

# Business Partner and Supplier Code

for the Welser Profile Group



# Foreword

Dear Sir/Madam,

The Welser Profile Group is a global family business with international operating locations. As a reliable partner, we are aware of our responsibilities in our dealings with our customers, suppliers, employees and other business partners (hereinafter "Business Partners"). In an increasingly complex economic and business world, the success of our company and thus also the trust placed in us by our business partners, owners, employees and the general public depends on the behavior of each individual.

At the heart of our actions and business activities is respect for law and order, our performance in terms of our contribution to environmental and climate protection, and compliance with all intragroup rules and regulations. Legally and ethically sound but also sustainable behavior not only makes a significant contribution to successful business, but also strengthens relationships with our business partners along our entire value chain.


The expectations we have of ourselves are similar to those we have of our business partners. We expect you to conscientiously read the following Business Partner and Supplier Code (hereinafter referred to as the "Code") and to observe and implement it in your work with us as well as with your own business partners.

As a shared understanding of values, the Code is the core of the compliance program implemented at Welser Profile and thus a formal framework condition for our business activities.

We look forward to building and expanding our business relationships with you based on these shared values and principles.



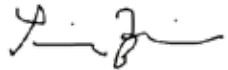
**Nicolas Longin**  
Managing Director, CFO



**Benedikt Geusau**  
Compliance Officer



**Markus Kepp**  
Compliance Officer



**Tania Zaripheh**  
Compliance Officer

# Objective & scope

The Code covers both legal requirements and Welser Profile-specific expectations and guidance for business partners who wish to do business with us, their affiliates, and all others with whom we do business, including all employees (permanent and temporary), upstream suppliers, and other third parties.

**Business partners are to conduct business with integrity, act in compliance with all applicable laws, and apply the values and principles set forth in this Code.**

Business partners are also responsible for passing on the Code itself or similar documents and guidelines that meet the requirements of this Code to their employees, representatives, suppliers and sub-contractors, and for ensuring that the contents are also implemented throughout the business partner's value chain.

Like Welser Profile itself, our business partners, have a firm obligation to contribute to environmentally sustainable development. Consequently, the continuous improvement of environmental protection measures and the ongoing safeguarding of the health and safety of people directly or indirectly affected by its activities must be a core element of corporate management and strategy.

## Consequences for violations

Violations of the principles and contents of the Code or of statutory regulations may have significant consequences for all parties involved as well as for our joint business relationship. Therefore, in the event of violations, we reserve the right to take appropriate action, which may include termination of the business relationship.

## Together against the "wrong"

Transparency and cooperation form the basis of the relationship between Welser Profile and our business partners. To that end, we have specific processes in place to ensure that our business partners comply with the core values set out in our Code. Based on internal guidelines and criteria, we conduct business partner reviews to minimize potential compliance and ethical risks. In this regard, we reserve the right to ask our business partners to provide appropriate and meaningful support for these efforts.

## Contact options and reporting of violations

Business partners must report any suspected violation of the contents of this Code. In case of violations, the responsible contact person of Welser Profile must be notified or one of the available channels used.

### Contact

#### Compliance Officer:

[compliance@welsler.com](mailto:compliance@welsler.com)

Benedikt Geusau (Welser Profile Group),

[b.geusau@welsler.com](mailto:b.geusau@welsler.com)

Markus Kepp (Germany), [m.kepp@welsler.com](mailto:m.kepp@welsler.com)

Tania Zaripheh (USA), [t.zaripheh@welsler.com](mailto:t.zaripheh@welsler.com)

#### Whistleblower system (confidential and anonymous):

[www.welsler.com](http://www.welsler.com)

# Welser value landscape

At Welser Profile, culture and values are both the foundation and the impetus for further development. Because only if we all live reliable values together, as companies and people, will this ensure sustainable opportunities for generations to come.

We attach great importance to responsible and fair dealings with our customers, suppliers, employees, and other business partners.

