

Wirthwein principles of social and environmental responsibility

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1. Commitment to respect for human rights

Wirthwein SE and its subsidiaries are a world-leading manufacturer of high-quality and complex plastic parts and tool molds. With Winkler Design, the group of companies is also active in the area of interior design.

As a family business, we rely on entrepreneurial foresight as well as stability and reliability. In our guidelines we commit ourselves to acting responsibly and lawfully towards our employees, business partners and the public.

We are aware of our corporate responsibility to respect human rights and environmental concerns. Wirthwein SE is therefore committed to respecting human rights and environmental protection in its own business activities, as well as in its global supply and value chains, and to providing those affected by legal violations access to redress. We align our business activities with the internationally recognized guiding principles for business and human rights of the United Nations and thus implement the requirements of the National Action Plan for Business and Human Rights.

In addition, our understanding and our human rights due diligence processes are based on the following international human rights reference instruments, to which we are committed:

- The International Charter of Human Rights, i.e. the Universal Declaration of Human Rights of the United Nations as well as the Civil Covenant and the Social Covenant, which define civil, political and social rights to which all people are entitled for the sake of their dignity.
- The core labor standards of the International Labor Organization (ILO) with their four basic principles on freedom of association and the right to collective bargaining, the elimination of forced and child labor and the prohibition of discrimination in employment and occupation.

We expect our business partners to also commit to respecting human rights, to establishing appropriate due diligence processes and to passing these expectations on to their own suppliers.

2. Relevant human rights issues and potentially affected groups of people

We are committed to respecting all internationally recognized human rights and focus our human rights and environmental due diligence processes in particular on the following topics, which are anchored in the Code of Conduct of Wirthwein SE and its subsidiaries.

- Prohibition of child labor
- Prohibition of discrimination
- Safeguarding health and safety
- Prohibition of corruption, bribery and personal gain
- Prohibition of forced labor
- Protection of intellectual property
- Financial responsibility
- Compliance with antitrust prevention
- Freedom of assembly and association
- Prohibition of any kind of harassment

- Compliance with statutory working time regulations
- Fair compensation
- Responsible use of resources and environmental protection
- Responsibility in the supply chain

In addition to the applicable laws and internal agreements, the Code of Conduct represents a globally binding set of rules for sustainable and responsible action in the corporate organization.

In our efforts to respect human rights and the environment, we focus on our employees, employees of business partners, groups of people in our direct and indirect supply chains and groups of people with an indirect link to the value chain.

3. Our approach to implementing human rights and environmental due diligence obligations

Respecting human rights and the environment is a continuous process for us. Due to changing contextual conditions, type of business activity and size and structure of the company, the implementation of human rights and environmental due diligence is constantly monitored and continually developed.

3.1 Risk analysis

We consider it part of our duty of care to be aware of potential and actual adverse human rights and environmental risks and the impact of our business activities on people and the environment along the entire value chain. We therefore use a defined process to identify and evaluate the relevant risks to people and the environment. In our management process, we take into account the industry, country of origin and our potential influence. This risk assessment pays particular attention to incidents reported by all interested parties, e.g. via the whistleblower system.

The analysis of human rights and environmental risks and their impact is updated annually and whenever there are significant changes to the company's profile or business activities. The results of the analysis are taken into account in our business decision-making processes such as supplier selection, business partner management, product responsibility and product development. They also serve as the basis for the creation of internal and external guidelines, processes and training.

3.2 Measures

We rely on the interaction of different measures. The aim is to protect the (potentially) affected persons and to avoid or at least minimize adverse human rights and environmental impacts.

Outside our company, we contractually oblige at least all our direct business partners to comply with the laws applicable in the respective country and the core labor standards of the ILO, to respect human rights and to address human rights and environmental risks appropriately vis-à-vis their own business partners. The general purchasing conditions of Wirthwein SE as well as our Code of Conduct for suppliers apply as the basis for the contract.

