

WWM GmbH & Co. KG Code of Conduct

Publisher

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*"Every unsolved problem is
a yet-to-be-founded
company!"*

Through economically, ecologically, and socially responsible actions, we aim to enhance the quality of life for people and safeguard the livelihoods of present and future generations. This responsibility is anchored in our culture of values.

WWM is committed to upholding internationally recognized human rights and social norms throughout the entire value chain. Our business partners significantly contribute to our success. We consider a shared understanding of ethical and sustainable conduct to be essential.

The social and environmental standards and processes described here are based on the ten principles of the United Nations Global Compact, the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

The requirements and principles of this Code of Conduct are an integral part of the contractual obligations and cooperation between our business partners and WWM. Therefore, our business partners commit to adhering to and promoting the following principles of this Code of Conduct, as well as regularly and appropriately training their employees in this regard. Additionally, these contents are applicable to suppliers and other third parties engaged by our business partners to fulfill contracts with WWM. The requirements consistent with the contents of this Code of Conduct must therefore be integrated by the business partner into its own contractual documents.

We expect that it will use its best efforts to ensure that its suppliers and other third parties are similarly committed.



Dr. Christian Coppeneur-Gülz
CEO, WWM GmbH & Co.KG



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1. PRINCIPLES

Law-abiding, rule-compliant, responsible, and fair behavior. We adhere to the principle of legality in all actions, measures, contracts, and other processes of the WWM Group. In particular, we do not deceive customers, authorities, or the public, nor do we participate in such deception by third parties.

Compliance with the principle of legality also includes, among other things, the payment of due taxes and duties, compliance with competition and antitrust laws, strict prohibition of corruption and money laundering, compliance with state-of-the-art practices, obtaining necessary regulatory approvals, compliance with export control laws, and respect for the legal rights of third parties. This principle is based not only on the consideration that violations can lead to significant business disadvantages through prosecution, fines, or damages claims. Rather, we affirm the principle of exclusively legal conduct, regardless of whether it benefits the WWM Group or not.

Legality and WWM values take precedence over customer demands or other economic interests.

We are responsible for compliance with the laws in our work area and are required to continually assess our work environment from the standpoint of legality, responsibility, and fairness. If we are uncertain about which decision to make from the perspective of legality, responsibility, and fairness, we contact our supervisors or the compliance organization or legal department.

Regardless of legally prescribed sanctions, a violation of this Code of Business Conduct generally results in disciplinary action up to and including termination and the pursuit of damages against the individual concerned.



Reports of possible irregularities

We are encouraged to report possible violations of the provisions contained in this Code of Business Conduct to our supervisors. We can also contact the compliance organization at any time. Preferably, we submit reports with our name, but they can also be made anonymously. Reports will be treated confidentially. Any form of discrimination against WWM employees or partners due to a good-faith report is prohibited. This also applies if the report is subsequently found to be unfounded.

As supervisors, if we receive reports of possible violations by employees or third parties, we involve the relevant department. Matters of legal significance are referred to the legal department responsible for legal advice.

Reports of possible violations are promptly investigated as part of internal investigations. If the reports are confirmed, necessary corrective actions will be taken.

Cooperation with Authorities

WWM maintains a cooperative relationship with authorities. As employees and managers of WWM, we fully cooperate in lawful investigations conducted by WWM or authorities. Legal rights to refuse testimony and disclosure, as well as other procedural rights, remain unaffected.



Responsibility of Managers

As managers, we are responsible for ensuring that no violations of legal regulations or this Code of Business Conduct occur within our areas of responsibility, which could have been prevented or hindered through adequate supervision. We ensure that compliance with legal and internal regulations in our respective areas of responsibility is continuously and appropriately monitored. As managers, we also ensure that our employees are aware that violations of the principle of legality and the Code of Business Conduct are prohibited and generally result in disciplinary consequences, regardless of the hierarchical position of the employees within the company.

