

Risse + Wilke Code of Conduct

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Foreword

Risse + Wilke recognises its societal and social responsibility. Accordingly, within the scope of its commercial activity, Risse + Wilke assumes its responsibility to the company itself, its employees, customers and suppliers along the value-added chain. In addition to social and societal responsibility, this responsibility also comprises ecological aspects.

The Code of Conduct is an essential component of Risse + Wilke policy and serves as the basis for securing long-term business success and focussing on sustainable business development. The Code of Conduct applies in the following companies and at the following locations of the business group:

Company	Street address	Post code	Town/city	Country
Risse + Wilke Kaltband GmbH & Co. KG	Stenglingser Weg 46	58642	Iserlohn	Germany
Hugo Schmitz GmbH & Co. KG	Stenglingser Weg 46	58642	Iserlohn	Germany
Wilke GmbH	Eilper Straße 113	58091	Hagen	Germany
General Business Service srl	Via Adamello 5/7	25015	Desenzano del Garda	Italy

The Code of Conduct is binding for all employees. Additionally, Risse + Wilke compels its direct suppliers and other business partners to uphold the conduct described in the following.

The Code of Conduct was compiled with the collaboration of company management and the workforce. Additionally, Risse + Wilke has nominated and trained executives for environmental, social, ethical and human rights issues.

Area	Name	Forename	Telephone number	E-mail
Social sustainability	Lohölter	Jörg	+49 (0)2374/935-210	j.lohoelter@risse-wilke.de
Compliance/ Business Ethics	Schöttler	Christoph	+49 (0)2374/935-281	c.schoettler@risse-wilke.de
Ecological sustainability	Wilke	Dr. Kai	+49 (0)2374/935-280	dr.wilke@risse-wilke.de
Monitoring of sustainability risks	Koch	Maurice	+49 (0)2374/935-202	m.koch@risse-wilke.de

The executives are available for contact in case of questions.

Note: For reasons of better legibility, single-gender terms are used in place of the simultaneous use of the speech forms male, female and diverse (m/f/d). All single-gender words refer to all genders equally.

Note: In the following text, we compel our suppliers to upholding the listed standards. This obligation must be understood as the basis for cooperation between Risse + Wilke and its business partners. The obligation is a passive expectation and is based on common values.

1. General principles

Risse + Wilke has established management systems for quality, the environment and energy and integrated them into the process sequences. For implementation, the company has incorporated the requirements of the Code of Conduct. Implementation is binding for employees.

The company has the effectiveness of the management systems monitored and confirmed annually by an independent organisation.

The Code of Conduct forms the basis of all business relationships and actions. Risse + Wilke has committed to upholding the principles and pursuing only commercial activities which are in full accord with the Code of Conduct. The company does not tolerate any deviations from the following ethical, social and ecological principles of sustainability.

The employees of the company commit to adhering to and observing the principles.

2. Principles of business ethics

The company commits to adhering to and upholding the following principles of human trafficking and commercial trade. The principles essentially cover the following matters: **Combating corruption and money laundering, data protection and data security, financial responsibility** (exact records), **disclosure of information, fair competition and antitrust law, conflicts of interest, plagiarism, intellectual property, export controls, economic sanctions and whistleblowing and protection against retaliation.**

The company commits to **fair and just competition** in the free market economy whilst **rejecting corruption**, blackmail and bribery, and **upholding antitrust law**. In accordance with this commitment, in cases of suspicion, the company cooperates with the authorities for clarification, and commits to the disclosure of information. This disclosure also covers financial records. In accordance with this **financial responsibility**, the company commits to transparent, proper accounting, and records financial transactions exactly.

The company checks and monitors the identity of customers, suppliers, service providers and other business partners, and commits to working exclusively with reputable partners and businesses. The company rejects any form of **money laundering**.

Within the scope of its commercial activities, the company avoids **conflicts of interest**. Goods are exported in accordance with **export checks and economic sanctions**.

The company rejects the unlawful appropriation of **intellectual** and **commercial property (plagiarism)** and subsequent publication.

