

Code of conduct

for suppliers and business partners
of
Fritz Winter Eisengießerei GmbH & Co. KG
and its affiliated companies

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Introduction

FRITZ WINTER EISENGIESSEREI GMBH & CO. KG is a company with a long tradition which operates globally. FRITZ WINTER EISENGIESSEREI GMBH & CO. KG and its affiliated companies (hereinafter collectively referred to as “Fritz Winter - Group” or “FW”) have corporate responsibilities in relation to their customers, employees, shareholders and to the public.

These corporate responsibilities require that FW complies with all applicable laws at all times, respects ethical principles and acts in a sustainable manner.

By joining the United Nations Global Compact, FW has become obliged to follow its 10 principles in the areas of human rights, working norms, environmental protection and anti-corruption.

In addition, FW follows the working standards set out in the conventions of the International Labour Organization (ILO). Finally, with the code of conduct, FW has obliged itself to follow binding guidelines concerning responsible behaviour. This code of conduct is based essentially on the principles of the Global Compact.

In accordance with the compliance strategy pursued by FW, we also expect that suppliers (any contracting partner which supplies FW with goods, materials or services) and business partners (this includes those with mediation or representation functions which act in the interest of or at the commission of FW to support sales, such as advisors, brokers or commercial representatives etc. as well as their employees act in a responsible manner and obligate themselves to fulfil the basic principles listed in this code of conduct for suppliers and business partners.

Should the suppliers or business partners engage third parties within the framework of the business relationships with FW (for example sub-contractors or representatives), FW expects that the third parties mentioned also obligate themselves to fulfil the basic principles set out in this FW code of conduct for suppliers and business partners.

1. Social Responsibility

The obligation to comply with the law and all applicable statutes is part of socially responsible business. FW expects that its suppliers and business partners comply with the following basic principles in particular:

Human rights

The suppliers and business partners of FW comply with and protect the worldwide regulations concerning the protection of human rights as fundamental and universally applicable guidelines. This also includes, in particular, that the suppliers and business partners of FW do not engage forced labour or child labour. The suppliers and business partners observe the regulations set out in the ILO Convention 138 concerning the statutory minimum age for the employment of young people and the requirements of the law on corporate due diligence in supply chains (➤ Lieferkettensorgfaltspflichtengesetz-LkSG).

Responsible procurement of conflict minerals

Suppliers and business partners may not supply FW with goods containing "conflict minerals" from sources that serve to finance or support armed groups in the Democratic Republic of Congo (DRC) or its neighbouring countries ("Covered Countries" are currently Angola, Burundi, the Central African Republic, the Republic of Congo, Rwanda, Southern Sudan, Tanzania, Uganda and Zambia) in accordance with Art. 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

All suppliers and business partners are required to inform FW in writing upon conclusion of any contracts for the sale of goods to FW if such goods contain conflict minerals. The notification shall specify the conflict raw material including the country of origin and the name of the processing smelter.

If the conflict mineral originates from a "Covered Country", the supplier must confirm that its purchase was not directly or indirectly used to finance or support armed groups in these countries and provide a basis for its confirmation.

FW reserves the right to withdraw from corresponding orders in case of the use of conflict minerals.

Equality of opportunity and non-discrimination

The suppliers and business partners of FW do not discriminate against anybody on the basis of ethnic or national origin, race, sex, religion, world view, age, disability, sexual orientation or other characteristics protected by law, unless mandatory laws prescribe otherwise. This includes, in particular, respect for women's rights, the promotion of diversity, equality and inclusion, and respect for the rights of minorities and indigenous peoples.

Environmental protection

The suppliers and business partners of FW assume responsibility in respect of the interests of environmental protection and comply with all statutory regulations concerning the environment and sustainability, in particular, they adhere to the corporate due diligence obligations in supply chains described in the LkSG. They use natural resources in a sparing manner and minimise effects on the environment.

As a supplier or business partner of FW, you declare the following in respect to environmental protection:

- You have a process or your own organisation, which ensures compliance with statutory regulations and customer requirements in respect to operational and product-related environmental protection.
- You document and regularly check all necessary permits and/or approvals for the operation of your business locations.
- You have a suitable management system (for example ISO 14001) or a comparable system for operational environmental protection.
- You have rules, guidelines, internal standards or similar for sustainability and product and process-related environmental protection (product design, substance restrictions,

labelling, information requirements, reuse, environmentally compatible product use, maintenance, disposal, chemicals legislation and chemicals management where applicable, protection of resources such as air and water) and train your employees accordingly.

