

# WWK SUPPLIER CODE OF CONDUCT

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## Prologue

WWK is committed to an environmentally and socially responsible corporate management.

The trust of our customers and business partners is therefore a crucial requirement for the success of our company.

This trust conditions legally correct and responsible behavior.

For WWK, it is a matter of course, not only to comply with legal regulations, internal and external guidelines and work instructions, but also to adhere to voluntary commitments, values and norms - as part of our corporate culture.

In line with sustainability, we fully support the Act on Corporate Due Diligence Obligations in Supply Chains. Against this background, the WWK Supplier Code of Conduct has been formulated.

It establishes the binding framework within we operate our successful relationships with our business partners.

We expect all our business partners to comply with the following principles. These principles are an essential part of our supplier selection and evaluation process. We strive to continuously optimize our corporate policies, our products and our services in terms of sustainability and encourage our suppliers to contribute to this with a holistic approach.

By signing, you confirm compliance with these requirements.

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<sup>1</sup> The abbreviation "WWK" refers to WWK Lebensversicherung a. G. as the parent company, including all companies in which WWK Lebensversicherung a. G. holds, directly or indirectly, a majority stake.

<sup>2</sup> Personal and functional designations apply equally to all genders.

## 1. Regulations

The WWK Supplier Code of Conduct is based on national laws (e.g. Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtgesetz LkSG)) and regulations, as well as international agreements such as:

- Universal Declaration of Human Rights
- Guidelines on Children's Rights and Business Principles
- UN Guiding Principles on Business and Human Rights
- Eight Core Labour Standards of the International Labour Organization (ILO)
- Minamata Convention (International agreements related to mercury)
- Stockholm Convention on Persistent Organic Pollutants (certain chemicals)
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal

In the event of changes to the LkSG, the addition of stricter binding European regulations, or previously overlooked risks, WWK is entitled to amend this Supplier Code of Conduct. The current version of the Supplier Code of Conduct will be promptly communicated to the business partner. To the extent that it is not unreasonable for them, the business partner is obligated to agree to these changes.

## 2. Obligations

The business partner undertakes to comply with the following values and principles and strives towards their compliance by its suppliers.

### 2.1 Social Responsibility

We expect the business partner to all nationally and internationally recognized human rights, particularly ensuring compliance with the following points:

#### **Prohibition of Forced Labor and Child Labor**

WWK does not accept slavery, servitude, forced labor, debt bondage, or involuntary prison labor and trafficking in any form within our supply chain. Child labor is not tolerated. The definition of child labor is based on the guidelines of the International Labour Organization (ILO).

#### **Fair Remuneration**

Remuneration must be paid regularly, punctually, and in full accordance with applicable laws to employees and be in line with local laws on remuneration, at least meeting minimum wage laws.

#### **Fair Working Conditions**

The applicable local laws and regulations set by the International Labour Organization (ILO) regarding working hours must be adhered to. Adequate break times must be ensured. Physical punishment, the threat of physical violence, sexual or other forms of harassment, and intimidation are prohibited.

#### **Equal Treatment and Inclusion**

Equal opportunities and equal treatment of employees are promoted by the supplier, and discrimination in any form is strictly rejected. Efforts should be made to provide an inclusive and supportive work environment by valuing diversity in the selection of employees.

### **Occupational Health and Safety**

The supplier is responsible for providing a safe and healthy working environment. By establishing and implementing appropriate occupational safety systems, necessary precautions are taken against accidents and health hazards that may arise in connection with the labour. The supplier ensures physical and mental strain is adequate and protects its employees.

### **Freedom of Association**

In accordance with local laws, the right of employees to freely associate, organize, appoint employee representatives, and collectively bargain must be respected.

## **2.2 Environmental Responsibility**

We expect the business partner to act in accordance with environmental regulations in order to protect the foundations of life.

### **Consumption of Natural Resources and Environmental Protection**

WWK expects natural resources to be used sparingly and preserved as much as possible. Applicable laws and regulations regarding the prohibition and restriction of certain substances in production must be strictly observed, and labeling for recycling and disposal must be carried out. Self-caused negative impacts on the environment and climate must be identified and stopped as quickly as possible.

### **Environmental Management**

WWK expects compliance with the applicable local environmental laws, regulations, and standards. Environmental burdens and hazards should be minimized, and environmental protection should be established and improved in daily business operations. Upon request, appropriate evidence and reporting should be provided.

## **2.3 Ethical Business Conduct**

We expect all business decisions and actions to comply with the applicable law and not engage in any criminal activities.

### **Fair Competition**

The supplier complies with applicable competition and antitrust laws.

### **Confidentiality/Data Protection**

The supplier must comply with all relevant legal requirements for data protection and information security when collecting, storing, processing, transmitting, and disclosing personal information.

### **Intellectual Property**

Intellectual property rights are to be respected. Technology and know-how transfers must be carried out in a way that protects intellectual property rights and customer information.

### **Integrity/Bribery, Corruption, Extortion, Advantage-taking**

The highest integrity standards are to be applied to all business activities. The supplier must maintain a zero-tolerance policy for all forms of bribery, corruption, extortion, and embezzlement.

## **3. Implementation and Compliance with Requirements**

We expect compliance with the WWK Supplier Code of Conduct to be ensured through appropriate measures.

### **Transparency**

All employees and subcontractors of the business partner must be informed about the content of this WWK Supplier Code of Conduct and regularly trained to ensure compliance with these requirements.

### **Processes**

The business partner has appropriate processes to identify risks and violations in its supply chain on the one hand. On the other hand, measures are taken to avoid violations of the WWK Supplier Code of Conduct and, if necessary, eliminate them. Violations are reported promptly to WWK.

### **Audit**

Upon request by WWK, the business partner provides information or reports from internal or external checks or audits of the criteria mentioned in this WWK Supplier Code of Conduct, while safeguarding the legitimate interests of the business partner, particularly its trade secrets.

### **Involvement of Subcontractors**

The business partner is obliged to pass on the regulations of the WWK Supplier Code of Conduct to subcontractors and its own suppliers in the same way.

### **Consequences of Violations**

In the event of noncompliance with the WWK Supplier Code of Conduct or failure to remedy violations, WWK is entitled to terminate individual or all contractual relationships with the business partner for good cause, if the business partner seriously violates any of the obligations and further cooperation is unreasonable. In the case of other violations of an obligation of the WWK Supplier Code of Conduct, WWK is entitled to terminate individual or all contractual relationships with the business partner, after the expiry of a reasonable period for the elimination of the violation, if the violation persists without remedy.

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Place/Date

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Authorized Signature (& Company stamp) of Business Partner