

# Code of Conduct

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Standards of conduct



# wanzl

INNOVATION  
MADE BY WANZL

CREATIVE CENTER  
**wanzl**

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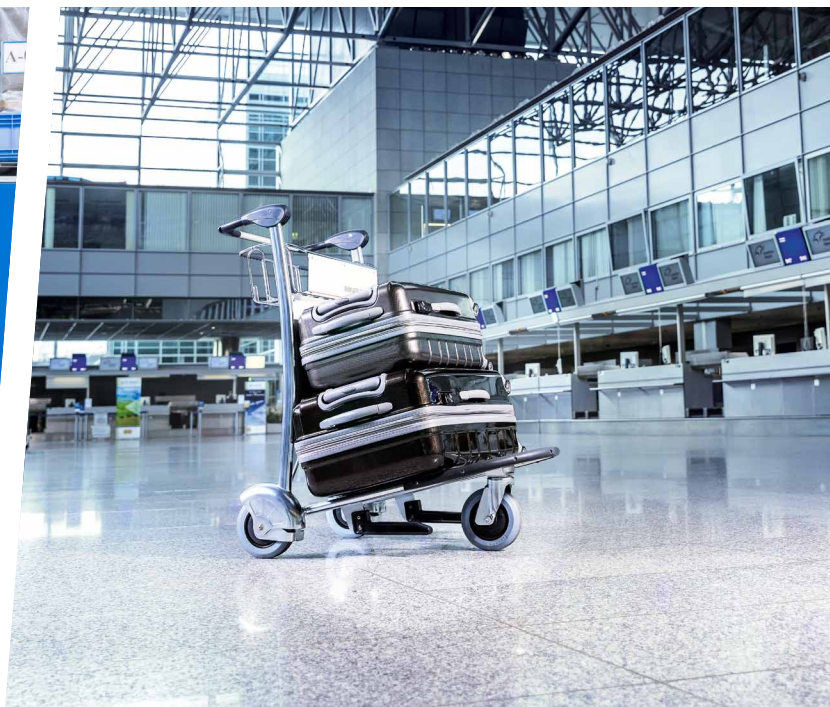
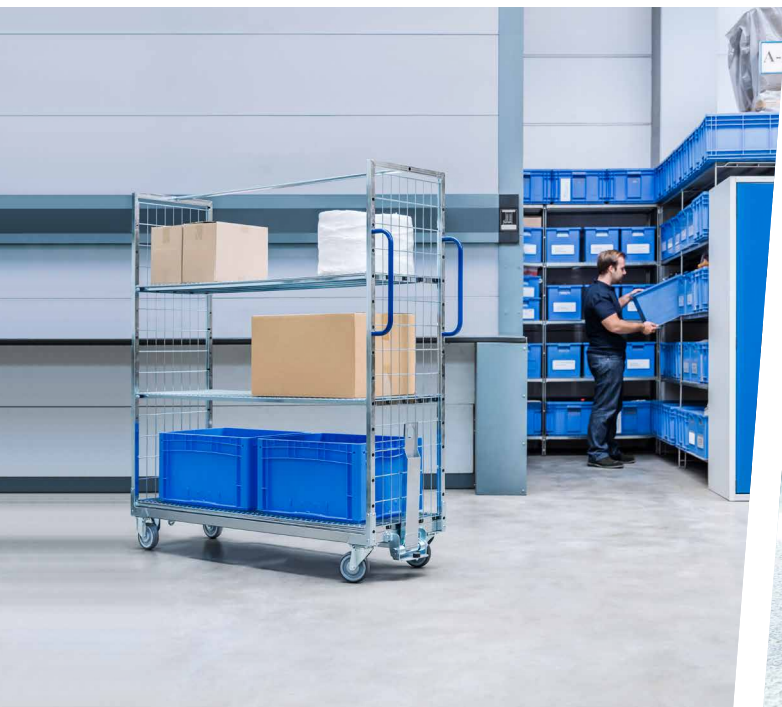
# Code of Conduct

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# Foreword

## Dear Colleagues,

With its Retail, Material Handling, Airport, Access Solutions and Hotel Service divisions, Wanzl is now a global leader, setting benchmarks worldwide with a constant stream of groundbreaking new developments.

Since its foundation in 1947, the sustained success of our company has been based on the prevailing values of dynamism, reliability and progress. As a high-performance, value-driven family business, we set ourselves high standards.

Responsibility towards employees, customers, business partners, the environment and society is Wanzl's philosophy and is inseparable from its corporate identity. It is this reliability that has made Wanzl a global leader and partner for international customers and business partners for decades.

