

With the Code of Conduct, the company commits itself to compliance responsibility, its social and societal responsibility, and the principles of fair competition. The company bases its actions on the fundamental principles of the United Nations Global Compact with its generally applicable ethical values and principles, in particular integrity, honesty, respect for human dignity and anti-discrimination.

I. Compliance and Business Ethics

1. Compliance with Law / Integrity

In all business activities and decisions, the company undertakes to comply with the applicable laws and other relevant regulations of the countries in which it operates. Business partners are to be treated fairly. Contracts are complied with, taking into account changes in the framework conditions. Any form of fraud or embezzlement, insolvency offenses, granting of advantages or bribery will not be tolerated. In dealing with business partners, personal benefits may neither be demanded nor accepted for unfair preferential treatment in business relationships. Company employees may not offer, promise, request, grant or accept gifts, payments, invitations or services in business dealings that are granted with the intention of unfairly influencing a business relationship or where there is a risk of jeopardizing the professional independence of the business partner. An exception applies only if the prior written consent of the management has been obtained. This is generally not required in the case of gifts and invitations which are within the scope of customary hospitality, convention and courtesy.

2. Prohibition of Corruption and Bribery / Avoidance of Conflicts of Interest

The company rejects corruption and bribery. When dealing with business partners and government institutions, the interests of the company and the private interests of employees on both sides are strictly separated. In the context of business relationships with third parties, only objective criteria count. Decisions are made free of irrelevant considerations and personal interests. Attempts by third parties to unfairly influence employees in their decision-making will not be tolerated; they must be reported to the superior or management.

The applicable criminal law on corruption must be complied with. Among other things, the following must be observed:

The granting of personal benefits by the Company and its employees to domestic or foreign public officials (such as civil servants or public employees) with the aim of obtaining advantages for the Company or themselves or third parties is not permitted. Personal benefits of monetary value in return for unfair preferential treatment in business dealings between companies may not be offered, promised, granted or approved.

3. Fair Competition

The company respects fair competition. Therefore, it complies with applicable laws that protect and promote competition, in particular the applicable antitrust laws and other laws regulating competition. In dealing with competitors, these regulations particularly prohibit agreements and other activities that unfairly influence prices or conditions, illegally allocate sales territories or customers, or unlawfully impede free and open competition.

4. Business Secrets

The Company respects and safeguards all trade and business secrets. Confidential information and confidential documents may not be disclosed to third parties without permission or made accessible in any other way, unless authorization has been granted, the information is in the public domain or an enforceable decision by an authority or court justifies this.

5. Money Laundering

We comply with the relevant regulations on money laundering prevention and do not engage in money laundering activities.

6. Information security / Confidentiality / Data Protection

Access to the intranet and internet, electronic information exchange and dialogue, electronic business processing - these are crucial prerequisites for the effectiveness of each of us and for business success as a whole. However, the advantages of electronic communication are associated with risks for the protection of privacy and the security of data. Effective precautions against these risks are an important part of IT management, the management task and also the behaviour of each individual.

Personal data may only be collected, processed or used insofar as this is necessary for specified, explicit and legitimate purposes. A high standard of data quality and technical protection against unauthorized access must be guaranteed. The use of data must be transparent for the persons concerned, and their rights to information and correction and, if applicable, to objection, blocking and deletion must be safeguarded.

7. Dealing with Exceptional Situations and Escalation

In the event of the (potential) occurrence of a serious event with significant critical relevance for the company, the company is prepared for the purpose of clarification and damage limitation. The escalation process results in the resolution of (potential) non-compliance situations that have already arisen or the prevention of non-compliance situations that are to be feared. This means that such activities should be made transparent and promptly presented to a responsible authority for regulatory decision-making.

8. Customs, Export Controls and Economic Sanctions

As an internationally operating company with customers, suppliers and projects all over the world, WINKEMANN is subject to national and international laws and restrictions that regulate the import, export or domestic trade of goods, technology, services and the handling of certain products. WINKEMANN must use appropriate procedures to ensure that transactions with third parties do not violate economic sanctions, trade regulations or requirements for import and export controls / customs clearance or requirements for the prevention of terrorist financing.

II. Social Sustainability

1. Human Rights

The company respects and supports the observance of internationally recognized human rights. WINKEMANN and its employees respect the dignity and personal rights of each employee and colleague as well as of third parties with whom the company does business.

2. Prohibition of Forced Labour and Child Labour

We reject any forced or child labour at any stage of the production chain or processing. Our suppliers are therefore also required to comply at least with the ILO conventions on the minimum age for admission to employment and on the prohibition of forced and child labour. WINKEMANN condemns any form of exploitation and discrimination and strictly adheres to legal requirements.

