

I. Scope

This code of conduct is binding for wolfcraft GmbH (D), wolfcraft GmbH (AUT), wolfcraft S.A.R.L., wolfcraft S.r.l., wolfcraft Espana S.L., wolfcraft SK s.r.o and wolfcraft Ltd. (hereinafter collectively referred to as "wolfcraft").

It comes into effect upon signature by the management.

wolfcraft undertakes to comply with the principles and requirements of this code of conduct. The scope of the code of conduct is not limited to wolfcraft itself. wolfcraft commits to appropriately addressing the principles, standards and regulations set out in this code of conduct with its own suppliers and to endeavour to contractually oblige its suppliers to agree to these standards. To this end, a supplier code of conduct was developed and distributed to suppliers.

The code of conduct is based on national laws, such as the German Act on Corporate Due Diligence in Supply Chains (Lieferkettensorgfaltsgesetz, LkSG), as well as on international agreements and principles, such as the United Nations (UN) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Fundamental Principles of the Core Labour Standards of the International Labour Organisation (ILO) and the Ten Principles of the UN Global Compact.

II. General principles

wolfcraft expects itself and its business partners to fulfil their social and societal responsibility in all of their business activities. In all business decisions and actions, wolfcraft commits to adhering to any and all applicable laws and regulations of the countries in which it operates.

wolfcraft maintains an atmosphere of respect and appreciation with its employees, customers and business partners and expects the same conduct from its customers and suppliers.

III. Principles of social responsibility

1. Upholding human rights

wolfcraft is committed to upholding human rights. Human rights are rights that every human being has by virtue of their humanity. Human rights are inalienable, indivisible and universal. Every human is entitled to these rights, regardless of where they live and how they live.

2. Ban on forced labour

wolcraft does not tolerate any forced or compulsory labour, slavery or any other comparable form of labour. Any threats of punishment, such as isolation, restrictions on freedom of movement, exploitation, physical violence, intimidation, withholding identity documents and other sensitive documents or withholding wages and salaries for disciplinary reasons, is prohibited. Labour must be given voluntarily and employees must have the freedom to stop working or terminate the employment relationship at any time. In its branches and subsidiaries, wolcraft also ensures that no one in the workforce experiences unreasonable treatment, e.g. mental cruelty, sexual or personal harassment, or humiliation.

3. Ban on child labour

wolcraft does not accept child labour or any form of exploitation of children and young people and all such conduct is strictly prohibited. In particular, wolcraft will not employ children below the legal minimum working age, unless exceptions approved by the ILO apply.

wolcraft employs adolescents from the age of 15 only if the work performed and the working conditions do not endanger their health, safety, morals and development.

If a national regulation which applies to wolcraft has more stringent requirements regarding child labour, those regulations take precedence.

4. Freedom of association and the right to collective bargaining

wolcraft respects the right of its employees to establish organisations (e.g. unions), to join these organisations and to conduct collective bargaining negotiations. Employees and their representatives must be able to communicate openly and without fear of discrimination or reprisal with the management, and to put forward ideas as well as concerns with regard to working conditions. Employees must be protected against discrimination. Employees must not be discriminated against for establishing, joining or being a member of an organisation that represents employees. In order to ensure that the representatives of the employees can exercise their rights in a lawful and peaceful manner, they must be granted access to the workplaces of their colleagues.

wolcraft points out that this also applies to countries in which freedom of association and the right to collective bargaining are restricted.

In its own branches and subsidiaries, wolcraft refrains from the use of security forces if such use may lead to inhumane or humiliating treatment of people, injuring people or compromising freedom of association.

5. Ban on discrimination

wolcraft undertakes to oppose any form of discrimination and unequal treatment, insofar as it is not duly justified by the employment requirements. In particular, this relates to discrimination of employees on the basis of gender, race, disability, ethnic or cultural origin, religious belief or ideology, age or sexual orientation. The personal dignity, privacy and rights of each individual must be respected.

6. Health and safety at work

wolcraft guarantees on-the-job safety and health protection at work in accordance with the national regulations. wolcraft is committed to the continuous improvement of working conditions at its branches and subsidiaries.

wolcraft ensures a safe and healthy work environment and prevents the risk of physical injuries and mental illnesses that may arise due to organisational and social factors at work.

7. Fairness in wages, salaries and working hours

wolcraft recognizes employees' right to an appropriate remuneration and complies with the legally guaranteed minimum wage or the mandatory minimum wage in the corresponding sector for each labour market in which the employees operate.

wolcraft must also provide all statutory benefits to its employees.

