

From: Management WAGNER Group  
To: All employees

10 October 2022

Dear Colleagues,

Fair and ethical practices are essential for good business. The following principles are intended to ensure that our company is managed in an ethical, socially responsible and sustainable manner in all its areas.

### **Principles**

WAGNER requires all employees on every level to comply with the highest standards of business and personal ethics in the exercise of their duties and responsibilities. In this way, we aim to protect and support our good reputation.

It is the responsibility of every single group company and all employees to live by these principles and to make them visible in day-to-day business conduct.

The following principles form the general framework of our business conduct:


- We respect the basic rights of all people worldwide. In particular, we do not tolerate any discrimination based on skin colour or ethnic background, gender, religion or world view, political affiliation, disability, age or sexual identity. Sexual harassment and bullying of employees by superiors or colleagues will not be tolerated. Appropriate reporting channels are available to affected individuals.
- We respect the law and the ethical and moral standards on which it is based. We therefore reject all forms of corporate crime.
- We work to supply our customers with excellent products and services. We run our company with decency and treat our customers and suppliers fairly. We do not tolerate any form of corruption or bribery.
- We support free and fair competition: we therefore do not make any formal or informal agreements with our competitors that aim at or bring about undue impediment to competition. We do not grant public officials or business partners any inappropriate advantages, nor do we accept any either. We want to impress the market, above all through innovation and the quality of our products.
- We treat our employees justly and with respect. We mutually challenge ourselves to achieve high levels of business performance and we reward achievement. We offer a safe working environment. We recognise employee rights and work constructively with employee representatives.
- We acknowledge our responsibility for protecting health and the environment. We deal conscientiously with raw materials.
- We make a positive contribution in the communities we work in.

- We keep proper accounts and report financial information punctually and honestly. Business information, copyright information (e.g., technical data) and customer data are protected and handled confidentially. We adhere to all tax regulations for national and international transactions and comply with the Money Laundering Act requirements.
- We act in the company's best interests. We internally disclose all matters that could represent a conflict of interest and resolve these issues. The same applies with regard to a close personal relationship between a superior and a direct employee or other familiar or close personal relationships between persons who are in a direct or indirect superior or subordinate relationship. Also in instances in which an actual, possible or seeming conflict of interest can arise, the affected persons are required to report these to the respective manager/management or HR, so that the cases can be checked and any necessary measures taken to remedy the conflict of interest.
- We never accept any gifts that exceed a symbolic value. The acceptance of occasional gifts of low value must be agreed with the respective line manager. Invitations must not exceed the customary and appropriate limits.
- We protect the company's assets and ensure that they are used only within the company and for the company.
- Development results must always be protected. We comply with our legal duties to confidentiality as well as our contractual obligations to the partner.
- The statutory national/international regulations for data protection are also to be complied with as well as the respective company regulations on information technology and data processing.
- We have implemented an IT-based whistle-blower procedure that is to be used to report violations of this code of conduct in implementation of the EU Whistle-blower directive.

### We listen

The company operates an "open door" policy and encourages all employees to share their questions, concerns and complaints regarding the principles of business conduct. In principle, the employees should contact the management of the company locally. In situations where this is inappropriate, or if the response is unsatisfactory, the employees are requested to contact a member of the management, the head of HR of the WAGNER Group, the head of Internal Audit or the Works Council. Such contact may also take place anonymously via the compliance reporting system on the Wagner website. The reporting system is available to both internal and external whistle-blowers. All concerns raised will be dealt with in absolute confidence and the doubts expressed will not result in adverse treatment.

Kind regards,

A handwritten signature in black ink, appearing to read "Bruno Niemeyer".

Dr Bruno Niemeyer  
CEO WAGNER GROUP

A handwritten signature in black ink, appearing to read "Guido Bergman".

CEO Decorative Finishing  
WAGNER Group

A handwritten signature in black ink, appearing to read "Michael Müller".

Michael Müller  
CEO Industrial Solutions  
WAGNER Group



**Declaration of consent**

As an employee, I confirm that I have received this code of conduct of the Wagner Group in full and have read it in its entirety. I agree with the points mentioned and undertake to fulfil the requirements and abide by the principles.

As a business partner, I confirm that I will abide by this code of conduct of the Wagner Group or a comparable code of conduct in my business contacts with the Wagner Group, and that I will also require my employees and suppliers to abide by it.

\_\_\_\_\_  
Place, date

\_\_\_\_\_  
Company name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Full name(s) in block letters

\_\_\_\_\_  
Title/function designation(s)