

CODE OF CONDUCT

Wagner GmbH & Co. Fahrzeugteilefabrik KG

VERSION May 2021

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Foreword

Dear employees, dear business partners,

as a long-standing partner of almost all major automotive manufacturers as well as numerous suppliers, we are aware of our responsibility towards our customers, employees and our environment. The trust of our customers is based on the quality of our products and the reliability and flexibility of our company. Each and every one of us assumes responsibility in his or her area of responsibility for ensuring and optimizing process & product quality.

This Code of Conduct is also intended to support us in behaving responsibly and loyally towards the company, our colleagues and partners in our day-to-day work, and to create a common understanding of cooperation and success. Even if many of the following contents will be self-evident for you, we would still like to ask you to familiarize yourself with the regulations, because the responsibility, commitment & loyalty of each individual contribute significantly to the success of our company. This enables us to grow at the Fulda site in the long term, create new jobs and assume responsibility for society and the region.

Together with our suppliers and business partners, we assume responsibility for a fair, social and environmentally conscious society. Compliance with the behavioral guidelines listed here is obligatory for company management and employees. Likewise, we expect the recognition of our business partners and encourage them to likewise commit their suppliers to compliance with equivalent ethical, social and legal principles. This Code of Conduct is communicated within and outside our company and made available on our homepage.

Fulda, 17 may 2021

Tolerance & Equality

We promote each individual employee according to his or her abilities and interests, regardless of his or her origin, gender, religious or political convictions. Each individual deserves fair and respectful treatment. We therefore do not accept any discrimination or harassment of our employees.

Compliance with the applicable regulations for the protection of human rights, respect for the dignity and rights of every employee is a matter of course for us. We strongly condemn child or forced labor. Our young employees in particular receive special protection when it comes to their health and the quality of their training.

- Treat your colleagues with respect.
- Be open to other cultures and values.
- Respect the privacy of your colleagues.

Health & Safety

The health & safety of our employees is our top priority. Both in production and in administration, we ensure compliance with the legal requirements on occupational health and safety. This includes measures to prevent accidents, the provision of protective equipment, and measures to improve working conditions. The health of our employees is also guaranteed by the involvement of a company medical center and the training of in-house first aiders. Our in-house sports teams also provide a wide range of leisure activities and an active balance to everyday working life.

- Each of us is responsible for safety.
- Observe the regulations and instructions on occupational safety.
- Report risks or potential for improvement to your supervisor.

Working conditions & freedom of association

We comply with German labor law. The remuneration of our employees as well as provisions regarding working hours, overtime & vacation are regulated in the IG Metall collective bargaining agreement. We respect the rights of trade unions and the right of our employees to join a trade union. Employees may not suffer any disadvantages as a result of exercising this right. Our employees are regularly informed about business activities by the management via notices, the internal employee newspaper or at the works meeting.

Sustainability

For us, sustainable corporate management encompasses three areas: Environment, Employees & Society. Sustainable value creation begins with the responsible procurement of raw materials. We also expect this from our suppliers. In addition to immediate environmental risks such as groundwater protection, exhaust air, waste, noise and greenhouse emissions, we pay attention to energy-efficient manufacturing in order to continuously reduce our ecological footprint.

Our environmental & energy management is certified to ISO 14001 and ISO 50001. Just as important to us is the health and safety of our employees and our commitment to the region. Here, we support numerous regional events from sports and culture to health & inclusion organizations.

- Use natural resources responsibly.
- Look for possible savings in energy consumption and waste.

Integrity

We attach great importance to fair competition with our competitors and comply without restriction with applicable competition and antitrust law. We do not participate in agreements that could restrict free competition. Our business relationships are based on objective criteria and, in accordance with the Anti-Bribery and Anti-Corruption Act, are not influenced by gifts, donations or other benefits. Likewise, we expect our employees not to be influenced by attempts at bribery or conflicts of interest, but to act objectively and loyally in the interests of the company.

We ensure, in compliance with national laws, that transactions with third parties do not violate trade regulations or import and export control requirements. In all forms of external communication in written, verbal and electronic form, we report punctually, truthfully and completely. We also ensure integrity in our financial reporting through standardized processes, transparent documentation of all transactions, and proper compliance with legal regulations and standards.

- When exchanging information with competitors, be careful not to share sensitive information. Do not collude with competitors on customers, capacities, quantities or prices.
- Do not let gifts or entertainment influence the integrity of your business decisions.
- Separate your private interests from business decisions and act in the best interests of the company.

Protection of property and information

Joint action in the interests of the company also includes the protection of material and intellectual property. Plant, operating and office equipment as well as all working materials and aids are the property of the company and are to be used only for its purposes and protected against damage, loss or theft. Likewise, intangible assets such as internal know-how, products or equipment developed in-house must be treated confidentially and not passed on to unauthorized persons. The use of plagiarized products is not permitted. In the same way, we respect the intellectual property rights of our business partners.

- Handle company property responsibly and protect it from damage or theft.
- Do not disclose internal information or techniques to unauthorized third parties.
- Respect patents and property rights of our partners.

Privacy

We take the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the statutory data protection regulations. This applies to the collection as well as the processing and use of personal data. We pay attention to expediency and transparency. We are committed to complying with common standards for safeguarding information processing in order to protect confidential data.

- Respect the privacy of your colleagues and our business partners.
- Store or use personal data for a specific purpose and with the consent of the data subject.

Whistleblowing

We encourage all employees to raise serious concerns through our reporting system so that we can address and correct inappropriate behaviors and actions. We therefore ask for your assistance in identifying opportunities for improvement by reporting concerns about violations of our Code of Conduct internally.