



Code of Conduct for Suppliers of the Wilfa Group

At the Wilfa Group, we are committed to complying with all applicable laws and regulations, to upholding human rights and labour standards and to protecting the environment – in our own operations as well as in relation to our business partners. Wilfa also supports UN declarations, core ILO conventions, the ETI base code and the principles of the United Nations Global Compact. We expect our suppliers to share this commitment. This Supplier Code of Conduct defines the basic requirements to meet our standards.

Health and safety

- ◆ Comply with all applicable laws and regulations on occupational health and working safety.
- ◆ Commit to continuous improvements of occupational health and safety.
- ◆ Use or set up a reasonable occupational health and safety management system.

Human rights and labour standards

- ◆ Working time: Comply with the applicable law and sector-specific labour regulations concerning working time, including overtime laws.
- ◆ Wages and benefits: Provide wages and benefits as prescribed by the respective national laws, including minimum wage legislation, and in line with existing practice in the industry and local labour markets.
- ◆ Non-discrimination and fairness: Apply the principles of equal opportunity and fair treatment. Non-tolerance of any form of discrimination or verbal or physical harassment of employees.
- ◆ Freedom of association and collective bargaining: Recognise, as far as legally permitted, the right of free association and collective bargaining of employees.
- ◆ No forced labour: non-tolerance of any form of forced labour, including forced prison labour, indentured labour, bonded labour, slave labour or any form of human trafficking
- ◆ No child labour: Comply with minimum working age requirements prescribed by national laws and international agreements.

Legal compliance and integrity

Comply with all applicable laws and regulations, in particular:

- ◆ Prohibition of corruption and bribery: Do not engage in or tolerate any form of corruption or bribery, in particular any payment, “kickback” or other form of benefit conferred for the purpose of influencing decision making.
- ◆ Competition and antitrust: Conduct business in compliance with all applicable competition/antitrust laws and regulations.
- ◆ Conflict of interest: Avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in business dealings with Wilfa or third parties.
- ◆ Confidentiality: Keep Wilfa’s business, financial and technical data as well as business



correspondence confidential; do not misappropriate Wilfa's or other companies' tangible or intellectual property.

Environmental protection

- ◆ Comply with all applicable laws and regulations and international standards relating to the protection and preservation of the environment.
- ◆ Commit to continuous improvements of environmental protection.
- ◆ Use or set up a reasonable environmental management system.

Supply chain

Undertake reasonable efforts to encourage your own suppliers and sub-contractors to comply with the principles of this Supplier Code of Conduct.

Compliance with this Code of Conduct – Improvements

- ◆ **Auditing and Monitoring**
In order to evaluate compliance with this CoC, Wilfa may conduct on-site audit of suppliers and their production sites. We reserve the right to monitor compliance with this CoC by inspections, conducted by assessment evaluations of their own business based on this CoC.
- ◆ **Non-compliance – Corrective actions – Termination of the contract**
This CoC sets the standard expected to be met by all our suppliers throughout the value chain. If the requirements in this CoC are not met by a supplier, the parties will discuss corrective actions through an open dialogue. The supplier shall do its utmost to implement corrective actions as soon as possible, and it shall inform Wilfa about any such actions.
- ◆ **Evaluation and Improvement**
Wilfa expects that the suppliers continuously and systematically evaluate their compliance with this CoC. We furthermore expect that improvement measures, whenever needed, are implemented by the suppliers. Wilfa will also continuously evaluate and, if needed, improve our own policies and purchasing practices in order to facilitate the suppliers' and their sub-suppliers' compliance with this CoC.