



CORPORATE COMPLIANCE

GUIDELINE FOR EMPLOYEES

PREAMBLE

WSW Spannwerkzeuge Vertriebs GmbH (hereinafter referred to as WSW), Maybachstr. 1, 73066 Uhingen, is a trading company operating worldwide.

Personally, logistically and administratively integrated into the environment of the company EWS Weigele GmbH & Co. KG and organized in a common management system.

WSW is committed to the common CORPORATE COMPLIANCE principles of EWS Weigele GmbH & Co. KG and the affiliated companies of the EWS Group.

What we stand for

Our corporate principles

- **We are profitable and committed to people and the environment.**

We aim to balance profitability, people and the environment in our work.

- **We act responsibly and respect the rules.**

We follow the laws and rules and take responsibility.

- **We address issues openly and stand for transparency.**

Honesty, openness and transparency are the foundation for our actions.

- **Fairness and respect are the basis for our cooperation.**

Trust, fairness and respect characterize our cooperation..

- **We live diversity**

The diversity of our employees is one of our strengths.

How we work

Our principles of conduct

▪ **Diversity and equal opportunities**

Consciously dealing with diversity and individuality is part of our corporate strategy. Discrimination will not be tolerated in any form, especially regarding

- Gender, ancestry, origin, Nationality
- religion and ideology
- Political or social activity
- sexual identity and orientation
- physical and/or mental limitations or age

We create a culture of tolerance - Bullying has no place at our company. It is our common task to create a fair, tolerant, appreciative and collegial working environment.

▪ **Appearance in public**

We coordinate external publications with management (e.g., at events, in public forums or in social media networks where we are recognizable as WSW employees). When appearing in public, we identify our personal views as such.

▪ **Safety and health**

Safe working conditions are a high priority for us. We create a working environment in which everyone can perform at their best while maintaining their physical and mental health. Our goal is to prevent occupational accidents and work-related illnesses.

We comply with occupational safety regulations and use the prescribed protective equipment. We independently ensure safe working conditions and report suspected safety and health risks. We do not work under the influence of alcohol or drugs so that we do not endanger our own safety or the safety and integrity of others.

WSW offers health-promoting and prevention-focused programs through the EWS and relies on the active participation of its employees in the

- Occupational medicine and protection
- Occupational health management
- Ergonomics
- reintegration and
- Social counseling

▪ **Work-Life-Balance**

Conditions are created that support the compatibility of work and private life.

▪ **Conflicts of interest**

We carefully weigh personal or our own financial interests against the interests of the company. This applies when employees

- accept, offer or grant gifts and invitations
- or engage in sideline engage in secondary employment.

If such conflicts of interest exist, we disclose them and seek a solution with the respective manager, in which the interests of WSW are not impaired.

For further information, please refer to the section "Dealing with business partners".

▪ **Use of resources**

We handle company property and resources carefully and sustainably.

We use company resources only for business purposes. This includes, for example, tangible and intellectual property, assets and other company resources. Examples include machinery, software and hardware, and telephony.

Wasting resources reduces the company's assets and can cause additional damage.

We ensure that we use resources responsibly and economically.

We protect information because it is valuable. We ensure that we do not disclose information about WSW in dealings with business partners or at private events that would allow outsiders inadmissible insights into business processes.

▪ **Business Secrets**

We provide special protection for trade secrets such as inventions, new products or services, because they give us an edge over our competitors. We comply with laws and regulations on the protection of trade secrets and respect the trade secrets of competitors, business partners and customers.

We ensure that confidential information is not disclosed to unauthorized third parties. This also applies to confidential information we receive from our business partners. If special confidentiality is required due to special circumstances (e.g., sensitive customer development projects or acquisitions), we also maintain this confidentiality with respect to our WSW employees.

▪ **Compliance with laws**

Unlawful conduct is not in the interest of our company because it is unethical, leads to loss of reputation and criminal prosecution and may result in damages and loss of contracts.

Employees who act unlawfully must be aware that they themselves are at risk of prosecution.

Law-abiding conduct serves our own protection.

Every employee is obliged to inform himself about the regulations applicable in his area of responsibility and to comply with them.

