



# Code of Conduct for Suppliers

## Supplier Code of Conduct (SCoC)

Responsible action along the entire supply chain

Dear supplier,

compliance with the applicable legislation and recognized social and ethical standards, as well as being aligned with sustainability principles are part of our holistic understanding and how we do business. It is based on ethical values of integrity, respect and fairness.

We assume responsibility for a value chain that is based on compliance with international legislation and standards, and is in line with the highest ethical values.

For this reason, we have defined our standards in the Supplier Code of Conduct (hereinafter referred to as SCoC) on compliance with applicable legislation, human rights and non-discrimination, work, ethics, health, safety and the environment.

W&H strives to maintain close, trusting and sustainable relationships with its business partners. Therefore, we consider the principles defined in this SCoC to be the basis of a fair and equitable business relationship.

This SCoC is a cornerstone of our compliance program and we are convinced that it makes a valuable contribution to trusting collaboration.

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## General provisions

This SCoC applies to all suppliers, service providers and other companies (suppliers) that manufacture or supply goods or provide services for the W&H Group. This SCoC also applies to any companies, sub-suppliers and sub-contractors associated with the supplier. The supplier associated with W&H must make all reasonable efforts to ensure that all of its sub-suppliers/suppliers and sub-contractors comply with the requirements, standards and guidelines specified in this SCoC.

In this regard, we also want to make reference to the ten principles of the UN Global Compact. (<https://unglobalcompact.org/what-is-gc/mission/principles>)

The SCoC is an integral component of the joint business relationship based on the W&H Terms and Conditions of Purchase. If more stringent legislation or regulations apply in a country, they take precedence over this SCoC.

## Compliance with applicable legislation and regulations

The business partner is expected to comply with all applicable legislation and regulations in all countries in which it operates or from which it supplies goods or services to W&H.

## Human rights and non-discrimination

The supplier must respect and support compliance with internationally recognized human rights and undertakes to oppose all forms of discrimination within the scope of the applicable legislation and regulations. This also applies to its employees and business partners. Any type of discrimination based on gender, skin color, sexual orientation, ethnicity, age, origin, nationality, religion, belief, health, disability, pregnancy, political alignment, membership in trade unions, civil status or other personal characteristics/qualities is prohibited.

## Money laundering and financing terrorism

The supplier must guarantee that it does not have any direct or indirect business or other connections with terrorists, terrorist groups or other criminal or anti-constitutional organizations. Furthermore, the supplier must ensure implementation of EC Regulations no. 2580/2001 and 881/2002 as well as the respective US and/or other relevant provisions by putting suitable organizational measures in place.

The supplier must continue to abide by the applicable anti-money laundering legislation, and must not promote it directly or indirectly.

## 1. Working standards

W&H is committed to respecting the human rights of its employees and to treating them with dignity and respect.

We expect our suppliers to abide by the conventions defined by the International Labor Organization (ILO) and the SA8000 standard of Social Accountability International (SAI). This applies to all employees, including temporary, contractual and direct employees.

### Prohibition of forced labor

All forms of forced, frontal or bonded labor (indenture), involuntary prison labor, slavery or human trafficking are prohibited. All work and services are voluntary, and employees are free to end their employment in accordance with the terms of their contract.

### Prohibition of child labor

Child labor must not be practised or tolerated at any stage of business activities. The term "child" refers to any employed person under the age of 15. The worst forms of child labor are prohibited for all young people under 18 years of age. They also must not carry out any work that is likely to be harmful to their health, safety or morals.

### Working hours

The daily and weekly working hours must not exceed the maximum permitted by the applicable local legislation. Measures and guidelines to prevent excessive fatigue, especially with regard to working hours and rest periods for employees, must be defined and adhered to.

### Remuneration

The remuneration for regular working hours and additional working hours must be ensured in a fair manner, and in accordance with the legal minimum wages or industry standards applicable in the country. The principle of equal remuneration for equal work must be adhered to. Wage deductions that have not been approved, as well as deductions as a form of punishment, are prohibited. All regulations applicable in the country with regard to additional services must be complied with.