By joining the UN Global Compact and recognising and promoting its core principles on human rights, labour standards, environmental protection and anti-corruption, we are reinforcing this vision in a sustainable way.

The following Code of Conduct is intended to help you navigate a business environment that has become increasingly complex in recent years. This Code of Conduct applies to all sites and companies within the Wanzl Group in Germany and abroad. It sets out our basic principles and provides a framework for how we will continue to operate successfully in the future. These principles represent our professionalism, our sense of responsibility and our high standards of personal conduct. By complying with legal requirements, regulatory standards and other ethical standards and criteria set out by the company itself, we want to prevent damage to Wanzl and our employees, customers and business partners (compliance).

With your help, Wanzl will maintain its excellent reputation and continue to earn the respect of our customers, business partners and the society in which we live and work.

Please read the following Code of Conduct carefully and sign it to confirm that you have read it. Please do not underestimate the importance of the Code of Conduct in your daily work.

The Compliance Officer will be happy to answer any questions you may have about the topics covered in this document. We ask you to make the values in the Code of Conduct a key part of your daily working life.

The Wanzl management team

**OLIVER WEIRAUCH**  
Chief Executive Officer

**PETER ALLAART**  
Chief Operating Officer

**ALEXANDER KIENLE**  
Chief Financial Officer

**BERNHARD RENZHOFFER**  
Chief Sales Officer

**ANDREAS STARZMANN**  
Chief Technology Officer

# 01 Our standards of conduct

## ■ Compliance with applicable laws is a fundamental principle of our conduct.

All employees and legal representatives (hereinafter referred to collectively as “employees”) of the Wanzl Group (hereinafter referred to as “Wanzl”) must comply with the legal regulations in force in the countries in which they operate. This Code of Conduct applies throughout the Group and around the world. Where national legislation is more restrictive than Wanzl’s internal regulations, national law shall take precedence. Foreign subsidiaries may add country-specific policies as long as they are consistent with this Code of Conduct.

Legal violations must be avoided under all circumstances, even if this results in economic disadvantages or difficulties for Wanzl or the employee. Every employee must expect disciplinary consequences for breaching the obligations of their employment contract, regardless of the sanctions provided for by law.

Wanzl’s conduct in competition is characterised by integrity. Corruption and antitrust violations are not a way for us to win contracts and are not tolerated. Violations will result in sanctions against those involved. In such cases, we prefer not to do business and prioritise meeting internal objectives over breaking the law.

In addition to applicable laws, Resolution 217 A (III) of the United Nations General Assembly of 10 December 1948 (Universal Declaration of Human Rights), the ETI Base Code, the UN Global Compact Principles and the ILO Core Labour Standards provide us with a minimum framework for responsible conduct.

Specific rules and regulations for individual situations and incidents in the professional environment are set out in relevant Group policies, manuals, process descriptions and other such internal documents. These internal specifications are valid and binding for all Wanzl employees worldwide.

In the course of their daily work, any employee may encounter a situation that raises moral, legal or ethical issues. In this case, the following questions can help you to make a decision:

- Is the decision in line with our company’s principles?
- Am I certain that the decision is legal and does not violate any legal requirements?
- Am I certain that my decision is morally, legally and ethically correct - in the interests of the company, but also in accordance with my personal standards?
- How would I feel if negative reports concerning my decision were to be made public tomorrow?

If, after answering these questions, you are still unsure about what to do, let your manager know and they will help you decide how to proceed.



### Sources

Principles 1 - 10 of the UN Global Compact  
 Principles 1 - 9 of the ETI Base Code  
 ILO Core Labour Standards No. 87, 98, 29, 100, 105, 111, 138, 183  
 Wanzl Group Corruption Prevention Policy  
 Wanzl Group Donations Policy  
 Wanzl Group Sponsorship Policy



## 02 Antitrust law, business partners and competition

■ **To avoid any suspicion of antitrust violations**, all employees are strictly prohibited from

- sharing information with competitors about prices, sales strategies, margins or similar information, particularly with a view to encouraging the competitor to behave in a similar manner,
- entering into agreements with competitors that include non-compete agreements, restricting business relationships with suppliers, submitting sham bids in response to a solicitation, or allocating customers, markets, territories or production programmes, or
- improperly influencing retailers' resale prices or attempting to restrict the export or import of Wanzl products by retailers.