▪ **Product safety and compliance with technical regulations**

We design our products and services to be as safe as possible. Technological developments we use to reduce chemical substances. We ensure the legal compliance of our processes and products, including packaging, throughout the entire life cycle, from the initial idea to disposal.

In doing so, we consider the meaning and purpose of the relevant laws and regulations.

We are familiar with the regulations that affect our field of work and ensure that our level of knowledge is always up to date. We openly address potential risks in our work environment.

▪ **Tax and customs regulations**

We comply with the applicable tax and customs regulations. A correct and timely declaration of the taxes and customs duties to be paid is elementary for WSW. We do not commit tax evasion or subsidy fraud, nor do we aid and abet them.

▪ **Antitrust law**

We are committed to protecting fair competition and comply with applicable antitrust and competition laws, because the laws also protect us from unlawful agreements and excessive prices.

In particular, the agreement of prices and conditions, the division of markets and regions, the allocation of customers and the coordination of supply, development or production strategies are prohibited.

In this respect, not only explicit agreements but also concerted practices are inadmissible.

Already the exchange of information with competitors, which can be the basis of such a concerted practice (i.e., in particular regarding prices, costs, margins, conditions, customers, offers, product developments, production capacities), is inadmissible.

Violations of these prohibitions are consistently pursued by the antitrust authorities and can lead to sanctions that threaten the existence of the company.

▪ **Foreign trade law**

We comply with all foreign trade regulations, such as those relating to the export of goods, intangible assets and services. We observe existing import or export restrictions and obtain any necessary permits. With regard to embargoes, we comply with goods and country restrictions.

▪ **Economic sanctions and money laundering prevention**

We comply with national and international sanctions and support the fight against money laundering and terrorist financing. Employees in affected areas keep up to date on current sanctions lists at all times.

The employees responsible for the business processes are required to design them in such a way that any form of economic crime is prevented.

▪ **Protection of intellectual property**

Our patents, utility models and other intellectual property rights, such as trademarks and designs, are among our most important resources and must be protected. It is equally important to avoid the unauthorized use of others' intellectual property.

▪ **Prevention of corruption**

We do not bribe and do not allow ourselves to be bribed. We decide for objective and comprehensible reasons.

We do not give corruption a chance, because it harms our company, competition and the common welfare.

WSW does not tolerate corrupt behavior by its employees, business partners and customers.

We also act in accordance with our corporate principles when in contact with employees of public authorities, as well as public officials and politicians. We avoid the mere appearance of improper influence, for example through payments, benefits or other advantages.

We adhere to this when such services are expected or alleged to be customary for official acts.

Dealing with business partners

▪ **Gifts and invitations**

Gifts and invitations are customary and permissible within reasonable limits. As employees, we may not solicit, request or demand gifts, invitations, personal services or favors from business partners, either for ourselves or for others. We refuse to accept inappropriate benefits from business partners.

Invitations must serve a business purpose and be in proportion to the occasion. As an order of magnitude of what can be considered appropriate is 50 euros, or 100 euros in the case of invitations from third parties. 100 in the case of invitations from third parties; in case of doubt, we consult with the responsible manager.

We coordinate gifts and invitations to our business partners and customers with the management. We take an extremely restrictive approach in connection with public officials; legal regulations are very strict in this area worldwide.

▪ **Selection of business partners**

WSW expects its business partners, such as suppliers and sales partners, to comply with WSW's sustainability standards. These are a condition for the conclusion of a contract. Our business partners must also encourage their suppliers to respect our sustainability standards.

We do not tolerate **child labor** and take all measures to protect our young employees.

We comply with the **statutory regulations on wages and social benefits**. The statutory minimum entitlement to the number of vacation days is granted and complied with by us.

We observe **break and working times** in accordance with the applicable working time regulations.

We do not tolerate any form of **forced labor**.

All employees are permitted to **associate freely** in accordance with applicable law.

All employees can communicate openly with the management about all company issues, including working conditions, without fear of reprisal, intimidation or harassment.

