



Code of Conduct

Woco Group

May 2026



Preliminary remarks

The key to profitable growth and success is rooted in the corporate culture of every company. In addition to the early identification of risks and opportunities, this also includes consistent compliance with laws, regulations, ethical principles and voluntary commitments. As the Woco Group, we are therefore committed to behaving with **integrity, responsibility and fairness** within our company and in our business relationships and supply chains. Every employee of Woco Group is committed to act **ethically, responsibly, sustainably** and with integrity. Shareholders, management and executives lead by examples by providing clear guidance, fostering a **culture of compliance** and consistently addressing violations.

We are committed to **diversity, inclusion and equal opportunities** across our workforce and value chain.

For this reason, we comply with the law, maintain transparent business practices with integrity and fairness, acknowledge our social and community responsibilities, and are dedicated to protecting the environment. This Code of Conduct describes the standard by which we want to be measured.

The due diligence obligations at Woco and our partners and suppliers are based on legal regulations such as the German Supply Chain Due Diligence Act (LkSG) as well as internationally recognized standards such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises, and the ILO International Labor Organization (International Labor Organization) Core Labor Standards and the principles of the UN (United Nations) Global Compact. These standards are further implemented by internal policies, procedures and contractual requirements.

In this way, Woco Group is and remains a reliable and trustworthy partner for our employees and business partners. Our Code of Conduct applies to the entire Woco Group and is also taken into account within our value chains.



“Integrity and responsibility are not optional. They are the foundation of everything we do and the key to our long-term success.”

Dr. Michael Borbe,
CEO Woco Group

Our core principles:

COLLABORATION.

CLARITY.

RESPONSIBILITY.

Together we shape a strong, successful future – defined by trust.

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1 Our social responsibility

The basis of all our business relationships is respect for and compliance with all internationally recognized human rights. We strive to contribute to the well-being and sustainable development of society within our sphere of influence and in line with applicable legal requirements. To this end, a process for ensuring human rights due diligence (e.g., a human rights due diligence process) is established. Woco Group has made a detailed commitment to this in the "Woco Group Policy Statement".



1 Our social responsibility



1.1 Human dignity

We strive to respect and protect **human dignity**, the individual **personal rights** of each member of society, and **privacy**, including **personal data**. This applies to cooperation within Woco Group as well as by and towards our business partners.

1.2 Prohibition of slavery and forced labor

We do **not** tolerate any form of **forced labor**, modern slavery or comparable practices that deprive individuals of their freedom. No one may be employed or forced to work against their will. This includes debt bondage and involuntary prison labor. All **employment** relationships are **voluntary** and can be entered into and terminated by the employee at his or her own will and in compliance with the applicable national legal requirements. Woco Group aims to ensure that labor practices align with ILO Conventions No. 29 on Forced Labor and No. 105 on the Elimination of Forced Labor. Employees are not subjected to financial burdens (e.g. withholding of wages or expenses, charging of fees in the hiring process), and their **freedom of movement** must be not restricted in any way, e.g. by withholding identification documents or the like against their will.

1.3 Prohibition of child labor

We **do not permit child labor** as defined by the ILO and the UN Convention on the Rights of the Child (CRC) and prohibit it **under all circumstances** within Woco Group and towards our direct suppliers. We actively support the global efforts to eliminate child labor. In this context, we are committed to complying with the respective state requirements and take into account the regulations of the United Nations on human and children's rights. In the absence of government regulations, we expressly agree to comply with Convention 138 of the International Labor Organization (ILO), which states that no children under the age of 15 may be employed directly or indirectly (except as provided in Articles 6 and 7 of the ILO). We are committed to **protecting young workers** under the age of 18 from working conditions that are harmful to their safety, health, development or morale. We actively support initiatives that advance children's rights and access to education and healthy development.



1 Our social responsibility



1.4 Promotion of equal opportunities and equal treatment

We promote collaborative and respectful working relationships, diversity and tolerance and therefore reject any form of discrimination. **Equal opportunities** are an important concern for us. We are therefore committed to treating all employees with respect and dignity in accordance with ILO Conventions No. 100 on Equal Remuneration and No. 111 on Discrimination in Employment and Occupation. Employees are selected, hired and promoted exclusively on the basis of their qualifications and skills. We do **not tolerate discrimination** based on origin, nationality, religion, ethnicity, gender, age, disability, marital status, union membership, political affiliation, sexual orientation or gender identity or any other personal characteristic.

1.5 Protection of freedom and expression

We attach great importance to open and free communication. That is why the right to freedom of opinion and expression is our top priority.

1.6 Protection of human rights defenders

Should actual or potential risks arise in connection with our value chain for persons defending human rights, we firmly oppose any kind of threat, intimidation, defamation or criminalization.

1.7 Protection of local communities and indigenous peoples

Woco Group seeks to respect the rights of local communities and indigenous peoples at all sites and integrates relevant requirements into its operational decision-making processes.

