

CODE OF CONDUCT

FOR

SUPPLIERS AND BUSINESS PARTNERS

Code of conduct for suppliers and business partners

PREAMBLE

This Code of Conduct for Suppliers and Business Partners (hereafter referred to as the Code of Conduct) defines the principles and requirements for the suppliers and business partners of WFL Millturn Technologies GmbH & Co. KG (hereinafter: WFL) and all its subsidiary companies with regard to their responsibility for people, society and the environment.

We as WFL are part of the Dr. Helmut Rothenberger Holding GmbH (hereinafter: Rothenberger-Group) and we live by our reputation as a family company that acts with integrity, is value-oriented and acts lawfully. Therefore, we have formulated our central ethical values in this Code of Conduct. We want to convey to our suppliers and business partners that our activities are always based on firm ethical principles and that we always act in fair partnership. Furthermore our principles include avoiding conflicts of interest and acknowledging our social responsibility. We are politically neutral but support social projects and are committed to fair competition.

These ethical principles are supplemented in our corporate philosophy by the seven ROTHENBERGER values, which form the guidelines for our entrepreneurial activities: Cohesion as a family, Trust, Responsibility, Efficiency, Quality, Courage and Entrepreneurship.

This Code of Conduct as the basis applies to all supplier and business relationships as well as for the cooperation. We expect our suppliers and business partners to apply this Code of Conduct. By agreeing to this Code of Conduct, the supplier or business partner declares its consent. Nevertheless, we reserve the right to inspect our suppliers and business partners or have them inspected. We also reserve the right to take measures in the case of corresponding violations.

This Code of Conduct is based on applicable national legislation, EU legislation and recognized international agreements, in particular the “Universal Declaration of Human Rights”, the guidelines on “Children’s Rights and Entrepreneurship”, the guidelines on “Business and Human Rights”, the United Nations “Global Compact” as well as the international labor standards of the ILO.

For reasons of better readability, the simultaneous use of the language forms male, female and diverse (m/f/d) is omitted. All personal designations apply equally to all genders.

DECLARATION OF THE SUPPLIER AND / OR BUSINESS PARTNER

The supplier and / or business partner hereby declares compliance with the principles described below:

1. COMPLIANCE WITH LAWS AND REGULATIONS

Compliance with the law and respect for human rights

Comply with the content and regulations of the applicable law. Respect human rights. Ensure through labor practices that all internationally proclaimed human rights are respected by avoiding both causing and participating in the abuse of human rights.

Forced Labor

Neither use nor contribute to slavery, servitude, forced or compulsory labor, or human trafficking.

Child Labor

Not to employ workers who cannot demonstrate a minimum age of 15 years. In countries for which the exception for developing countries according to ILO conventions are applicable, the minimum age might be reduced to 14 years. Not to hire workers for hazardous work who do not have a minimum age of 18 years according to ILO conventions. To observe and respect the special rights of children.

Anti-Corruption and Bribery

Not to tolerate any form of corruption or bribery and not to engage in it, directly or indirectly, and not to offer, grant or promise gratuities to government officials or private sector counterparties for the purpose of influencing official actions or obtaining an inappropriate advantage. This includes refraining from granting or accepting improper acceleration payments.

Fair competition, antitrust and intellectual property rights

To act according to national and international competition laws. Not engage in price fixing, sharing of markets or customers, market collusion or bid rigging, and respect intellectual property rights. Transfer technology and know-how in a way that protects intellectual property rights and customer information.

Business Secrets

Obligation to treat as business secrets all commercial and technical details which are not in the

public domain and which become known as a result of the business relationship.

Grievance Mechanism

Provide employees with access to a protected procedure to report possible violations of the principles of this Code of Conduct.

Conflicts of Interest

To avoid and/or disclose internally and to WFL and its affiliates all conflicts of interest that could influence business relationships, and to avoid even the appearance of such conflicts of interest.

Data Protection

Process personal data confidentially and responsibly, respecting everyone's privacy and ensuring that personal data is effectively protected and used only for legitimate purposes.

Money Laundering, Financing of Terrorism

Not to promote money laundering or terrorist financing, neither directly nor indirectly.

Export control and customs

Comply with applicable export control and customs regulations.

Responsible sourcing of minerals

Take appropriate measures within the products to avoid or minimize the usage of raw materials that originate from conflict and high-risk areas and might contribute to human rights abuses, corruption, funding of armed groups or similar negative impacts.

Transparency in the supply chain

To make reasonable efforts to ensure that their suppliers also apply the basic principles of this Code of Conduct. To apply the principles of non-discrimination in the selection of suppliers as well as the interaction with their suppliers.

2. BUSINESS BEHAVIOR, INTEGRITY, SOCIAL AND ETHICAL RESPONSIBILITY

Working Hours, Remuneration & Fringe Benefits for Employees

Recognize the right of employees to form trade unions, join existing unions and to engage in collective bargaining; neither favor nor discriminate against members in employee organizations or unions. To comply with applicable working time regulations worldwide. To pay adequate remuneration and to comply with all applicable remuneration and compensation regulations worldwide. In the case of cross-border personnel deployment, to comply with all applicable legal provisions, regarding minimum wages.

Non-Discrimination and Respect for Employees

Promote equal opportunity and treatment for its employees regardless of color, race, national origin, ethnicity, political affiliation, social origin, disability, sexual identity and orientation, religious beliefs, gender or age. Not tolerate inappropriate treatment of workers, such as psychological hardship, sexual harassment, or discrimination, including gestures, language and physical contact that are sexual, coercive, threatening, abusive or exploitative.

Health & Safety of Employees

Act in accordance with applicable legal and international standards relating to health and safety in the workplace, and to provide safe working conditions. To provide training and ensure that employees are trained on health and safety issues. To establish and apply an appropriate health and occupational safety management system.

3. ECOLOGIC RESPONSIBILITY

To act in accordance with applicable legal norms and international standards relating to the environment. Minimize environmental pollution and continuously improve environmental protection. To establish and apply an appropriate environmental management system.

Conservation of Resources

To reduce the consumption of raw materials as much as possible to a minimum, in particular to use water and energy economically and, if possible, to give preference to renewable resources.

Avoidance and Reduction of Environmental Impact

To reduce any emissions to a minimum according to the state of the art, as well as to control polluting emissions and to treat them prior to releasing them into the environment, to avoid waste as far as possible or to recycle it. To re-use materials whenever feasible. To develop procedures to regulate the transport, storage, treatment, and disposal of waste in a safe and environmentally friendly way.

Avoidance of Hazardous Substances

Avoid, as far as possible, substances that may pose a risk to people and the environment through release. Implement a hazardous substance management system that ensures safe use and transport, as well as safe storage, reprocessing, re-use and disposal.

Environmentally Compatible Products and Processes

Ensure the economical consumption of energy and natural resources when developing products and processes. Products should also allow re-use, recycling or safe disposal.

4. COMPLIANCE WITH THIS CODE OF CONDUCT

Management Systems

To implement management systems that ensure compliance with the principles set forth herein and to certify such systems in accordance with recognized standards.

Communication

Communicate this Code of Conduct to third parties used to fulfill the contractual relationship and verify the compliance.

5. ACKNOWLEDGEMENT AND CONSENT OF THE SUPPLIER

By signing this document, the supplier undertakes to act responsibly and to adhere to the principles/requirements listed.

Place/Date:

Signature and company stamp