Internal review and approval processes must be completed before contracts are signed with business partners and customers. Before commissioning external companies, their qualifications, reputation and creditworthiness at the very least must be reviewed. Transparency regarding concluded contracts as well as the beneficial owners of business partners and payment recipients must also be established prior to entering into a contract. If there is a reasonable suspicion that a business partner may use unfair means, in particular corruption, a contract should not be concluded.

Wanzl follows the rules of fair competition. In particular, employees must not obtain competitively sensitive information through illegal means or knowingly disseminate false information about competitors.



### Sources

Principle 10 of the UN Global Compact  
Wanzl Group Corruption Prevention Policy

## 03 Gifts, hospitality and social commitment

■ **No employee may offer, promise, grant or authorise the granting of any unlawful advantage, directly or indirectly (e.g. through consultants), to any official, representative or employee of any government or other public body, state-owned enterprise, political party or public international or supranational organisation (hereinafter referred to as "Official") in connection with business activities.** The same applies to unlawful advantages given to individuals in the private sector if this could be perceived as being intended to influence business decisions. Any appearance of dishonesty or impropriety must be avoided.

At Wanzl, the focus of gift-giving is on what the gift symbolises; the material value of the gifts must be low level for the person receiving them. Cash, vouchers and similar gifts are always prohibited.

No employee may use their professional position to request, accept, obtain or receive a promise of personal benefits.

The aforementioned restrictions do not apply to symbolic gifts of nominal value and invitations to business meals and entertainment that are appropriate in accordance with local custom and permitted by applicable law.

When entertaining business partners, commensurability must be ensured at all times. It is forbidden to hold or participate in events that are detrimental to Wanzl's reputation.

Donations are made exclusively for charitable, social, humanitarian, cultural and scientific purposes. Political parties and private individuals are excluded from receiving donations. Promotional sponsorship and business-related memberships in organisations are not considered to be donations. Specific regulations on donations, sponsorship and membership contributions are set out in the Donations Policy and the Sponsorship Policy.



### Sources

Principle 10 of the UN Global Compact  
Wanzl Group Corruption Prevention Policy  
Wanzl Group Donations Policy  
Wanzl Group Sponsorship Policy



## 04 Sustainability, environmental protection and company property

■ **Sustainable environmental and climate protection, and resource efficiency** are also important corporate goals for Wanzl. When developing new products and services – as well as in the operation of production facilities – it is important to ensure that the resulting impact on the environment and climate is kept to an absolute minimum. It is also important to make sure that the products themselves make a positive contribution to our customers' environmental and climate protection efforts. Every employee is responsible for protecting natural resources and contributing to the protection of the environment and climate through their individual behaviour.

Wanzl will introduce or support further initiatives to promote environmental awareness and sustainable development. Examples include reducing the carbon footprint through sustainable energy generation and conservation, waste prevention and recycling, and the responsible use of water resources.

Company property and resources must be used appropriately and exclusively for company purposes and must be protected from loss, theft and misuse. The intellectual property of our company, such as design documents, drawings, parts lists and calculations, represents a competitive advantage for Wanzl, i.e. an asset that must be protected against unauthorised access by third parties.



### Sources

Principles 7, 8, 9 of the UN Global Compact  
Employment contracts  
Internal policies

## 05 Employees

■ **The health and safety of our employees at their place of work** is an essential goal for Wanzl. Occupational health and safety, fire safety and health protection are an integral part of all operational processes and are incorporated into the planning phase of a project. (2)

Each manager is responsible for the employees entrusted to them. They must be recognised for their exemplary personal conduct, performance, openness and social skills.

A manager must give their employees as much personal responsibility and freedom to act as possible, while making it clear that compliance with laws and internal policies is a top priority under all circumstances and at all times. However, a manager's responsibility does not release employees from their own responsibility.

Conflicts of interest with private matters, other business or other activities, including those of an employee's relatives or other related persons or organisations, must be avoided at the earliest possible stage. Conflicts of interest must be reported to Wanzl immediately. (1)

No employee may award, or cause to be awarded, a contract to a family member or close personal friend without the prior written approval of the responsible manager. (1)

No employee may engage in any activity that is in competition with Wanzl, in particular secondary or primary employment on a self-employed or employed basis. This also applies to investments in companies that are in competition with Wanzl.

However, employees are permitted to own shares in the context of private wealth management up to a maximum of 3%, a stake that does not entitle them to exercise influence over management. The responsible manager must be notified prior to the commencement of paid ancillary work and must give prior written approval.