1.8 Employee rights

We do not tolerate exploitative working conditions and respect our employees' right to **freedom of association**, freedom of assembly, and to engage in free **collective bargaining** and wage negotiations **without** interference, discrimination, retaliation or **harassment**. Employees should **not be subjected to harsh and inhumane** treatment, including sexual harassment, sexual **abuse**, corporal punishment, mental or physical coercion or verbal abuse, or **threats** of such treatment. Where freedom of association and collective bargaining are restricted by law, we strive to find alternative ways to incorporate the principles of ILO Conventions Nos. 87 and 98 with local laws.



1 Our social responsibility



1.9 Remuneration / Working hours / Qualification

Employees should receive fair and **appropriate remuneration without discrimination**. The remuneration of our employees is based on the statutory provisions applicable at the respective location.

We comply with applicable national regulations on working hours and provide paid leave in accordance with legal requirements. Where no local regulations exist, we follow ILO standards.

All agreed employment conditions (e.g. salary, vacation, working hours, etc.) are documented in a formal agreement (e.g. employment contract, letter of engagement) in the employee's native language.

The regular qualification and further training of our employees is particularly important to us in order to meet our level of performance and quality.

1.10 Health and occupational safety

We take great importance to **safe and healthy working conditions**, which are always based on national occupational health and safety legislation. In this regard, Woco Group aims to comply with all national laws on occupational health and safety and fire protection. Working conditions and processes are reviewed in line with legal requirements and improved where reasonably necessary and feasible.

The **safety of employees** is given priority at all times.

Therefore, Woco Group implements the following measures:

- Informing employees about the identified hazards and the associated **preventive and corrective measures** for minimizing hazards in the languages relevant to employees
- Providing adequate training for employees on preventing health disorders, accidents, first aid, chemical management and fire safety
- Free provision of suitable **protective equipment** and clothing
- Implementing appropriate **fire safety systems**, such as fire alarms, extinguishers and emergency exits
- Monitoring and control of work-related health hazards and the resulting protective measures
- Labeling of chemicals used according to the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) or CLP in European countries, and
- **Storage of chemicals** according to national specifications

2 Our responsibility as a business partner

We take particular importance to a business policy that is legally compliant, has integrity, is transparent and fair. Within our technology fields, we take great importance to the following principles and also require our business partners to comply with these principles and values in their business activities.



2 Our responsibility as a business partner



2.1 Legal certainty

We **comply** with applicable **laws and regulations** and promote legal compliance throughout our organization.

2.2 Acceptance of benefits and corruption

We promote high ethical standards and **do not tolerate bribery**, extortion, or **corruption**. We do not tolerate immoral or corrupt practices and promote integrity through responsible leadership and oversight.

Monetary or other personal benefits in return for **preferential treatment** in competition and/or business dealings are prohibited.

Gifts, hospitality or other benefits may only be offered or accepted if they are **reasonable, appropriate, transparent** and do not influence – or appear to influence – business decisions.

2.3 Fair and free competition

We uphold **fair and free competition** and for this reason we comply with all relevant laws dedicated to this goal (in particular antitrust law, laws regulating unfair competition). We **do not** participate in **price fixing, market sharing** or customer, market or bid rigging. We also expect our business partners to comply with applicable competition and antitrust laws, in particular neither to enter into anti-competitive agreements with third parties nor to abuse potentially dominant market positions, and we **avoid exchanging** competitively **sensitive information** or engaging in any other conduct that could improperly influence or restrict competition.

2.4 Prevention of money laundering and prohibition of terrorist financing

We aim to comply with legal requirements on preventing money laundering and terrorist financing. This also prevents funds from being made available for terrorist crimes or to support terrorist organizations.



2 Our responsibility as a business partner



2.5 Protection of confidential information and intellectual property

We protect **confidential information** and respect **intellectual property** rights. We transfer technology and know-how in such a way that intellectual property rights, **trade secrets** and non-public information are always protected.

2.6 Privacy

We process, store and protect **personal data** in line with applicable laws, including the General Data Protection Regulation (**GDPR**).

2.7 IT Security

We maintain robust IT security measures to **protect** our systems **against** data corruption, data loss and **external attacks**.

2.8 Export control

Within the scope of our cross-border economic transactions, we strive to comply with all applicable export control regulations, including licensing requirements and sanctions lists.

2.9 Taxes and duties

We are committed to transparent and responsible tax practices and comply with all applicable tax, customs and trade regulations.

2.10 Accounting and financial reporting, disclosure of information

We protect confidential information and respect intellectual property rights. We transfer technology and know-how in such a way that intellectual property rights, trade secrets and non-public information are always protected.



2 Our responsibility as a business partner



2.11 Avoidance of conflicts of interest

We strive to ensure decisions are based solely on objective criteria, avoiding **conflicts of interest**. If conflicts arise, we **disclose** them and seek **prompt resolution**.

