

Wickeder Group

Code of Conduct

Wickeder Group has devised a code of conduct that has applied to all regions and companies of Wickeder group since autumn 2017. This Code of Conduct links our demand for the compliance of statute and law with our special requirements and ethical standards.

These guidelines apply to all employees and all business units, regardless of hierarchical levels, and also represent our direction for our business partners and stakeholders.

The code of conduct is based on international agreements and guidelines, including the Universal Declaration of Human Rights, the conventions of the International Labour Organization (ILO) and the Global Compact of the United Nations.

This Code of Conduct will be used in the selection and evaluation of our business partners. The goal is a common understanding of the implementation of sustainable behavior in everyday business. For this reason, we also expect our business partners to comply with the following principles.

Human Rights, Labor, and Social Standards

Wickeder Group is particularly committed to the abolition of all forms of child and forced labor, the principle of non-discrimination, the recognition of the freedom to associate, collective bargaining and social partnership, fair compensation and benefits based on local market conditions, entitlement to adequate working hours and paid leave as well as maintaining proportionality in disciplinary measures and security.

Wickeder Group is firmly committed to equal employment opportunities and to compliance with all applicable laws that particularly prohibit employment discrimination on the basis of age, race, color, sex, sexual orientation, gender identity or expression, national origin, religion or disability.

This policy applies to all employment decisions, including recruiting, hiring, promotions, pay practices, benefits, disciplinary actions and terminations. Sexual harassment and other workplace harassment are also strictly prohibited. We promote a diverse and inclusive workplace where all employees treat each other with respect and dignity.

Protection of Environment, Health, and Safety

Compliance with all legislation to protect humans and the environment is one of our basic tenets. This applies to our products as well as to our processes.

Each employee is responsible for working safely at all times and must comply with all applicable environmental and occupational health and safety laws and regulations, as well as with the corresponding corporate policies and rules. All managers have the duty to instruct, supervise and support their team in living up to this responsibility.

Air, water and land may only be used for industrial purposes within the framework of approvals granted by the relevant authorities. The same applies when erecting and operating or modifying and extending production plants. Waste must be disposed of in accordance with legal requirements.

If the services of third parties are used for this purpose, it must be ensured that they, too, comply with environmental regulations and our corporate standards.

Antitrust Laws

Our policy is to promote fair competition. We therefore require all employees to strictly abide by all applicable antitrust laws.

Agreements and concerted practices between competitors, “horizontal agreements”, are prohibited if their objective or effect is to prevent or restrict competition. These comprise, for example, agreements on prices, collusion on tender bids, allocation of customers, terms of sale or procurement, production or sales quotas, or carving up geographical markets.

Also prohibited are some types of vertical agreements, i.e., arrangements and agreements between suppliers and customers. These include restrictions of the customer’s freedom to set prices and conditions of supply with respect to their business partners, certain most-favored-customer clauses, exclusivity such as total requirement or exclusive supply, as well as non-competition. In case of doubt in connection with antitrust laws or the permissibility of a certain behavior under such laws, you are requested to consult your manager or the legal department at an early stage.

Corruption

All our business partners, in particular our suppliers, customers, joint venture partners, contractors and distributors, must be dealt with fairly. Our relations with all business partners shall be based solely on objective criteria, in particular quality, reliability, competitive prices, as well as compliance with environmental, social and corporate governance standards.

Wickeder Group is strictly committed to fighting any kind of corruption. Therefore, Wickeder Group prohibits its employees and agents from engaging in any form of bribery. While dealing with business partners or government officials, they must never demand or accept anything of value (e.g. cash, gifts, entertainment or any other personal benefits) which could be construed as an attempt to influence or induce business decisions.

Likewise, employees of other companies or government officials must never be promised or granted any personal benefits with the intent to obtain or retain business or to gain any improper advantage for a company of Wickeder Group.

We require all employees to inform their manager if a business partner or governmental official offers or demands any personal benefits.

Gifts and Entertainment

Gifts and invitations in business are generally handled much more restrictively today than some years ago. Consequently, gifts, business meals or entertainment are to be given or accepted only if intended or understood as simple business courtesies which are consistent with customary business practices and which from the outset rule out any influence on a business decision or an official decree.

If inappropriate gifts cannot be tactfully refused, they should be accepted. In that case, the manager must be informed thereof and shall decide on the further treatment (e.g., a donation to charity).

Offering, granting, demanding or accepting cash or cash equivalents is never appropriate.

Money Laundering

Money laundering means the introduction of assets (not only cash) originating from criminal offences into the regular financial and economic cycle.

Money laundering is a criminal offence. No employee, either alone or in collaboration with third parties, may take measures that violate applicable regulations on money laundering.

Where questionable financial transactions involving transfers of cash or cash equivalents are requested, prior review by and approval from your treasurer is required.

Data- and Information Protection

Any non-public information about Wickeder Group that, if disclosed, would be detrimental to the company, or would give someone an unfair business or personal advantage, is confidential property of the company.

Inventions, patents and expertise are particularly important for the long-term success of Wickeder Group companies. You must always keep confidential information secret and protected against unauthorized access by third parties. You must also not exploit your knowledge of such information for your personal gain or the benefit of a third party.

Wickeder Group is committed to respecting the privacy and integrity of its employees and its business partners. We adhere to strict standards when processing our employees' personal information and our business partners' data.

All personal data collected and held by a company of Wickeder Group will be processed fairly, transparently, carefully and in compliance with the locally applicable data privacy laws.

Sales and Distribution

Various national and international trade laws restrict or prohibit the import and export of products or services. These restrictions are based not only on the nature of the product, but also on the country of origin or destination and, sometimes, even on the identity of the customer (embargo). Country-specific embargoes are in place for certain countries.

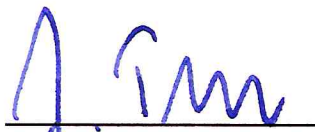
No person or company subject to the jurisdiction imposing an embargo may participate or assist in the import or export of goods or services from or to a country, its citizens or residents subject to an embargo.

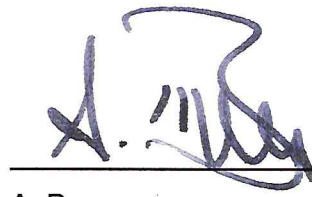
Protection of Property

All Employees are required to handle Company Property and Property of Business Partners in a responsible manner and to protect assets of Wickeder Group companies against loss, damage, theft, abuse and unauthorized use. Company property also includes intangible assets such as proprietary knowledge, intellectual property rights and copyrighted material.

Wickeder Group

September 2017



Dr. J. Platt

A. Braun

Auerhammer Metallwerk GmbH

September 2017



Dr. R. Laag
