

Code of Conduct

WDI AG's daily operations are founded on strong, individualised and friendly service as well as technical competence. Social engagement, high levels of integrity and concern for the environment are additional components of our corporate philosophy.

The principles stated in this code of business conduct are not to be seen as our highest goals, but rather as ones to be exceeded wherever possible.

1. Area of application

This code of business conduct is valid throughout the world and defines the basic principles and demands which WDI AG places on business partners and their employees, in particular with regard to the responsibility of suppliers of goods and services towards human beings and the environment. The prescribed principles accord with, amongst other such guidelines, the Conventions of the International Labour Organisation (referred to hereafter as „ILO“), the Universal Declaration of Human Rights of the United Nations as well as UN Conventions on the Rights of the Child and on the elimination of all forms of discrimination against women.

2. Adherence to laws

National and international laws and stipulations, minimal industrial standards, ILO and UN Conventions as well as all other relevant regulations (hereafter referred to as „standards“) are to be adhered to, whereby those standards with the highest demands are the ones to be applied.

Adherence to the code of business conduct as well as the standards specified above is not to be circumvented through contractual agreements or similar measures.

3. Prohibition of bribery and corruption

No forms of bribery or corruption will be tolerated by WDI AG. Any offers to attempt to influence decision-making in any way, including through making any offers of illegal payments or similar gratuities, are to be rejected. Relations are to be maintained in such a manner that no personal dependency, obligation or influence arises from such interactions. Business-like conduct is expected, based on fairness and adherence to the appropriate national and international standards in force. As regards nations where it is customary and polite to exchange gifts, care should be taken to ensure that such exchanges do not generate any relationships of dependency and obligation and that the legal standards in force in the country are adhered to.

4. Fair Competition and Antitrust Law

WDI AG complies with the applicable antitrust and competition laws. The conduct in the competition is fair, open and independent. No inadmissible price agreements or agreements on other conditions (technical and commercial) are made, there are no anti-cartel or anti-competitive agreements of any kind and all laws for the protection of fair competition are observed. These laws prohibit restrictive agreements, both horizontally between competitors and vertically between companies at different levels of the supply chain.

5. Discrimination / Respect for employees' basic rights

Any form of discrimination in recruitment and employment is prohibited. Equality of opportunity and the equal treatment of employees are to be promoted. In particular, any differentiation, exclusion or preferment is prohibited if it is undertaken on the basis of race, caste, skin colour, gender, age, religion, political beliefs, physical or mental disability, ethnic, national and social origin, nationality, sexual orientation or other personal attributes.

Treating employees in an unacceptable manner, for example through physical hardship, sexual or personal harassment or discrimination will not be tolerated. Likewise no behaviour (including gestures, speech and physical contacts) will be tolerated which is sexual, coercive, threatening, abusive or exploitative.

6. Right of association and right to collective bargaining

Employees are to be protected against every form of differentiated treatment arising from their employment and which is contrary to the freedom of association. Respect is to be afforded for their right to found associations or organisations of their own choice for the purpose of promoting and protecting the interests of employees, as well as their right to join or leave such bodies as well as to be active on their behalf. No restrictions may be placed on any employee's ability to carry out their employment in this regard. Members of employees' organisations or trades unions are to be neither favoured nor disadvantaged.

7. Compulsory labour

No form of compulsory or forced labour will be tolerated by WDI AG. No employee may be forced to work, either directly or indirectly, through the use of force and/or through intimidation. Employees are only to be recruited if they have made themselves available for work on a voluntary basis.

8. Prohibition of child labour and the employment of juveniles

Child labour and any form of exploitation of children and juveniles will not be tolerated by WDI AG. The minimum recruitment age for employment must not be below the age at which compulsory education ends and in no cases will be below 15 years of age. Domestic standards are to be adhered to regarding child protection and the employment of juveniles. Exceptions specified by the ILO are allowed. Measures are to be taken to ensure that the prohibition of child labour and limitations applying to the employment of juveniles are upheld. In particular, juveniles are not to be exposed to situations which are dangerous, unsafe or are likely to damage their health.

9. Hours of work

Hours of work are to accord with the law in force, industrial standards or the relevant ILO Conventions, whichever has the stricter regulations. The maximum permissible weekly hours of work are to accord with national legislation. The employee is entitled to take at least one day off after having worked for six days in a row. Any overtime worked is to be remunerated separately in accordance with the appropriate domestic standards. Overtime is only to be worked on a voluntary basis. Care must be taken to ensure that fair remuneration is paid and that any legally prescribed minimum wage is guaranteed.

10. Disciplinary measures

All employees are to be treated with dignity and respect. In addition, the private domain and personal rights of each individual are to be respected. Sanctions, fines, other punishments or disciplinary measures are only to be imposed in so far as they are in accordance with the national and international standards in force as well as internationally recognised human rights. No employee may be subjected to verbal, psychological, physical, sexual and/or bodily violence, duress or harassment.

11. Health and safety of employees

Care must be taken to ensure a safe and healthy working environment. Risks are to be kept to a minimum and optimum precautionary measures are to be taken to prevent accidents, work-related illnesses as well as damage to health arising from performing occupational duties. Systems are to be established accordingly to determine potential threats to the health and safety of employees and to prevent, or respond to, these. In addition, employees are to be regularly informed and trained with regard to currently valid standards concerning health protection and safety standards as well as safety measures.

12. Drug-free workplace

WDI AG is committed to providing a healthy and safe working environment for all employees. Therefore, a zero-tolerance policy applies to the consumption of drugs and alcohol in the workplace and to working under the influence of drugs and alcohol. In particular, employees are prohibited from driving or operating a company vehicle, such as a company car or forklift, if they are under the influence of alcohol or any other drug. It is irrelevant whether the drugs are legal or illegal, prescribed or unprescribed.

13. Conflict minerals

WDI AG takes appropriate measures to avoid the use of raw materials in its products that originate from conflict and risk areas and contribute to human rights violations, corruption, the financing of armed groups or similar negative effects.

14. Protection of the environment

Protection of nature and of the environment is an integral component of WDI AG's business practice. The respective legal environmental standards currently in force and international standards are to be observed and adhered to. Integrated environmental management systems require on-going work with regard to avoiding and reducing environmental pollution. Procedures and standards currently in force regarding waste management, the treatment of chemicals and other hazardous substances as well as their disposal, together with emissions and the treatment of effluents, are to be enforced.

15. Promotion of the code of business conduct

WDI AG is responsible for ensuring that the basic principles of the code of business conduct are implemented and for promoting them to the greatest possible extent amongst their suppliers. In addition, the basic principles of non-discrimination in choosing suppliers and in dealings with suppliers are to be respected.

In the event of discrepancies between the German and the English version of these terms, the German version shall take precedence.