

## **Code of Conduct of the Company Risse + Wilke**

### **Preamble**

The company Risse + Wilke acknowledges its corporate responsibility worldwide. In particular the company bears responsibility within the framework of its business operations towards the company itself, towards customers and towards suppliers in the value chain, and towards the environment and society.

This Code of Conduct records in the form of guidelines the value base with respect to social and corporate responsibility and fair competition.

The Code of Conduct is a voluntary code. By signing it Risse + Wilke acknowledges that it will comply with the following principles.

### **I. General principles**

#### **1. Basic understanding**

Risse + Wilke acknowledges its corporate and social responsibility and undertakes to fulfil this responsibility in all its business operations.

#### **2. Compliance with laws**

The company Risse + Wilke undertakes to observe in all its business actions and decisions the relevant applicable laws and any other significant regulations of the countries in which it operates. Business partners shall be treated fairly and contracts shall be adhered to, taking due account of any changes in the parameters.

#### **3. Orientation towards generally applicable values and principles**

Risse + Wilke orients its actions towards generally applicable ethical values and principles, and in particular integrity, honesty, respect for human dignity and non-discrimination.

#### **4. Financial responsibility**

Risse + Wilke undertakes to comply with generally applicable accountability requirements, i.e. to record, maintain and report all business documentation in accordance with applicable laws and recognized accounting principles.

### **II. Principles regarding corporate and social responsibility**

#### **1. Human rights**

The company Risse + Wilke respects and supports compliance with internationally recognised human rights. In particular it respects human rights under the UN human rights charter (Universal Declaration of Human Rights, Resolution 217 A (III) of the General Assembly of 10.12.1948).

#### **2. Prohibition of discrimination**

Within the framework of the relevant applicable rights and laws the company rejects any form of discrimination. This relates in particular to discrimination of workers on the grounds of race, ethnic origin, sex, religion or philosophy, disability, age or sexual identity.

#### **3. Protection of health**

Risse + Wilke ensures safety and health at the workplace within the framework of the national regulations. The company supports constant development to improve the working environment.

#### **4. Working conditions, prohibition of forced labour and of child labour**

The company Risse + Wilke respects its employees' right of association and assembly within the framework of the relevant applicable rights and laws. The company complies with the working standards regarding the maximum allowable working time and remuneration, especially with respect to the level of remuneration, in accordance with the applicable laws and regulations. Employees must be protected against corporal punishment and against physical, sexual, mental and verbal harassment. The employees' privacy shall be respected.

The prohibition of forced labour in any form is observed. In particular the convention on forced or compulsory labour of 1930 (convention 29 of the

International Labour Organisation) and the convention on the abolition of forced labour of 1957 (convention 105 of the International Labour Organisation) are adhered to.

Risse + Wilke complies with the regulations on the prohibition of child labour, and in particular the convention on the minimum age for admission to employment of 1973 (convention 138 of the International Labour Organisation) and the convention concerning the prohibition and immediate action for the elimination of the worst forms of child labour of 1999 (convention 182 of the International Labour Organisation) are observed. If a national regulation provides for stricter standards concerning child labour, such standards shall have priority.

## **5. Export controls and economic sanctions**

Risse + Wilke undertakes to observe the legally prescribed or politically initiated restrictions on the export or re-export of goods, software, services and technologies as well as the present trade restrictions for certain countries, regions, companies or organizations and individuals.

## **6. Sustainability and environmental protection**

The company is committed to the objective of protecting the natural resources for the present and future generations in a sustainable manner. Laws and regulations enacted for the protection of the environment are to be observed. Risse + Wilke undertakes to make an appropriate contribution to the implementation of the 17 Sustainable Development Goals of the UN as well as the sustainability strategy of the German Federal Government.

## **7. Communication**

The company Risse + Wilke communicates openly and on a dialogue basis with regard to the requirements of this code of conduct and its implementation in relation to employees, children, suppliers and other interest and entitlement groups.

## **8. Escalation policy**

Risse + Wilke expressly supports the reporting of violations of laws or internal regulations by employees. Reports should be made in writing and can be made anonymously to the respective supervisor, the human resources department or the management. Employees who report violations do not have to expect any negative

consequences under labour legislation. However, deliberately misrepresented information entails appropriate measures and sanctions.

### **III. Principles of fair competition**

#### **1. Prohibition of corruption**

Risse + Wilke rejects corruption and bribery. When dealing with business partners and government institutions the interests of the company and the private interests of employees are kept completely separate on both sides. Decisions are taken free of extraneous considerations and personal interests. The applicable criminal law concerning corruption must be complied with. Among other things the following must be observed:

It is not permitted for the company and its employees to grant personal advantages to domestic or foreign officials (such as civil servants or public service employees) with the aim of obtaining advantages for the company or oneself or third parties.

Monetary personal advantages as consideration for unfair favouritism in business transactions between companies may not be offered, promised, granted or approved. Similarly it is not permitted to demand or accept personal advantages of value for any unfair favouritism in transactions with business partners. The management and employees of the company may not offer, promise, demand, grant or accept in business transactions any gifts, payments, invitations or services which are granted with the intention of influencing a business relationship in an unfair fashion or where there is a risk that the professional independence of the business partner will be jeopardised. This is basically not the case with respect to gifts and invitations which fall within the framework of hospitality, custom and courtesy common in business practice.

#### **2. Conduct towards competitors**

The company Risse + Wilke respects free competition. It therefore complies with applicable laws which protect and promote competition, and in particular the applicable cartel laws and other laws to regulate competition.

In dealings with competitors these regulations prohibit in particular agreements and other activities which influence prices or condition in an unfair fashion, which illegally allocate sales districts or customers, or which inadmissibly hinder free and open competition. Furthermore these regulations prohibit unfair agreements

between customers and suppliers intended to restrict the freedom of customers to determine autonomously their prices and other conditions when reselling (determination of prices and conditions).

In view of the fact that there may be difficulties in distinguishing between prohibited cartels and permissible cooperation, the company has appointed for its employees a contact person who may be consulted where there are cases of doubt.

### **3. Business secrets**

Risse + Wilke respects and keeps company and business secrets of others. Confidential information and confidential documents may not be passed without authorisation to third parties or made accessible to them in any other way, unless power has been granted to do this, the information concerned is publicly accessible or an enforceable decision is taken by an official authority or court ordering this.

## **IV. Scope, implementation, suppliers**

### **1. Scope**

This code of conduct applies to all branches and business units of the company.

### **2. Implementation and compliance**

The company Risse + Wilke will inform its employees of the subject matter governed by this code of conduct and of the obligations this gives rise to. It shall ensure by taking suitable measures that this Risse + Wilke code of conduct is complied with.

### **3. Suppliers**

The company is called upon to convey to its direct suppliers the principles of this Risse + Wilke code of conduct, to promote in the best possible fashion compliance with the content on the part of its suppliers and to call on these also to follow the code of conduct. The company is also called upon to recommend to its direct suppliers to call on their suppliers in turn to follow this code of conduct.

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