

PREAMBEL

Wohlhaupter GmbH is committed to its social responsibility in the context of its corporate activities worldwide (internationally usually referred to as 'CSR'¹). This Wohlhaupter Code of Conduct on Corporate Social Responsibility (hereinafter referred to as 'CoC') sets out what this means, in particular working conditions, social and environmental compatibility, transparency, trust-based cooperation and dialog. The contents of this CoC are an expression of the values of the Wohlhaupter family business as defined in the company's vision and mission and, in particular, in its commitment to the social market economy.

CODE OF CONDUCT OF WOHLHAUPTER GMBH

This CoC is based on a fundamental understanding of socially responsible corporate governance. For Wohlhaupter GmbH, this means that it assumes responsibility by considering the consequences of its business decisions and actions in economic, technological, social and ecological terms and achieving an appropriate balance of interests. Wohlhaupter GmbH voluntarily contributes to the well-being and sustainable development of global society within the scope of its respective possibilities and scope of action. In doing so, it is guided by generally accepted ethical values and principles, in particular integrity and honesty and respect for human dignity.

1. SCOPE OF APPLICATION

This CoC applies to all branches and business units of Wohlhaupter GmbH worldwide.

Wohlhaupter GmbH undertakes to promote compliance with the contents of this CoC among its suppliers and in the wider value chain within the scope of its respective possibilities and scope of action.

2. CORNERSTONES OF SOCIALLY RESPONSIBLE CORPORATE GOVERNANCE

We live common values. We act in the overall interests of the company. Openness and mutual respect characterize the way we work together. We build on strong values: reliability and honesty, credibility and integrity.

Wohlhaupter GmbH actively works to ensure that the values and principles listed below are observed and adhered to in the long term.

2.1 COMPLIANCE WITH LAWS

Wohlhaupter GmbH complies with the applicable laws and other legal provisions of the countries in which it operates. In countries with a weak institutional framework, it carefully examines which good corporate practice from its own home country should be applied to support responsible corporate governance.

2.2 INTEGRITY AND ORGANIZATIONAL GOVERNANCE / COMPLIANCE

2.2.1 Ethical Behavior

Wohlhaupter GmbH bases its actions on generally accepted ethical values and principles, in particular integrity, honesty, respect for human dignity, openness and non-discrimination of religion, ideology and gender.

Bribery, corruptibility, corruption

2.2.2 Bestechung, Bestechlichkeit, Korruption

Wohlhaupter GmbH rejects corruption and bribery as defined by the relevant UN Convention.² It promotes transparency, acting with integrity and responsible management and control within the company in an appropriate manner. Wohlhaupter GmbH expects its suppliers not to misuse invitations and gifts to exert influence. Invitations and gifts to Wohlhaupter employees or persons close to them are only granted if the occasion and scope are appropriate, i.e. they are of low value and can be regarded as an expression of generally accepted local business practice. Similarly, suppliers do not demand any inappropriate benefits from Wohlhaupter employees.

2.2.3 Competition

Wohlhaupter GmbH pursues clean and recognized business practices and fair competition. In competition, it is guided by professional behavior and quality work. It maintains a cooperative and trusting relationship with the supervisory authorities.

2.2.4 Prevention of money laundering

Money laundering refers to the process of smuggling illegally obtained money or illegally acquired assets into the legal financial and economic cycle. We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

2.3 FINANCIAL RESPONSIBILITY / RESPONSIBILITY FOR DOCUMENTS

Financial statements and books, records and accounts of each legal entity within Wohlhaupter GmbH are part of the company records and therefore constitute company property. They must be accurate and comply with all legal and tax requirements and Wohlhaupter's internal accounting policies. All company records are important assets of the company. All employees are responsible for the creation, use, management, secure storage and, if necessary, secure destruction of such records. Such actions shall only be carried out in accordance with company policy, company standards and procedures and current legal requirements.

2.4 AVOIDANCE OF CONFLICTS OF INTEREST

Wohlhaupter GmbH expects its suppliers to make decisions relating to their business activities with Wohlhaupter exclusively on the basis of objective criteria. Conflicts of interest with private interests or other economic or other activities, including those of relatives or other related persons or organizations, are avoided from the outset.