### Dealing with employees

All employees must be treated equally and without prejudice. Unacceptable treatment will not be tolerated under any circumstances (e.g. psychological cruelty, sexual harassment/discrimination). When using private or public security personnel, it must be ensured that they have also been instructed on the sections on how to treat employees and on the section relating to freedom of assembly and association, and that they adhere to them.

### Freedom of assembly and association

In accordance with the applicable local legislation, the right for employees to freely associate and form trade unions and works councils must be respected. The representatives of these organizations must be permitted to fulfill their obligations without any restrictions.

## 2. Ethical standards

Integrity, respect and fairness are our main ethical values, and the way in which we build trusting and productive collaborative partnerships with our business partners. We expect our suppliers to ensure that the highest standards of integrity are applied in all business relationships and activities that they enter into.

### Integrity and anti-corruption measures

We expect the supplier's management team to categorically prohibit all forms of bribery, corruption, extortion and embezzlement, and to take appropriate action in the event of any violations.

It is prohibited to influence any business relationships and the decisions made as a result thereof with gifts, payments, invitations or services.

### Special favors

All business decisions and actions must be carried out in compliance with the applicable legislation and other binding provisions at home and abroad. Stable business cooperation for the benefit of all can only be achieved with fair competition and by strictly complying with the legislation. For this reason, it is prohibited for all suppliers to influence the people involved in the decision-making process by offering them personal favors, or similar benefits. Violations of these ethical principles include:

- Offering, promising, granting or approving a preferential treatment to a business partner or its employees (including family members) or a personal benefit when awarding or delivering a contract;
- Directly or indirectly conferring an undue benefit on themselves or to a third party to the detriment of the business partner;
- Notes or gifts sent to private addresses

### Conflict of interest

It must be ensured that professional and private interests are kept separate. Invitations must always be predominantly in a business context, and in a socially appropriate setting. The supplier undertakes to promptly disclose and resolve both actual and potential conflicts of interest that arise in collaboration with W&H. This is particularly the case if the independence and objectivity of business decisions are jeopardized by personal or financial interests, relationships or obligations, for example.

### Disclosure of information

Upon request, the supplier must disclose the following information in accordance with industry practices and in compliance with the relevant regulations:

- Business activities
- Organizational structure
- Financial situation and performance
- Other documentation/information required to check that they are compliant with the SCoC

Forging documents and misrepresentation is unacceptable.

The supplier's financial data must comply with the general principles of proper accounting.

### Intellectual property and trade secrets

Intellectual property rights must be strictly and fully respected by the supplier. Expertise and technologies may only be shared if intellectual property rights are sufficiently protected. Trade secrets must be protected. Confidential information from W&H must NOT be disclosed, forwarded to third parties or otherwise made available. In individual cases, W&H may deviate from this with a note of written approval.

### Data privacy and information security

The data privacy and information security legislation as well as the legal regulations for collecting, storing, converting, transmitting and releasing personal data (GDPR) must be observed. The supplier undertakes to process confidential information responsibly and to actively protect it against loss, misuse, unauthorized access, disclosure or manipulation.

### Conduct vis-à-vis competitors

The existing legislation for supporting and promoting competition, in particular the antitrust legislation, as well as legislation to regulate competition, must be respected and adhered to by the supplier.

### Conflict minerals

Conflict minerals must be procured in a way that human rights are not violated and conflicts are not financed in any way.

### 3. Health and safety standards

We believe it is of the utmost importance that all health and safety regulations are complied with in the workplace. This is why we greatly value a clean and safe working environment for our employees. We expect our suppliers to make a clear commitment to health and safety in the workplace. The respective management team must ensure that this is carried out in accordance with the size of the company and risk profile.

#### Occupational safety

Risks of injury in the workplace must be kept to a minimum by putting proper processes in place, designing suitable workstations and conducting safety training. Employees must be provided with personal protective equipment.