3. Fairness in Wages, Working Hours and Social Benefits

Working hours and non-working hours comply with applicable laws, industry standards or relevant ILO conventions. Compensation and benefits comply with the basic principles regarding minimum wages, applicable overtime regulations and statutory social benefits.

4. Equal Opportunities / Non-Discrimination

The company rejects any form of discrimination within the framework of the respective applicable rights and laws and stands for equal opportunities and tolerance. This refers in particular to discrimination against employees on grounds of race, ethnic origin, gender, religion or belief, disability, age or sexual identity, political and trade union activity, illness or pregnancy. All employees are given equal opportunities within the limits of their personal prerequisites during recruitment and their further development in the company.

5. Freedom of Association and Right to Collective Bargaining

It is ensured that employees can openly discuss working conditions with management without fear of disadvantages. Freedom of association and the effective recognition of the right to collective bargaining are respected. The right of employees to associate, join a trade union, appoint and be elected to representation is respected.

6. Safety and Health at Work

To maintain the health and physical integrity of all employees, our workplaces comply with the valid rules on occupational safety and health protection. In addition, the company offers compensatory programmes to promote physical fitness.

III. Sustainability in environmental protection

1. Environmentally friendly products and processes / Energy consumption and efficiency

Sustainable environment and climate protection as well as resource efficiency are important corporate goals for us. Both in the development of new products and in the operation of production facilities, we take care to ensure that any resulting impact on the environment and climate is kept as low as possible and that our products make a positive contribution to environmental and climate protection.

Our implemented and certified environmental and energy management system ensures compliance with the law and sets high standards for this purpose. Every employee shares responsibility for reducing energy consumption, water use and greenhouse gas emissions in all activities. The prohibition of unlawful eviction and the prohibition of unlawful taking of land, forests and waters in the acquisition, construction or other use of land, forests and waters is respected (protection of biodiversity and deforestation-free supply chains). By acting sustainably, the environmental impact is reduced to a minimum and environmental protection and energy efficiency are continuously improved.

2. Water Consumption / Treatment and Discharge of Waste Water

Wherever possible, we use water effectively in cycles and thus avoid waste water. Waste water from operations, manufacturing processes and sanitary facilities is monitored prior to discharge in accordance with national regulations. In addition, we take measures to reduce water consumption and the generation of waste water.

3. Dealing with Air Emissions / Carbon Footprint

Our environmental and climate protection programme primarily aims to avoid and reduce greenhouse gas and air pollutant emissions by saving energy and resources. Every single contribution made by our employees also counts towards reducing our carbon footprint.

4. Handling Waste and Hazardous Substances

Based on a systematic approach and our annual waste balance sheet, waste is identified, properly handled, reduced and responsibly disposed of or recycled. Chemicals or other materials that pose a hazard when released into the environment or handled by our employees are listed in our hazardous substances register, so that safety is ensured when handling, transporting, storing, using, recycling or reusing and disposing of these substances.

Compliance with the Code of Conduct, Complaints mechanisms / Whistleblowing and Protection against Retaliation

The management of E. WINKEMANN GmbH expects every employee to feel personally responsible for complying with this Code of Conduct and to support colleagues in complying with it as well. We actively promote the communication of the policies and agreements underlying the Code of Conduct. No employee may suffer any disadvantage as a result of complying with the guidelines or agreements.

Our executives are role models for integrity and respect, and their actions are particularly measured against the Code of Conduct. They are the first contact for questions about understanding the regulations and ensure that all employees know and understand the Code of Conduct. They prevent unacceptable behaviour within the scope of their management duties or take appropriate measures to prevent violations of rules in their area of responsibility. Trusting and good cooperation between employees and managers is reflected in honest and open information and mutual support.

In order to clarify questions regarding the content of or compliance with the Code of Conduct, the executives and the management are available as contact persons at any time. In addition, the central e-mail address codeofconduct@winkemann.de is available to all employees and also to third parties (customers, suppliers, etc.). Concerns can be expressed anonymously, confidentially and without retaliation.

WINKEMANN consistently follows up on every indication of misconduct, taking into account the principle of proportionality. Each individual case is reviewed. According to the result, a comprehensible decision is made as to which consequences (if necessary also legal and/or labour law) are suitable, necessary and appropriate.

We regularly review whether the standards stated in the Code of Conduct still meet current requirements, for example due to changing national or international regulations or legal standards.

The overall responsibility for compliance and amendments to the Code of Conduct rests with the management, which hereby adopts the present version.

Plettenberg, February 2023

.....
Markus Kloke
Managing Director
(Chairman)

.....
Jürgen Westphal
Managing Director

.....
Thomas Russe
Management Representative