When handling personal data, the company commits to processing this data in accordance with the specifications and storing and deleting it in compliance with legal requirements. The legal **data protection** regulations are observed. The company also respects and protects the privacy of its employees. Data stored for operative purposes, in particular personal data, is protected in accordance with the highest standard of **data security**. The legal data protection regulations are observed. Additionally, the company respects the protection of personal rights and the right to freedom of expression as long as they comply with the principles of the Code of Conduct.

Each employee is encouraged to report infringements and suspicious cases, and to contribute to the clarification of infringements and suspicious cases in consideration of social responsibility. Infringements and suspicious cases must be reported using the **whistleblowing** procedure. Notifications can be made anonymously. Reports of infringements and suspicious cases are treated confidentially in the interest of **protection from retaliatory measures**. Interested parties also have the option to use the whistleblowing system as well as employees.

3. Principles of human rights

The company commits to adhering to and upholding the following principles of human rights. The principles essentially cover the following matters: **Child labour** and **young employees, wages and social contributions, working hours, modern slavery** (i.e. slavery, servitude and forced work or work performed under duress and human trafficking), ethical recruiting, **freedom of association and collective bargaining, non-discrimination and harassment, women's rights**, diversity, **equality and inclusion, rights of minorities and indigenous peoples, land, forestry and water rights, forced eviction** and **the deployment of private and public security forces**.

Within the framework of its commercial activities, the company promotes the equal treatment and **equal rights** of people. The company advocates the upholding of **women's rights** and the **rights of minorities and indigenous peoples** along the value-added chain. This is reflected in a zero-tolerance policy with regard to **harassment and discrimination** of any kind. The company lives by the principles of social and cultural openness and **diversity**. This also encompasses the **inclusion** of people with disabilities in the operational process.

Moreover, the company advocates fair and social working conditions along the value-added chain. In the process, fair and just **wages** (salaries), the **right to freedom of association and collective bargaining and social benefits** are essential components of the strategy for social responsibility and the commercial orientation.

The company includes suppliers, and compels them to adhere to and uphold the principles to the same extent. In the process, occupational health and safety and the associated binding obligations are the highest priority. Compliance with **working hours, prohibition of and measures against child labour** and any form of forced labour and **modern slavery** (slavery, servitude and forced work or work performed under duress, and human trafficking) and rejection of **ethical recruitment** are a minimum standard for the company and suppliers with regard to the upholding of working conditions and human rights. In the process, **young employees** are afforded particular protection.

The company respects **land, forestry and water rights** globally and avoids **forced evictions** with preventive measures. The company has a policy of sustainable development, taking into account the withdrawal of land, woodland and waterways with regard to the acquisition, development and use of land. In this context, the company reserves the right to **deploy private or public security forces** to protect the company's projects should the deployment of security forces potentially lead to human rights abuses due to the company's lack of qualification or control.

4. Principles of occupational health and safety

The company commits to active occupational health and safety in the interest of employees and others persons working or present at the locations (contract workers, service providers, suppliers and customers). In the process, the legal requirements form the basis and must be understood as a minimum requirement. The company commits to preserving and improving the safety and health of employees and other persons working or present at the locations whilst at work. Accordingly, the company has committed to adhering to and upholding the following principles of occupational health and safety. The principles essentially cover the following matters: **Personal protective equipment, machine safety, emergency prevention, fault and accident management, workstation ergonomics, handling of chemical and/or biological substances and fire safety.**

The company commits to preventive occupational health and safety. The prevention of occupational health and safety hazards is the highest priority. Accordingly, when machines, plants and other facilities are engineered and procured, and workstations are designed, the following maxim of occupational health and safety is upheld:

- **Machine safety:** Machines, plants and facilities are purchased and operated in accordance with state-of-the-art technology so that all technical requirements can be upheld. This also includes the safety standard which applies here. The company commits to guaranteeing the machine safety of machines, plants and facilities.