We are therefore committed to a **corporate culture and values** that emphasize morally, ethically, and legally correct conduct.

As we are aware of our current but also future responsibility, the following four pillars of the Welser “value landscape” form the orientation and basis for our actions and business activities.



[OUR PURPOSE]

Passionate people  
create opportunities  
for generations.

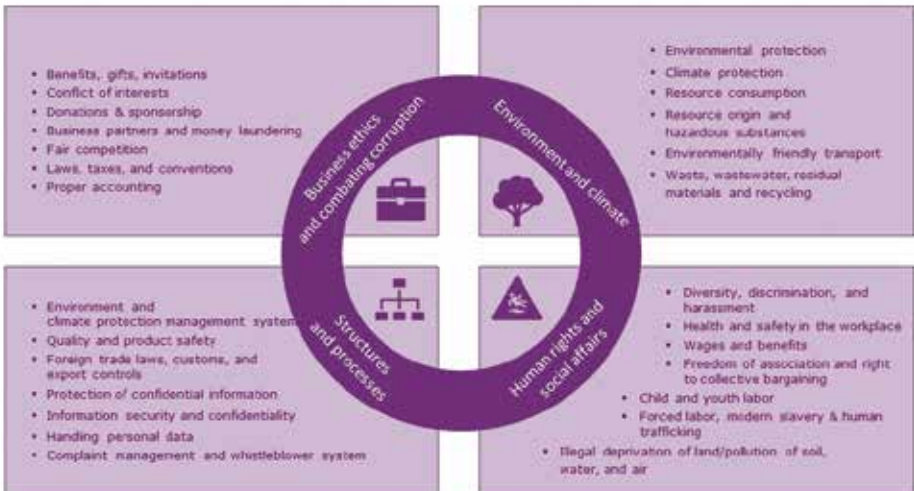


Fig. 1: Welser value landscape

# Business ethics and combating corruption

The four pillars with the topics and challenges they contain reflect our understanding of holistic ethical (business ethics and anti-corruption), economic (governance), social (human rights and social affairs) and ecological (environment and climate) responsibility.

## 1. Business ethics and combating corruption

Welsper Profile does not tolerate corrupt practices, neither within the corporate group nor among its business partners. Welsper Profile therefore supports national and international efforts to prevent corruption from influencing competition. All business partners are expected to actively oppose any form of corruption and to reject it if it occurs.



### ■ Benefits, gifts, invitations

Welsper Profile strictly rejects any form of unauthorized influence in the course of its own business activities. Promising, offering, accepting, demanding or granting gifts, payments, invitations or services with the intention of influencing business relationships and jeopardizing the independence of the business partners involved is absolutely contrary to this.

A transparent and ethically sound approach to benefits, gifts and invitations as well as compliance with applicable anti-corruption regulations is also expected, without exception, from our business partners. This also includes a special focus on dealing with public officials and politically exposed persons (PEPs).

### ■ Conflicts of interest

The avoidance of conflicts of interest (secondary employment, family relationships, economic self-interest, etc.) as well as transparent and open dealings in unavoidable cases are a matter of course for Welsper Profile. Business partners must avoid all conflicts of interest in their activities or report any situation of potential or apparent conflict between their personal interests and the interests of Welsper Profile.

### ■ Donations & sponsoring

In principle, there is nothing wrong with selective sponsorship in terms of positive public welfare. To this end, Welsper Profile has implemented a clearly defined process that ensures transparency and traceability and takes into account country-specific laws and customs. We expect our business partners to be transparent, to have defined values, and to comply with all laws governing donations and sponsorship. Business partners may not sponsor political parties and politicians or violate lobbying regulations in connection with business activities undertaken with Welsper Profile.

