

E. Wilhelm GmbH - as a globally positioned company - is active in numerous markets and is thus confronted with a wide range of requirements and challenges. The entrepreneurial actions of E. Wilhelm GmbH are guided by the principles of ethics, integrity and compliance with the law. In doing so, E. Wilhelm GmbH is guided by globally applicable standards, in particular the 10 principles of the Global Compact Initiative of the United Nations ([www.globalcompact.org](http://www.globalcompact.org)). E. Wilhelm GmbH expects its business partners to comply with all laws and regulations relevant to their business activities as well as the requirements of generally applicable and E. Wilhelm standards as well as this Code of Conduct. E. Wilhelm GmbH also expects its employees to comply with the Code of Conduct for Employees. Furthermore, E. Wilhelm GmbH strives to continuously optimize its corporate actions and products and services in terms of sustainability. E. Wilhelm GmbH asks its business partners to contribute to this in the sense of a holistic approach. For future cooperation, E. Wilhelm GmbH and the business partner agree on the validity of the following regulations for a joint code of conduct. This Code of Conduct shall apply as the basis for all future business relationships. E. Wilhelm GmbH and the business partner undertake to comply with the principles and requirements of the Code of Conduct. The business partner is requested to contractually obligate its subcontractors to comply with the standards and regulations set forth in this Code of Conduct. The business partner shall demonstrate to E. Wilhelm GmbH its willingness to participate in audits. A violation of this Code of Conduct may be reason and cause for E. Wilhelm GmbH to terminate the business relationship.

## **1. Requirements for business partners**

### **1.1 Respect for fundamental human rights**

E. Wilhelm GmbH is committed to the principles of respectful, fair and loyal dealings with each other, respects the personality of everyone and is against any discrimination of persons in employment and occupation. E. Wilhelm GmbH undertakes to comply with the international minimum standards, as laid down in particular in the ILO core labor standards ([www.ilo.org](http://www.ilo.org)) as well as the Supply Chain Sourcing Obligations Act. E. Wilhelm GmbH also expects its business partners to comply with the aforementioned principles and to pass on these obligations within the entire supply chain.

### **1.2 Prohibition of child labor**

Child labor may not be used in any phase of production. Business partners are required to comply with the recommendation from ILO Convention 138 on the minimum age for the employment of children. Thus, business partners may not hire employees who have not reached the minimum age, with the exception of trainees.

### **1.3 Prohibition of Illegal Employment and Forced Labor**

E. Wilhelm GmbH opposes any form of illegal employment and forced labor. Thus, no forced labor, slave labor or such comparable work may be used. All work must be voluntary and employees must be able to terminate work or employment at any time. In addition, there must be no unacceptable treatment of employees, such as psychological hardship, sexual or personal harassment.

### **1.4 Fair Compensation**

Compensation paid to employees must comply with all applicable laws on compensation, including, for example, minimum wage and overtime laws. Deductions from wages as a punitive measure are not permitted.

### **1.5 Fair Working Hours**

Working hours must comply with applicable laws or industry standards. Overtime is only permitted if it is worked on a voluntary basis and does not exceed the number of hours per week permitted by law.

## **1.6 Freedom of association**

Business partners shall respect the right of employees to freedom of association, to join trade unions, to call upon labor representation or to join works councils in accordance with local laws. Workers must be able to communicate openly with management without fear of reprisal or harassment.

## **1.7 Freedom from Discrimination**

Discrimination against employees, in particular with regard to race, ethnic and social origin and status, gender, skin color, religion or ideology, disability, age, sexual orientation, genetic characteristics or property, is inadmissible in any form and will not be tolerated. The personal dignity, privacy and personal rights of each individual are respected.

## **1.8 Health and safety in the workplace**

Business partners are responsible for providing a safe and healthy work environment. By establishing and applying appropriate occupational safety systems, necessary precautionary measures are taken against risks, accidents, damage to health and occupational diseases that may arise in connection with the activity. In addition, employees are regularly informed and trained on applicable health and safety standards and safety measures in order to eliminate or at least minimize the risk of injury. Employees are provided with access to drinking water in sufficient quantity and access to clean sanitary facilities.

## **1.9 Grievance mechanisms**

Business partners are responsible for establishing an effective grievance mechanism ("whistleblower system") at the facility level for individuals and communities that may be affected by adverse impacts.

## **2. Requirements for environmental protection and sustainability in the Supply Chain**

In addition to the relevant legal environmental standards, E. Wilhelm GmbH pays particular attention to the sustainability of its production and products, uses resources sparingly and minimizes environmental impacts in order to continuously improve environmental protection. E. Wilhelm GmbH therefore requires its business partners to comply with the following principles in particular.

### **2.1 Treatment and discharge of industrial waste water**

Wastewater from operations, manufacturing processes and sanitary facilities must be typed, monitored, inspected and, if necessary, treated prior to discharge or disposal. In addition, measures should be implemented to reduce the generation of wastewater.

### **2.2 Dealing with air emissions**

General emissions from operations (air and noise emissions) and greenhouse gas emissions must be typed, routinely monitored, reviewed, and, if necessary, treated before they are released. Business partners are also required to monitor their emission control systems. Furthermore, they are required to find economical solutions to minimize any emissions.