2.5 HANDLING INFORMATION

2.5.1 Reporting

Wohlhaupter GmbH builds on strong values: reliability and honesty, credibility and integrity. We therefore attach great importance to open and truthful reporting and communication on the company's business transactions to shareholders, employees, customers, business partners, the public in general and state institutions.

Every employee ensures that both internal and external reports, records and other company documents comply with the applicable legal regulations and standards and are therefore always complete and correct, as well as timely and system-compliant.

²Übereinkommen der Vereinten Nationen gegen Korruption von 2003

2.5.2 Confidential Company Information / Insider Informationen

We take the necessary steps to appropriately protect confidential information and business documents from being accessed and viewed by colleagues and other third parties who are not involved.

2.5.3 Data Protection and Information Security

The protection of personal data, in particular that of employees, customers and suppliers, is of particular importance to Wohlhaupter GmbH.

No personal data may be collected or processed without legal permission or the consent of the person concerned.

2.6 HUMAN RIGHTS

Wohlhaupter GmbH is committed to the promotion of human rights. It upholds human rights in accordance with the UN Charter of Human Rights, in particular the following: ³

2.6.1 Privacy

Protection of privacy.

2.6.2 Health and safety

Safeguarding health and occupational safety, in particular ensuring a safe and healthy working environment to prevent accidents and injuries.

2.6.3 Harassment

Protecting employees from corporal punishment and from physical, sexual, psychological or verbal harassment or abuse.

2.6.4 Freedom of Expression

Protection and granting of the right to freedom of opinion and expression.

2.7 WORKING CONDITIONS

Wohlhaupter GmbH complies with the following core labor standards of the ILO⁴:

2.7.1 Child Labor

The prohibition of child labor, i.e. the employment of persons younger than 15 years of age, unless local legislation stipulates higher age limits and exceptions are permitted.⁵

2.7.2 Forced Labor

The prohibition of forced labor of any kind.⁶

2.7.3 Remuneration

The labor standards regarding remuneration, in particular the level of remuneration in accordance with applicable laws and regulations.⁷

³Allgemeine Erklärung der Menschenrechte, UN-Resolution 217 A (III) von 1948
⁵ILO-Konvention Nr. 138 von 1973 und ILO-Konvention Nr. 182 von 1999
⁷ILO-Konvention Nr. 100 von 1951

⁴ILO = International Labour Organization = Internationale Arbeitsorganisation
⁶ILO-Konvention Nr. 29 von 1930 und ILO-Konvention Nr. 105 von 1957

2.7.4 Workers' Rights

Respect for the right of employees to freedom of association, freedom of assembly and collective bargaining, insofar as this is legally permissible and possible in the respective country.⁸

2.7.5 Promotion of Diversity and equal Opportunities

We promote equal opportunities and do not tolerate discrimination.⁹ We treat all people equally, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

2.8 WORKING HOURS

Wohlhaupter GmbH complies with the labor standards regarding the maximum permissible working hours.

2.9 PROTECTION OF COMPANY PROPERTY AND PLAGIARISM

We use the property and resources of Wohlhaupter GmbH appropriately and carefully and protect them from loss, theft or misuse. The intellectual property of our company represents a competitive advantage for Wohlhaupter and thus an asset worth protecting, which we defend against any unauthorized access by third parties. Third-party intellectual property and property rights must be respected. We also expect this from our business partners.

We use Wohlhaupter GmbH's tangible and intangible property exclusively for company purposes and not for personal purposes, unless expressly permitted. Together with their superiors, our employees are responsible for ensuring that the type and scope of business trips are always proportionate to the purpose of the trip and are planned and carried out economically, taking into account time and cost aspects.

2.10 ENVIRONMENTAL PROTECTION, ENERGY AND CLIMATE PROTECTION

We act in accordance with the applicable laws and are guided by international standards¹⁰ in order to minimize negative effects on the environment and continuously improve our activities for environmental and climate protection.

