

All enterprises within the Woregg group (Woregg GmbH & Co KG and its subsidiaries) pledge to maintain corporate social responsibility in line with their business activity. This corporate responsibility includes but not exclusively the terms of working condition, social and environmental responsibility as well as transparency and cooperation based on mutual trust. The executive managers claim responsibility of implementing these policies wherever possible.

We expect our business partners, first and foremost our suppliers, to respect and execute these principles of the code of conduct in the same manner.

HUMAN RIGHTS

We and our business associates commit to act in accordance with the international human rights.

CHILD LABOUR AND EMPLOYMENT OF THE UNDERAGED

We by no means do not endorse child labour at our enterprises nor at those of our business associates. The age of employment must meet all legal requirements.

FORCED LABOUR AND HUMAN TRAFICKING

We decline any involvement in forced labour and human trafficking in our enterprise as well as in our business associates.

DISCRIMINATION AND MUTUAL RESPECT

We provide jobs devoid of discrimination and we expect our employees and business associates to apply the same non-discriminatory principles, and to take action against any form of discrimination of which one gains knowledge, including the discrimination against gender, race, colour of skin, age, nationality, sexual orientation and physical disabilities. We treat each other respectfully and open-mindedly.

When faced with discrimination against employees or any other person associated with Woregg we immediately start investigating into it and take respective measures against it. In order to report such incidents we provided an appropriate tool on our website to internal and external persons.

When recruiting, we take special consideration on competence, integrity, transparency and performance and evaluate these characteristics free of prejudice. We count on diversity as our strength for our aspiration to provide the best workplace possible in our region and obtain maximum customer satisfaction with a multifaceted workforce.

5	Siehe Doku-Lenkungsmatrix	MEM/29.10.2023	MEM/02.11.2023	FAH/30.10.2023	MEM/06.11.2023
4	Whistleblowing	MEM/22.09.2021	MEM/23.09.21	FAH/23.09.2021	MEM/23.09.2021
3	Firmennamen ergänzt	MEM/03.03.2021		FAH/03.03.2021	MEM/03.03.2021
1	Hinzu Plagiate und geistig. Eigentum	MEM/25.06.2019	MEM/28.06.19 BER/28:06.19	FAH/26.06.19	MEM/02.07.19
0		MEM/24.05.2019		FAH/26.05.19	MEM/28.05.19
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REMUNERATION, LABOUR LAWS AND DATA SECURITY

Legal requirements as to remuneration, minimum wage, overtime and other legal aspects including but not exclusively all labour regulations and data security of person related data are binding both to us and our business associates.

We are constantly putting our work conditions to the test and evaluate it to the end of providing our employees with the best possible work environment.

WORKING TIME ARRANGEMENT

The arrangement on working time and overhours must meet all legal requirements for both Woregg group and our business associates.

HEALTH MANAGEMENT, EMPLOYEE SATISFACTION

We provide a safe and healthy work environment by fulfilling and exceeding respective national standards for safety and health-related issues at work. We upkeep an open communication to our management board and to one another without regards to hierarchies within the company. The interests of the employees are being met to the best of our possibilities by means of a representative board, which forms part of the freedom of association to which every employee is entitled without fear of punishment. By means of suitable actions and measures job related illnesses are being avoided. We expect from our business associates to meet and exceed all legal requirements to protect their employees

OCCUPATIONAL SAFETY AND HEALTH (OSH)

We take appropriate measures to prevent work related injuries and diseases. All employees are called upon to take measures for OSH, such as determining possible risks or taking part of organizational programs. Our goal is and remains a workplace free of accidents. We maintain a non-certified OSH management system, which continuously improves the situation at the workplace and actively reduces possible hazards. Our employees are instructed to report suspicious behavior, disregard of rules or manipulation of protective equipment, possible consumption of alcohol or drugs or potential threats. We expect our suppliers and business associates to respect or surpass the current rules and regulations as to OSH in order to protect their employees. Our business associates should maintain an appropriate OSH management system.

ENVIRONMENTAL COMPATIBILITY

We and our business associates maintain an effective environmental management system at all production sites worldwide which is constantly being improved and upgraded. A minimum requirement is the application of all applicable laws, which are enacted in the respective countries.

