

Code of Conduct

Transparency, trust, cooperation

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Foreword

Our mission statement describes the values we share and how we want to work together – today and in the future. It gives us a clear vision of what we need to achieve in order to ensure the long-term success of our company. We can only achieve our goals by working together. Our values, such as personal responsibility, openness, and transparency, as well as behavior that is always legally compliant and ethically correct, play a particularly important role in this.

This Code of Conduct brings together for the first time in a single document our key rules and principles, which are binding for us both today and in the future. It provides a framework for guidance and applies equally to each and every one of us – to the management, to executives, and to each individual employee. It sets standards for ourselves and at the same time is a promise to the outside world that we will behave responsibly toward our business partners and the public, but also in our dealings with each other within the company. Together, we are responsible for the reputation of our company. The misconduct of individuals can cause enormous damage to us all.

Our customers' requirements determine how we think and act. We break new ground and develop innovative products and services for sustainable infrastructure and resource efficiency. Competence and diversity, global networking, and tradition are the foundations of our performance and make us a leader in our market.

We act entrepreneurially, with confidence, courage, and with a focus on performance—with the goal of being the best. The commitment and skills of each individual are the basis for this. The development of our employees is particularly important to us. Health and safety in the workplace are our top priorities.

Compliance

We consider compliance with national and international laws and internal regulations to be an essential basic principle of economically responsible conduct.

We observe all applicable legal prohibitions and obligations at all times, even if this entails short-term economic disadvantages or difficulties for the cooperation, for individual companies, or for individuals.

Data protection and information security

The protection of personal data in general, but especially the data of employees, partners, customers, and suppliers, is very important to us. As a matter of principle, we only collect and process personal data if this is absolutely necessary to fulfill the respective task or if it has been ordered by law, and even then we pay attention to data security, transparency, and data minimization. Otherwise, we only process personal data after obtaining the consent of the person concerned, which always complies with the regulations and principles laid down in the European General Data Protection Regulation.

When exchanging data between partners, each cooperation partner will ensure that consent was obtained from the subject of the personal data being exchanged. Each cooperation partner ensures at least that the legally required level of data protection is maintained in their company.

Equal treatment and non-discrimination

In our company, we live a culture of equal opportunity, mutual trust, and mutual respect. We promote equal opportunity, tolerance, and dignified, polite, and honest interaction with one another.

We prohibit any form of discrimination, especially in the hiring of employees and in the promotion or in the granting of further education and training measures. We treat all employees equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religious affiliation, or worldview.

Sustainable environmental and climate protection

Sustainable environmental and climate protection and resource efficiency are among our most important goals. Both in the development of new products and services and in the support of existing customers, we ensure that any impact on the environment and climate is kept to a minimum and that our products make a positive contribution to environmental and climate protection for our customers.

Avoiding conflicts of interest

In our company, business decisions are made exclusively in the best interests of the company. Conflicts of interest with private interests or other economic or other activities, including those of relatives or other related people or organizations, should be avoided from the outset. If they do occur, they must be resolved in accordance with the law and company guidelines applicable. This requires transparent disclosure of the conflict.

Fair competition

WENZEL stands for technological expertise, innovative strength, customer focus, and motivated, responsible employees. This is the basis for our excellent reputation and the company's sustained economic success in global competition.

Corruption and antitrust violations threaten these guarantees of success and will not be tolerated (zero tolerance). We do not use bribes or cartel agreements as a means of obtaining orders. We would rather forego a business opportunity and the achievement of internal goals than violate the law. Violations will not be tolerated and will result in sanctions against the persons concerned.

Our company complies with its legal obligations regarding money laundering prevention and does not participate in money laundering activities.

All employees are required to have unusual financial transactions, especially those involving cash, which could give rise to suspicion of money laundering, reviewed by the finance department in case of doubt.

Human and labor rights

We respect and support compliance with internationally recognized human rights, personal rights and human dignity. We strictly reject any form of forced or child labor. We respect the right to freedom of association and collective bargaining within the framework of applicable regulations. We are committed to fair working conditions, including remuneration, working hours, and privacy protection.

Occupational health and safety

We ensure a healthy and safe working environment for our employees. Occupational safety and health protection are integral parts of all operational processes from the outset – right from the planning phase – and are incorporated into technical, economic, and social considerations. All our employees comply with occupational health and safety regulations. High safety requirements are also taken into account when awarding subcontracts and searching for suitable partners.

Donations

WENZEL sees itself as an active member of society and is therefore involved in various ways. Among other things, it makes donations and engages in other forms of social commitment. However, we do not make financial contributions to political parties, party-affiliated or party-like organizations, or to elected representatives or candidates for political office in Germany or abroad.

Public appearance and communication

We respect the right to freedom of expression and the protection of personal rights and privacy. Every employee should be aware that they can be perceived as part of and representative of WENZEL even in their private life and are therefore required to uphold the company's image and reputation through their behavior and conduct in public, especially towards the media.

