

WWM GmbH & Co. KG Code of Conduct for partners

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. PRINCIPLE OF LEGALITY

WWM adheres to the principle of strict legality for all actions, measures, contracts, and other proceedings of the WWM Group and also expects this from its business partners. Compliance with the principle of legality includes, among other things, the payment of due taxes and duties, compliance with competition and antitrust laws, the strict prohibition of corruption and money laundering, compliance with the state of the art, obtaining necessary regulatory approvals, compliance with export control laws, as well as adherence to legal rights of third parties and legal regulations for the protection of social and environmental standards.



2. SOCIALSTANDARDS

2.1 Human Rights

We expect our business partners to consistently respect internationally recognized human rights and actively promote them. The United Nations Guiding Principles on Business and Human Rights form the basis for this. This includes, among other things, the protection of local communities, indigenous peoples, and human rights defenders.

2.2 Child Labor

Our business partners commit to employing only workers who have reached the minimum age required by the applicable national legislation for work and to not tolerate any child labor. Compliance with International Labour Organization (ILO) Conventions No. 138 on the Minimum Age for Employment and No. 182 on the Worst Forms of Child Labour is required. Furthermore, our business partners commit to respecting and protecting the dignity and rights of children.

2.3 Forced Labor

We expect our business partners to strictly reject any form of forced labor, including but not limited to trafficking in persons, torture, any form of slavery, or compulsory labor. The principle of freely chosen employment must also be respected and adhered to.



2.4 Equal Opportunities and Fair Conduct

We expect our business partners to tolerate no discrimination, for example based on race, ethnic origin, gender, age, nationality, social background, disability, sexual orientation, religion, belief, or political and trade union activity. The same applies to any form of harassment. When it comes to similar requirements and tasks, the principle of equal pay for work of equal value without regard to gender differences must apply. Compliance with ILO conventions is required.

2.5 Fair Working Conditions

Our business partners commit to ensuring the right to fair working conditions in accordance with applicable ILO conventions. This includes, in particular, fair wages and social benefits that meet at least national and local legal standards, provisions, or agreements. Legal regulations on minimum wages in respective countries must be adhered to, as well as applicable regulations on working hours, breaks, and leave.

2.6 Occupational Health and Safety

Our business partners must adhere to the respective national standards for a safe and hygienic working environment and take appropriate measures within this framework to ensure health and safety in the workplace, thereby ensuring conditions conducive to good health and safety at work.



3. ENVIROMENTAL STANSDARDS

3.1 Environmental Protection

Our business partners commit to adhering to the precautionary principle, aiming to minimize risks to human health and the environment and to protect natural resources used in food production. Processes, facilities, and equipment of our business partners comply with applicable legal requirements and environmental standards.

3.2 Climate Protection

We expect our business partners to engage in sustainable and active climate protection, for example, by increasing energy efficiency or sourcing energy from renewable sources. Transparency about their CO2 emissions should be established, and ambitious CO2 reduction targets should be set.

3.3 Water Consumption and Quality

Our business partners commit to using water responsibly. Especially in water-scarce areas, water extraction should be minimized, and access to drinking water and sanitation facilities should be ensured. Standards for wastewater quality are to be defined and monitored within the framework of applicable legal and regulatory requirements.



3.4 Air Quality and Soil Quality

Our business partners comply with at least the relevant legal requirements and the directives of local authorities regarding air and soil quality.

3.5 Materials and Waste Management

We expect our business partners to minimize the environmental impact of their business activities and to use resources efficiently. Wherever possible, materials should be reused. In handling waste, our business partners follow the principle of "prevention before reuse before disposal." Our business partners always comply with at least the relevant legal regulations and regulatory requirements.



4. BUSINESS RELATIONSHIPS



4.1 Avoidance of Conflicts of Interest

We expect our business partners to make decisions based on factual considerations and not to be unduly influenced by personal interests. Once a business partner becomes aware of a potential conflict of interest, they are required to take internal measures to address these conflicts and promptly inform WWM.

4.2 Free Competition

Our business partners are obligated to conduct themselves fairly in competition and comply with the applicable legal regulations protecting free competition. Furthermore, they shall not enter into agreements or coordinated behaviors with other companies aimed at preventing, restricting, or distorting competition in accordance with the applicable antitrust regulations, and they shall not unlawfully exploit any dominant market position.

4.3 Corruption

Compliance with the respective applicable anti-corruption laws is to be ensured by our business partners. In particular, they shall ensure that their employees, subcontractors, or representatives do not offer, promise, or grant benefits to employees of the WWM Group with the aim of obtaining an order or other preference in business dealings. These principles also apply if our business partners collaborate with other third parties in connection with their activities for WWM.

