



# **Supplier Code of Conduct**

Westfalia Metal Hoses GmbH (WMH) and its legal global entities place the highest value on the integrity of its companies and each of its directors, officers, employees and representatives. The countries in which WMH operates have different laws, customs and social norms. It is our commitment to follow the national and local laws in each country and community in which we do business, and to conduct business in an ethical manner.

This Code sets out the framework of legal, ethical and integrity standards which WMH wants to live by and to apply its company philosophy and values. We therefore also expect that our suppliers fully comply with applicable laws and adhere to internationally recognized environmental, social and corporate governance standards (ESG standards). We also expect our suppliers to use their best efforts to implement these standards with their suppliers and subcontractors.

We particularly expect you as our supplier to support, embrace and enact the following ESG standards, which are based on the ten principles of the United Nations Global Compact initiative, the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization, and Declaration on Fundamental Principles:

# **Environment**

# Protecting the environment

You comply with applicable environmental laws and meet the requirements of environmental permits.

You are committed to driving environmental sustainability by striving to reduce the environmental footprint and by developing solutions that conserve resources and protect the environment.

You will contribute to environmental sustainability and will strive to use energy-efficient technologies, to minimise environmental hazards and waste, and to recycle waste materials.

# Hazardous Substances

You identify potentially hazardous substances in chemical products and articles used in your production and ensure that they are handled, transported, stored,

recycled and disposed of safely. Safety information shall be available to educate, train, and protect employees from hazardous materials and employees shall have access to adequate personal protective equipment.

### Safe and Healthy Workplace

You comply with all health and safety regulations.

You rely on a safe and healthy workplace for employees, business partners and visitors as well as people in the communities in which you operate.

Everybody at your company shares the responsibility to make health and safety an on-going priority. Managers and employees will watch out for each other, help others to avoid unsafe behaviours, and know and practice emergency procedures.



Employees shall have ready access to clean drinking water, hygienic toilet facilities, hygienic food preparation, storage and eating facilities, adequate ventilation, light and temperature levels, and acceptable levels of noise and dust pollution (as applicable).

Working under the influence of drugs, alcohol, or under any other substance that could impair a person's ability to work safely and productively, must be prohibited.

### Social

# Safeguarding Human Rights

You respect internationally recognised human rights. You provide fair working conditions in compliance with all legal requirements. You reject all forms of forced labour and child labour or human trafficking and you will not obstruct lawful employee representation.

You take reasonable steps to avoid doing business with companies which or individuals who break the law, do not respect human rights or engage in corrupt practices. You will not knowingly do business with business partners who violate human rights.

You comply with minimum wages and working hours in accordance with local laws and ensure compensation of a living wage according to local living conditions.

You uphold the freedom of association and the right to collective bargaining in accordance with applicable laws.

You provide means for your employees to report concerns or potentially unlawful activities in the workplace. Any report should be treated in a confidential manner. You investigate such reports and take corrective action if needed.

# Diversity and Inclusion

You respect individuals of all backgrounds, capabilities and opinions. All employees and managers treat each other with dignity and respect to foster an open and fair communication.

You hire, retain and promote people based on qualifications, demonstrated skills and achievements. You do not discriminate and expect all your business partners to act in a way that is consistent with fair treatment and equal opportunity standards.

You do not tolerate discrimination against others on the basis of race, colour, gender, age, sexual orientation or identity, national origin, ethnicity, religion, marital status, physical or mental disability or veteran status and any other legally protected status.

#### No Bullying or Harassment

You take a zero-tolerance approach to any form of abuse, bullying or harassment of employees, subordinates, business partners or anyone else. This includes but is not limited to unwanted verbal or physical conduct, degrading or disparaging jokes related to race, colour, age, gender, belief, sexual orientation, and other categories.

#### Governance

### Fair Competition

You compete for business always fairly. You believe in free and open competition that is dynamic and ethical. You will avoid obtaining an unfair advantage through manipulation, concealment, abuse of confidential information or by any other manner of unfair dealing.

You will never abuse your market position and do not hinder the market mechanisms

outside any competition laws and regulations.

You have a zero-tolerance attitude towards the failure to comply with antitrust and competition laws. You also pay close attention to not infringe any patents of third parties and to observe the patent laws of those countries where you operate.



# No Bribery or Corruption

You work in accordance with international anti-corruption laws – these include the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other laws implementing the OECD (Organisation for Economic Co-operation and Development) Anti-Bribery Convention, the United Nations Convention Against Corruption or further local jurisdictional anti-corruption laws and regulations.

You do not tolerate bribery, corruption or unethical behaviour anywhere in your business or by any of your employees, business partners or representatives. This includes, but is not limited to, promising, giving or accepting bribes, kickbacks or any other advantage to or from your business partners, competitors, stakeholders or government officials, other than gifts or favours as permitted under this Code's section on gifts and entertainment.

#### Gifts and Entertainment

Offering or accepting business gifts and providing entertainment to business partners is legitimate and legal in the general course of business. However, it should never affect, or be seen to affect, a business decision or result in preferential treatment on either side of the business relationship.

### Confidentiality and Privacy

You respect the privacy of your employees, business partners and stakeholders as well as the confidential nature of the information provided to you by business partners and other stakeholders.

Each of your manager and employee must keep and treat such information confidentially and in conformity with applicable data protection legislation. Processes must be designed to comply with the requirements arising from data protection legislation and any other applicable local law.

# Compliant with International Sanctions

You need to comply fully with sanctions laws and regulations prohibiting or restricting transactions with certain designated foreign governments, entities,

persons, or end users. You shall not conduct any business transactions involving prohibited entities or persons.

You must know and comply with all laws and regulations aimed at fighting money-laundering or terrorist financing.

It is your responsibility to decide on the process for screening business partners. All business partner screenings must be documented and preserved for future reference.

## Responsible Sourcing

You conduct due diligence to understand the source of the raw materials used in your products and you do not knowingly provide products containing raw materials that contribute to human rights abuses, bribery and ethics violations, or negatively impact the environment.

#### **Conflict Minerals**

You ensure that products supplied to WMH do not contain metals derived from minerals or their derivatives originated from conflict regions that directly or indirectly finance or benefit armed groups.

### **Gathering Competitive Intelligence**

When gathering information on business partners, competitors or markets, you use only legal and legitimate means to do so. Furthermore, you will not allow information to be collected in a manner that is unethical.

### Sponsorship and Donations

You only make donations with no expectations of consideration in return, and award sponsorships and donations only in the context of the respective legal framework. The awarding of donations and sponsorships must be transparent: the purpose, the recipient, and the receipt for the contribution from the recipient must be documented and verifiable.

You do not make contributions to organisations that discriminate on the basis of race, religion, creed, gender, age, physical challenge or national origin.



You may acknowledge the principles stated above or demonstrate your commitment via compliance with your own code of conduct or company policies that embrace these standards.

WMH reserves the right to conduct audits or assessments to ensure your compliance and will take appropriate steps regarding our relationship with you if there is a reason for concern.

WMH reserves the right to discontinue any relationship for non-adherence to international principles, failure to correct violations, or displaying patterns of non-compliance with these standards.

For further details regarding Westfalia Metal Hoses, its legal entities and its products please visit: www.westfalia-mh.com.