



CODE OF CONDUCT

Duty of care in the supply chain

Preface by the Management Board

As an internationally active manufacturing company, WINTERSTEIGER Holding AG (hereinafter referred to as "WINTERSTEIGER") has a responsibility to act in an economically, socially, and ecologically sustainable manner. WINTERSTEIGER considers itself obliged to comply with nationally and internationally applicable guidelines. Our enterprise philosophy "Thinking about tomorrow" and focus on long-term relations with employees, suppliers, and customers and on the durability of our products all show that a policy of sustainability is deeply rooted in our corporate culture. Only by acting sustainably can a company ensure its future viability. Employees, customers, and suppliers are referred to in the following as "Business Partners".

Cooperation with our Business Partners is founded on partnership and mutual respect. The basis for this is provided by the present code of conduct (hereinafter

referred to as the "Code of Conduct"), in which we define our expectations and the binding demands we place on our Business Partners and thereby promote adherence to our principles. WINTERSTEIGER regards the responsible treatment of people and the environment as a necessary condition for economically sustainable operation. To this end, WINTERSTEIGER assumes economic, ecological, and social responsibility along the supply chain. The present Code of Conduct helps us by identifying possible areas of risk and conflict as well as their significance for the company. The Code of Conduct serves as a binding guideline not only for our company, but also for our employees and Business Partners. It is supplemented by internal guidelines and employment contracts as well as observance of national and international legal requirements.



Dr. Florestan von Boxberg,
Group CEO & CFO



Thomas Fürkötter,
CTO

The Code of Conduct is based on WINTERSTEIGER's values, which create a foundation for shared success:



Agility and
pro-activeness



Customer orientation



The joy of innovation



Trust



Appreciation



Openness



Working together



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General information about the Code of Conduct

Scope

This Code of Conduct applies to all legal and natural persons who sell or provide goods and/or services to WINTERSTEIGER themselves or through third parties, for example, affiliated companies, intermediaries, commercial agents, or subcontractors. The Code of Conduct further applies to all companies in which WINTERSTEIGER has a direct or indirect interest. As defined above, all these persons are hereinafter referred to as „Business Partners“. The Code of Conduct is to be embraced throughout the Group and carried over into business relationships. The basic requirements set out in this Code of Conduct are binding for all WINTERSTEIGER Business Partners and their employees. The requirements of our guideline must also be appropriately addressed along the supply chain.

Applicable standards

The Code of Conduct is based on the following internationally applicable standards and conventions:

- International Bill of Human Rights including relevant rights under the UN Civil and Social Covenants
- UN Global Compact
- UN Guiding Principles on Business and Human Rights
- UN Convention on the Rights of the Child
- UN Convention on the Rights of Women
- UN Convention against Corruption
- Core labor standards of the International Labor Organization (ILO)
- OECD Guidelines for Multinational Enterprises
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- Minamata Convention
- Basel Convention
- POPs Convention

Compliance with laws and regulations

WINTERSTEIGER's Business Partners must comply with applicable national and international regulations. If the requirements of locally applicable laws and regulations go beyond the provisions of this Code of Conduct, the stricter provision shall be observed. WINTERSTEIGER reserves the right to terminate business relationships with Partners if a breach of this Code of Conduct is identified. In the event of contradictions between WINTERSTEIGER's Code of Conduct and local legal requirements, Business Partners must notify WINTERSTEIGER of this without delay. In order to fulfill human rights and environmental obligations, our Business Partners undertake to safeguard the objects of protection (Schutzgüter) set out in the German Supply Chain Act (Lieferkettensorgfaltspflichtengesetz). These are explained in detail on the following pages.

Our responsibility towards fellow human beings

WINTERSTEIGER expects the fundamental rights of workers in Business Partners' companies to be recognized. Business Partners undertake to uphold these rights and to treat employees with dignity and respect as understood by the international community. WINTERSTEIGER also undertakes to treat its own employees with dignity and respect and to comply with applicable national and international regulations.

