

RESPONSIBILITY FOR HUMAN BEINGS AND ENVIRONMENT

CODE OF CONDUCT FOR BUSINESS PARTNERS

As medium-sized companies, Wurm GmbH & Co. KG Elektronische Systeme, Wurm Beteiligungs GmbH, Wurm EMS GmbH & Co. KG, Wurm Schaltanlagenbau GmbH & Co. KG and GTM Gebäudetechnik Management GmbH (in the following “Wurm“) take their responsibility for society and environment very seriously. Sustainability is our aim. As a consequence, we set highest standards for compliance with environmental and ethical principles as well as legal and normative guidelines for our entire business.

Considering increasingly complex structures in the flow of goods, it is essential to also oblige our business partners to a behavior that respects and fosters sustainability.

As a business partner of Wurm, you agree to comply with the following basic principles:

Basic rights of employees and standards for working conditions

- Discrimination at the workplace because of different cultural, ethical and religious backgrounds, age, handicaps, colour of skin, sexual identity, gender and philosophies of life, has to be prevented. An equal treatment must be promoted and supported.
- Inacceptable conduct towards employees (including gestures, language and physical contacts), such as sexual harassment, exerting pressure, threatening, abuse or exploitation must not be tolerated.
- The personal dignity, private sphere and personal rights of each single person have to be respected.
- Employees have to be paid adequate wages in accordance with all laws and current regulations, in particular with regard to the statutory minimum wage as regulated in the minimum wage law (MiloG).
- Working places and working conditions always ensure that the health of employees is protected and any possible dangers are prevented by security measures.
- It must be ensured that all employees are informed about work safety and that they are trained to apply corresponding protective measures. Therefore an adequate work safety management system has to be set up and applied.
- Regular working time must not exceed the hours allowed by the legislators. Employers are not allowed to recruit anybody against his will (forced labour). Child labour must not be tolerated. The legal regulations of the respective states have to be strictly observed.

Business ethics and compliance with legal requirements

Our business partners agree to exercise their business activities in an ethically correct manner and in full compliance with laws, rules and regulations of the relevant legal system. In particular, you must:

- prohibit and not practice any kind of corruption, blackmail and bribery. It is expected that neither payments, gifts, entertaining nor other benefits that disregard current anti-corruption laws will be accepted.
- abide by competition rules and anti-trust-law.
- comply with international trade and export control regulations.
- minimise security threats caused by terrorism, criminality and natural disasters.
- protect all sensitive information of the business relationship in an adequate manner and use this information only within the scope of order fulfilment. Current data protection laws must be obeyed.
- respect any industrial property rights and copyright as well as intellectual property of any third party, including Wurm.

- feel obliged to make contracts in accordance with all legally required social security schemes and other relevant insurances.
- ensure that all delivered components have been produced with conflict-free raw materials. The use of raw materials coming from illegal sources that may contribute to the financing of armed conflicts has to be strictly avoided.
- avoid possible conflicts of interests and communicate any circumstances that may lead to such to us immediately.

Environment and substance prohibition

The protection of the environment and a responsible use of natural resources are of paramount importance for the entrepreneurial activities of the Wurm Group. Business partners comply with the necessity to consider this in their own processes at all their business locations and follow respective current national and international guidelines and regulations. This comprises (among others) the following aspects:

- The business partner has to ensure that he and his sub-suppliers only deliver and process components that comply with the RoHS directive 2011/65/ EU respectively with its valid version and that they are suitable for RoHS-conform production processes. The business partner is obliged to document the conformity on all order documents and accompanying documents.
- The business partner knows his duties respecting the European chemicals legislation and has taken all measures resulting from the REACH chemicals regulation (EU) 1907/2006 respectively the valid version for the (EC) No 1907/2006 on the registration, evaluation, authorisation and restriction of chemicals. On demand, he has to provide a proof.
- The business partner also complies with the EU directive 2012/19/EC or the current WEEE on dealing with waste of electrical and electronic equipment.

Quality requirements

We expect from our business partners that the quality of their business processes is guaranteed. Quality assurance should be guaranteed according to DIN EN ISO 9001. The corresponding procedures should be regularly checked and adapted if necessary. Wurm reserves the right to demand a written proof for quality assurance.

Compliance and enforcement of the legal regulations

Our business partners are obliged to respect all laws in national and international legal systems they do business in. They also have to impose a corresponding obligation on their own business partners along the supply chain to comply with the principles of our code of conduct.

This regulation in this document is valid from the date of delivery as a basis for the business relationship and is part of any contract and any agreement with the business partner. Business partners are expected to take notice of the document and follow its rules in all respects. We reserve the right to demand evidence as permitted by law.

Wurm has the right to terminate all contracts with the business partner at his own expenses if he violates the principles of this code of conduct. Wurm reserves the right to adapt the code of conduct for his business partners in case of updates of the guidelines and directives mentioned above.



Dr. Horst-Peter Wurm (CEO)

Business partner