



## **Code of Conduct for Suppliers of WOLF GmbH (Status: June 13, 2022)**

The Wolf Group is one of the world's leading providers of heating and air conditioning products. As a modern company for climate and environmental protection, we consider it essential that also our contractual partners and suppliers adhere to the following principles.

We are aware of this accountability which we have due to our areas of responsibility. For this reason, we have developed the Code of Conduct for Suppliers.

We expect our suppliers and also their suppliers to strictly adhere to these principles.

### **Compliance with law**

Law and other provisions of the respectively applicable legal regulations must be strictly adhered to, in particular

- The United Nations Global Compact,
- the UN Universal Declaration of Human Rights,
- the UN Principles of Business and Human Rights,
- the OECD Guidelines for Multinational Enterprises
- as well as the 1989 International Labor Organisation Declaration on Fundamental Principles and Rights at Work.

### **Prohibition of child labor**

The supplier shall not employ children younger than the legal minimum employment age in the respective country or legal system. Nevertheless, the supplier shall only employ children from the age of 15, regardless of local regulations.

Employees under the age of 18 are entitled to special protection and may only be employed in accordance with the respective legal requirements in the country of employment. This means that no work shall be carried out that is classified as risky under ILO Convention 182.

### **Prohibition of forced labor**

The supplier shall not use forced labor, bonded labor, serfdom, compulsory labor, or other modern forms of slavery. All work of the employees shall always be done voluntarily. Trafficking in human beings shall not be used or contributed to. Employees shall not be deprived of ID cards or other working papers in order to keep them employed.

Furthermore, no psychological or physical constraints shall be exercised.

## **Anti-discrimination**

Suppliers shall neither discriminate their employees in recruitment, promotion, remuneration, collection of performance, or other working conditions on the basis of their skin color, race, nationality, ethnical or political affiliation, social origin, disability, sexual orientation and identity, religious beliefs, nor gender or age.

Any incidents to this regard shall not be tolerated or promoted by the supplier. Particular attention shall be paid to psychological hardship, sexual harassment or discrimination, coercion, threats, abuse or exploitation of a predicament.

## **Freedom of assembly and association**

The supplier shall allow that his employees have the free choice to join or refrain from joining a trade union or employee representation of their choice without threat, intimidation, or other influence. To this regard, the supplier shall respect legal provisions and conduct collective bargaining or participate in accordance with local conditions. The supplier shall neither favor nor disadvantage employees in employee organizations or trade unions.

## **Remuneration and working hours**

The supplier shall comply with the working time regulations of the respective country. He shall pay an appropriate remuneration and comply with all applicable pay and remuneration provisions. In particular, the supplier shall pay the employees on time and inform them comprehensibly and unambiguously about the basis according to which they are paid.

In addition, the provisions on minimum wages in force in the countries concerned shall strictly be adhered to.

## **Health and safety at work**

The supplier shall be obliged to comply with the respectively applicable health and occupational safety regulations and to ensure a safe and health-promoting working environment. The aim is to preserve the safety and health of employees, prevent accidents that can lead to injuries or failures, and protect third parties.

In addition, training courses shall be offered which ensure that his employees are trained and informed about these topics.

The supplier shall be obliged to set up an appropriate health and occupational safety management system, to constantly check it, and to apply it in an appropriate manner.

## **Environmental protection**

The supplier shall be obliged to comply with all environmental laws, regulations and standards applicable to him, and to install a system that detects and avoids potential risks.

Environmental pollution shall be minimized to what is necessary. Adequate environmental protection shall be continuously improved.

In order to be able to fulfil these tasks efficiently, the supplier shall undertake to set up and maintain an appropriate environmental protection management system, to promote climate-friendly products, and to incorporate this into the manufacturing processes.

This shall help and enable the environment and climate protection goals to be achieved.

## **Integrity in economic activity**

- Anti-corruption and bribery

The supplier shall comply with all national and international anti-corruption laws and other regulations applicable to him. In particular, he shall not tolerate any form of corruption or bribery, either directly or indirectly vis-à-vis business partners and administrative officials. He shall not grant, offer, or promise benefits to influence actions or gain an unfair advantage. This shall also include the waiver or acceptance or granting of acceleration payments, or other advantages granted to public officials for decisions which do not allow for margin of discretion.

- Free competition

The supplier shall comply with competition and antitrust laws applicable to him. He shall also act in accordance with international competition laws and national competition laws and shall not participate in price agreements, market or customer sharing, market agreements, or bid agreements.

- Foreign trades legal requirements

The supplier shall comply with all export control and customs regulations applicable to him. This shall also include export controls and sanctions which are defined on the basis of contractual regulations.

- Money laundering

The supplier shall undertake to comply with all applicable laws and regulations to combat money laundering. Therefore, he shall neither directly nor indirectly promote money laundering or terrorism financing.

- Conflicts of interest

The supplier shall avoid conflicts of interest that involve a personal or financial interest, business or personal actions or relationships, a previous or current employment relationship, due to which the possibility of an objective decision is impaired or may be impaired. Should there be a risk of a conflict of interest on the part of the supplier, the supplier shall submit this to the customer without being asked to do so in order to avoid the appearance of an interest.

These conflicts of interest shall include relationships with relatives, or persons related by marriage, partnerships or marriages, or investments.

## **Trade secrets**

All information obtained in the context of the business relationship shall be treated confidentially and kept strictly confidential. They shall be protected against unauthorized access by third parties in the same way as own trade secrets are protected.

Intellectual property rights and know-how of third parties shall be respected.

## **Procurement of minerals**

The supplier shall comply with all applicable laws and the resulting obligations regarding the procurement of minerals and materials from conflict regions and risk regions that may contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects.

## **Supply chain**

All suppliers who fall under the legislation of the German Supply Chain Care Obligations Act in the latest version shall comply with the provisions of the Supply Chain Care Obligations Act and in turn oblige their suppliers to comply with it. In particular,

- a risk management system with clear responsibilities shall be put in place,
- a risk analysis shall have been carried out and documented,
- a declaration of principle on human rights shall have been made,
- prevention and remedial measures in one's own business area and with direct suppliers shall be anchored
- measures shall be taken at indirect suppliers if there are indications of violations of human rights or the environment,
- a complaints procedure shall have been set up,
- as well as reports on relevant measures shall be transferred at intervals to be defined.

All obligations shall regularly be evaluated and adjusted.

## **Controls and complaint management**

Wolf reserves the right to check compliance with the requirements of this Code of Conduct at any time. For this purpose, the supplier already now permits Wolf or third parties commissioned by Wolf to carry out on-site audits or other checks. This may be done during the usual business hours with a notice time of 5 working days.

Employees of the supplier or also third parties may contact Wolf at any time to report violations of the Code of Conduct for Suppliers.