

WENKO CODE OF CONDUCT



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1. preface

Commitment to values and responsible sourcing

WENKO WENSELAAR GmbH & Co KG and its subsidiaries are committed to a specific set of values, both within our own global operations and throughout our supply chain. Our values are reflected in the principles of recognized global social and environmental standards; such as the United Nations Guiding Principles on Business and Human Rights (UNGP), the International Labor Organization's Declaration on Fundamental Principles and Rights at Work (ILO).

The values of WENKO WENSELAAR GmbH & Co KG and its subsidiaries can be summarized as follows:

- **We respect universal human and employee rights.**
- **We act in accordance with basic environmental, health and safety standards.**
- **We promote sustainable development and corporate responsibility.**

WENKO WENSELAAR GmbH & Co KG expects its suppliers to adopt the same values and enforce them in their own supply chain network. Therefore, we carefully evaluate our suppliers and approve them only after they have gone through a review and qualification process.

This Supplier Code of Conduct defines our expectations and provides our suppliers with the guidelines regarding the requirements to be met when supplying goods or services to WENKO anywhere in the world.

We are extending our commitment to responsible sourcing by supporting suppliers to improve their sustainability performance. Together, we want to ensure that we all comply with the standards defined in this document. For future cooperation, the contractual partners agree on the validity of the following regulations for a joint code of conduct. This agreement shall apply as the basis for all future deliveries. The contractual partners undertake to comply with the principles and requirements of the Code of Conduct and to endeavor to contractually oblige their subcontractors to comply with the standards and regulations set out in this document. This agreement shall become effective upon signature. A violation of this Code of Conduct may ultimately be grounds and cause for the company to terminate the business relationship including all associated supply contracts.



Niklas Köllner
Managing Director



Philip Köllner
Managing Director



Daniel Labonde
QC / CSR - Manager

2. requirements for suppliers

The supplier ensures full compliance with the following points through national laws and international standards. These include the Universal Declaration of Human Rights, the core conventions of the International Labour Organization on labor standards, and all applicable local, national, and international laws regarding social minimum standards, anti-corruption, fair competition, environment, occupational health and safety, as well as confidentiality and protection of the privacy of each employee.

2.1 Social Responsibility

Exclusion of Forced Labor

No forced labor, slave labor, or similar forms of labor shall be employed. All work must be voluntary and free from the threat of punishment. Employees must be able to terminate their employment at any time. Additionally, there should be no unacceptable treatment of workers, such as mental cruelty, sexual and personal harassment, and humiliation. The hiring or use of security forces is prohibited if it results in inhumane or degrading treatment or impairs freedom of association.

Exclusion of Child Labor

Child labor shall not be used at any stage of production. Suppliers are urged to comply with the recommendations from ILO conventions regarding the minimum age for the employment of children. Accordingly, the age should not be lower than the age at which compulsory schooling ends according to the laws of the place of employment and, in any case, not under 15 years. If children are found working, the supplier is required to document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers must be protected: Those under 18 years of age should not be engaged in work that is harmful to their health, safety, or morals. Special protective provisions must be observed.

Fair Remuneration

Remuneration for regular working hours and overtime must comply with the national statutory minimum wage or the industry's customary minimum standards, whichever is higher. The remuneration for overtime must exceed the remuneration for regular hours in any case. If the remuneration is insufficient to cover the costs of basic living and to build a minimum level of savings, the supplier is obliged to increase the remuneration accordingly. Employees must be granted all legally mandated benefits. Deductions from wages as a disciplinary measure are not permissible. The supplier must ensure that employees receive clear, detailed, and regular written information about the composition of their remuneration.

Freedom of Association

The right of workers to form and join organizations of their choice, to engage in collective bargaining and to strike shall be respected. In cases where freedom of association and the right to collective bargaining are legally restricted, alternative means of independent and free association of workers for the purpose of collective bargaining shall be allowed. Worker representatives shall be protected against discrimination. Workers shall not be subjected to adverse treatment based on the establishment, membership, or participation in workers' organizations.

Non-Discrimination Policy

Discrimination and unequal treatment of employees in any form are prohibited unless justified by the requirements of employment. This applies, for example, to disadvantages based on gender, race, ethnic or social origin, skin color, disability, health status, political belief, origin, worldview, religion, age, pregnancy, or sexual orientation. The personal dignity, privacy, and individual rights of each person shall be respected.

Occupational Health and Safety

The supplier is responsible for providing a safe and healthy working environment. Necessary precautionary measures against accidents and health hazards related to the work activity shall be taken through the establishment and implementation of appropriate occupational safety systems. Excessive physical or mental fatigue shall be prevented through suitable measures. Additionally, employees shall be regularly informed about and trained in applicable health and safety standards and measures. Employees shall have access to an adequate supply of drinking water and clean sanitary facilities.

Preservation of Natural Resources

The supplier shall not deprive legitimate rights of land, forests, or water resources that secure the livelihood of individuals. Harmful changes to the soil, water, and air pollution, noise emissions, as well as excessive water consumption, shall be avoided if they harm people's health, significantly impair the natural foundations for food production, or prevent people's access to clean drinking water or sanitation facilities.

Complaint Mechanisms

The supplier shall appropriately communicate to its employees the accessibility, responsible authorities, and procedures for a complaint mechanism received from WENKO WENSELAAR GmbH & Co KG. The complaint mechanism must be accessible to employees while ensuring the confidentiality of their identities and effective protection against retaliation. If no information is provided, the supplier is responsible at the operational level for establishing an effective complaint mechanism for individuals and communities that may be affected by negative impacts.

