

CODE OF CONDUCT SUPPLIER

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1 Preamble

WACK GROUP is a world’s leading group of companies in the field of hard surface cleaning with over 300 employees operating in 7 countries. We align our business activities to meet the needs of our stakeholders and the environment, offer sustainable solutions, and become the first choice as a supplier, partner and employer.

The WACK GROUP includes, in addition to the Dr. Wack Holding GmbH & Co. KG, the following subsidiaries:

Dr. Wack Holding Verwaltungsgesellschaft mbH	Ingolstadt / Germany
Dr. Wack Immobilien GmbH & Co. KG	Ingolstadt / Germany
Dr. Wack Immobilienverwaltung GmbH	Ingolstadt / Germany
Dr. O.K. Wack Chemie GmbH	Ingolstadt / Germany
ZESTRON Precision Cleaning SDN.BHD	Penang / Malaysia
ZESTRON Trading (Shanghai) Co. Ltd.	Shanghai / China
Zhe Shi Chuan Trading (Shanghai) Co. Ltd.	Shanghai / China
ZESTRON Korea Ltd.	Gyeonggi-do / Korea
ZESTRON Holdings, LLC	Manassas, VA / USA
ZESTRON Corporation	Manassas, VA / USA
ZESTRON Japan Co., Ltd.	Kanagawa / Japan

The Code of Conduct applies to all suppliers and service providers (in the following “business partners”) with whom there is a direct business relationship.

2 Responsible Business Practices

2.1 Compliance with Laws, Recognized Standards and Guidelines

All applicable national laws and relevant internationally recognized standards, guidelines and principles must be observed by the business partner. The business partner supports the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights, the UN Principles of Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the 1998 International Labor Organization on Fundamental Principles and Rights at Work in accordance with national laws and practices.

2.2 Prevention of Corruption

The WACK GROUP takes action against any kind of corruption or bribery and does not tolerate any violations. Accordingly, the business partner complies with all applicable national and international anti-corruption laws and regulations. The business partner does not offer, grant or accept money or any other advantage (whether direct or indirect) to improperly influence official actions or to obtain an improper advantage with the aim of initiating or maintaining business activity. This also applies to so-called facilitation payments or other benefits granted to public officials for routine decisions that do not allow for discretion.

2.3 Antitrust and Competition Law

The WACK GROUP expects its business partners to behave fairly in competition and to comply with applicable national and international antitrust laws and laws against unfair competition. Business partners do not participate in agreements with competitors that violate antitrust law, nor do they abuse a potentially dominant market position.

2.4 Confidentiality & Data Protection

The business partner undertakes to collect, use and otherwise process personal data (including the data of employees, business partners, customers and consumers in its sphere of influence) with reasonable care. The business partner observes the legal regulations and legal requirements with regard to data protection.

2.5 Export and Import

Business Partner hereby commits to upholding all applicable laws governing importation and exportation.

2.6 Business Continuity Planning

The business partner takes precautionary measures in the event of disruptions to its business activities (e.g. natural disasters, supply chain disruptions, pandemics, cyber-attacks). The precautionary measures include, in particular, business continuity plans to protect employees and the environment from the effects of any serious disruption to business activity.

3 Working Standards

3.1 Occupational Health and Safety

The safety, health and well-being of employees is of the utmost importance for the WACK GROUP. Therefore, the business partner must comply with the applicable national regulations and laws on occupational safety and health protection. In the course of this, the supplier must take measures - for example in the form of training courses - to continuously improve occupational safety, prevent occupational diseases and minimize health and accident risks.

3.2 Worktime

Business Partner hereby commits to ensuring its worktimes comply with respective national laws, industrial sector standards, or the relevant International Labour Organization (ILO) conventions, whichever are stricter in their protection of employees' time off work.

3.3 Wages and Social Benefits

The business partner guarantees that the remuneration of the employees is based on the applicable laws, supplemented by the relevant national minimum wage laws and on the respective national labor market. The business partner is committed to the principle of equal pay for work of equal value in accordance with the relevant ILO core labor standards, regardless of gender or other discriminatory distinctions.

3.4 Training and Qualification

Business Partner hereby commits to actively promoting and developing its employee's professional skills on all levels by means of suitable training and further education measures.

3.5 Complaints Mechanism

Business Partner hereby commits to implementing and maintaining whistleblowing and complaints mechanism for its employees.

4 People & Fundamental Rights

4.1 Human Rights

Business Partner hereby commits to upholding, supporting and monitoring compliance with internationally recognized human rights.