### ■ Business partners and money laundering

The basis of our business relationships is that we want to know our business partners. Based on our internal rules, we screen new business partners according to defined guidelines and expect the same

# Environment and climate

degree of honesty as well as compliant conduct and integrity. Welser Profile complies with all laws to prevent money laundering and tax evasion and scrutinizes suspicious financial transactions. All business partners ensure that their own business partners are also sufficiently known and that the applicable legal provisions against money laundering are complied with at all times, and are actively counteracted.

## ■ Fair competition

The entire corporate group is clearly committed to fair and free competition and vehemently rejects any behavior of a contrary nature. We require all business partners to comply with applicable competition and antitrust laws and not to engage in unlawful collusion with competitors, disclose unauthorized information or enter into unlawful agreements that restrict competition.

## 2. Environment and climate

In order to live up to our role as a sustainable partner with high-quality products, it is essential to systematically integrate environmental and climate protection into everyday business activities. Business partners too must act in an environmentally and socially sustainable manner and seek ongoing, open dialog on sustainability issues with local communities and other stakeholders.



## ■ Environmental protection

Welser Profile is aware of its responsibility for environmental protection and complies with applicable environmental laws and regulations. We strive to continuously minimize the negative impact of our business activities on the environment and take initiatives to promote environmentally friendly technologies. That is why we expect the same high values from our business partners when it comes to the environment. Environmental impacts must be reduced to a minimum to the extent that this is technically possible.

## ■ Climate protection

We attach great importance to being mindful of our climate and saving energy for this purpose, thus continuously reducing our CO<sub>2</sub> footprint. In order to maintain this goal in the value chain, it is important that our business partners are equally careful in their approach to climate protection and emissions reduction. Business partners are required to achieve a sustained low CO<sub>2</sub> footprint and strive to make continuous improvements.



### ■ Resource consumption

Resource-efficient and environmentally friendly production is a central pillar of our philosophy. It improves working conditions, minimizes risks, lowers production costs and reduces the need for raw materials. We therefore see it as extremely important for our business partners to promote the responsible and efficient use of resources.

### ■ Resource origin and hazardous substances

Welsper Profile is clearly committed to not using conflict minerals (Dodd-Frank Act) as well as the avoidance and restriction of chemical substances (RoHS, REACH, TSCA) and the sustainable handling of chemicals. Business partners are required to act carefully and sustainably when dealing with the origin of resources and the use of hazardous substances.

### ■ Environmentally friendly transport

A resource-saving approach in harmony with the environment also includes environmentally friendly transport. Welsper Profile therefore attaches great importance to supplying business partners through the use of optimized routes and modes of transport. This is also expected of our business partners, so that together we can make a contribution to a sustainable future. When transporting goods, care must be taken in choosing the mode of transport to ensure that the environmental impact is kept as low as possible.

### ■ Waste, wastewater, residual materials and recycling

Welsper Profile takes care to avoid all types of waste as far as possible both in the development and in the manufacture of its products. However, since this cannot be avoided entirely, materials and waste must be reused as far as possible (recycling) and residual materials disposed of in a safe and environmentally friendly manner (disposal).

This philosophy must also be followed and adhered to by our business partners. Waste or wastewater capable of endangering human health or the environment must be appropriately collected, checked, and treated prior to release. Substances that pose a risk to humans and the environment must be avoided wherever possible and are subject to appropriate use and monitoring measures.

# Human rights and social affairs

## 3. Human rights and social affairs

Welsper Profile feels that a work environment free of harsh or even inhumane treatment that affects a person's physical or psychological integrity goes without saying. Based on the UN Charter and the European Convention on Human Rights, human rights are considered fundamental values to be respected and observed by all. Avoiding adverse impacts on human rights that could be caused by us or our business activities is therefore always central in everything we do.



### ■ Diversity, discrimination, and harassment

Diversity and respect are considered fundamental values at Welsper Profile. Welsper Profile actively strives to create a working environment characterized by equality, diversity, and mutual respect.

