



# WEHRLE

## Code of Conduct



### **WEHRLE-WERK AG**

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## Introduction

We at WEHRLE-WERK AG, hereinafter referred to as WEHRLE, are a traditional company based in the town of Emmendingen in Baden. Since 1860, the company has been managed by the founding family and is now in its sixth generation of leadership. Our 'generational mindset' as a family business is our great strength. It enables WEHRLE to make long-term and sustainable decisions that not only consider our own company but also the environment and communities.

Our WEHRLE values serve as important guidelines for our behavior and interactions with each other. They define what is important and right for WEHRLE and help us make decisions and achieve goals. The values consist of: **Reliability**, **Expertise**, **Progress and growth**, **Openness and agility**, and **Sustainable family business**. As a company, WEHRLE is committed to remaining true to these values and promoting a corporate culture guided by integrity, respect, and mutual trust.

Through this policy, we aim to anchor and deepen ethical and moral standards in all aspects of our business activities. The principles and directives listed therein apply to all employees of WEHRLE-WERK AG, as well as to all individuals acting on behalf of or representing the company. We actively work to ensure that the principles of this policy are consistently observed and adhered to. Together, we share the responsibility. Each one of us is called upon to act in accordance with these principles and values, contributing to a positive corporate culture.



Our WEHRLE values

## Corporate Responsibility

### **Compliance with applicable laws**

For WEHRLE, compliance with laws and regulations is a matter of course. We consistently adhere to all applicable national and local regulations in all business matters, at all our locations, and in all the countries where we operate.

#### **We expect all our employees to ...**

- ... be aware of all applicable laws and regulations relevant to their work. This includes the responsibility to stay updated on changes regularly.
- ... adhere to the applicable laws and regulations relevant to their work and responsibilities
- ... avoid engaging in activities that violate applicable laws.

### **Ethics and integrity**

As a responsible company, WEHRLE is committed to conducting all its business in a fair and honest manner. We aim to maintain an ethically impeccable work environment guided by values such as transparency, reliability, openness, and mutual respect.

#### **We expect all our employees to ...**

- ... conduct their work at WEHRLE honestly, fairly, and transparently.
- ... take responsibility for their actions and decisions, being aware of the impact they may have on others.
- ... approach the management or a designated person in case of any doubts or inquiries regarding ethical concerns..

### **Illegal business practices**

WEHRLE strictly rejects illegal business practices. Criminal activities such as corruption, bribery, fraud, embezzlement, or any other offenses are strictly prohibited and will be disciplined through appropriate measures.

#### **We expect all our employees to ...**

- ... conduct all activities in compliance with laws and regulations, maintaining the highest standards of professionalism.
- ... immediately report any suspicion or discovery of illegal behavior to the management or a designated person. Reported suspicions will be investigated, and appropriate actions will be taken if necessary.

## **Conflict of Interest**

Conflicts of interest can arise when employees' personal interests conflict with WEHRLE's business interests. This can occur, for example, when company employees hold positions where they make decisions or provide recommendations that could have a direct or indirect impact on their personal interests or the interests of others such as family or friends. As a responsible company, it is important to us to take proactive measures to avoid such conflicts through clear guidelines and responsibilities.

### **We expect all our employees to ...**

- ... conduct their work transparently, with integrity, and in line with WEHRLE's values and objectives.
- ... ensure that their personal interests do not conflict with WEHRLE's business interests.
- ... address any existing or potential conflicts of interest openly with their superior and work together to find solutions..

## **Handling of gifts**

In the business context, various methods exist to express appreciation, such as giving gifts or inviting others to meals. It is crucial to note that the recipient should not expect any reciprocation. Therefore, business courtesies should be carefully evaluated, both when receiving and giving them to third parties. Frequent or high-value gifts pose a risk of inappropriate influence on business decisions, and every employee plays a crucial role in avoiding such conflicts.