When expressing private opinions, we take care not to associate our respective roles or activities at WENZEL with our private statements.

Reliability, honesty, credibility, and integrity are among our shared values. Accordingly, we engage in open and truthful reporting and communication regarding the business transactions of each individual company to employees, customers, business partners, the general public, and government institutions. Every employee ensures that their internal and external reports, information, and communications are complete and accurate and comply with applicable law and the internal guidelines of the respective company.

Confidential company information

We take the necessary steps to protect confidential information and business documents from access and inspection by employees and other third parties not directly involved in the specific business transaction in an appropriate manner. Employees who possess information that is not generally known or readily available may not disclose this information or make it public in any other way.

Protection of company property

We use the company's property and resources appropriately and carefully and protect them from loss, theft, or misuse. Our company's intellectual property represents a competitive advantage and is therefore an asset worthy of protection, which we defend against any unauthorized access by third parties.

We use tangible and intangible property exclusively for the business purposes of WENZEL and its affiliated companies, unless private use has been permitted. We also adhere to the principle of cost-effectiveness in business travel and other company expenses, ensuring that costs are proportionate to the nature and scope of the event.

Ethical recruitment

Ethical recruiting describes a practice in our recruitment process in which applicants are assessed without discrimination or bias. Integrity, transparency, trust, and performance are paramount.

Only when recruitment is based on unbiased criteria and standardized processes all candidates can have a fair chance of getting the job. Ethical recruitment includes, among other things:

- No discrimination against candidates based on their appearance, gender, ethnicity, or age
- Open and transparent communication with applicants
- Keeping candidates informed about the status of their application

In addition, ethical recruiting means treating all applicants and candidates with respect and honesty and showing them that you appreciate them taking the trouble applying for the position.

Women's rights

It is firmly anchored in our corporate culture that equality and gender-neutral assessment are crucial for a healthy working environment. Women, men, and people of diverse genders receive equal attention and are evaluated solely based on their performance.

Gender-based differences and prejudices do not arise from the behavior of men or women themselves, but are conditioned by the environment in which they work. Therefore, we all work hard to create a neutral environment.

Diversity, equality and inclusion

We stand for the ideal of a society that embraces diversity, excludes no one, and allows everyone to participate equally in social life. Inclusion in this sense means that diversity—in all its nuances—is the norm.

Rights of minorities and indigenous peoples

Indigenous peoples and minorities are free and equal to all other peoples and individuals, and have the right not to be subjected to any discrimination in the exercise of their rights, especially on the basis of their indigenous origin or identity.

Land, forest, and water rights

We respect country-specific land, forest, and water rights without exception. This ensures that that we contribute to climate protection.

Plagiarism

The intellectual property of the company must be protected. Plagiarism must not be circulated or acquired and must be reported to management immediately. The theft of intellectual property of others is strictly prohibited.

Export controls and economic sanctions

As an internationally active company, we comply with the respective export controls and economic sanctions of all respective countries. These must be complied with without exception and, in the event of a violation, reported immediately to the management.

Whistleblowing and protection against retaliation

Whistleblowers can report violations of guidelines and standards anonymously to the relevant departments within the company. These reports are reviewed directly by management and the necessary steps will be taken.

Whistleblowers are expected to act in good faith and not to make false or malicious accusations. If possible, they should be able to provide further evidence or information to facilitate an investigation.

We do not tolerate harassment, retaliation, intimidation, victimization, or reprisals against whistleblowers. In addition, the law in some countries provides special protection for individuals who raise concerns, in which case stricter legal protections apply.

Handling chemicals and hazardous substances

To protect everyone, the company, and the environment, hazardous substances are handled in accordance with all legal and internal requirements and comply with all established safety regulations. To protect the soil and the environment, we store hazardous substances in containers or storage rooms designated for this purpose. The proper disposal of chemicals and hazardous substances is carried out by certified waste disposal companies, taking into account all health, environmental, and safety aspects.

Fire protection

We comply with the current fire protection regulations and protect our company with suitable fire protection equipment (e.g., fire alarm system, fire extinguishers), which are monitored by regular inspections.

Emergency evacuation

Regular evacuation drills train employees on how to behave in the event of a fire or other emergency. The evacuation drills are carried out on the basis of internal specification documents.

Closing remarks

WENZEL actively promotes communication of the corporate guidelines and agreements underlying the Code of Conduct. The individual companies ensure their implementation and make sure that no employee is disadvantaged by compliance with the guidelines or agreements.

Our managers have a special role model function and are measured to a particular degree by the code of conduct in their actions. They are the first point of contact for questions regarding the understanding of the regulations and ensure that all employees are familiar with and understand the code of conduct. As part of their management responsibilities, they prevent unacceptable behavior and take appropriate measures to prevent violations of the rules in their area of responsibility. Trusting and good cooperation between employees and managers is reflected in honest and open communication and mutual support.

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