For Wanzl, a close and trusting working relationship with employee representatives is a key component and a proven cornerstone of company policy. Mutual trust and fair cooperation are based on open and constructive dialogue characterised by mutual respect. (1) (2) (3)

Honesty, mutual respect, trusting cooperation and complementary approaches to communication are of great importance to Wanzl's corporate culture. Wanzl promotes equal opportunities and does not tolerate discrimination within the company on the basis of gender, age, skin colour, ethnic origin, sexual identity, disability, religion or belief. (1) (2) (3)

Wanzl respects human rights in accordance with Resolution 217 A (III) of the General Assembly of the United Nations of 10 December 1948 (General Declaration of Human Rights) and supports their observance. Wanzl strictly rejects all forms of forced labour and child labour - including at suppliers. Remuneration and other benefits are fair and comply at the very least with the applicable legal and individual and collective labour law requirements, in particular with regard to minimum wages, working time restrictions and occupational health and safety regulations. (1) (2) (3)

The market success of our products and services is inextricably linked to their quality. This requirement places high demands on all employees in terms of creativity, skill and care, and demonstrates our personal standards to our customers and third parties. We see quality as a dynamic process of continuous improvement of our products and services.



### Sources

(1) Principles 1, 2, 3, 4, 5, 6 of the UN Global Compact

(2) Principles 1 - 9 of the ETI Base Code

(3) ILO Core Labour Standards 29, 87, 98, 100, 105, 111, 138, 182

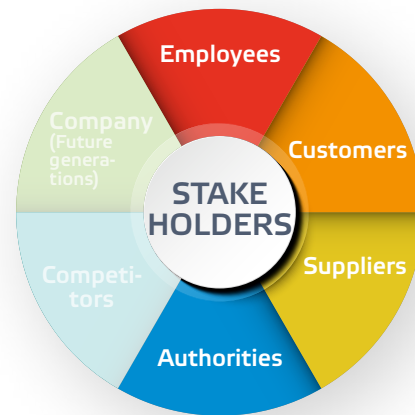
## 06 Foreign trade and money laundering prevention

■ **All employees involved in the import and export of goods, services or technology** are required to comply with all applicable economic sanctions, export control and import laws and regulations.

Wanzl is not involved in money laundering activities. Every employee is required to report unusual financial transactions, particularly those involving cash, in accordance with the requirements of this Code of Conduct.

### Sources

Principle 10 of the UN Global Compact



## 07 Reporting, communication and data protection

■ **Wanzl values open and truthful reporting and communication** of the company's business processes to employees, customers, business partners and government institutions. Every employee must ensure that reports, records and other Wanzl documents comply with applicable laws and standards and are therefore always complete, accurate, timely and systematic. Generally accepted accounting principles (GAAP) must be complied with. Declarations for the collection of duties, fees, taxes, contributions, etc. are made to the best of our knowledge and belief and are correct and complete. Any payments due to the relevant bodies as a result of such declarations must be made in full and on time.

The duty to uphold confidentiality applies to internal confidential or proprietary information as well as Wanzl's company and trade secrets. Non-public information provided by suppliers, customers, employees, consultants and other third parties must also be protected in accordance with legal and contractual requirements. The same applies to information about them. The obligation to maintain confidentiality shall apply beyond the end of the employment relationship. Personal data may only be collected, processed or used insofar as this is necessary for lawful purposes.

Every employee should be aware that they can also be perceived as part of and a representative of their company in the private sphere and is therefore required to protect Wanzl's reputation through their conduct and appearance in the public domain, especially with regard to the media.



### Sources

Internal organisational guidelines

## 08 Receipt of complaints and further information

### ■ Whistleblower system at Wanzl

All employees and business partners are requested to report violations of the Wanzl Code of Conduct by telephone, in writing or via our electronic reporting portal. The Wanzl Group has appointed independent ombudspersons (intermediaries) from the auditing firm BDO for this purpose.

You can find out who the ombudspersons are and how to reach them online at: [www.wanzl.com/Compliance](http://www.wanzl.com/Compliance).

Alternatively, whistleblowers can, of course, also contact their supervisor, the HR department or the Compliance Officer directly.

Any report can be made on a named or anonymous basis. All information supplied shall be treated confidentially within the framework of the statutory provisions. Whistleblowers must not experience any unjustified disadvantages as a result of their tip-off.