### **We expect all our employees to ...**

- ... carefully assess whether accepting or offering a business gift is appropriate and consider its potential impact on others. Gifts should not obligate the recipient or induce pressure.
- ... immediately report to their superior or WEHRLE's management in case of inappropriate attention or suspicion.
- ... avoid accepting or sending gifts from/to business partners throughout the duration of negotiation processes.

## **Fair competition**

We strictly adhere to all applicable competition laws, both domestically and internationally. We consider fairness and openness as fundamental principles of our competitive behavior. Therefore, we avoid any agreements or schemes that could unduly influence competition.

### **We expect all our employees to ...**

- ... comply with applicable competition laws and regulations.
- ... avoid any agreements or schemes with competitors that inappropriately affect competition.
- ... respect the intellectual property rights of other companies and refrain from plagiarism or imitations violating copyright or patent laws..

### **Protection of confidential information and data**

As a company, it is our responsibility to protect the personal and confidential information of our employees, customers, suppliers, and other business partners. This means handling all entrusted information responsibly and ensuring compliance with applicable national data protection laws. We use this data only when necessary for our work and protect it from unauthorized access or misuse.

#### **We expect all employees handling confidential information to ...**

- ... handle it responsibly and carefully, using it only for legitimate purposes.
- ... be familiar with the applicable information protection laws and act in accordance with the latest, location-specific guidelines.
- ... ensure the appropriate use of this data and prevent its disclosure to unauthorized third parties.
- ... participate in the provided IT security training and implement the acquired knowledge in their work practices..

### **Protection of intellectual property**

Our success at WEHRLE is based on decades of accumulated know-how and experience, as well as the ideas and inventions resulting from it. Such intellectual property assets are of utmost value to WEHRLE's success and must be protected. We fulfill this duty by complying with legal requirements at all our company locations. Additionally, we ensure that our employees understand the importance of this protection and act accordingly.

#### **We expect all our employees to...**

- ... support us in protecting WEHRLE's intellectual property.
- ... not use WEHRLE's intellectual property without authorization or disclose it to unauthorized parties.
- ... handle the sensitive information entrusted to them with care and confidentiality, even within the company's boundaries..

## **Social Responsibility**

### **Protection of human rights**

Human rights are fundamental rights and freedoms that belong to every person in the world solely based on their humanity. WEHRLE supports the "[Universal Declaration of Human Rights](#)" adopted by the United Nations in 1948, along with the fundamental rights and freedoms outlined therein, which are meant to apply to everyone. These rights include, among others, the right to life, liberty, and security, freedom of thought and expression, the right to equality before the law, as well as the right to education and work. Through specific measures such as this code of conduct for our employees and individuals acting on behalf of WEHRLE, as well as our Supplier Code of Conduct, we

are committed to upholding these rights within and beyond our own company borders and combating abuses such as forced labor, child labor, or discrimination

### **We expect all our employees to ...**

- ... respect the universal human rights applicable to all individuals and fully implement them in their work at WEHRLE.

### **Anti-discrimination, equal opportunity, and inclusion**

We are committed to creating a fair and equal work environment based on mutual respect and appreciation. Any form of discrimination is unacceptable, both towards employees and other stakeholders such as suppliers, customers, or any other business partners. We aim to prevent and eliminate any form of discrimination. Discrimination, degradation, or unequal treatment based on gender, nationality, origin, religion, disability, age, sexual orientation, or identity is not tolerated. WEHRLE actively strives to create a discrimination-free work environment at all company locations, ensuring equal opportunities for all.

### **We expect all our employees to ...**

- ... treat all individuals they come into contact with during their work at WEHRLE with respect, fairness, and dignity.
- ... consider the needs and differences of others and respect the individuality of each person.
- ... refrain from discriminatory behavior or language towards other employees, customers, or other business partners of WEHRLE.
- ... report discriminatory behavior or related concerns promptly to their supervisor or an appropriate person, so that the incident can be investigated and solutions can be implemented.
- ... be open to constructive feedback regarding discriminatory behavior from other employees, supervisors, or other individuals.