If an employee brings possible violations to our attention as managers, we ensure that this employee is protected from any form of disadvantage due to a report made in good faith. This applies even if the report is subsequently found to be unfounded.

As managers, we lead by example for our employees, inform them about the provisions of this Code of Business Conduct, discuss them with it, and, with the involvement of management, serve as points of contact. As driving forces, we regularly conduct compliance dialogues within our departments.

Responsibility towards Society

We act responsibly on our own initiative and in the interest of our company, taking into account the impacts on society and the environment. We consider fairness in cooperation within the company and with business partners as a prerequisite for our success.

We reject the violation of human rights (such as forced labor and child labor), including by our business partners. We pay attention to the reputation of the WWM Group in fulfilling our duties. In doing so, we adhere to the principle of legality and uphold the principles of responsible and fair conduct.

Behavior towards Employees

We respect and protect the personal dignity of each individual. We do not tolerate discrimination or harassment of our employees and promote diversity.

2. PROTECTING TRUST RELATIONSHIP

Secondary Activities and Capital Participation

We engage in secondary activities only with the prior consent of the employer. This consent is granted if the secondary activity does not impair the legitimate interests of the company. Additionally, as employees, we are allowed to have a stake in competitors, suppliers, or customers only after prior written notification to the employer on a case-by-case basis. Transactions with companies in which we, our spouses, or close family members are involved or employed in a managerial capacity may only be conducted after prior written notification to the employer—provided that we can influence the business relationship and there is a possibility of a conflict of interest.

Engaging Business Partners for Personal Purposes

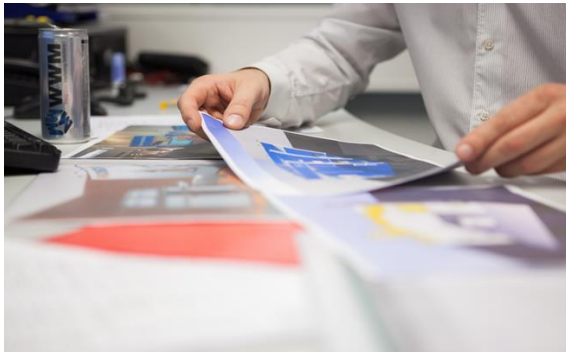
We may engage a business partner of WWM for personal purposes only with the prior written consent of the relevant management, to the extent that we are directly involved in the awarding or execution of contracts in our professional capacity and there is a possibility of a conflict of interest. Generally offered goods or services are exempt from this requirement.



3. HANDLING OF INFORMATION

Documents

Records and reports (internal and external) must be accurate and truthful. We adhere to the principles of proper accounting and financial reporting. Accordingly, data entries and other records must always be complete, accurate, and timely, and conform to the system. The creation of records, files, and similar documents using confidential company information is only permitted when it is directly in the interest of WWM.



Confidentiality

We maintain the confidentiality of the company's confidential information. This obligation continues even after the termination of the employment relationship. Data protection and information security in all business processes, we ensure the protection of privacy, personal data, and the security of all business information in compliance with legal requirements. In securing data, especially protection against unauthorized access and loss, we maintain an appropriate standard that significantly considers the state of the art and the respective risk. In the development of WWM products and new business models, we ensure the early implementation of data protection and information security requirements. In addition to the management, the data protection officer is primarily available as a contact person for questions about the correct handling of data.

Insider Information

Insider information is non-public information that can influence the price of securities or other financial instruments ("securities"). When in possession of insider information:

- (1) We do not acquire or dispose of securities using this insider information, whether for our own account, on behalf of others, or for another.
- (2) We do not recommend to anyone the acquisition or disposal of securities based on insider information, nor do we otherwise induce anyone to do so.
- (3) We treat insider information as strictly confidential. We do not generally disclose it to third parties, including the sharing of passwords that provide access to electronically stored insider information. We only disclose insider information to employees or external consultants if the recipient requires the information to fulfill their duties and is obligated to treat it strictly confidentially.