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We and our business associates commit to protecting the environment and habitats of all animals and plant life both on land and in the water whilst respecting the respective regulations and laws as well as best-practice thereof. We persecute every possible violations that we are privy to checking possible legal actions.

An energy management system is optional and should be implemented as a medium-term goal. The same principles hold true of material procurements and purchasing as we place great emphasis on sourcing in keeping with the respective and valid regulations such as REACH, RoHs and the list of banned substances as defined current EU guidelines and by GADSL. Our suppliers commit to manufacturing the goods delivered to us with the least possible impact on the environment and the climate and to reducing the pollution as well as the CO₂ footprint. Our business associates strive to obtain climate neutrality under consideration of economic feasibility.

CONFLICT OF INTEREST, PRESENTS AND INTEGRITY

We expect from our business associates to maintain an obligation to respect the rules and regulations of fair trade and free competition, especially but not exclusively that of antitrust laws. No bribes or other form of payment must be directed towards government or any other public officials, nor to employees of Woregg group or any other group of persons in direct line of business. Money laundry in any shape or form is frowned upon and discouraged. We expect our business associates and our employees to respect our code as well as maintain transparency and integrity in the business relation without either party obtaining an improper advantage. We decline any form of lobbyism. All parties involved refrain from using a potential market dominance to their advantage. Woregg may intensify the obedience to their guidelines by further contractually obligating its business associates or possibly conducting audits.

Our employees commit to respecting these guidelines; they evaluate a situation factually and base their actions and decisions on information available to them without influence being motivated by personal interests or allowances. We do not gain advantage by improper actions such as disclosing confidential information, falsifying facts, tacit agreements with competition, price agreements or any other violation against a due bidding procedure. to this end, our employees.

Our employees do not accept gifts or allowances from our business associates that exceed the value of the equivalent of 100€. Payments in cash or payments from unassociated sources in exceedingly high amounts are prohibited and will be prosecuted. In case you are privy to improper or unlawful behaviour on the part of Woregg or its business associates, please report it to us by means of the communication tool on our website or contact our compliance representative directly by means of the contact details found in the respective section on our website.

REGULATIONS ON IM- AND EXPORT

Our business associates comply with laws and regulations concerning the importation and exportation of goods and services. Herein included are the so-called Conflict Minerals (gold,

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tantalum, tungsten, tin). We oblige our suppliers to abide by the legal obligation in regards to the raw materials used.

We and our business associates respect restrictions on imports and exports as well as sanctions without prior written consent. Violations are reported by us and should be reported to us without undue delay.

PLAGIARISM; COUNTERFEITS AND INTERLECTUAL PROPERTY

The Woregg group processes exclusively material and components taken from known and verified sources whom we expect to upkeep a process of detecting counterfeits and to avoid introducing counterfeits into our supply chain. Our business associates are obliged to take immediate action and to inform the Woregg group should counterfeited parts or materials be used or be put into circulation. The protection of intellectual property is of the highest priority to both the Woregg group and our business associates, the infringement of which will be met with the necessary legal actions on Woregg´s part.

PROTECTION FOR INFORMANTS (WHISTLEBLOWING)

The Woregg Group stands up for their social responsibility and their respective impact on the society as a whole including the environment. This comprises comprehensive protection for persons stemming from inside and outside the organization from repressions and negative implications who turn to the organization with hints and evidence for possible or actual failures on part of the organization via the intended means of communication (please refer to our website “Whistleblower System”).

INFORMATION AND DATA PROTECTION

The Woregg Group maintains an information security and data protection management system, which aims to protect the Confidentiality, Integrity and Availability of information and personal data by means of current state-of-the-art Technical and Organizational Measures. The protection of information stemming from our business associates and personal data has top priority to us. We oblige our employees and our business associates to keep to our guidelines and legal requirements. Theft or potential acquisition of company related or confidential information as well as forwarding it to third parties without prior consent by the proprietor is strictly forbidden. Such incidents will be reported immediately. We also oblige our employees and business associates to report immediately to us any incident that led to a loss or breach in the protection of information or person-related data confided to us. On our website, we provide the respective contact details.

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