Child and youth protection

Child labor may not be used in any phase of production or processing. Business Partners must comply with the minimum standards of the ILO conventions concerning the minimum age for admission to employment and concerning the prohibition of child labor.

Prohibition of forced and compulsory labor

All employees in Business Partners' companies undertake to perform their work voluntarily. No employees in Business Partners' companies are forced to work under threat of punishment or other menace. Forced labor, forced prison work, forced enlistment of manpower, or human trafficking are strictly prohibited.

Prohibition of disadvantage and discrimination

WINTERSTEIGER expects Business Partners to promote equal opportunities and equal treatment. Business Partners undertake to comply with applicable legal provisions on the prohibition of discrimination in hiring and employment on the basis of ethnicity, social background, health status, skin color, gender, age, creed, political opinion, membership of an employee organization, physical or mental disability, nationality, sexual orientation, possible parenthood, or other personal characteristics.

Reasonable working hours and compensation

Working hours (including overtime) must comply with applicable legal requirements, industrial standards, or the ILO Convention. The stricter provision shall apply in this respect. Business Partners shall ensure that wages paid are at least equivalent to the statutory or collectively agreed minimum wages or the minimum wages customary for the sector in the country concerned (in which employees work). If there is no statutory or industry-standard minimum wage, Business Partners shall ensure that the wages paid cover employees' basic needs. Business Partners shall ensure that there is no unequal treatment. In particular, unequal treatment would be deemed to exist if unequal remuneration were paid for work of equal value.

Health and safety in the workplace

Business Partners of WINTERSTEIGER guarantee their employees a safe and healthy working environment. Necessary measures are taken to prevent health hazards and accidents that could occur in connection with the activity (e.g., monitoring, management system, safety equipment, contingency plans). Business Partners comply with all required health and safety regulations (e.g., ISO 45001).

Safeguarding basic human needs

Business Partners undertake to provide adequate working facilities. At a minimum, access to drinking water and sanitary facilities must be ensured. Fire safety, access to emergency medical care, adequate lighting and ventilation must be guaranteed.

Our responsibility for ethical conduct and integrity

WINTERSTEIGER considers that it has a responsibility to uphold integrity, ethics, and anti-corruption standards in its dealings with all Business Partners.

Combating bribery and corruption

Any form of bribery and corruption is condemned. Business Partners and their employees must behave in such a way that no personal dependence, obligation, or influence arises that violates anti-corruption standards. Even the appearance of such behavior is to be avoided. Business Partners are required to make decisions on a purely objective basis. Personal (financial) and private interests should not influence decisions. WINTERSTEIGER expects business conduct based on fairness and compliance with applicable national and international regulations.

Protection of data and confidential information

Business Partners are obliged to protect confidential and personal information obtained in the course of business activities and to comply with applicable national and international regulations in the field of data protection law. Confidential information of any kind as well as intellectual property rights of WINTERSTEIGER shall be properly secured in accordance with legal requirements. In the event of cooperation with WINTERSTEIGER, a separate non-disclosure agreement may need to be concluded between the parties. This can be found by visiting by visiting the WINTERSTEIGER website www.wintersteiger.com and selecting ABOUT US / Group Purchasing, Supplier Application.

Enabling fair competition

WINTERSTEIGER's Business Partners shall ensure that they compete fairly and comply with applicable antitrust laws. Business Partners shall not participate in agreements with competitors that violate antitrust law and shall not exploit possible positions of market dominance.

Handling of gifts

Our Business Partners agree that they will not use gifts, donations, or hospitality for purposes of bribery. WINTERSTEIGER allows only gifts of "minor value" to be accepted. Gifts are prohibited if an inappropriate consideration is demanded. This is particularly the case if:

- An attempt is made to exert pressure on suppliers, Business Partners, or other third parties
- An attempt is made to obtain, retain, or extend a contract or favorable clause
- An attempt is made to be wholly or partially exempted from the payment of license fees, taxes, or fines

Occasions such as anniversaries, birthdays, project completions, or social events such as Christmas or New Year can be legitimate occasions for gifts and invitations. If, on the other hand, there is no obvious reason for the gift, the donor and/or recipient should be able to explain the reason for it. Gifts in the form of cash, cash-like allocations, shares, securities, precious metals, or low-interest loans are prohibited. Appropriate gifts are characterized by the fact that they are presented openly and transparently, are only an expression of appreciation or gratitude, and are permitted under local law.