- You have ongoing processes for the continuous improvement of energy efficiency and the ongoing reduction of greenhouse gas emissions.
- Saving energy and CO₂ are maxims of your daily actions. You are committed to the development, realization and continuous improvement of resource-saving production processes.
- You actively inform your customers concerning the environmental sustainability of your products (for example product environment declarations, environmental protection reports).
- You promote the use of renewable energies, the protection of soils, biodiversity and forests within your means.

Product safety

The suppliers and business partners of FW comply with all respectively applicable regulations and guidelines under product safety laws, in particular the statutory guidelines concerning safety, identification and packing of products, as well as the use of hazardous substances and materials.

Safety at work

The suppliers and business partners of FW comply with the respectively applicable statutory regulations concerning safety and protection of health in the workplace. They support the further development and improvement of working conditions.

FW expects that its suppliers assume responsibility for the health and safety of their employees.

Your contribution as a supplier or business partner to active implementation concerning the health and safety of employees:

- Clear commitment of company management to workplace safety and protection of health.
- Continued assessment and taking into account of possible effects of work, products and services on the health of employees.
- Regular implementation of measures to avoid accidents on construction sites and in factories.
- Immediate correction of unsafe and dangerous situations.
- Implementation of protective measures against accidents and occupational diseases.

- You have specialist persons who are responsible for workplace safety and protection of health and ensure compliance by means of suitable measures.
- The employees must be equipped with identifiable protective equipment for their work and must undertake to use it.

Employee rights

FW expects that its suppliers comply with the fundamental employee rights, which are contained in international conventions of the United Nations (UN), the International Labour Organization (ILO), the Organization for Economic Co-operation and Development (OECD) and the UN Global Compact initiative.

Your contribution as a supplier to the active implementation of this code of conduct concerning compliance with fundamental employee rights:

- You have internal regulations, with which compliance with the applicable employee rights is ensured.
- When hiring employees and carrying out personnel measures, such as for example training and further development, as well as promotion, you comply with the principles of equal opportunity and equal treatment. This means that discrimination on the basis of race or skin colour, nationality, social background, any disabilities, sexual orientation, political or religious views, sex or age is not permitted.
- You do not employ any persons who are obliged to work for you due to a law, an official decree or a court decision. This means that forced labour as defined in Convention 29 of the International Labour Organization (ILO) is not permitted.
- You have developed internal rules concerning fair treatment of each other and monitor compliance. Your employees are free to raise complaints with their superiors without the fear of reprisals. Behaviour, which is sexual, forced, threatening, abusive or exploitative, will not be tolerated (including gestures, words and physical contact).
- You pay your employees a fair salary and comply with relevant country-specific statutory minimum wages and working times.
- You accept the applicable right of employees, which is outlined in the respective legal framework to form organisations such as trade unions and do not favour or discriminate against members of employee organisations or trade unions.

2. Transparent business relationships

Openness and transparency are the keys to credibility and trustworthiness in the course of business. FW expects that its suppliers and business partners comply with the following basic principles in particular:

Avoiding conflicts of interest

The suppliers and business partners make their decisions exclusively on the basis of objective criteria and do not allow their decisionmaking to be influenced by personal interests and relationships.

Prohibition/fighting of all forms of corruption

FW's suppliers and business partners do not tolerate corruption, bribery, threats, extortion or other unfair business practices. They shall ensure that their employees, subcontractors or agents do not give, offer, accept bribes, kickbacks, improper donations or other improper payments or benefits to, or from, customers, public officials or other third parties, or engage in or tolerate other unfair business practices.

Gifts, hospitality and invitations

The suppliers and business partners of FW do not offer FW employees or third parties unreasonable favours in the form of gifts, hospitality or invitations either directly or indirectly in order to gain undue influence. In addition, the suppliers and business partners do not request or accept such unreasonable favours.

Occasional giveaways and gifts which are granted to FW employees voluntarily by business partners may only take place to a reasonable value and extent. When checking whether something is reasonable, we proceed on the basis of a value of 35 euros per annum.

The invitation of business partners to meals or events must serve a business purpose, not take place unreasonably often and the hospitality must take place within the framework of usual co-operation, as well as be reasonable in relation to the purpose.

The state as customer and dealing with authorities

The suppliers and business partners of FW comply with the strict statutory guidelines when dealing with governments, authorities and public institution. When participating in public tenders, they comply with the relevant legal guidelines and the rules of free and fair competition.

Consultants and agents

The suppliers and business partners of FW only engage consultants or agents in agreement with applicable laws. In particular, they ensure that the remuneration paid to consultants or agents is only granted in respect of advice and brokerage services which have actually been carried out and that the remuneration is proportionate to the work which has been provided.