In the event that our business activities contribute to potential or actual human rights violations and/or disregard for environmental protection or are indirectly linked to these, we endeavor to remedy the abuses appropriately. If we have a justified suspicion or concrete indication of possible human rights violations and/or disregard for environmental protection in our company or along our upstream value chain, we investigate this carefully and consistently.

If there are indications of human rights violations and/or disregard for environmental protection, NBH (New Business Hold) status will be assigned immediately. The information is reviewed and, if necessary, countermeasures such as audits, on-site training and the definition of suitable action plans are initiated.

If business partners demonstrably and intentionally do not comply with human rights regulations and/or do not take environmental protection into account, the cooperation with the relevant suppliers will be terminated.

In the event that we as a company have directly caused the violation of human rights and/or do not comply with environmental protection, we will quickly work to stop the business activities that caused it. If the behavior of our employees is not compatible with human rights and environmental protection, appropriate sanctions will be initiated. Failure to comply with human rights and/or environmental obligations will not be tolerated.

3.3 Effectiveness check and remedy

We review the effectiveness of our measures at least once a year and on an ad hoc basis. Adverse human rights and environmental impacts must be prevented. We also check whether our requirements are being met.

Within our company, human rights and environmental requirements are checked via internal processes/audits. Employees are sensitized through training and reports and all information about potential human rights violations and violations of environmental protection are tracked. The Wirthwein Corporate Principles, the Code of Conduct and the "Diversity Charter" are binding for all employees. In addition, the principle of equal opportunities "No one is disadvantaged at Wirthwein SE and its subsidiaries because of their origin, gender or religious views. We build on performance, not on prejudices" is actively practiced.

We check the effectiveness of measures in our value chain by monitoring the results of our continuous analysis of human rights and environmental risks and impacts. In accordance with the defined management process, our employees may carry out spot checks as part of audits or other checks at our direct suppliers.

3.4 Complaints mechanism

We reject any form of human rights violations. Appropriate and effective complaint management is therefore an important part of our due diligence processes. We have set up a company complaint management system that is accessible inside and outside the company. This is intended to effectively prevent adverse human rights and environmental impacts caused by our company and our business activities and to provide effective remedies.

We also operate a whistleblower system that provides a confidential communication channel for internal and external stakeholders and all potentially affected parties worldwide to report possible violations. Access to the whistleblower system is communicated proactively and reports can be made anonymously.

All reported information and reasonable suspicions about possible human rights violations and environmental damage are processed as part of a process that is transparent, balanced and predictable for everyone involved. The confidentiality and anonymity of whistleblowers is respected. We ensure, as far as possible and within our sphere of influence, that whistleblowers are protected from discrimination and punishment in connection with the complaints they submit. Our systematic handling of complaints and the insights we gain from them enables us to continually improve our due diligence processes.

3.5 Reporting

In our annual report, we provide information on our human rights and environmental commitments and due diligence processes and their effectiveness. We also report on the material human rights and environmental risks and impacts we have identified as a result of our business activities along our global supply and value chains. Preventive and remedial measures implemented are also described.

4. Responsibilities and continuous development

We have defined clear responsibilities for exercising and complying with our human rights and environmental due diligence obligations. At the top management level, our Executive Board members are responsible for respecting human rights and environmental protection in our business activities and in the upstream value chain. Regular and event-related internal reporting on human rights and environmentally relevant results ensure that appropriate decisions can always be made. Information from our continuous risk analysis, information from our complaint mechanisms and information on the effectiveness of our remedial and prevention measures as well as the complaints procedure are taken into account.

For us, respecting human rights and implementing human rights and environmental due diligence obligations in our operational processes is an important contribution to improving the human rights situation and environmental protection along global supply and value chains.

At the top management level, we are responsible for respecting human rights and environmental protection in our business activities and in the upstream value chain.

Creglingen, December 2023

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