4.2 Approach to Child Labor

Any form of child labor is prohibited. The WACK GROUP does not employ any children and generally requires its business partners and their subcontractors to refrain from any use of child labor in accordance with the relevant ILO core labor standards or the regulations applicable in the respective country. Employees under the age of 18 will only perform work in accordance with the legal requirements of their country (e.g. with regard to working hours and conditions) of employment and subject to education and training requirements.

4.3 Approach to Forced Labor

All forms of forced and compulsory labor are prohibited. The business partner does not use any form of forced labor, including bonded labor, indentured labor, military labor, modern forms of slavery and any form of human trafficking. Work must always be done voluntarily and there must be the possibility of being able to terminate the employment relationship. Furthermore, employees must be allowed to retain control of their identity papers (e.g. passport, work permit or any other personal legal document).

4.4 Freedom of Association and Collective Bargaining Rights

The business partner respects the right of its employees to form employee representatives or trade unions or to join them or not to do so. The business partner recognizes and respects the right to collective bargaining within the framework of applicable laws. Employees are not disadvantaged or favored in any way because of their membership in an employee representative body or trade union.

4.5 Disciplinary Measures and Approach to Employees

The WACK GROUP requires Business Partner to treat its employees with dignity and respect. Sanctions, fines, other punishments or disciplinary measures may only be imposed under strict observation of applicable national and international laws and norms, as well as internationally recognized human rights.

4.6 Approach to Discrimination

The business partner promotes a working environment that enables inclusion and in which the diversity of its employees is valued. The business partner is committed to equal opportunities and does not discriminate against anyone on the basis of gender, ethnic and national origin, race, skin color, religion, age, disability, sexual orientation or identity or other legally protected characteristics, and will not tolerate such discrimination.

5 Environmental Protection

5.1 Environmental and Climate Protection

Environmental protection is an essential part of the sustainable corporate culture of the WACK GROUP. For this reason, all business partners are expected to minimize risks to the environment, use natural resources sparingly and comply with the applicable national and international laws and regulations.

We expect all business partners to take sustainable measures to protect the climate and reduce greenhouse gas emissions, e.g. by using renewable energies or by increasing energy efficiency. The WACK GROUP requires its business partners to provide relevant data on environmental and climate protection on request.

In addition, it is required that business partners minimize their water and energy consumption and the impact of their business activities on water, air and soil quality. The legal and official requirements must be observed.

5.2 Waste and Emissions

The WACK GROUP requires Business Partner to uphold the principles of environmental and climate protection, in accordance with applicable legal requirements and international standards.

Furthermore the WACK GROUP requires Business Partner to maintain procedures and systems that guarantee the safe and secure handling, transportation, storage, recycling, reuse and management of raw materials, other business materials, and waste.

5.3 Process Safety and Security

The WACK GROUP requires Business Partner to implement and maintain safety and security processes to steer and maintain the integrity of its business processes, in accordance with applicable safety and security standards.

6 Product Responsibility

6.1 Product Safety and Responsibility

Business Partner hereby commits to upholding all laws and applicable legal directives that govern its business activities. Should the WACK GROUP require it, Business Partner undertakes to provide the corresponding and current proof of its business activities' full compliance.

6.2 Conflict Materials

The WACK GROUP is committed to responsible sourcing of the materials contained in its products. Business Partner shall not supply any products or materials to the WACK GROUP that contain metallic elements whose ores and/or derivatives originate from a conflict region.

7 Implementation and Requirements

7.1 Implementation

The WACK GROUP requires Business Partner to uphold all the abovementioned principles.

7.2 Information and Communication

The WACK GROUP requires Business Partner to make the stipulations of this Code of Conduct freely accessible to all employees.

The business partner implements standards, e.g. ethical principles, for its own business partners as part of the fulfillment of their contractual obligations, which correspond to the standards in this code of conduct for suppliers.

7.3 Monitoring

The WACK GROUP reserves the right to monitor and check its business partners' compliance with the requirements of this Code as detailed above, either through, independent third parties, certifications or other forms of official assurance, or by means of topic-specific on-site audits.

7.4 Sanctions and Corrective Measures

The WACK GROUP will treat every material violation by Business Partner of the obligations, requirements and stipulations of this Code as detailed above as a contractual infringement, and as such will consider taking appropriate legal steps on a case-by-case basis.

8 Declaration of Consent

I hereby confirm full compliance with each and every requirement set out in this Code of Conduct:

Name:

Job Title:

Place, date:

Signature:

Company stamp:

Please send the completed form back by e-mail.

If you have any comments or questions about the Supplier Code of Conduct, please feel free to contact us:

Wack Group

Sustainability@wack-group.com