4.4 Money Laundering

Our business partners must also comply with the relevant legal provisions for the prevention of money laundering and fulfill their reporting obligations properly.

4.5 Data Protection and Data Security

Our business partners are obligated to ensure the right to informational self-determination, the protection of personal data, and the security of all business information and personal data in all business processes in compliance with legal requirements and applicable data protection and information security laws.

4.6 Customs and Export Control Regulations

Our business partners comply with international customs and export control regulations and ensure proactive exchange of foreign trade-relevant information with the aim of a secure supply chain.



5. WHISTLEBLOWER SYSTEM



Every business partner - including their employees or affected individuals - is encouraged to report potential suspicions and violations of this Code of Conduct. In this way, the consequences of such violations should be limited, and similar misconduct should be avoided in the future. Reports to WWM can be made via email (info@wwm.de) or by phone (02472-9910-55). Our business partners inform their employees about the possibility of whistleblowing.

6. COMPLIANCE WITH THE CODE OF CONDUCT

6.1 Whistleblower System

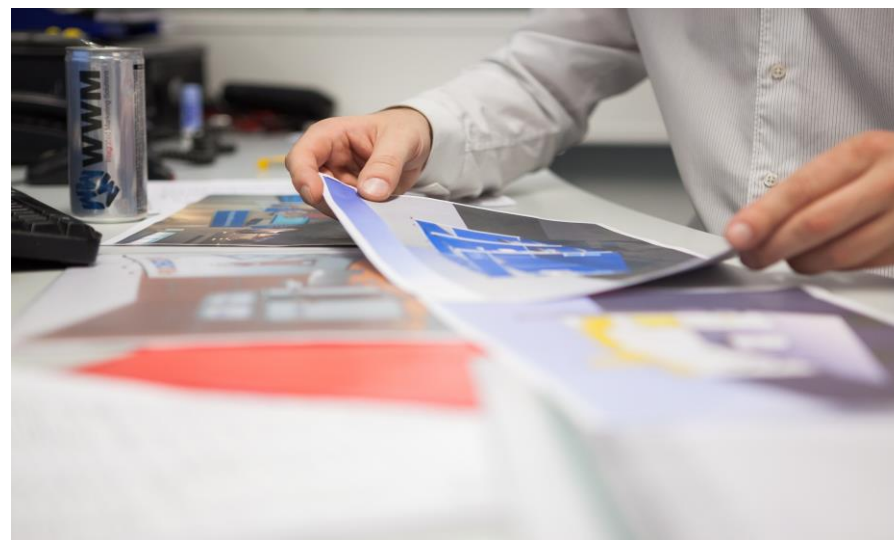
To ensure strict adherence to our guidelines, our whistleblower system allows anyone to report potential compliance violations. Every report is received, preliminarily assessed, and confidentially forwarded to our compliance team or management, depending on the content. Reports can be submitted anonymously or with your name. We will document every submission and its corresponding processing. Reports can be submitted through our whistleblower system at: [WWM GmbH & Co. KG | Personio Whistleblowing](#)

6.1 Controls

WWM reserves the right to verify compliance with this Code of Conduct in an appropriate manner. The business partner is obligated to actively support necessary controls. To this end, WWM will coordinate with the business partner regarding the scope, duration, and location accordingly. Requests and inquiries must be answered by the business partner in a timely manner and in accordance with prescribed formalities within the framework of applicable data protection laws.

6.2 Remedial Measures

Violations, especially those related to human rights or the environment, must be immediately stopped. If this is not possible in the foreseeable future, the business partner must promptly develop and implement a concept for termination or minimization. The concept must include a specific timetable. Initiated measures must be documented and reviewed for their effectiveness. Furthermore, in the event of a suspected violation, the business partner must promptly investigate possible violations and inform WWM about the investigative measures taken.



6.3 Consequences of Violations

A violation of the obligations described in this Code of Conduct constitutes a breach of contract with WWM and a significant impairment of the business relationship between WWM and the business partner. Within a reasonable period, the business partner must inform WWM about the internal measures they have taken to prevent future violations. If the business partner fails to fulfill these obligations within a reasonable period, fails to initiate appropriate improvement measures within a reasonable period, or if a violation is so serious that continuing the business relationship becomes unreasonable for WWM, WWM reserves the right, without prejudice to further rights, to terminate the affected contractual relationship immediately or to withdraw from the affected contract.