

# Compliance Declaration



by W+P PRODUCTS GmbH,  
its suppliers  
and service providers

## **1 | WORKING CONDITIONS**

W+P PRODUCTS and its partners undertake to uphold human rights when dealing with their employees and to treat the latter with dignity and respect. This applies to all employees, including temporary workers, student workers, agency workers, and other types of workers.

### **1.1 FREE CHOICE OF EMPLOYMENT**

Forced labour, slave labour or comparable forms of work may not be used. Every employee must do their job voluntarily and be able to terminate his or her employment at any time.

### **1.2 HUMANE TREATMENT**

Disproportionate severity or inhumane treatment of employees is prohibited. The above includes sexual harassment, sexual abuse, corporal punishment and physical and mental abuse. This also applies to the threat of such treatment.

### **1.3 PROHIBITION OF DISCRIMINATION**

Harassment or illegal discrimination within the workforce is not to be tolerated. Race, colour, age, gender, sexual orientation, ethnicity, disability, pregnancy, religious or political beliefs, union membership or marital status should not play a role in recruitment, promotions, compensation or access to training opportunities.

### **1.4 CHILD LABOUR**

Persons under the age of 15 (or under 14 depending on national legislation) may not be employed. Employees under the age of 18 may not carry out work that could endanger their physical, mental, social and psychological health and development.

### **1.5 WORKING HOURS**

Weekly working hours may not exceed the national statutory maximum, including overtime. Exceptions thereto are emergencies and exceptional circumstances. Employees must be granted at least one day off in a seven-day week.

### **1.6 WAGES AND BENEFITS**

It is important to ensure appropriate, market-based remuneration that complies with national laws on minimum wage, overtime and statutory social benefits.

### **1.7 FREEDOM OF ASSOCIATION**

All employees must be granted the right - in accordance with the respective national laws - to form and join associations that represent their interests.

## **2 | HEALTH AND SAFETY**

This code of conduct recognises that a safe & healthy work environment contributes to increasing product quality and employee motivation.

### **2.1 HEALTH AND SAFETY IN THE WORKPLACE**

Processes and measures have been implemented to ensure compliance with national statutory health and safety regulations. Potential security risks are identified, evaluated and avoided by taking suitable measures. The employees shall be informed about residual potential safety risks and be made aware of the correct behaviour and protective measures. If adequate risk control is still not possible, employees shall be provided with appropriate personal protective equipment.

### **2.2 ACCIDENT PREPARATIONS**

Reporting, tracing and assessment of work-related injuries shall also be implemented, including the provision of readily accessible first aid kits.

## **3 | ENVIRONMENT**

Dealing responsibly with the environment is of fundamental importance. Negative effects on the environment must be avoided in the production processes and natural resources must be conserved.

### **3.1 ENVIRONMENTAL PROTECTION**

Implemented systems, processes and measures as well as the required permits ensure that national legal environmental regulations are observed. Employees directly involved in production know the measures to avoid environmental risks. Certification according to ISO 14001 certifies that W+P PRODUCTS takes this responsibility seriously.

### **3.2 HAZARDOUS SUBSTANCES**

Chemicals and hazardous substances should be avoided as far as possible. If this is not possible, care is taken to ensure safe handling, transport, storage, use or reuse and disposal.

### **3.3 RESTRICTIONS ON PRODUCT INGREDIENTS**

All nationally applicable laws, regulations and transmitted customer specifications regarding the prohibition or restriction of specific substances are observed. Necessary labelling requirements for recycling and disposal are met.

## 4 | BUSINESS ETHICS

This code of conduct is based on high ethical requirements in relation to social obligations and behaviour on the market. This includes the following principles:

### 4.1 GENERAL COMPLIANCE WITH THE LAW

All applicable national laws and other regulations are observed at all times.

### 4.2 INTEGRITY

Bribery, corruption, extortion, embezzlement or fraud in any form are prohibited. To this end, business processes are kept transparent and documents are kept comprehensible.

### 4.3 PROHIBITION OF ACCEPTANCE AND GRANT OF BENEFITS

Anti-corruption laws shall be complied with. No money or means of bribery or improper advantage will be offered or accepted.

### 4.4 FAIR COMPETITION (ANTITRUST LAW)

All business activities will be conducted in compliance with applicable antitrust laws and regulations.

### 4.5 AVOIDING CONFLICTS OF INTEREST

Decisions are made solely on the basis of factual, business-related considerations and are not influenced by personal interests.

### 4.6 PROTECTION OF CONFIDENTIAL INFORMATION

Business secrets, financial and personnel data as well as any customer data are regarded as information that is particularly worthy of protection. They will be treated with the utmost care and protected from unauthorised access. The provisions of the GDPR are to be observed in relation to the collection, storage, processing, transmission and disclosure of information. The information is only used to the extent necessary and permissible.

### 4.7 EXPORT/IMPORT LAWS

All applicable laws and regulations in the areas of export and import controls and customs shall be observed.

### 4.8 DISCLOSURE OF INFORMATION

Business activities, structure, financial situation and performance are disclosed in accordance with standard industry practice. Misrepresentation of supply chain conditions and practices is unacceptable.

#### **4.9 INTELLECTUAL PROPERTY**

Intellectual property rights shall be fully respected. Technology transfer and transfer of know-how are carried out in such a way that intellectual property rights are protected.

#### **4.10 RESPONSIBLE RAW MATERIAL SOURCING**

Measures are in place to ensure, to the best of our knowledge and belief, that the raw materials used (e.g. tantalum, tin, tungsten, gold, etc.) in the manufactured products are not used directly or indirectly to finance or support armed groups that are guilty of serious human rights violations. The origin and acquisition of these minerals is handled extremely carefully and the supply chain can be disclosed to publishers at any time.

### **AUDIT RIGHTS**

W+P PRODUCTS GmbH reserves the right to carry out audits on the premises and works of its suppliers and service providers with regard to this code of conduct. Such audits are to be facilitated.

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