



Business Partner Code of Conduct

of WM SE and its affiliated companies

Preamble

WM SE and its affiliated companies named in the attachment thereto are committed to a responsible corporate management while observing and complying with legal requirements such as the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz). The same behavior is expected from the business partners.

By signing this Code of Conduct, business partners shall comply with these principles and requirements of this Code of Conduct, which are based on national laws such as the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz) as well as international conventions such as ILO, Minamata, PoP- and the Basel Convention.

Requirements to business partners

Business partners are expected to adhere to the following guiding principles:

I Compliance with laws, rules and regulations

Business partners are obliged to comply with all applicable laws, rules and regulations of the countries in which they do business.

Business partners shall maintain appropriate control systems in their business operations to prevent violations of the law and enable their investigation.

II Prohibition of slavery and other similar forms

Slavery and practices similar to slavery, servitude or other forms of domination or oppression in the workplace environment, such as extreme economic or sexual exploitation and humiliation, are prohibited.

III Prohibition of forced labor

The employment of persons in forced labor is prohibited. This includes any work or service that is required of a person under threat of punishment and for which he or she has not voluntarily made himself or herself available, for example as a result of debt bondage or human trafficking.

IV Prohibition of child labor

It is prohibited to employ a child under the age at which compulsory education ends according to the law of the place of employment, whereby the age of employment must not be less than 15 years. This does not apply if the law of the place of employment deviates from this in accordance with Art. 2 Par. 4 and Art. 4 to 8 of Convention No. 138 of the International Labor Organization of 26 June 1973 concerning the minimum age for admission to employment. Furthermore, the worst forms of child labor for children under the age of 18 are prohibited and must be observed. This includes:

- all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and servitude, and forced and compulsory labor, including the forced or compulsory recruitment of children for use in armed regions
- abduction, procure or offering a child for prostitution, the production of pornography or pornographic acts
- abduction, procure or offering a child to engage in illegal activities, in particular to produce and trading in drugs
- labor which by its nature or because of the circumstances under which it is performed, is likely to be harmful to the health, safety, or morals of children.

V Health and safety at the workplace

It is prohibited to disregard the health and safety obligations applicable under the laws of the place of employment if this creates the risk of accidents at work or work-related health risks, in particular due to:

- obviously insufficient safety standards in the provision and maintenance of the workplace and the work equipment
- the absence of proper safety measures to prevent exposure to chemical, physical or biological substances

- the absence of measures to prevent excessive physical and mental fatigue, in particular through inappropriate work organization in terms of working hours and rest periods
- the insufficient training and instruction of employees

VI Prohibition of disregard for freedom of association

Prohibited is the disregard of the freedom of association, according to which

- employees are free to form or join labor unions
- the formation, joining and membership of/in a labor union may not be used as a reason for unjustified discrimination or retaliation
- labor unions may operate freely and in accordance with the law of the place of employment; this includes the right to strike and the right to collective negotiations.

VII Prohibition of discrimination

Unequal treatment, for example on the basis of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, is prohibited unless it is justified by the requirements of the employment. Unequal treatment includes, in particular, the payment of unequal salary for work of equal value.

VIII Appropriate compensation

The refusal to pay a reasonable wage is prohibited. The appropriate wage is at least the minimum wage set by the applicable law and is otherwise measured according to the laws of the place of employment.

IX Preservation of livelihoods

It is prohibited to cause harmful soil alteration, water pollution, air pollution, harmful noise emissions, or excessive water consumption that would

- significantly impair the natural basis for the preservation and production of food,
- deny a person access to safe drinking water,
- prevent or destroy a person's access to sanitary facilities, or
- harm the health of a person.

X Prohibition of eviction, expropriation and use of security guards

Prohibited is unlawful eviction and unlawful deprivation of land, forests and waters in connection with the acquisition, construction or other use of land, forests and waters, which provide a person's livelihood. It is prohibited to hire or use private or public security guards to protect the company's project if, due to lack of instruction or control on the part of the company in the use of the security guards, the security guards are - disregarding the prohibition of torture and cruel, inhuman or degrading treatment

- harming individuals, or
- impairing the freedom of association.