### **Occupational health and safety**

As a responsible company, the safety and well-being of our employees are paramount to us. We understand that only a safe and healthy work environment enables employees to reach their full potential and contribute to the company's success. Occupational health and safety are ongoing processes. Therefore, we are committed to continuously improving existing standards and providing the best possible work environment for our employees.

### **We expect all our employees to ...**

- ... be familiar with and follow the relevant and current work and safety instructions applicable to their work at WEHRLE.
- ... attend and implement the mandatory safety briefings and training sessions offered by WEHRLE, applying the knowledge acquired in their daily work.

- ... handle machines, tools, transport vehicles, and all other work equipment used in their work at WEHRLE carefully, considering foreseeable risks.
- ... immediately inform the responsible person if they have potential safety concerns or risks, to report the situation..

### **Career management**

We emphasize equality and equal opportunities both during the hiring process and throughout employees' tenure at WEHRLE. Our decisions regarding hiring are solely based on qualifications and business needs. We value diversity and welcome all applications from individuals who believe they have the required skills and wish to be part of our team.

Open and transparent communication is crucial for us. Problems can only be addressed and solutions found if they are openly communicated. Through targeted measures such as regular personnel evaluation meetings, we can contribute sustainably to employee satisfaction and development.

In our training and development management, we also promote equal opportunity structures. All our employees should have the opportunity to advance professionally, continuously improving their skills and knowledge. Through our support in their professional and personal development within our vocational training and development programs, we aim to assist them on their career paths. The development of our employees not only contributes to WEHRLE's success but also enhances the personal satisfaction and career development of the employees..

### **Therefore, we encourage all WEHRLE employees to ...**

- ... engage in open and honest conversations. Particularly in cases of problems or dissatisfaction, it is important to seek constructive dialogue to find solutions together.
- ... consider possible professional training and development options for their individual situations.
- ... engage in a dialogue with their respective supervisors, jointly exploring professional opportunities while considering the specific prerequisites and business circumstances.

### **Balance between personal and professional life**

We understand the importance of our employees having a balanced work and personal life to remain motivated and productive in the long run. Through targeted measures such as flexible working hours or remote work options when feasible, we aim to ensure that employees have enough time and energy to fulfill their family or personal obligations while achieving their professional goals.

### **Social engagement**

As a long-standing family-owned company, WEHRLE is deeply committed to not only being economically successful but also taking on social responsibility. We feel a strong connection to our local community and engage in various ways to contribute. Through the WEHRLE-WERK Foundation for elderly and nursing care and support for school education, we make significant social contributions. Furthermore, we support our municipality and region through sponsorship of public events and

projects. We believe that our efforts help strengthen the community and improve the lives of our fellow citizens. WEHRLE is aware of its social responsibility and will continue to expand its corporate commitment in the future.

### Ecological Responsibility

#### **Commitment to Environmental protection**

As a company, we consider it our duty to protect the environment. Environmentally friendly and responsible business practices form the core of our actions and decisions. For instance, through our sustainable product and service portfolio, we make a significant contribution to resource efficiency and circular economy. Our entrepreneurial activities are guided by a strong awareness of ecological responsibility. We continuously strive to improve in this regard.

Sensitizing our workforce to environmental conservation is of paramount importance to us, as our success depends on the collective efforts of all. We want to ensure that all our employees have an understanding of environmental responsibility and actively participate in our initiatives..

#### **Therefore, we encourage all employees to ...**

- ... reflect on their own mobility behavior and consider more sustainable alternatives. We can all contribute by, for example, carpooling or switching to eco-friendly modes of transportation such as bicycles or trains.
- ... actively contribute to resource conservation. Through conscious actions in our daily work routines, we can significantly contribute to conserving valuable resources such as energy, materials, or water.
- ... responsibly dispose of all generated waste and follow the existing recycling system. Proper disposal allows numerous production and work materials to be reused or recycled, thereby collectively contributing to resource conservation.
- ... participate in WEHRLE's efforts and share their ideas and suggestions. As experts in their respective fields, employees can make a valuable contribution to our shared environmental responsibility. We value their involvement and look forward to innovative ideas.





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