

Policy Statement  
Human Rights Strategy

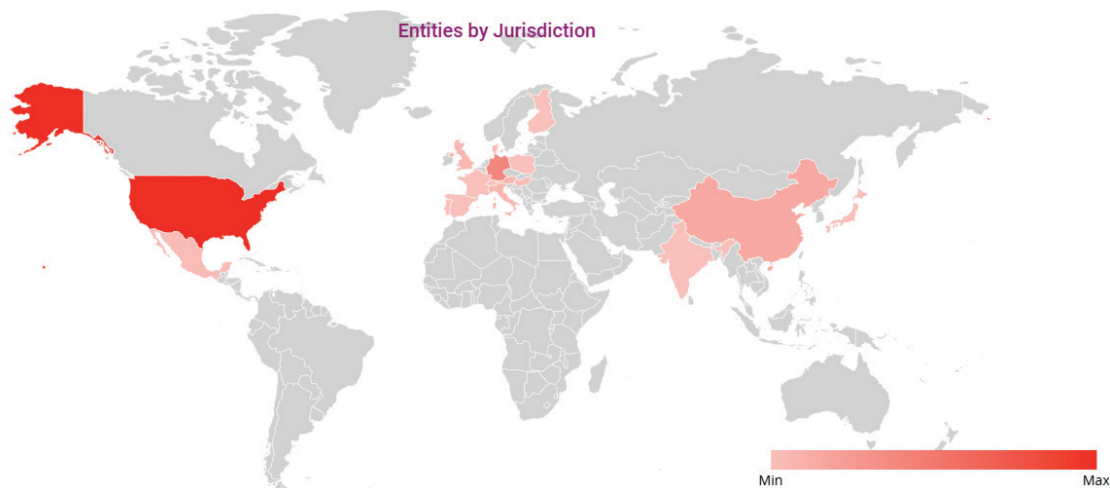
Wieland Group



# Introduction

The Wieland Group is a leading global supplier of semi-finished products and copper alloys, as well as component and system solutions. With a global network of production sites, service and sales locations, the company offers a comprehensive portfolio of products, technologies and services with over 10,000 employees at 84 locations. Wieland is strategically positioned to optimally serve customers in all important markets. With a comprehensive network in all key regions, Wieland ensures high availability of its products and services.

The global distribution of Wieland companies is shown in the following chart.



As a manufacturer of semi-finished products, we source raw materials, other goods, and services from up to 65 countries. Supplier management is the responsibility of the corporate function Global Metals Management and the corporate function Global Procurement and Logistics. Global Metals Management handles the

procurement of raw materials for the foundries and formats from approximately 1.430 suppliers. Global Procurement and Logistics purchases direct materials, logistics services, capital goods and spare parts (CapEx), services, and consumables and supplies from approximately 15.275 suppliers.

# The Wieland understanding of values

The Wieland Group fundamentally adheres to the UN Guiding Principles on Business and Human Rights, the ten principles of the UN Global Compact and the principles embodied in the provisions of the core labor standards of the International Labor Organization (ILO).

For all employees, we have anchored the resulting rules of conduct in our „Code of Conduct“ (CoC). This contains a clear position of the Wieland Group on the subject of human rights and rejects child labor, forced labor and compulsory labor. Furthermore, the CoC requires us to refrain from any form of discrimination, unlawful unequal treatment, insult or (sexual) harassment. In addition, our CoC commits us to appropriate remuneration and fair working conditions. Of course, we also comply with the applicable legal requirements.

The corresponding requirements were specified in the Human Rights and Working Conditions Policy, which came into force in August 2022 and applies throughout the Group.

We consistently pursue and punish misconduct and violations of the CoC as well as the Human Rights and Working Conditions Policy and the requirements for the protection of human rights contained therein.

To strengthen Wieland's understanding of human rights and as a central point of contact, the Senior Vice President Human Resources was also appointed as Wieland Human Rights Officer.