XI Handling waste and hazardous substances

The following points must be observed when handling waste and hazardous substances:

- the manufacture of products containing mercury is prohibited in accordance with Art. 4 Para. 1 and Annex A Part 1 of the Minamata Convention
- the use of mercury and mercury compounds in manufacturing processes as defined in Art. 5 para. 2 and Annex B Part I of the Minamata Convention is prohibited as of the phase-out date specified for the respective products and processes in the Convention
- it is prohibited to treat mercury waste in contrary to the provisions of Art. 11 para. 3 of the Minamata Convention
- it is prohibited to produce and use chemicals according to Art. 3 para. 1a and Annex A of the POPs Convention
- it is prohibited to handle, collect, store and dispose of waste in a way that is not environmentally friendly in accordance with the regulations in force in the applicable jurisdiction under the provisions of the Art. 6 para. 1 d (i) and (ii) of the POPs Convention.
- the import and export of hazardous waste and other waste according to the Basel Convention is prohibited.

XII Fair competition

Business partners are expected to observe the principle of fair competition and comply with applicable competition law.

XIII Intellectual property

Intellectual property rights must be respected by the business partner; technology and know-how must be transferred in such a way that intellectual property rights and customer information are protected.

XIV Conflicts of interest and combating corruption

Business partners shall ensure that business decisions are made free from any conflict of interest with private interests or other activities.

Business partners must not tolerate corruption in any form whatsoever and must never grant, accept or broker bribes or benefits of monetary value with the aim of obtaining an order or other preferential treatment in business dealings.

XV Prevention of money laundering

Business partners are obliged to comply with all legal provisions aimed at preventing money laundering and must not participate in any way in money laundering activities.

XVI Export control

Business partners must comply with the applicable regulations regarding the import and export of goods, services and information as well as all applicable embargoes and sanctions.

XVII Data protection

Business partners must observe and comply with the applicable data protection regulations.



Implementation of the requirements

The business partner warrants that it acts in accordance to this Code of Conduct within the scope of its own business activities and that the production of the product/performance of the service within the supply chain is carried out in compliance with this Code of Conduct.

The business partner shall ensure that his associates comply with the requirements of this Code of Conduct.

WM SE and its affiliates retain the right to verify compliance with the standards and regulations specified in this Code of Conduct by holding audits at the business partners' locations.

A violation of this code can ultimately be the reason for terminating the business relationship, including all associated contractual relationship.

Information and consent of the business partner

By signing this Code of Conduct, the business partner agrees to act responsibly and to apply the principles and requirements of the Code of Conduct.

Business partner: _____

Address: _____

Place, date: _____

Signature: _____



Attachment associated companies

- autoservice.com VP GmbH
- Cartrend GmbH
- EVB Handelshaus Bour GmbH
- FISCHER Bike GmbH & Co. KG
- Fuchs + Sanders Schrauben-Großhandels GmbH + Co. KG
- Intertec Beteiligungs-GmbH
- Intertec Asia Ltd.
- Intertec Polska Sp. Z.o.o.
- Inter-Union Technohandel GmbH
- masteroil GmbH
- MTS MarkenTechnik Service GmbH & Co. KG
- MTS Verwaltungs-GmbH
- Nigrin GmbH & Co. KG
- Parkshore Trading Corp.
- SSF Imported Auto Parts LLC
- Systemzentrale plus Werkstattkonzepte GmbH
- Tegro AG
- UNIPART Technik GmbH
- WM Autodele ApS
- WM Autodíly spol. s r.o.
- WM Automaterialen B.V.
- WM Autoricambi S.r.l.
- WM Fahrzeugteile AG
- WM Fahrzeugteile Austria GmbH
- WM Fahrzeugteile Austria Holding GmbH
- WM Logistics Germany GmbH
- WM Logistic Nýřany spol. s r.o.