Employees may not be discriminated against or harassed in any manner in their employment or compensation on the basis of national or ethnic origin, religion, gender, sexual identity, age, union membership or disability. (ILO Convention 100, 111)

### ■ Health and safety in the workplace

Welsper Profile is always concerned to maintain a healthy and hazard-free working environment for its employees, in which the statutory rules and regulations on health and safety at work are observed.

Business partners are expected to ensure occupational safety and health protection in the workplace within the framework of the national regulations applicable at the location where the activity is undertaken. (ILO Convention 155) This also includes precautionary measures for first aid, fire protection, and the rescue of persons from hazardous areas as well as effective alarm systems.

### ■ Wages and benefits

For Welsper Profile, appropriate and fair wage and salary agreements are not only a form of respect and appreciation for employees, but also a question of human rights. Business partners must pay a fair wage that complies with any national legal standards on minimum wages. They must also ensure that locally applicable working time laws are complied with. Business partners must also guarantee that employment relationships are based on written contracts that set forth the terms and conditions of employment in a language understandable to the individual concerned.

### ■ Freedom of association and right to collective bargaining

Welsper Profile also respects and promotes the rights of our employees to collective agreements and social partnerships.





Business partners must ensure and respect freedom of association and the right to collective bargaining. If the right to freedom of association and the right to collective bargaining are restricted under national law, business partners must allow their employees to freely choose their representatives. (ILO conventions 87, 98)

#### ■ **Child and youth labor**

Child and youth labor is strictly prohibited and will not be tolerated in any way at Welser Profile. Business partners must comply with the UN Convention on the Rights of the Child and the ILO Convention. Children are thus, among other things, according to Article 32 of the UN Convention on the Rights of the Child, to be protected from any work that affects their health, education, and development. **Business partners may not employ anyone under the age of 15, and hazardous activities may only be performed by employees who are over the age of 18.** (ILO Convention 138)

#### ■ **Forced labor, modern slavery & human trafficking**

Welser Profile strictly rejects any use of forced and compulsory labor as well as any form of modern slavery and human trafficking. This also includes the misuse of security forces for violent and coercive acts. **Business partners are also obligated to strictly reject any kind of the aforementioned forms of knowingly forced labor as well as violence by security forces and to actively take action against it if cases should occur within their own supply chain. Only employment relationships that are voluntary in nature may be entered into.** (ILO Convention 29)

#### ■ **Illegal deprivation of land/pollution of soil, water, and air**

Welser Profile is opposed to any unlawful deprivation of land and the impairment of the quality of life through contamination of soil, water, and air.

**The unlawful deprivation of land and the pollution of soil, water, and air must be refrained from and prevented by all business partners, including alternatives.**

# Structures and processes

## 4. Structures and processes (Governance)

Welsler Profile feels that a work environment free of harsh or even inhumane treatment that affects a person's physical or psychological integrity goes without saying. Based on the UN Charter and the European Convention on Human Rights, human rights are considered fundamental values to be respected and observed by all. Avoiding adverse impacts on human rights that could be caused by us or our business activities is therefore always central in everything we do.



### ■ Environmental and climate protection management system

Various environmental and climate protection management systems exist at Welsler Profile in order to better present ecological and economic activities and make them comparable. The top priority is to make both internal and external activities measurable and to show whether and to what extent the defined sustainability targets have been achieved, where there is potential for improvement, and how we can implement this.

Business partners also promote structured management of environmental and climate protection aspects (e.g., in the form of management systems) designed for long-term improvement.

### ■ Quality and product safety

A high degree of quality and product safety is a matter of course for Welsler Profile. Ongoing and continuous care is taken to eliminate actual or potential hazards emanating from Welsler Profile products and to ensure uninterrupted protection of customers and users. We expect our business partners to comply with national, European, and international regulations to ensure product safety throughout the supply chain.