4. BEHAVIOR TOWARDS BUSINESS PARTNERS AND THIRD PARTIES

Competition and Antitrust Law

We adhere to the rules of fair competition within the framework of legal regulations. We recognize that among competitors, territorial or customer allocations, agreements, or exchange of information regarding prices/price components, supply relationships and their conditions, as well as capacities or bidding behavior are prohibited. The same applies to the exchange of information on market strategies and investment strategies. We understand that not only written contracts regarding this matter, but also verbal agreements or tacitly coordinated parallel conduct are generally not allowed.

We only engage in agreements or exchanges of information on research and development projects in very limited exceptional cases. We do not restrict customers and buyers in setting their resale prices and refrain from influencing them in this regard. We comply with the respective national regulations regarding clauses restricting competition in customer or supplier contracts.

Supplier and Customer Relationships

We make agreements with customers and suppliers that are complete and unambiguous and document them, including subsequent changes and additions. We strictly adhere to internal regulations for the application of dual control ("four-eyes principle") and for the separation of action and review functions. We select suppliers solely on a competitive basis, after comparing prices, quality, performance, and suitability of the products or services offered.



Corruption

We do not tolerate any form of corruption. Corrupt behavior by employees or business partners is illegal and leads to distortion of competition as well as financial and reputational damage to WWM. We adopt an extremely restrictive approach to giving gifts to officials or persons equivalent to them. We aim to avoid even the appearance of influence. We do not accept gifts from officials. We do not offer benefits to officials for the performance or acceleration of official acts or grant such benefits. We observe this regardless of whether there is a claim for the performance of the official act or the official breaches his duties in his actions.

Also in business dealings, especially in dealings with customers and suppliers, we refrain from any form of corruption or other unfair influence on business decisions. This applies in particular to agreements related to the intermediation, allocation, delivery, execution, and payment of orders. We do not agree to services where it is assumed that they are intended, wholly or in part, for the payment of bribes. We oblige representatives or other intermediaries that we engage to obtain orders or approvals, not to make bribes or provide advantages and not to accept bribes. In the event of a violation, we contractually provide for the right to terminate the contract without notice.

We are extremely restrictive in accepting and giving gifts and other benefits including invitations.

Should we allow ourselves to be influenced in an unfair manner by officials, customers, suppliers, or other third parties, or attempt to influence them in an unfair manner, we will be subject to disciplinary action regardless of criminal consequences. Attempts by officials, suppliers, customers, or other third parties to unfairly influence our decisions will be reported to the appropriate management and the compliance officer.

In the event of violations, we respond appropriately, for example, by placing orders on hold or terminating contracts.



Donations

Business units of the WWM Group, on the other hand, provide monetary and in-kind donations for education, science, culture, and social issues in the spirit of civic engagement. The rules for awarding such donations are decided solely by the managers of WWM. When awarding such donations, we adhere to the principle of selflessness and clearly differentiate them from sponsorship.

5. DEMAND FOR OUR PRODUCTS AND SERVICES



Outstanding quality is our strength. This is how we fulfill the desires and expectations of our customers. When developing and manufacturing products and providing services, our actions are always guided by the principles of legality and our commitment to quality. Our products meet at least the current state of the art. If conflicts arise in the practical implementation of these requirements, we openly express them. They are resolved in accordance with the principles of legality, responsible and fair business practices, and the other values of WWM.

6. INTELLECTUAL PROPERTY OF THIRD PARTIES

Third-party intellectual property includes both industrial property rights (such as patents, trademarks, registered designs) and copyrighted works (such as software, image rights) of third parties.

We respect third-party intellectual property and may only use it if appropriate usage rights have been granted to us. We may only use and disclose third-party know-how that is not protected by industrial property rights or copyrights if there are no legal provisions to the contrary. If this third-party know-how has been disclosed to us under a confidentiality agreement, it may only be used and disclosed by us in accordance with the provisions of this confidentiality agreement.