Of course, we also expect our business partners, suppliers and service providers to comply with the values that are firmly anchored in the Wieland culture. In particular, we expect our suppliers to pass on and actively live our requirements in their respective supply chains.

These requirements are also reflected, for example, in our General Terms and Conditions of Purchase, which form a fundamental element of our supplier contracts.

Any violations of the Supplier Code or legal regulations may have significant consequences for the Wieland Group and the joint business relationship. Therefore, in the event of violations, we reserve the right to take appropriate measures, which may include termination of the business relationship.

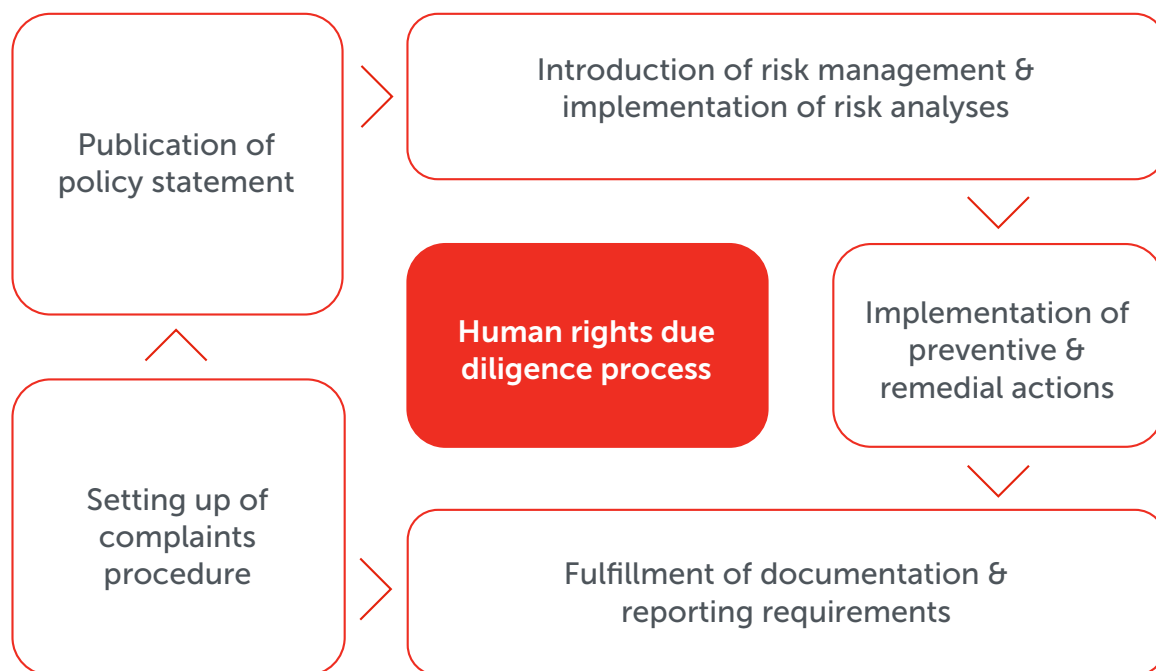
## Dealing with conflict minerals

Wieland uses tin as an alloying element in some of its materials. In addition, the surfaces of some products are tin-plated or even gold-plated. We ensure through our sources of supply that the tin and gold we use is not a conflict mineral.

Wieland strictly adheres to the EU Conflict Minerals Regulation as well as other applicable legislation regarding conflict minerals. We follow an integrated risk-based management approach based on the five steps of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High- Risk Areas (CAHRA). We expect our business partners to make comparable efforts to comply with the relevant regulations and requirements.

# The Wieland human rights due diligence process

The basic process for the fulfillment of the human rights due diligence obligation by the Wieland companies is shown in the following diagram.



As a global manufacturer of semi-finished products, we source raw materials from all over the world, including countries with different human rights standards. We are aware of our due diligence obligations, particularly with regard to human rights and working conditions, but also with regard to possible environmental impacts in these countries. A central element of fulfilling our duty of care is to implement an efficient and effective process (risk management) to identify the potential impacts of our business activities on human rights, working conditions, and environmental aspects and to prevent or mitigate these impacts in the best possible way. The basis for appropriate and effective risk management is the structured identification and assessment of human rights and environmental risks in our own business and among our direct suppliers.