- **Workstation ergonomics:** When developing processes and workstations, ergonomic aspects are fully considered and implemented in accordance with the current state of the art. Employees are involved in the process. Workstations are designed to suit the needs of the employees.
- **Personal protective equipment:** In the event that hazards cannot be completely ruled out by technical or organisational measures, employees are provided with personal protective equipment. It is selected to suit the conditions. Personal protective equipment is provided by the company.

The company additionally regulates the handling of chemical and/or biological substances with the aim of guaranteeing that they are handled in a manner which is safe for health, and to control exposure appropriately.

Additionally, an **accident and incident management system** is in place at the locations. An essential component of the accident and incident management system is **emergency prevention**. In accordance with the legal minimum requirements, first aiders are nominated and trained. The company also additionally commits to active **fire safety** and adherence to fire safety regulations. Accordingly, fire safety assistants are trained and evacuation assistants are designated and nominated in accordance with the minimum requirements. Emergency situations are simulated at regular intervals and training is provided with regard to how to act.

5. Principles of environment and energy

The company commits to protection of the environment, reduction of environmental effects and sustainable and resource-saving handling of materials and products. The principles essentially cover the following matters: **Reporting on greenhouse gas emissions, energy efficiency, renewable energies, decarbonisation, water quality, water consumption and water management, air quality, responsible chemical management, sustainable resource management, waste prevention, reuse and recycling, animal welfare, biodiversity, land usage and deforestation, soil quality and noise emissions.**

In the process, the company commits in particular to climate protection and also to reducing greenhouse gas emissions to a minimum with the goal of **decarbonisation**, primarily using **renewable energies** and continually improving **energy efficiency**. Accordingly, the company regularly carries out **reporting on greenhouse gas emissions**.

Additionally, the company aspires to a continual reduction of **water consumption** and sustainable **water management**. In the process, the minimum goal is the preservation of **water quality**. The company also commits to reducing air emissions to a minimum and monitoring the measures for preservation of the **air quality**.

Responsible chemical management and **sustainable resource management** are elementary components of the operational company strategy. The company aspires to the achievement of these goals by way of

- resolute **waste prevention** and

- use of resources for **reuse and recycling**.

The company commits to **animal welfare** and preservation of **biodiversity**.

The company resolutely integrates its suppliers in environmental protection measures, and compels them to reduce environmental effects to the same extent, adhere to legal requirements and conduct commercial activities in an ecologically sustainable manner. In order to preserve biodiversity and ecology, the company pursues the goal of sustainable **land usage** and militates against **deforestation** measures. In the process, the company monitors the securing of **soil quality**.

The company also commits to continually reducing **noise emissions** in relation to commercial activities, whether caused directly or indirectly by the company.

6. Principles of supplier management

The company commits to passing on social and ecological sustainability requirements in accordance with the Code of Conduct, and to the same extent, to suppliers, service providers and other business partners, and developing them with the goal of sustainable and responsible continuation of business.

This obligation comprises the following principles:

- **Business ethics**
Combating corruption and money laundering, data protection and data security, financial responsibility (exact records), disclosure of information, fair competition and antitrust law, conflicts of interest, plagiarism, intellectual property, export controls, economic sanctions and whistleblowing and protection from retaliation.
- **Human rights**
Child labour and young employees, wages and social benefits, working hours, modern slavery (i.e. slavery, servitude and forced work or work performed under duress and human trafficking), ethical recruiting, freedom of association and collective bargaining, non-discrimination and harassment, women's rights, diversity, equality and inclusion, rights of minorities and indigenous peoples, land, forestry and water rights, forced eviction and the deployment of private and public security forces
- **Occupational health and safety**
Personal protective equipment, machine safety, emergency prevention, incident and accident management, workstation ergonomics, handling of chemical and/or biological substances and fire safety.

- **Environment and energy**

Reporting on greenhouse gas emissions, energy efficiency, renewable energies, decarbonisation, water quality, water consumption and water management, air quality, responsible chemical management, sustainable resource management, waste prevention, reuse and recycling, animal welfare, biodiversity, land usage and deforestation, soil quality and noise emissions

In the process, the company recognises its obligation in the value-added chain for direct and indirect business relationships.

Iserlohn, February 2023
Company management
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