### ■ Additional questions about compliance at Wanzl

If you have any questions about this Code of Conduct, or if you are unsure about the correct course of action in a particular case, please contact us:

Michael Glogger, Compliance Officer

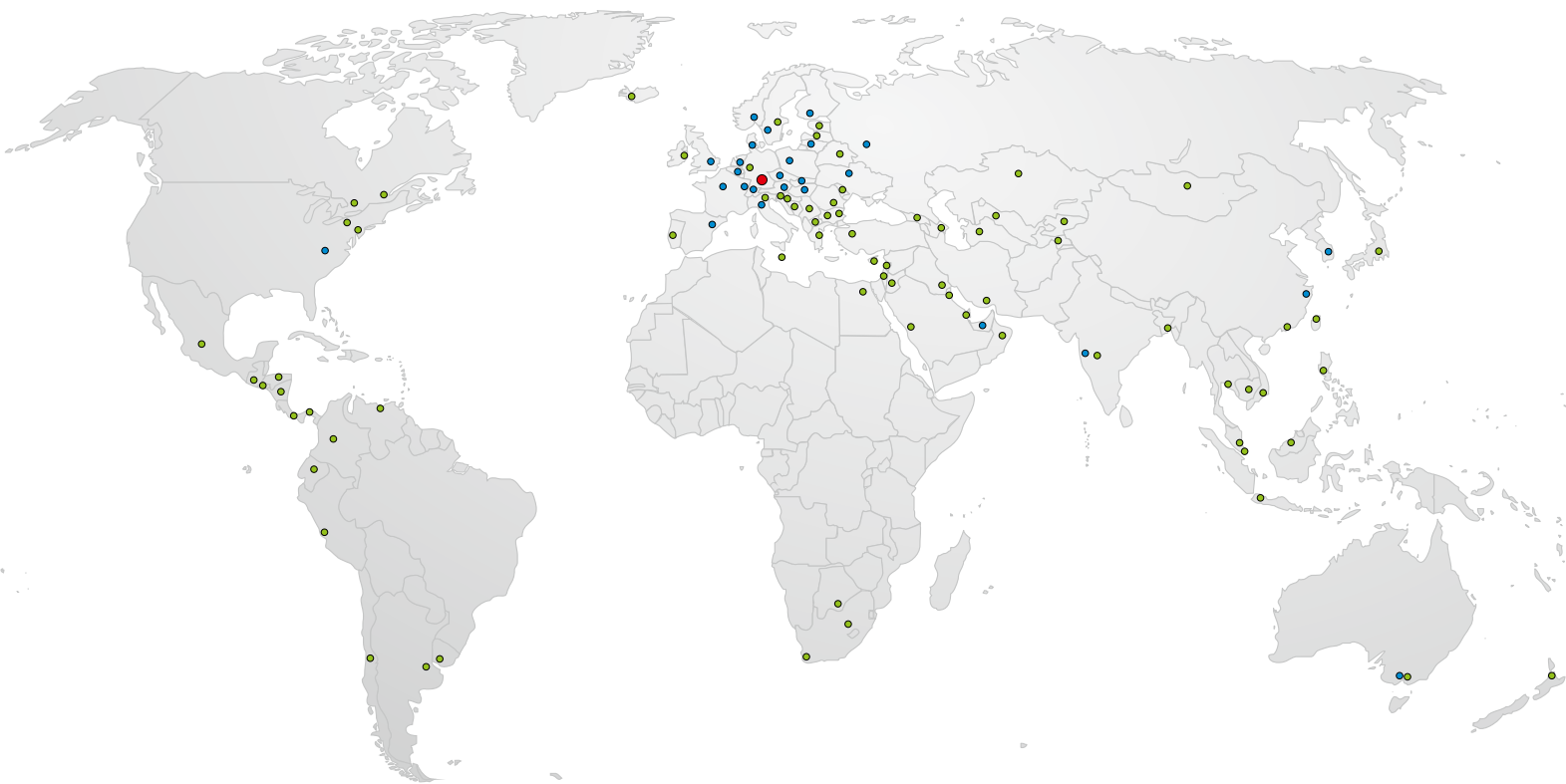
Wanzl GmbH & Co. Holding KG  
Rudolf-Wanzl-Str. 4  
89340 Leipheim  
Germany

[compliance@wanzl.com](mailto:compliance@wanzl.com)  
+49 8221 / 729-6777

*This Code of Conduct is reviewed at least once a year and updated as necessary.*







## Wanzl worldwide

- Head Office
- Subsidiaries
- Partners



**GERMANY**  
**Wanzl GmbH & Co. Holding KG**  
**Rudolf-Wanzl-Straße 4**  
**89340 Leipheim**