We use third-party software, including open-source software and firmware, only within the scope of the granted rights and in compliance with the respective license terms.



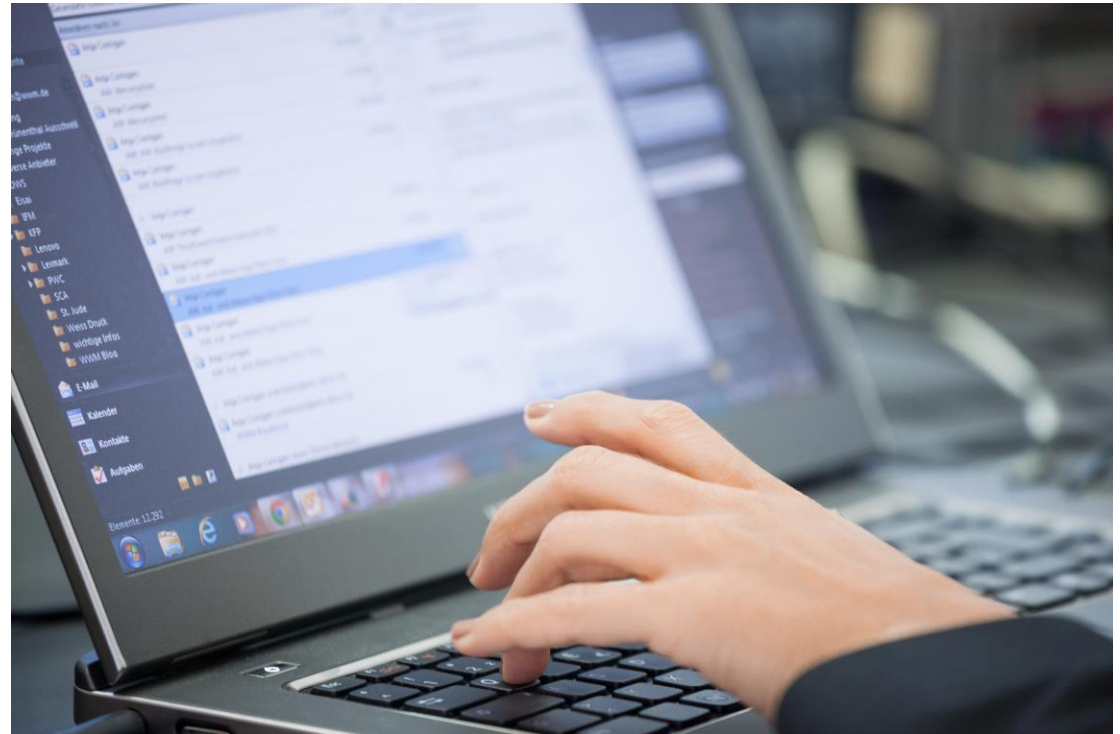
7. OCCUPATIONAL SAFETY, HEALT, FIRE AND ENVIROMENTAL PROTECTION



It is our responsibility to avoid hazards to people and the environment, minimize impacts on the environment, and use resources sparingly. Processes, facilities, and equipment must comply with applicable legal and internal requirements for occupational safety, as well as health, fire, and environmental protection.

8. COMMUNICATION AND TRAINING

We will be regularly informed about current topics related to this Code of Business Conduct. We engage in regular dialogue on compliance issues and openly address risks. We receive regular training on specific topics.



9. INTERNAL CONTROL SYSTEM



WWM maintains an internal control system. The management of each business unit is responsible for compliance with the provisions contained in this Code of Business Conduct, as well as other internally established rules within their area of responsibility. The Central Shared Services department has unrestricted access to information and auditing rights, unless prohibited by legal or internally agreed upon regulations.