary measures.

## **Open communication with employees**

We do not cover up misconduct. If employees report actual or suspected misconduct in good faith, we will not tolerate intimidation or retaliation against them. We understand "in good faith" to mean that the employee is convinced that his or her account is true. This applies regardless of whether a subsequent investigation confirms the employee's version or not.

## **Dialogue with cooperation partners**

All business information of our partners and their trade secrets are treated sensitively and confidentially as a matter of principle. Required documents are properly prepared, stored or, if necessary, destroyed after the end of the cooperation.

## **Customer orientation**

We behave fairly and honestly towards our customers and business partners. We record the wishes, needs and expectations of our customers and business partners in order to ensure targeted implementation in products, services or other processes. Our primary goal is to build a long-term and stable relationship with our customers and business partners on the basis of trust.

## **Acceptance of gifts, donations**

### **a) Gifts to our employees**

Our employees do not demand or accept personal benefits from customers or suppliers that could influence or affect their own behaviour with regard to their own work for the company. If gifts are offered by third parties, they may only be accepted if they are common practice and can be recognised as a courtesy or kindness (promotional gifts with the logo of the company giving the gift, such as calendars or pens).

In the case of gifts whose value exceeds the usual amount, the Compliance Officer or the management must be informed. If this is not possible, these gifts are to be refused as a matter of principle.

### **b) Gifts from our employees**

Gifts on our part may also only be offered within the scope customary for the business relationship and to a materially reasonable extent. The recipient must not be able to associate with it any obligation that would influence his or her business decisions.

### **c) Donations**

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

## **Bribery and corruption**

We do not tolerate any form of corruption and bribery, regardless of whether this damages our company assets or the assets of third parties. We ensure through control mechanisms that bribery, theft, embezzlement, fraud, tax evasion or money laundering are prevented.

Our employees are prohibited from accepting or giving favours of any kind (cash, travel, gifts, etc.) that are linked to an undue advantage (contract award, project award, etc.).

Our business partners are also required to avoid conflicts of interest that pose a risk of corruption.

## **Data protection**

We treat all personal data of our customers, business partners and employees with the utmost care. This includes names, addresses, telephone numbers as well as date of birth or information about the current state of health. Our employees are obliged to take all measures to secure the data, which are suitable to protect our IT system against internal as well as external data theft. This concerns in particular passwords misused in the company as well as unauthorised downloading of files, in particular of inappropriate material from the Internet.

## **Protecting the environment**

Protecting the environment and the climate are important to us. Our employees are required to treat all natural resources used in our company (e.g. energy, water, land) with care. A responsible approach to the production and distribution of our products and/or our services is expected from our employees. We comply with all laws and rules concerning health and safety at work to protect our employees. To this end, our managers in particular take measures to create a healthy and hazard-free working environment for our employees.

## **Compliance with applicable law**

We require our managers to familiarise themselves with the laws, regulations and rules relevant to their area of responsibility and to comply with them without exception. Our managers in particular bear a great responsibility in fulfilling the Code of Conduct. The business practices of our business partners and their suppliers must also comply with applicable laws. This applies in particular to import, export, and domestic trade in goods, technologies or services, but also to the movement of payments and capital. A violation of economic embargoes as well as trade, import and export control regulations must also be ruled out by our business partners, as must the financing of terrorism.

## **Fair competition**

We are committed to fair competition and abide by these laws and rules. We refrain from agreements on prices, conditions and strategies with competitors, suppliers, other companies and traders that hinder fair competition.

We do not participate in any anti-competitive boycott.

## **Non-discrimination**

Any form of discrimination is prohibited as a matter of principle. Regardless of nationality, ethnicity, age and gender, sexual orientation, marital status, pregnancy or disability, or religion or belief. Promotions, new appointments are always made free of discrimination.

## **Dealing with internal company matters**

We attach importance to the careful and responsible handling of the products manufactured, the working materials used and the company's intellectual property.

## **Protection from child or forced labour**

We strictly reject child or forced labour without exception and expect the same from our business partners. Children of compulsory school age (younger than 15 years) may not be employed even if the legal requirements of the respective country of our supplier would allow this.

## **Implementation and enforcement**

The Wölfe GmbH company undertakes to make every effort to live up to the principles and values described in this Code of Conduct:

Ochsenhausen, dated 26/02/2020

Place, date



Board of Directors/ Management