Our responsibility towards the environment and resources

WINTERSTEIGER expects its Business Partners to comply with applicable laws and regulations (in the country concerned) and with internationally recognized standards for protection of the environment.

Environmental protection

Business Partners are obliged to obtain the necessary environmental permits and approvals in the country concerned, keep them up to date and observe them, so as to ensure that they operate in compliance with the law. Business Partners are also expected to establish and apply an appropriate environmental management system (for example, according to ISO 14001).

Optimizing resource efficiency

Business Partners are obliged to optimize the consumption of natural resources, including energy and water. Appropriate measures are taken to prevent pollution and minimize the generation of waste and wastewater (for example, through recycling measures and reuse of materials). The measures are aimed at achieving a circular economy.

Reducing energy consumption and emissions

Business Partners are required to set targets and take appropriate measures to minimize hazardous air emissions, greenhouse gas emissions, and energy consumption.

Handling of hazardous materials and waste

Business Partners undertake to label hazardous materials, chemicals, and substances and to ensure safe handling, movement, storage, reuse, and disposal of these materials. Nationally applicable legal requirements and regulations relating to hazardous materials, chemicals, and substances must be strictly observed. It is mandatory to comply with substance restrictions and product safety requirements under nationally applicable laws and regulations. Substances under the above-mentioned agreements are prohibited. Business Partners must comply with the provisions of the Minamata Convention. These prohibit the manufacture of products containing mercury, the use of mercury and mercury compounds in manufacturing processes, and the treatment of mercury waste.

In the production and use of chemicals, the bans on persistent organic pollutants ("POPs") set out in the Stockholm Convention apply. Business Partners must handle, collect, store, and dispose of waste in an environmentally responsible manner in accordance with the requirements of the applicable legal system and the Stockholm Convention. They must also comply with prohibitions on the export and import of hazardous waste as defined by the Basel Convention.



Responsibility of Business Partners

Compliance with the code of conduct

WINTERSTEIGER reserves the right to verify compliance with the Code of Conduct. Business Partners shall grant access to the required documentation for the purpose of verification. In the event of non-compliance, Business Partners are obliged to take the necessary measures immediately and independently. WINTERSTEIGER reserves the right to terminate the business relationship.

WINTERSTEIGER provides a training document that serves to prevent human rights abuses and environmental violations and explains the obligations arising from this Code of Conduct. The current version of the Code of Conduct and the associated training document are stored on the WINTERSTEIGER website. WINTERSTEIGER reserves the right to amend the Code of Conduct. Important changes will be notified to Business Partners.

Supplier relations

WINTERSTEIGER expects Business Partners to communicate all legally applicable rules and requirements to their subcontractors and suppliers and also take them into account when selecting them.

Business Partners shall encourage their subcontractors and suppliers to comply with the described standards on human rights, working conditions, prevention of corruption, and environmental protection when fulfilling their contractual obligations.

Notification of violations and obligation to cooperate

If Business Partners become aware of a violation of this Code of Conduct, this must be notified immediately. Business Partners shall cooperate with investigations. The legitimate interests of Business Partners and the rights of employees must be safeguarded when notifying, especially with regard to the protection of data and business secrets. This also applies to violations at Business Partners' subcontractors. Furthermore, Business Partners must inform potentially affected parties of the rights arising from this Code of Conduct and draw attention to the possibility of reporting violations directly to WINTERSTEIGER.

Information about violations of this Code of Conduct can be reported to WINTERSTEIGER at any time – including anonymously – using the digital whistleblower system. The whistleblower system can be accessed via WINTERSTEIGER's website.