3. Fair market behaviour

FW is a fair and responsible market participant and complies with contractual obligations. FW also expects this from its suppliers and business partners, in particular compliance with the following basic principles:

Free competition

The suppliers and business partners of FW comply with the applicable cartel laws. In particular, they do not conclude any agreements with competitors, suppliers or customers, which infringe competition and do not abuse any possible market leading position.

Export controls

The suppliers and business partners of FW comply with all respective applicable laws concerning the import and export of goods, services and information, including export controls and compliance with economic sanctions.

Money laundering

The suppliers and business partners of FW only maintain business relationships with partners of whose integrity they can be assured. They ensure that the respective applicable statutory regulations concerning money laundering are not breached and observe all recording and reporting obligations.

Business information

The suppliers and business partners of FW publish business data and report their business activities in a truthful manner and in accordance with the respective applicable laws.

Supply chain

A proportion of added value in the supply chain also arises on the part of our suppliers. Therefore, it is important to us that our suppliers reasonably support and actively implement compliance with this code of conduct and their own equivalent code of behaviour in their supply chain.

Therefore, we expect that our suppliers do not just comply with this code of conduct in their own organisation, rather that they also forward on and promote the standards summarised by us in this code of conduct in relation to their own suppliers.

4. Protection of data, business secrets and company assets

Confidential data, business secrets and company assets must be protected. FW expects that its suppliers and business partners comply with the following basic principles in particular:

Data protection

The suppliers and business partners of FW comply with all respectively applicable laws concerning the protection of personal data of employees, customers, suppliers and other concerned parties.

Protection of know-how, patents, operating and business secrets

The suppliers and business partners of FW respect the intellectual property, know-how, patents, operating and business secrets of FW and third parties. You shall not forward such information on to third parties without the prior express written consent of FW or transmit the information in any other unauthorised manner.

Handling of company assets

The suppliers and business partners of FW bear financial responsibility and respect the tangible and intangible assets of FW and do not use it for unfair purposes or for purposes which are not related to operating activities. You shall ensure that your employees as well as any third parties engaged within the framework of the business relationship (such as subcontractors or representatives) do not damage the assets of FW or use them in an abusive manner, i.e. against the interests of FW.

5. Protection and maintenance of information security

The basic handling of information security at suppliers and business partners of FW, the handling of subcontractors and the security regulations to be observed for the use of information and IT equipment must be ensured during cooperation with FW. The background to this are the TISAX requirements.

Confidentiality agreement between the contractor and its employees

The suppliers and business partners of FW undertake to conclude a non-disclosure agreement (separately or as part of the employment contract) with all employees who receive or have access to FW information in the course of the cooperation. The supplier and business partner shall be responsible for proving compliance and shall provide evidence thereof at any time upon request by FW

Compliance with information security in supply chain

When subcontracting, suppliers and business partners shall ensure that FW's requirements for compliance with information security pursuant to TISAX (Chapter 5 of CoC | Protection and Maintenance of Information Security) are also complied with by the subcontractors. This also includes the conclusion of non-disclosure agreements with subcontractors. Proof of compliance shall be the responsibility of the suppliers and business partners and must be provided at any time upon request by FW.

If suppliers and business partners are entitled to subcontract, they shall be fully liable for this, independently of any contractual or statutory limitations or exclusions of liability.

Audit rights in relation to information security

The Suppliers and Business Partners grant FW the right, to be exercised at any time and after prior notification, to inspect and review all data on business transactions relating to information security between the Supplier / Business Partner and FW and to review IT and data security measures.

Employees of FW or third parties commissioned by FW may enter the Supplier's / Business Partner's office during normal business hours for this purpose. The costs of the inspection shall be borne by the Supplier / Business Partner if breaches of the information security and/or agreements of the respective commission are identified, unless such breaches were not attributable to the fault of the Supplier / Business Partner.

Physical transport of media

As a general rule, media containing FW information must be protected from unauthorised access, misuse or falsification during transport, even across organisational boundaries.

Care must be taken to ensure that all necessary and appropriate precautions are taken (e.g. encryption) to protect against the access, modification and deletion of information by unauthorised persons during transport and use in public areas. Data carriers with secret information are always transported escorted by a staff member. Documents must be transported visibly protected, e.g. in a non-transparent folder.

Exchange of information

Care must be taken in all conversations about FW confidential or secret information, including telephone conversations, to ensure that they cannot be overheard without authorisation.

Information security incident handling and reporting

Serious information security events (e.g. malfunctions occurring, violations of internal guidelines, loss of FW data or information) must be reported immediately to FW's Information Security Officer (ISB) at the e-mail address *ISB@FritzWinter.de*.