### ■ Laws, taxes, and conventions

Welsler Profile and all business partners undertake to comply with all applicable statutory provisions and legal regulations. Everyone assumes the responsibility of the tax obligations and the tax laws applicable locally and internationally in their areas of activity.

Business partners are required to comply with the applicable laws and regulations of their country of origin and the countries in which they operate. We expect our business partners to comply with relevant international conventions and guidelines adopted by international organizations such as the Organization for Economic Cooperation and Development or the United Nations.

In the event of any discrepancies between applicable laws and regulations and the Code, the more stringent requirements shall prevail.

### ■ Proper accounting

At Welser Profile, it goes without saying that all documents and reports prepared internally or externally are accurate and truthful. This ensures transparency and actively prevents fraud by capturing and documenting all business information, transactions, and activities accurately, completely, promptly, and truthfully. **Each business partner must follow the same principle to comply with laws, rules, and regulations.**

### ■ Foreign trade laws, customs, and export controls

At Welser Profile, all regulations relevant to export controls are complied with, efforts are made to act in an exemplary manner with regard to export controls, and cooperation is maintained with all authorities concerned worldwide if necessary. This is also expected of all business partners without exception and forms the basis for compliance within the supply chain.

**Business partners are obliged to ensure complete and transparent customs clearance of all imports and exports at all times and to comply with applicable foreign trade laws (including relevant export control obligations, sanctions and embargo restrictions).**



# Structures and processes

## ■ Protection of confidential information

Information security and related measures to prevent confidential information from being accessed without authorization are the responsibility of all of us. Business partners must handle business correspondence confidentially. Confidential information, any kind of data worthy of protection, and the intellectual property rights of Welser Profile must be properly secured in accordance with the respective legal requirements. In the event of a data protection incident (data breach), this must be reported immediately to Welser Profile (for details, see the “Information Security - Suppliers” guidelines).



## ■ Handling personal data

Processing personal data contrary to the applicable data protection regulations is not compatible with our corporate culture. The provisions of European and national data protection laws (in particular GDPR) are therefore especially relevant.

Personal data must always be safeguarded in the best possible way by protective measures during the entire processing and destruction process, and the transfer of data to third parties takes place only to the extent permitted by law. In the event of a data protection incident (data breach), this must be reported immediately to Welser Profile (for details, see the “Information Security - Suppliers” guidelines).

## ■ Complaint management and whistleblower system

We take our responsibility to stakeholders and all other relevant parties very seriously. For us, corporate communications means transparency and open communication, but we never not lose sight of any confidentiality that may be required in individual cases.

Business partners must have a mechanism (grievance procedure) for reporting and addressing concerns and violations of the Code, and inform Welser Profile immediately of possible violations or other concerns. Retaliation against individuals who, in good faith, raise concerns about corporate integrity and possible violations is also contrary to our principles.

Our relationship with you is based on mutual trust and respect. You can also demonstrate your commitment to the stated values and principles of Welser Profile through your own code of conduct or through your own company policy that incorporates these standards.



# Mutual trust

However, Welser Profile reserves the right to **ask for your assistance in this regard** and to use one of the following methods to verify your compliance with these standards, as well as to take further action if there is cause for concern:

- **Self-disclosure**

We reserve the right to ask you to complete a questionnaire on compliance with the above values and principles.

- **Statements/certificate**

We reserve the right to ask you for a certificate or statement confirming compliance with the above values and principles.

- **On-site audits**

We or a third party contracted by us could ask you for permission to demonstrate compliance with the above values and principles on site.

It is important to us to ensure the principles of sustainable development in our value chain within the framework of the Supply Chain Due Diligence Act (LkSG) as well as the future Corporate Sustainability Due Diligence Directive (CSDDD).

We thank you for your support because  
**WE CAN ONLY DO IT TOGETHER!**



**[OUR PURPOSE]**

**Passionate people  
create opportunities  
for generations.**

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We take responsibility  
for our partnerships.