#### Preventing hazards

Hazards and potential emergency situations must be determined and evaluated. The impact of any risks must be kept to a minimum by putting preventative measures, contingency plans and rules of conduct in place in the event of an emergency.

#### Cleanliness, hygiene and living conditions

Employees must be provided with clean bathroom facilities and clean drinking water, as well as hygienic facilities for preparing food and meals.

#### Deprivation of livelihoods

It is prohibited to destroy or impair the livelihoods of a person via unlawful forced evacuation, or unlawful removal of land, forests and waters when acquiring, building on or utilizing land, forests and waters in any other way. These also include harmful soil changes, water pollution, air pollution, noise emissions or excessive water consumption.

### 4. Environmental standards

**We make an active contribution to sustainable development of flexible packaging with our expertise and solutions.**

As a family business, we take responsibility and take action in a sustainable way, with the economy, environment and society in mind. We have made this promise in our mission statement, and it is in our company's DNA. It is our firm conviction that profitability and sustainability go hand-in-hand when it comes to successfully shaping the future. We make an active contribution to the sustainable development of flexible packaging with our expertise and solutions.

Accordingly, we expect our suppliers to also act responsibly and minimize the potentially adverse impact of business activities on people, the environment and natural resources.

## Preventing pollution and managing resources

Waste generation, emissions and the consuming resources such as energy, water and land/soil must be kept to a minimum. We must do our utmost to apply the principles of the circular economy to ensure that the required resources are properly utilized. Opportunities for reuse, repair and recycling should be utilized to keep the amount of residual waste as low as possible. The supplier is expected to run a continuous improvement process to evaluate and implement suitable measures.

## Hazardous substances

Substances that pose a danger to humans or the environment when someone or something has come into contact with them, or they have been absorbed, must be labeled and handled accordingly. Care must be taken to ensure that they are handled, transported, stored, used and recycled/disposed of properly. They may only be used for applications that are deemed to be necessary from a technical standpoint, and in accordance with the applicable legislation. Information on these hazardous substances and how to properly proceed as regards handling and disposal must be communicated along the supply chain. We also explicitly make reference here to the latest version of Regulation (EC) No. 1907/2006 REACH (Regulation for the Registration, Evaluation, Authorization and Restriction of Chemical Substances).

## Wastewater and waste

Appropriate measures must be implemented and documented in accordance with the applicable local legislation for proper and environmentally sound handling and disposal of waste generated during business activities.

## Air pollution—Emissions

Business emissions of chemicals that damage the ozone, products that degrade via combustion, volatile organic chemicals, aerosols or dirt particulate matter must be monitored, controlled and properly prepared prior to being released. It must be ensured that applicable legal restrictions are observed.



## 5. Ensuring compliance with the rules

As the German Supply Chain Act (LkSG) has now entered into force, we are obliged to inquire about compliance with the regulations, document them, and derive measures from these inquiries.

### Self-assessment

We expect our suppliers to take part in a self-assessment program and to comply with the standards and regulations in relation to legal compliance, human rights and non-discrimination, environmental protection, health and occupational safety. It is expected that the information provided is true and complete and has been prepared to the best of your knowledge. The supplier must respond and provide information in a timely fashion.

### On-the-spot checks

Continuous compliance with the requirements is checked as part of our supplier quality check framework. If we become aware of any serious and well-founded concerns about compliance with the rules, W&H reserves the extraordinary right to audit individual cases.

### Disclosure of certificates

The supplier undertakes to provide all relevant certificates for its business activities upon request. These will also be queried as part of the self-declaration, including an expiry date. The supplier is obliged to renew the expired certificates if they are still required to carry out their business activities.

## 6. Non-compliance with the rules

### Correctional measures

If a supplier fails to comply with the requirements, W&H will agree on corrective measures with the supplier, which must be implemented within a reasonable time frame. Full compliance with the SCoC is a part of our supplier risk assessment and is a basic component of our supplier qualification and evaluation processes. The SCoC is a prerequisite for a long-term partnership between the supplier and W&H.