All employees are sensitized to environmental protection and the necessary training measures and courses are offered. We have taken appropriate environmental protection measures (e.g. the implementation of an operational environmental protection management system) that adequately cover the following topics:

- Objective setting, definition and implementation of measures and their continuous improvement;
- Environmental aspects such as reducing CO2 emissions, increasing energy efficiency and using renewable energies, ensuring water quality and reducing water consumption, ensuring air quality, promoting resource efficiency, reducing waste and disposing of it properly and handling hazardous substances responsibly for people and the environment.

⁸ ILO-Konvention Nr. 87 von 1948 und ILO-Konvention Nr. 98 von 1949
⁹ ILO-Konvention Nr. 111 von 1958

¹⁰ Die 27 Grundsätze der „Rio Declaration on Environment and Development“ von 1992 als Ergebnis der Konferenz der Vereinten Nationen über Umwelt und Entwicklung in Rio de Janeiro

2.11 INTERNATIONAL TRADE RESTRICTIONS AND EXPORT CONTROLS

Governments and international bodies may impose temporary trade restrictions and boycotts that affect certain products and apply to countries or individuals. Wohlhaupter GmbH recognizes the decisions of the international community.

We conduct our business activities exclusively in accordance with international regulations and do not export any goods or technologies that are affected by trade restrictions. In exceptional cases, individual products may be used for military purposes (so-called dual-use goods). The relevant export control regulations must be complied with for these products. Special instructions from the management must be complied with.

2.12 CIVIC ENGAGEMENT

Wohlhaupter GmbH contributes to the social and economic development of the country and region in which it operates and promotes corresponding voluntary activities by its employees.

3. IMPLEMENTATION AND ENFORCEMENT

3.1. Communication

Wohlhaupter GmbH undertakes all appropriate and reasonable efforts to continuously implement and apply the principles and values described in this CoC. Contractual partners shall be informed of the key measures upon request and within the framework of reciprocity, so that it is clear how compliance is ensured. There is no entitlement to the disclosure of trade and business secrets, information relating to competition or other information worthy of protection.

3.2. Notification of Violations

All employees have the opportunity at any time to directly report any irregularities to the management. Such grievances may include violence, threats, violations of laws, regulations and guidelines. Actions directed against employees who report such grievances will not be tolerated. In the interest of our employees and business partners who act with integrity, any employee who violates this internal policy must expect consequences under labor law and disciplinary action.

Frickenhausen, 7th of June, 2023

Wohlhaupter GmbH

Frank-M. Wohlhaupter
Managing Partner

Wohlhaupter GmbH becomes a member of the VDMA's „Blue Competence“ Initiative

Wohlhaupter GmbH will become a member of the VDMA "Blue Competence" initiative at the beginning of 2021, clearly expressing that sustainability is a top priority for the precision tool manufacturer and that the following **sustainability principles of mechanical and plant engineering** are an important part of Wohlhaupter's corporate philosophy.

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Our comprehension of trendsetting sustainability is based on the principles of economic success, fairness, respect & responsibility and includes the dimensions of society, ecology & economy. We comprehend sustainable action in terms of the definition of the Brundtland-report¹ and the definitions of the German "Rat für Nachhaltige Entwicklung"².

STRATEGICAL:

1. Sustainability is a crucial part of our company strategy.
2. We create solid business schemes with sustainable values and secure entrepreneurial success.
3. Our technologies and solutions promote worldwide sustainable developments.

OPERATIVE:

4. Sustainable thinking and action are represented in our processes and products.
5. We act with consideration of resources and stand up for climate protection. Our staff is our most valuable asset. We promote engagement and participation.
6. We stand up for keeping the human rights.

CULTURAL:

7. Our company is a habitat.
8. We take responsibility in our region.
9. We do, what we promise!

COMMUNICATIVE:

10. We actively cultivate the network with all participants.
11. We transparently communicate our sustainable action.



¹ „Sustainable development meets the needs of the present without compromising the ability of future generations to meet their own needs.“ (Brundtland-report, 1987)

² „Sustainable development means to consider ecological aspects equal to social and economic aspects. Therefore, sustainable economy means: For our children and grandchildren, we must leave behind us a sound ecological and economic structure.“ (Rat für Nachhaltige Entwicklung, 2001)