We continuously evaluate and adjust our due diligence process as necessary, for example in response to

relevant legislative changes. This means that we also focus on compliance with the prohibition of child labour, the prohibition of forced labour and all forms of slavery, disregard for occupational health and safety and work-related health hazards, disregard for freedom of association and the right to collective bargaining within the framework permitted in the respective location, the prohibition of unjustified unequal treatment in employment, the prohibition of withholding adequate wages, the destruction of natural resources through environmental pollution, the unlawful violation of land rights, the prohibition of the unlawful use of private/public security forces, which, due to lack of instruction or control, the prohibition of any other action or omission in breach of duty which is directly capable of adversely affecting a protected legal position in a particularly serious manner and whose unlawfulness is obvious upon reasonable assessment of all relevant circumstances, the prohibition of the

prohibited production, use and/or disposal of mercury (in accordance with the Minamata Convention), the prohibited production and/or use of substances within the scope of the Stockholm Convention (POPs), as well as the environmentally unsound handling of waste containing POPs and the prohibited import/export of hazardous waste within the meaning of the Basel Convention.

## Risk analysis direct suppliers

A screening tool was introduced within the Wieland Group to implement the risk analysis.

As part of the basic risk assessment, the country risk and the industrial risk are evaluated. Based on this, potentially risky suppliers are subjected to an extended risk analysis which includes, among other things, relevant facts already known to the public and our potential influence. Individual measures are prioritized and derived on the basis of the specific individual risk identified in this way.

In addition, the screening tool acts as an early warning system for increased risk potentials and possible violations of human rights and environmental due diligence obligations through proactive evaluation of relevant media reports.

## Minimizing risks through preventive measures & taking remedial action

Our aim is to prevent or mitigate the identified and prioritized risks through appropriate measures and, if possible, to eliminate them completely. This is also reflected in the design of our management processes and purchasing practices. We are aware that our business partners, their experience and their quality are an essential part of our corporate success. Only in cooperation with them can we fulfill our corporate duty of care and, in addition to fair competition, make our contribution to humane working conditions and compliance with environmental obligations in the value chain. For this reason, our actions focus on dialog with suppliers and those affected, joint processing, and awareness-raising and training of relevant employees, business partners and suppliers. In the event of repeated or serious violations, however, we reserve the right to terminate business relationships. For this purpose, a corresponding decision-making committee has been established at Group, in form of the Supplier Risk Committee, which includes the Wieland Human Rights Officer among its members.

We also strive to continuously improve working conditions throughout the supply chain. We are, therefore, involved in various industry associations and initiatives.

## Establishment complaint procedure

Our employees, suppliers, business partners, and all other stakeholders, such as private individuals, have the right and the opportunity to confidentially report deficiencies or violations regarding human rights and environmental due diligence within the Wieland Group or at our suppliers and their upstream suppliers at any time via our anonymous whistleblower system.

## Reporting

In addition to the annual report on the fulfillment of the due diligence obligations enshrined in the German Supply Chain Act, we also report on current developments in Wieland governance structures and sustainable procurement in our Sustainability Report which is also available to the public at [wieland.com](https://www.wieland.com).

## Measures for the continuous improvement of the due diligence process

If a violation of a human rights-related or environmental obligation is identified at active Wieland sites, remedial measures are immediately taken by competent and trained personnel within the Wieland Group. As a preventive measure, the purchasing organization of the entire Wieland Group has been trained in the German Supply Chain Act.

The risk analysis and the media reports on existing direct suppliers, available to us through the screening tool, have identified risks in the areas of human rights and environmental law. Based on this, we have initiated various preventive and remedial measures. In the new fiscal year, further checks for high-risk suppliers will be initiated based on the results of further risk analyses.

**wieland**

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