Inhumane treatment, such as **abuse or sexual harassment**, is subject to a zero-tolerance policy. All conspicuous acts, even the threat of harassment, will be punished in any case, up to and including termination without notice. This also applies to insults, psychological and physical coercion and any form of physical punishment.

The **zero-tolerance** strategy also applies to discrimination against employees based on their skin color, religion, gender, sexual orientation, ethnic or social origin, skin color, language, age and social status.

Equal treatment of all persons is a prerequisite for successful, peaceful and safe cooperation.

▪ **Environmental protection**

We do our best to ensure that our environment is protected. We strive for an exemplary environmental and energy balance. We use natural resources sparingly and strive to do the same for our products.

We avoid harmful effects on the environment. Compliance with the laws for the protection of the environment is a matter of course. We comply with energy targets and ensure energy efficiency at our workplaces.

The future is paperless - we continuously pursue this goal and take the initiative ourselves to reduce paper or even save it completely via digital data processing and networked systems.

▪ **Donations and sponsoring**

We do not expect any quid pro quo for donations and do not pursue any economic self-interest.

Donations are made exclusively to institutions recognized as non-profit organizations.

Politics and political organizations are excluded. In contrast, we use our sponsorship to positively shape the reputation and perception of our company through public advertising.

▪ **Voluntary commitment**

We support the volunteer efforts of our employees.

Digitization

▪ **Data Privacy**

We use personal data only to the extent permitted by law and by the persons concerned. Our employees, business partners and customers should be able to rely on the fact that their data is safe with us. We take data protection into account, analyze it intelligently and responsibly, and store, share and use all data prudently.

We protect the data of our employees, business partners and customers from access by third parties.

In order to guarantee the protection of privacy, personal data will not be disclosed to third parties without the consent of the persons concerned. As a matter of principle, no information is provided about matters concerning individual employees; the same applies to ongoing investigations and to competitors.

▪ **Documentation of business transactions and archiving**

We document the main business transactions in a comprehensible and timely manner. Both internal and external reports must be correct and complete so that the recipient can form an accurate picture. In doing so, we adhere to the presentation of facts and a factual style of expression. Hasty conclusions are to be avoided.

Documents required for ongoing or anticipated internal investigations or official inquiries must not be destroyed, removed or altered.

We comply with legally prescribed archiving times and requirements.

Compliance with the WSW Code of Conduct

▪ **Scope of application**

All employees must be familiar with the contents of this policy, comply with it and act as described. If specific guidelines or other regulations exist, they are binding.

▪ **Expectations placed on managers**

We expect managers to live up to their role model function and provide guidance to employees. Our managers are committed to excellent work results and observe our corporate guidelines and principles of conduct at all times.

Our managers behave respectfully toward their employees and promote a sense of community among their team. Sie schaffen für ihre Mitarbeitende eine geeignete Wissensbasis und befähigen sie, Verantwortung zu übernehmen. They create a suitable knowledge base for their employees and empower them to take responsibility. Managers report to their team from the executive management bodies. Managers explain the background to decisions to their team members so that they can work together to achieve goals. They promote a culture of respectful cooperation.

▪ **Guidelines for our managers**

A manager stands behind the **company's goals** and enforces them in his department.

A manager participates in the **staff survey** and motivates his employees to take part.

A leader is always a **role model**. This is especially true for

- reliability
- punctuality
- commitment
- in thinking for the company

A leader listens to the needs of employees and recognizes and nurtures the talents of aspiring employees.

The manager is committed to ensuring that his/her team is doing well and is motivated to achieve the agreed goals!

▪ **Dealing with errors**

We want to learn from mistakes. Therefore, we maintain an open and transparent approach to mistakes and share our experiences to enable further development and innovation.

The prerequisite for this is to shape our corporate culture in such a way that wrong decisions are recognized, discussed and corrected. It is up to each of us to take responsibility and create - or demand - a work environment in which employees have no inhibitions about addressing potential mistakes.

We treat employees who disclose errors fairly and responsibly.

- **Dealing with rule violations**

When we observe rule violations or we have reason to suspect them, we do not hesitate to address them.

If you have any criticism, questions or suggestions, please contact:

contact@wsw-tools.de

The management
CEO Frank Weigele
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