2.12 Product conformity and safety

We have implemented a due diligence system in which appropriate structures and processes ensure the safety and technical compliance of our products. We monitor our products in the market and respond swiftly and appropriately to any identified compliance violations.

We are committed to meeting applicable legal and regulatory requirements related to product safety and conformity and take appropriate measures to address identified risks.

3 Our responsibility for the environment

Protecting the environment for present and future generations is our fundamental concern. Woco Group is therefore certified according to the international standard ISO 14001.

In the course of our business activities, we strive to comply with applicable environmental and energy law. We take measures to prevent environmental pollution, avoid waste through appropriate waste concepts and enable the reuse and environmentally compatible disposal of our products. We aim to protect nature's finite resources. This includes continuously increasing the efficiency of resource consumption, in particular energy, water, raw (primary) materials, and minimizing environmental impacts (emissions, pollutants, waste).



3 Our responsibility for the environment



3.1 Climate protection

In order to achieve the goals of the Paris Climate Agreement, Woco Group strives to use renewable energies, efficient technologies, and environmentally friendly materials wherever possible. One of our core environmental priorities is the continuous **reduction of CO2 emissions**.

3.2 Conservation of resources and circular economy

Woco Group strives to use **efficient** and innovative technological solutions to conserve natural and technical **resources** in the procurement and production process, to use them sparingly and, if possible, to replace them with more environmentally friendly alternatives, e.g. from recycling processes, secondary or bio-based materials. In doing so, we observe the environmental due diligence requirements.

3.3 Water protection and quality

The protection of (drinking) water as the basis of all life is an important part of the Woco Group's environmental commitments. We take appropriate measures to minimize environmental impacts and manage water-related risks in line with applicable regulations.



3 Our responsibility for the environment



3.4 Handling hazardous substances and waste

Woco Group also pays special attention to preventing **potential hazards** such as water pollution, air and soil contamination, and other harmful effects by identifying, labeling, and appropriately storing and disposing of chemicals or operating materials stored or processed on Woco Group's premises or generated by the production process, and by providing appropriate training for employees. We aim to promote **proper reuse, recycling and disposal** in line with legal and contractual requirements. The following conventions are followed:

- the Minamata Convention (use of mercury),
- the Stockholm Convention (persistent organic pollutants), and
- the Basel Convention (transboundary movements of hazardous wastes and their disposal).

3.5 Biodiversity and deforestation-free supply chains

Where applicable to Woco Group, we strive to prevent illegal deforestation or conversion of natural ecosystems. If necessary, measures are taken to protect natural ecosystems as well as natural and cultural values.

3.6 Energy management and efficiency

Woco Group is striving for certification of its energy management system (ISO 50001) at its sites - where this has not already been done. The top priorities are minimizing energy waste, reducing energy consumption, and improving energy performance.

4 Continuous improvement and collective responsibility

We are aware that we can only achieve our goals by **continuously** reviewing and **improving** our practices. We **cannot** accomplish this task **alone**. Through **transparent communication** channels as well as an open-minded attitude towards all stakeholders, we create an atmosphere of **trust** that enables an open exchange of ideas and confidence.

In addition to our internal processes, which we regularly review for effectiveness, we encourage our employees and business partners to make their contribution to continuous improvement.

This includes, if potentially negative impacts on human rights are to be feared, establishing processes for ensuring human rights due diligence (e.g., a human rights due diligence process) within an appropriate period of time, and implementing systematic and appropriate due diligence measures in connection with human rights on the basis of this.

We regularly review our processes and those of our suppliers and implement preventive and corrective measures as needed. We expect our suppliers to promote these principles within their own supply chains in accordance with applicable legal requirements.

5 Whistleblower system

Every employee of Woco Group as well as every business partner - both their employees and those affected - are called upon to **report** possible cases of suspicion and **violations** of this Code of Conduct. This is intended to limit the consequences of such violations and prevent similar misconduct in the future. For this purpose, Woco Group has set up a **whistleblower system**. Reports can be submitted via our online platform, by email, phone, mail or in person. **Anonymous reporting** is possible. Our business partners inform their employees about the possibility of submitting a tip. We **prohibit retaliation** against anyone who raises concern in good faith. Reports are reviewed **confidentially, respecting presumption of innocence**. **Abuse of the system is not tolerated.**

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6 Entry into force

This Code of Conduct enters into force upon its signature by the management of Woco Group.

Bad Soden-Salmünster, May 28, 2026

Management Woco Group

A handwritten signature in blue ink, reading 'Michael Borbe', written over a horizontal line.

Dr. Michael Borbe (CEO Woco Group)

A handwritten signature in blue ink, reading 'Kolja Kress', written over a horizontal line.

Kolja Kress (CFO Woco Group)