Management of Conflict Materials

For conflict minerals such as tin, tungsten, tantalum, and gold, as well as other raw materials like cobalt, the company establishes processes in accordance with the guidelines of the Organization for Economic Cooperation and Development (OECD) for fulfilling due diligence to promote responsible supply chains for minerals from conflict and high-risk areas. The company also expects its suppliers to adhere to these guidelines. Smelters and refineries without adequate, audited due diligence processes should be avoided.

2.2 Environmental responsibility

Treatment and Discharge of Industrial Wastewater

Wastewater generated from operational processes, manufacturing processes, and sanitary facilities must be characterized, monitored, assessed, and treated if necessary before being discharged or disposed of. Additionally, measures should be implemented to reduce the generation of wastewater.

Management of Air Emissions

General emissions from operational processes (air and noise emissions) as well as greenhouse gas emissions must be characterized, routinely monitored, assessed, and treated if necessary before their release. The supplier is also responsible for monitoring their exhaust gas cleaning systems and is encouraged to find cost-effective solutions to minimize any emissions.

Handling of Waste and Hazardous Substances

The supplier follows a systematic approach to identify, handle, reduce, and responsibly dispose of or recycle solid waste. The prohibitions on the export of hazardous waste in the Basel Convention of March 22, 1989, in its current version, must be adhered to. Chemicals or other materials that pose a hazard when released into the environment must be identified and handled in a manner that ensures safety during their handling, transport, storage, use, recycling, reuse, and disposal. Mercury is to be used in accordance with the prohibitions of the Minamata Convention of October 10, 2013, and persistent organic pollutants in accordance with the Stockholm Convention of May 23, 2001, in its current version.

Reduction of Raw Material and Natural Resource Consumption

The use and consumption of resources during production, as well as the generation of any type of waste, including water and energy, must be reduced or avoided. This can be achieved either directly at the source or through processes and measures such as changing production and maintenance processes, adopting alternative materials, implementing savings, recycling, or utilizing material reuse.

Management of Energy Consumption / Efficiency

Energy consumption must be monitored and documented. Cost-effective solutions should be sought to improve energy efficiency and minimize energy consumption.

2.3 Ethical Business Conduct

Fair Competition

The norms of fair business conduct, fair advertising, and fair competition must be adhered to. Additionally, applicable competition laws must be followed, which particularly prohibit agreements and other activities with competitors that influence prices or conditions. These regulations also prohibit agreements between customers and suppliers that restrict customers' freedom to independently determine their resale prices and other conditions.

Confidentiality / Data Privacy

The supplier commits to meet the reasonable expectations of its clients, suppliers, customers, consumers, and employees regarding the protection of private information. The supplier must comply with data protection and information security laws and regulatory requirements when collecting, storing, processing, transmitting, and disclosing personal information.

Intellectual Property

Rights to intellectual property must be respected, and technology and know-how transfers must be conducted in a manner that protects intellectual property rights and customer information.

Integrity / Bribery and Extortion

The highest standards of integrity must be upheld in all business activities. The supplier must adopt a zero-tolerance policy regarding all forms of bribery, corruption, extortion, and embezzlement. Procedures for monitoring and enforcing these standards must be implemented to ensure compliance with anti-corruption laws.

3. implementation of the requirements

We, WENKO WENSELAAR GmbH & CO KG and its subsidiaries expect our suppliers with regard to supply chains to identify risks within them and to take appropriate measures. In the event of suspected violations and in order to secure supply chains with increased risks, the supplier will inform the company promptly and, if necessary, regularly about the identified violations and risks as well as the measures taken. The company checks compliance with the standards and regulations listed in this document using a self-assessment questionnaire and risk-based audits by WENKO PACIFIC at the suppliers' production sites. The supplier agrees that the client will carry out such audits annually or for specific reasons to check compliance with the WENKO CODE at the supplier's premises during normal business hours after reasonable advance notice.

The supplier must identify and name a responsible person in the company; changes must be reported to WENKO WENSELAR GmbH immediately. If a violation of the regulations of this Code of Conduct is discovered, the client will immediately inform the supplier in writing within one month and give him a reasonable grace period to bring his behavior into compliance with these regulations. If a remedy is not possible in the foreseeable future, the supplier must report this immediately and, together with the company, create a concept with a timetable for ending or minimizing the violation. If such a violation was culpable, the grace period expires fruitlessly or if the implementation of the measures contained in the concept does not provide any remedy after the schedule has expired and makes it unreasonable for the client to continue the contract until its regular termination and no milder remedy is available, the client / the company can terminate the contract, the business relationship and terminate all contracts after the set deadline has expired without result, if it threatened to do so when setting the grace period. A statutory right to extraordinary termination without setting a grace period, particularly in the case of violations that are considered to be very serious, remains unaffected, as does the right to compensation.

The WENKO CODE is updated annually and must be signed and submitted. The WENKO CODE OF CONDUCT is updated annually and must be submitted immediately with a signed copy. This year, we would like to draw your attention once again to current changes regarding the Deforestation-Free Supply Chain Regulation (EUDR 2023/1115) and the obligations to the European Carbon Border Adjustment Mechanism (CBAM), with corresponding documentation obligations on the manufacturer side. If you are affected by these regulations and supply us with items that fall under the regulation, we would like to draw your attention again to the mandatory notification obligations starting in January 2026.

If WENKO PACIFIC's internal audits reveal points for improvement, these must be addressed immediately. A follow-up audit, in the event of major violations, will be charged a flat rate of USD 500. The initial audit is free of charge.

4. knowledge and agreement of the supplier

By signing this document, the supplier undertakes to act responsibly and to adhere to the principles/requirements listed. The supplier undertakes to communicate the content of this code to employees, agents and subcontractors in a manner that is understandable to them and to take all necessary precautions to implement the requirements.

date

location

Stamp + signature of the authorized representative