

# Code of Conduct for Suppliers

WALDNER Laboreinrichtungen



## Preface by the Management

**Dear business partners,  
dear colleagues**

The code of conduct describes the standards by which we will measure our actions, how we want to treat each other, colleagues and business partners alike.

All of us want to comply with applicable laws and regulations so that we are able to make our daily decisions on the basis of this code of conduct.

First of all, this guideline is intended to provide us with meaningful support in our daily tasks. It provides guidance, advice and assistance for behaving at the workplace with integrity, as a business partner, and as a member of society.

These principles are our visible commitment to responsible behaviour and also play an important role in public perception. They apply throughout the Group and are binding for everyone, regardless of hierarchical level.

The current Code of Conduct for Suppliers actively calls for sustainable business practices. It is also the basis for economic, ecological and social responsibility. Based on globally accepted guidelines and principles, this document summarises the basic principles and standards for our suppliers of production-related and non-production-related goods and services.

We encourage you to engage actively with these contents, discuss them and continue to improve their implementation in your routine. Please consider this framework as guidance for legally compliant behaviour.

Let's work together to firmly embed these principles in our everyday lives.

**"Great developments in a company never come from one person alone – they are a team's product."**

All of us share the responsibility of protecting WALDNER Laboreinrichtungen SE & Co. KG's reputation as a reliable business partner, a fair competitor, and an appealing employer.

## The Management of WALDNER Laboreinrichtungen SE & Co. KG

\* In the following, the term 'employee' is used for either male or female 'employees', provided that this serves to improve readability. This also applies accordingly to other gender-specific terms. This does not imply any judgement.

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In its business operations WALDNER is contractually connected to a large number of suppliers and service providers.

### Corporate Principle

We carefully select suppliers and service providers based on objective criteria. When purchasing products and services, we involve the procurement department in charge in accordance with the relevant procurement principles.

### Social Responsibility

Exclusion of forced labour and the use of security services. Forced labour, slave labour, or any similar form of work is strictly prohibited. All work must be voluntary and performed without the threat of punishment. Employees must have the freedom to terminate their employment at any time. Furthermore, unacceptable treatment of workers, such as psychological abuse, sexual and personal harassment, and humiliation is not tolerated. Hiring or making use of security services is prohibited if it involves inhuman or degrading treatment or injury of individuals, or the restriction of freedom of association.

### Prohibition of Child Labour/Young Workers

Child labour is prohibited at any stage of production. Suppliers are required to adhere to the recommendations of the ILO standards concerning the minimum age for child employment. This means, that the age must not be lower than the age at which general school attendance ends according to the local laws of the employment location. If children are found working, the supplier must document the actions to be taken to address the issue and ensure that the children are given the opportunity to attend school. Workers under the age of 18 must not be employed in work that is harmful to their health, safety, or morals. Special protective regulations must be met.

### Fair Compensation and Working Hours

The wages for regular working hours and overtime must comply with the national legal minimum wage or the industry-standard minimum, whichever is higher. Overtime pay must always exceed regular wage rates. If wages are insufficient to cover the ordinary cost of living and create a minimum level of savings, the supplier is obligated to increase compensation accordingly. Employees must be provided with all legally required benefits. Wage deductions as penalties are not permitted. The supplier must ensure that employees receive clear, detailed, and regular written information about the composition of their wages. Working hours must comply with applicable laws or industry standards. Overtime is only permitted on a voluntary basis and should not exceed 12 hours per week.

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## **Freedom of Association**

Employees' rights to establish organizations of their choice, join them, engage in collective bargaining, and strike must be respected. In cases where freedom of association and the right to collective bargaining are legally restricted, alternative means to form independent and free associations for the purpose of collective bargaining must be provided for employees. Employers must not discriminate against employees based on their establishment, membership, or participation in such organizations. Employee representatives must be granted free access to their colleagues' workplaces to ensure they can exercise their rights in a lawful and peaceful manner.

## **Non-discrimination, Harassment, and Women's Rights**

The unequal treatment of employees without just cause is prohibited. This includes e.g. harassment or discrimination based on gender, national, ethnic or social origin, skin colour, disability, health status, political beliefs, ideology, religion, age, pregnancy, or sexual orientation. Personal dignity, privacy, and rights of each individual must be respected.

