

J.WAGNER (Corporate Group) principles of responsible procurement

Introduction

- ❖ This code derives from the Code of Conduct of the Corporate Group J.WAGNER (WAGNER) and follows the principles of the United Nations Global Compact as well as the conventions of the International Labour Organization (ILO).
- ❖ Sustainable and socially responsible business practice is the basis of all of our business and a universal principle of good, long-term business relationships.
- ❖ This code defines the high expectations WAGNER places on itself, compliance with which WAGNER demands both from itself and from its suppliers.
- ❖ This code applies worldwide for all WAGNER suppliers and their affiliates.
- ❖ Our suppliers commit to maintain at least comparable standards and ensure that their organs, employees, suppliers, intermediaries, subcontractors, and miscellaneous business partners also maintain equal or higher standards.
- ❖ It is the responsibility of suppliers to WAGNER to develop their own code for this purpose, and to share and promote the principles within it in the supplier's own supply chain.

1) Lawful conduct

We expect our suppliers to prioritize lawful conduct over profit, and to ensure that this is the case in the entire supply chain.

- ❖ All prevailing applicable national and international laws and legal provisions shall be complied with.
- ❖ Infractions of the law will not be tolerated.

2) Respect for human rights

We expect our suppliers to respect and support the protection of human rights and to not be complicit in any human rights abuses.

- ❖ **Prohibition of forced labor**
All labor must be provided by choice and performed in working conditions that conform to national laws and working practice.
- ❖ **Prohibition of child labor**
The minimum working age must not be below the age at which any statutory compulsory general education ends, and in any event not younger than 15 years, and, in the case of hazardous work, not below the age of 18 years. All forms of exploitation and labor in working conditions that are hazardous to health are prohibited for young workers.
- ❖ **Fundamental human rights**
The fundamental human rights of all people are to be protected and respected, especially the right of every individual to dignity and privacy.
- ❖ **No discrimination**
Our suppliers have to ensure that no-one is discriminated against in terms of position, employment, or remuneration on the basis of gender, age, race, religion, social background, or any other criteria.

❖ **No harassment**

All employees are to be treated with dignity and respect; the privacy and personal rights of every individual are to be respected. No employee may be subjected to corporal punishment, threats of force, or any other form of force, whether physical, sexual, psychological, or verbal.

3) **Correct business practices and integrity**

Our suppliers are obliged to comply with all prevailing applicable national and international laws and legal provisions.

❖ **Prohibition of bribery and corruption**

Our suppliers are obliged to neither tolerate any form of bribery or corruption nor to be involved in any way with such behavior.

❖ **Fair competition**

Every business activity undertaken by our suppliers must comply with the rules of fair competition. The relevant anti-trust laws and laws against unfair competition must be complied with.

❖ **Protection of intellectual property**

Our suppliers are obliged to respect the intellectual property rights of third parties.

4) **Appropriate working conditions**

We expect our suppliers to display responsible work policies and to operate health and safety precautions.

❖ **Safe and healthy workplaces**

Our suppliers have to offer their employees a workplace that is safe, hygienic, and harmless to their health. Policies and practices must be in place to prevent accidents and injuries at work.

❖ **Appropriate remuneration**

Wages and salaries must meet or exceed the legal minimum and the local wage level.

❖ **Freedom of association and collective bargaining**

The supplier is obliged to respect the rights of employees to freedom of assembly and collective negotiations on pay.

❖ It shall be ensured that working hours do not exceed the prevailing legally permissible levels. In addition, employees will be permitted the work breaks, days off and holidays as reasonably required by law.

5) **Environmental protection and sustainability**

We expect our suppliers to strive to reduce to a minimum any ecologically harmful effects that result from their activities, products, and services.

❖ **Handling hazardous materials**

When dealing with hazardous substances, their safe handling, transportation, storage, reuse, or disposal is to be ensured.

❖ **Reducing environmental damage**

Our suppliers shall undertake continuous measures to minimize the use of resources and to improve energy efficiency. Waste and emissions must, in a controlled manner, be reduced to a

minimum, suitably transported, and disposed of. The use of environmentally friendly technologies is to be promoted.

6) Compliance with the rules governing trade controls

We expect our suppliers to ensure compliance in a global context with the prevailing laws applying to exports, customs, and taxes.

❖ Import/export rules

The prevailing rules applying to the import, export and transfer of goods, technology, and services, as well as the movement of capital and payments, are to be complied with nationally and internationally.

❖ Trading prohibitions

Any prohibitions or restrictions on trade shall be observed or indicated.

❖ Dual-use goods

For goods that can be used for both military and civilian purposes (dual-use goods), the appropriate approvals shall be obtained.

❖ Regulations concerning money laundering

Any prevailing regulations in connection with money laundering and the financing of terrorism shall be complied with.

7) Compliance with this Code of Conduct

❖ Obligation to monitor and to provide proof

Our suppliers are obliged to monitor compliance with the principles set out in this code. They shall upon request make available all information necessary to prove compliance with this code. They shall notify us of the occurrence of any events that conflict with the principles set out in this code. The company's own reporting system is available to all external whistleblowers for reports of inappropriate transactions and can be found under the relevant thematic section "Compliance" at www.wagner-group.com.

❖ Compliance with this code in the supply chain

Our suppliers shall promote compliance with this code, and ensure its adoption, in their own supply chain.

❖ Audit

We reserve the right to conduct an audit of our suppliers in this regard.

❖ Non-performance

In the event of non-performance of this code, we reserve the right to demand remedial action or to cease working together.

8) Signatures

J.WAGNER (Corporate Group) principles of responsible procurement

Place: _____

Date: _____

Supplier's stamp and signature

Any printed or saved copy of this document is an uncontrolled copy. Anyone who uses uncontrolled copies of this document is responsible for ensuring the use of the up-to-date release.