6. Whistleblower system

FW aims to act ethically in all business activities and in accordance with legal requirements; integrity and transparency of all business processes have top priority. This applies worldwide and to all organizational levels.

FW has established various reporting channels to enable suppliers and business partners of FW to report possible violations of laws and regulations.

Who can report violations?

- Every employee, including trainees, interns or temporary workers
- External parties, e.g. employees of external service providers
- Any business partner, e.g. suppliers, customers or cooperation partners and their employees
- Any third party

Which violations should be reported?

All specific events that indicate a criminal act, e.g. fraud, bribery, theft, a violation of other legal provisions or a violation of our corporate regulations, e.g. this Code of Conduct for Suppliers and Business Partners, can be reported. This also applies to human rights and environmental risks and corresponding breaches of rules.

What details should be reported?

- What type of misconduct does it concern?
- When and where did it occur?
- How exactly did the suspect person or company go about it?
- Do you have documents that corroborate the allegations?
- Are there witnesses who can confirm the suspicion?

How can it be reported?

- by email: compliancebeauftragter@fritzwinter.de
- to our ombudsman:

Suppliers and business partners also have the option of contacting the FW Compliance Office by mail via the ombudsman. The lawyer and notary Mr. Florian Möller from the law firm Immel & Möller, Stadtallendorf has been appointed as the company's external ombudsman. Employees and third parties can turn to this neutral body in confidence and also anonymously if they observe improper business practices in the company.

Mr. Florian Möller, lawyer and notary
Am Markt 6
35260 Stadtallendorf

Suppliers and business partners have the option of submitting their report without giving their name. However, FW recommends that a contact be named to the FW Compliance Office, if necessary also via a person of trust. This is the only way we can consult with you if there is still a need for clarification. Otherwise, it may not be possible to clarify the matter further without the cooperation of the supplier or business partner.

7. Legal consequences in case of breaches of the code of conduct

Should a supplier or business partner of FW not comply with the basic principles laid down in this code of conduct, FW reserves the right to extraordinarily terminate the supply relationship with this supplier or the business relationship with this business partner.

FW expressly reserves the right to check the sustainable compliance with the obligations and principles laid out in the code of conduct for FW suppliers. Thereby the following methods can be used, whose support by qualified personnel is to be ensured by the suppliers or business partners.

- Self-assessment
- Supplier quality audit
- Event-related inspection

The on-site inspection will only be carried out following prior notification by FW, only during normal business hours and only in accordance with the respective applicable law. In addition, it will be ensured that the business activities of the supplier will not be restricted and no breach of confidentiality agreements of the supplier with third parties will take place. All data will be handled in accordance with the applicable legal regulations concerning the protection of personal data and data security, as well as the provisions under antitrust law.

Consequences in case of breach:

In case of deviations from the principles of the code of conduct, it will be jointly clarified with the supplier as to what corrective measures will be sustainably implemented within a reasonable period of time.

All measures, which are ascertained due to the monitoring, will be recorded in the FW supplier assessment. The implementation of measures therefore influences the assessment of the services of the supplier, the estimation of future potential of the supplier, as well as the status of the supplier approval.

Should a serious breach be present, the business relationship will be suspended.

8. Contractual obligations

FW considers the principles and requirements of this code of conduct to be a minimum standard for sustainable supplier management. This code of conduct forms the basis of our business relationships and is therefore an integral part of our purchasing agreements with suppliers or other contractual agreements with business partners.

Alongside our own obligations concerning the values of the code of conduct, the legally effective obligation of our suppliers and business partners concerning this code of conduct is a decisive component of the FW compliance programme.

By means of the contractual obligations incumbent on the suppliers and business partners, FW has the right to take corresponding legal action in case of serious breaches of this code of conduct, in particular the option of termination of the contractual relationship.

By means of a legally binding signature and return of the declaration attached as an enclosure, our suppliers are therefore obliged to comply with the rules of code of the conduct for suppliers and business partners of Fritz Winter – Group.

Stadtallendorf, April 2024

Fritz Winter Eisengießerei GmbH & Co. KG



Ralf von Hörsten
CEO



Gerald Höbler
SC-RA/Compliance Officer

Supplier declaration

concerning the code of conduct for suppliers and business partners of Fritz Winter - Group.

We have been informed of the contents of the code of conduct for suppliers and business partners of Fritz Winter Eisengießerei GmbH & Co. KG and its affiliated companies and are aware of it.

We expressly agree that the Code of Conduct for Suppliers and Business Partners published at <https://www.fritzwinter.de/downloads/allgemein/> in its current version shall form the contractual basis for the existing business relationship between

(add name of company and address)

and the Fritz Winter - Group.

Place, date

Name in block capitals

Role

Signature