## **Ethical Recruitment**

The supplier ensures transparency in the application and hiring process and adheres to the principle of equal treatment. Requirements concerning personal characteristics (e.g. age and gender) are only applied if they are necessary and objectively justified for the position. Applicants must not be asked questions that are not relevant to the position or job performance, such as potential or intended pregnancy, religious beliefs, sexual orientation, or ethnic background. As a principle, selection, hiring, and promotion of employees must be based on their qualifications and abilities.

## **Protection Against Retaliation / Complaints Procedure**

The supplier must establish communication channels for employees to submit complaints or report potential unlawful behaviour without fear of retaliation, intimidation, or harassment. All reports must be treated confidentially. The supplier must inform employees about the possibility of reporting misconduct at the workplace.

## **Health Protection; Occupational Safety**

The supplier is in charge of a safe and healthy working environment. All necessary preventive measures must be taken to avoid accidents and health risks related to the occupational activities. Excessive physical or mental fatigue must be prevented through appropriate measures. Furthermore, employees must be regularly informed and trained on applicable health protection and safety standards and procedures. Employees must have access to an adequate supply of drinking water and clean sanitary facilities.



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## **Fair Competition and Antitrust Law**

The standards for fair business practices, fair advertising, and fair competition must be adhered to. Additionally, applicable antitrust laws must be followed. In particular, legal prohibitions on price-fixing agreements with competitors and price-setting for resellers must be observed.

## **Financial Responsibility**

We expect our suppliers to maintain accurate accounting and records. Financial statements must be prepared in accordance with legal requirements and in compliance with generally accepted accounting principles.

## **Disclosure of Information**

Accordingly, our suppliers must disclose information in line with applicable regulations and customary practices of the industry. This includes, but is not limited to, information on occupational safety measures, environmental practices, and financial status.

## **Integrity / Bribery and Avoidance of Conflicts of Interest**

Integrity in all business activities is essential. The supplier must adopt a zero-tolerance policy regarding bribery, corruption, extortion, and embezzlement. Appropriate procedures must be in place to monitor and enforce compliance of standards to ensure adherence to anti-corruption laws. Decisions must be based solely on objective criteria and must not be influenced by personal interests or relationships. The respective applicable laws against money laundering must be strictly observed.

## **Intellectual Property and Counterfeiting**

Intellectual property rights must be respected; technology and know-how transfer must be carried out in a manner that protects intellectual property rights and customer information. Counterfeit products must neither be circulated nor acquired.

## **Data Protection and Security**

The supplier is obliged to meet the reasonable expectations of its client, suppliers, customers, consumers, and employees regarding the protection of private information. The supplier must comply with data protection and information security regulations when collecting, storing, processing, transmitting, and disclosing personal information.

## **Export Controls and Economic Sanctions**

The supplier must comply with all applicable import and export control laws, sanctions, and embargoes, including restrictions on the export or re-export of goods, software, services, and technology to certain destination countries, as well as prohibitions on transactions involving certain countries, regions, organizations, and individuals that are subject to restrictions.

## **Environment**

The applicable national laws, regulations, and standards for limiting and preventing environmental pollution must be adhered to. If the supplier's business activities pose a risk of pollutant contamination in water, soil, or air, appropriate measures must be taken to reduce and prevent such pollution.

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## Emissions

Emissions are air pollution, noise, vibrations, light, heat, radiation and similar environmental impacts originating from the supplier's facilities which in terms of their nature, extent, and duration are capable of causing hazards, significant harm, or considerable nuisance to humans, animals, plants, soil, water, atmosphere, as well as cultural and other tangible assets.

The supplier must categorise, monitor, and analyse emissions classified as noxious or environmentally harmful, particularly those from volatile organic chemicals, aerosols, caustic substances, particulates, ozone-depleting chemicals, or by-products from combustion processes, and subject them to the legally required treatment in order to make the emissions as harmless as possible. The statutory limits must be adhered to.

## Use of Water

The proper quality and availability of water in waterbodies and groundwater are the basis of life for humans, animals, and plants. Therefore, water must be used sparingly for all processes, operations, and procedures. Industrial facilities should have closed-loop systems that allow for the reuse of water.

The supplier must ensure that wastewater from its operations, manufacturing processes, and sanitary facilities undergoes the necessary treatment before being discharged into groundwater. The concentration of hazardous substances in the water, such as salts, mineral oils, heavy metals and their compounds, oxidisable substances, nitrogen, phosphorus, organic halogen compounds, and other chemicals, must be kept to a minimum, ensuring that the wastewater does neither have a negative impact on human health nor on the ecosystem. If no infrastructure for water purification is available at the site, qualified and appropriate companies must be contracted for the transport and purification of the water.