In its branches and subsidiaries, wolcraft must ensure that the employees receive clear, detailed and regular written information about the composition of their remuneration.

In addition, wolcraft complies with the national requirements of legislation regarding working hours, which must be in line with applicable laws or sector standards.

At the branches and subsidiaries of wolcraft, employees are informed about their working conditions and are provided with a written employment contract.

8. Preservation of natural resources

wolcraft will not unlawfully enforce evictions from or expropriate land, forests, or bodies of water that are used for the purpose of securing the livelihood of individuals. wolcraft will refrain from illegal and harmful soil changes, water and air pollution, and noise emissions, as well as from using excessive amounts of water if this is harmful to the health of people, significantly impacts the natural foundations for the production of food or prevents people from accessing safe drinking water or sanitary facilities.

IV. Conduct towards stakeholders

1. Anti-corruption and money laundering prevention

wolcraft will not take part in corrupt practices, nor will it tolerate such practices, and will comply with the applicable legal requirements. This includes prohibiting the promising, offering or granting of financial or other benefits for the purpose of preferential treatment that results in unfair competition. This specifically and particularly pertains to employees of wolcraft. When dealing with officials, wolcraft will comply with the stricter legal requirements that are applicable for such situations. Additionally, wolcraft fulfils its legal obligations regarding the prevention of money laundering and does not take part in transactions that serve to conceal or integrate criminal or illegally gained assets.

2. Fair competition

wolcraft respects fair competition and complies with the relevant antitrust laws and other regulations governing competition. In particular, wolcraft does not participate in prohibited collusion with competitors, customers and suppliers regarding prices or sales conditions, the dividing up of markets, customers or sales territories.

3. Business information and trade secrets, confidentiality

wolcraft undertakes to keep confidential and to not disclose to third parties any business and trade secrets of customers, suppliers and service providers that became known to wolcraft in the course of services performed. wolcraft will use such information only as authorized for its intended purposes.

4. Data protection and data security

When collecting, storing, processing, transmitting and disclosing personal information, wolcraft complies with national laws regarding data protection and information security as well as official regulations. When performing technical and organisational backups of data, and in particular, when protecting data against unauthorised access or loss, wolcraft ensures that an appropriate standard is met that factors in the state of the art as well as any possible risks.

V. Trade control

wolcraft complies with the applicable legal requirements regarding trade control (including trade sanctions, such as embargos and sanctions lists).

VI. Environmental and climate protection

wolcraft is committed to environmental and climate protection for the generation of today as well as for future generations. wolcraft accepts its environmental responsibility for its branches and subsidiaries and strives to avoid any adverse effects on the environment caused by its business activity. In particular, wolcraft undertakes to adhere to national laws, regulations and standards for reducing and preventing environmental impacts. If the business activities entail risks that could lead to the pollution of water, soil or air, appropriate measures to reduce or prevent such pollution must be implemented.

wolcraft undertakes to follow a systematic approach for the determination, handling, reduction and responsible disposal or recycling of solid waste at its branches and subsidiaries. It is mandatory to comply with the prohibitions regarding the transboundary movements of hazardous waste in accordance with the current version of the Basel Convention of 22 March 1989. Chemicals and other materials that are hazardous when released into the environment must be identified. They must then be handled in such a way that safety is guaranteed when transporting, storing, using, recycling or reusing and disposing of these materials. Mercury must be used in accordance with the prohibitions of the Minamata Convention on Mercury of 10 October 2013, and persistent organic pollutants must be used in accordance with the Stockholm Convention of 23 May 2001, in its current version.

wolcraft undertakes to observe an environmentally friendly use of resources and to minimize emissions and waste in its business activities. Re-use and recycling of waste is preferred to waste disposal. If re-use or recycling is not possible, wolcraft must ensure that the waste is stored/disposed of in accordance with the applicable regulations.

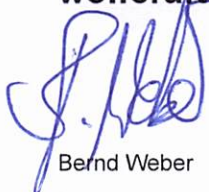
In addition, wolcraft undertakes to continuously implement and improve appropriate measures for protecting the environment and the climate.

VII. Final provisions

wolcraft relies on a transparent approach to ensure that the stated responsibilities are not empty promises but instead result in decisive actions. wolcraft expressly commits to transparently investigating any environmental or social issues of which it becomes aware throughout the supply chain, and to take concrete measures to address such issues.

In case of discrepancies or conflicts between the German version and other language versions, the German version takes precedence.

wolcraft management



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