### **2.3 Handling waste and hazardous substances**

Business partners follow a systematic approach to identify, handle, reduce, and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a hazard when released into the environment shall be identified and handled in a manner that ensures safety when handling, transporting, storing, using, recycling or reusing, and disposing of such materials safely is guaranteed.

## **2.4 Reduce consumption of raw materials and natural resources.**

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, shall be reduced or avoided. This is done either directly at the point of origin or through procedures and measures, e.g. by changing production and maintenance processes or procedures in the company, by using alternative materials, through savings, through recycling or with the help of the reuse of materials. In the interests of sustainability, the business partners ensure that, in addition to production development, the products themselves also use raw materials and natural resources sparingly and are reusable wherever possible.

## **3. Ethical business conduct**

### **3.1 Fair competition, compliance with competition and antitrust law**

E. Wilhelm GmbH complies with the applicable rules of competition and antitrust law as well as the requirement of fair competition and expects the same from its business partners. In dealing with competitors, the applicable antitrust laws prohibit, in particular, agreements and other activities that influence prices or conditions, as well as agreements between customers and suppliers that are intended to restrict customers' freedom to determine their prices and other conditions autonomously when reselling. E. Wilhelm GmbH outlaws and disapproves of such practices and expects the same from its business partners.

### **3.2 Counteract all forms of corruption, including extortion and bribery**

E. Wilhelm GmbH will fight any form of criminal or unethical influence on decisions of customers and other business partners and will take action against bribery in the company as well as against any form of personal enrichment at the expense of the company.

E. Wilhelm GmbH tolerates hospitality of its employees in the context of business appointments only within the scope of the applicable limit recognized for tax purposes in a country in which the employees or their relatives have their residence or center of life. Benefits to the employees or their relatives by business partners are not desired, not even on a small scale. The obligation expressly expressed by E. Wilhelm GmbH to its employees to comply with the aforementioned regulation shall also be expressed by the business partners to their own employees.

The highest standards of integrity are to be applied in all business activities. Business partners must follow a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards shall be in place to ensure compliance with anti-corruption laws.

### **3.3 Confidentiality/data protection**

The business partners undertake to meet the reasonable expectations of E. Wilhelm GmbH and its employees with regard to the protection of confidential information. The business partners shall work together with E. Wilhelm GmbH to conclude appropriate agreements on confidentiality and to ensure adequate protection of confidential information received. The business partners shall observe the laws on data protection and information security and the official regulations when collecting, storing, processing, transmitting and forwarding confidential information.

## **4. Implementation of the requirements of the supply chain security law and consequences of violations**

E. Wilhelm GmbH considers the provisions of this Code of Conduct to be essential to the business relationship between E. Wilhelm GmbH and its business partners. Therefore, compliance with the provisions contained herein is essential to the business relationship between E. Wilhelm GmbH and its business partners.

E. Wilhelm GmbH expects its business partners with respect to its supply chain to identify risks within it and to take appropriate measures to hedge risks. In the event of suspected violations as well as to safeguard a supply chain with increased risks, E. Wilhelm GmbH expects

E. Wilhelm GmbH to disclose the suppliers concerned. In particular, the business partners assure E. Wilhelm GmbH that the human rights-related and environmental requirements addressed by E. Wilhelm GmbH within the meaning of the German Supply Chain Due Diligence Act (LkSG) will be complied with and adequately addressed along the supply chain. Furthermore, the undersigned business partner will train and educate its personnel accordingly so that the human rights-related and environmental requirements can be enforced along the supply chain.

Compliance with the standards and regulations set forth in this Code of Conduct may be enforced by E. Wilhelm GmbH at any time, also by audit.

E. Wilhelm GmbH reserves the right to take appropriate measures against business partners who do not comply with these requirements, which may ultimately lead to the suspension or termination of a business relationship.

## **5. Indications of legal violations and contact with the compliance organization**

E. Wilhelm GmbH encourages its business partners to immediately report any legal violations within the area of responsibility of E. Wilhelm GmbH as soon as these are observed or are to be expected with high probability. The business partners do not have to fear any disadvantages, provided that the respective report was made to the best of their knowledge and with honest intentions.

A suspected case or violation can be reported anonymously to [info@wilhelm-etuis.com](mailto:info@wilhelm-etuis.com).

## **6. Modifications**

E. Wilhelm GmbH is entitled to modify this Code of Conduct at any time.

## **7. Designation of the social gender**

For better readability, the present Code of Conduct refrains from using feminine and masculine forms of language simultaneously. The generic masculine is used, also for title designations, whereby all genders are meant equally.

## **8. Acknowledgement and Agreement of the Business Partner**

By signing this Code of Conduct, the business partner undertakes to act responsibly and to comply with the principles/requirements listed. The business partner confirms that it communicates the contents of this Code of Conduct in a binding manner to its employees, agents, subcontractors and suppliers and ensures that the principles/requirements listed, in particular with regard to the German Supply Chain Sourcing Obligations Act (LkSG), are also complied with there.

Compliance with these principles is hereby expressly confirmed:

\_\_\_\_\_  
Place, date

\_\_\_\_\_  
First name, last name

\_\_\_\_\_  
Company stamp

\_\_\_\_\_  
Signature