## Waste

Waste refers to all substances or objects that their owner discards, intends to discard, or is obligated to discard. Hazardous waste (special waste) includes waste that poses a danger to health and/or the environment, and possesses one or more of the following characteristics: flammable, explosive, irritating, inflammable, corrosive, infectious, toxic upon contact or release of toxic gases, carcinogenic, infectious, toxic for reproduction or ecotoxic.

### General Handling:

Handling, storage, transport, and disposal of waste must not have harmful effects on air, soil, water, or the health of employees, and must be carried out by qualified personnel. Explosions, fires, and other sudden hazardous events must be prevented.

The supplier must implement measures for waste prevention and waste reduction.

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## Handling of Hazardous Waste:

Hazardous waste must be clearly labelled and disposed of properly. The handling of such waste must be carried out with adequate protective equipment. Hazardous waste must be kept separate from non-hazardous waste.

## Disposal and Recycling:

Recycling of waste is preferred over disposal, e.g. through landfill.

The supplier must assess the waste to determine the best possible method of recycling. Material recycling is to be preferred over energy recovery. In material recycling, waste is used as a resource or substitute for raw materials in the production of a new product, while in energy recovery, waste is incinerated in a furnace and used for energy generation.

## Chemicals and Other Hazardous Substances

Hazardous substances are materials, mixtures and products with dangerous properties that can cause acute health damage to humans, are flammable, explosive, or hazardous to the environment. Hazardous substances include not only chemicals but also substances such as welding fumes, ozone, uranium, asbestos, wood dust, and mineral-based fuels.

## General Handling:

Handling, storage, transport, and disposal of hazardous substances must not have harmful effects on humans, animals, plants, soil, water, atmosphere, or cultural and other tangible assets, and must be carried out by qualified personnel.

The supplier must maintain documentation regarding the quantity and type of chemicals and hazardous substances present and/or used at the plant.

## Storage:

Hazardous substances must be stored separately and in closed containers.

The floor in storage areas must be constructed in such a way that it does not absorb the hazardous substances and does not react with them.

The supplier must use sufficiently large containment trays for liquid substances. All storage tanks for liquid hazardous substances must be regularly monitored to prevent leaks.

When handling substances or processes that release toxic gases, employees must use the required protective equipment provided by the supplier.

## Disposal:

Disposal of hazardous substances must be carried out properly. It must be ensured that hazardous substances reacting with one another will not be disposed of together.

## Labelling:

Chemical and hazardous substances containers must be labelled with safety-related information indicating the risk of the hazardous material.



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## Natural Resources and Raw Materials

Natural resources are functions or components of nature, raw materials and energy sources that exist without human intervention, and physical space.

The supplier must use natural resources sustainably, keeping their use and consumption as low as possible. This can be achieved either directly at the place of origin or through procedures and measures such as changing production and maintenance processes or the workflow at the plant, using alternative materials, savings, recycling, and reusing materials.

### Responsible Sourcing of Raw Materials:

The supplier must develop measures to ensure and improve the transparency and traceability of the raw materials used in the product within the supply chain. The objective is, in particular, to ensure that the raw materials used come from responsible sources.

Special attention must be paid to ores, concentrates, and metals, including tantalum, tin, tungsten, cassiterite, coltan, and gold, which originate from conflict and high-risk areas. These are primarily mining areas that are the scene of armed conflicts, those in fragile post-conflict situations, or areas with weak or absent governance and security, where human and civil rights are systematically violated.

The sourcing of raw materials must not result in human rights violations or the financing of armed groups. To ensure this, the supplier must apply due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and WALDNER must disclose these due diligence measures upon request.

If the list of critical product ingredients will be expanded in the future, the supplier is obliged to implement due diligence measures for any additional substances.

## Implementation and Request of Supplier Relationships

The supplier commits to adhering to the listed principles/requirements by signing this document. The supplier further commits to communicating the essential content of this code or corresponding company regulations to the relevant employees, representatives, and subcontractors in a way they can understand, and to making all necessary arrangements to implement these requirements.

**WALDNER Laboreinrichtungen SE & Co. KG**