

VHG - Code of Conduct

Public welfare affects us all

The individual companies within the group portray themselves as highly qualified manufacturers of wire, wire ropes, textile sling gear and ribbed expanded metal. Flexibility, experience and know-how are the group's greatest strengths. Social, economic and ecological obligations as well as sustainability go hand-in-hand with our business.

Following the wishes of the family, the Vom Hofe Group was transferred into a foundation in 1997. Sustainability is necessary in order for the Board of Trustees to uphold the purpose of the foundation. The Erwin-Reinecke-Stiftung reinvests a large part of its profits in its employees, for their training or for continuation training, as well as in technology and buildings. In addition, surpluses are regularly accrued by the sole beneficiary, the charitable organisation Evangelisches Pertheswerk e.V., a registered society that supports the old, the ill and the handicapped as well as helping those in need. Furthermore, many other community activities are sustained and supported by the Vom Hofe Group.

All sister companies of the Vom Hofe Group are fully owned by the Wilhelm vom Hofe Drahtwerke GmbH.

DRAHTWERKE

Vom Hofe Group

KALTSTAUCHDRAHT

Vom Hofe Group

FRÖNDENBERGER

Vom Hofe Group

DRAHTSEILWERK

Vom Hofe Group

ENGELMANN

Vom Hofe Group

WADRA

Vom Hofe Group

RSM

Vom Hofe Group

Preamble

Wilhelm vom Hofe GmbH and the individual companies within the group hereby acknowledge their social responsibility worldwide. In particular, all companies bear responsibility, within the scope of their business activities, in relation to their own company, their customers, their suppliers in the supply chain, the environment and society.

This VHG Code of Conduct lays down, as a group guide, a common set of values in respect of social and societal responsibility, as well as fair competition. This VHG Code of Conduct is an obliging code for all companies inside the group. By signing the VHG Code of Conduct the companies commit themselves to comply with the following principles:

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I. General Principles

1. Fundamental understanding

The Company hereby acknowledges its societal and social responsibility and undertakes to fulfil this responsibility in all its business activities.

2. Compliance with laws

In all its business actions and decisions, the Company shall observe the respective applicable laws, as well as all other relevant provisions of the countries where it operates. Business partners shall be treated fairly. Contracts shall be adhered to, with due regard being given to any changes in the underlying circumstances.

3. Focus on generally valid values and principles

The Company shall base its actions on generally valid ethical values and principles, particularly on integrity, probity, respect of human dignity and non-discrimination.

II. Principles Relating to Societal and Social Responsibility

1. Human rights

The Company shall respect and support compliance with internationally recognised human rights. In particular, the Company shall respect human rights in accordance with the UN Human Rights Charter (Universal Declaration of Human Rights, General Assembly Resolution 217 A (III) as of 10 December 1948).

2. Prohibition of discrimination

The Company hereby rejects, within the scope of the respective applicable laws and regulations, all forms of discrimination. In particular, this relates to discrimination against employees on grounds of race, ethnic origin, sex, religion, ideology, disability, age or sexual identity.

3. Health protection

The Company hereby warrants safety and health protection at the workplace within the scope of the national provisions. The Company shall support a constant process of further development for improving the working environment.

4. Working conditions, prohibition of forced labour and child labour

The Company shall respect its employees' right to freedom of association and assembly within the scope of the respective applicable laws and regulations. The Company shall comply with all labour standards in respect of the maximum permissible number of working hours and remuneration, particularly in respect of the level of remuneration, in accordance with the applicable laws and provisions.

Employees shall be protected against corporal punishment and against physical, sexual, mental and verbal harassment. The private sphere of all employees shall be respected. The prohibition of all kinds of forced labour shall be observed. In particular, the Convention on Forced and Compulsory Labour, of 1930, (Convention 29 of the International Labour Organisation) and the Convention on the Abolition of Forced Labour, of 1957, (Convention 105 of the International Labour Organisation) shall be complied with. The Company shall observe the provisions relating to the prohibition of child labour. In particular, the Convention on the Minimum Age for Admission to Employment, of 1973, (Convention 138 of the International Labour Organisation), as well as the Convention

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concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, of 1999, (Convention 182 of the International Labour Organisation) shall be complied with. If a national provision concerning child labour provides for stricter standards, these shall take precedence and be observed.

5. Environmental protection

The Company shall be committed to sustainably upholding the goal of protecting natural resources for current and future generations. Laws and provisions enacted for the protection of the environment shall be observed.

6. Communication

The Company shall communicate in an open and dialogue-orientated manner concerning the requirements of this Code of Conduct and its implementation in relation to employees, customers, suppliers and other interest and entitlement groups.

III. Principles of Fair Competition

1. Prohibition of corruption

The Company hereby rejects corruption and bribery. In dealings with business partners and state institutions, the Company's interests and the private interests of employees shall, on both sides, be kept strictly separate from each other. Decisions shall be made free from irrelevant considerations and personal interests. The respective applicable criminal law on corruption shall be complied with. Among other things, the following shall be observed:

Neither the Company nor its employees shall be permitted to grant, within Germany or abroad, personal advantages to public office holders (such as civil servants and public sector employees) with the aim of obtaining advantages for the Company, themselves or third parties.

Personal advantages of monetary value in return for unfair favouritism in business transactions between companies shall not be offered, promised, granted or condoned. Nor shall personal advantages of value be demanded or accepted in dealings with business associates for the purpose of unfair favouritism in business transactions. Neither the general management nor the employees of the Company shall, in business transactions, offer, promise, demand, grant or accept any gifts, payments, invitations or services granted with the intention of unfairly influencing a business relationship, or where there is a risk that the professional independence of the business associate will be jeopardised. In principle, this shall not be the case in respect of gifts or invitations that fall within the scope of customary business hospitality, custom and courtesy.

2. Conduct in relation to competitors

The Company shall respect fair competition. Therefore, it shall comply with the applicable laws protecting and promoting competition, particularly all applicable anti-trust laws and other laws governing competition.

In particular, these provisions prohibit, in dealings with competitors, agreements and other activities that unfairly affect prices or terms, unlawfully allot sales territories or customers or impermissibly hinder free and open competition. Furthermore, these provisions prohibit

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unfair agreements between customers and suppliers under which customers are to be restricted in their freedom to autonomously determine their prices and other terms (determination of prices and terms).

Given that it can be difficult to distinguish between prohibited cartels and permissible collaboration, the Company is to name a contact person whom its employees can contact in cases of doubt.

3. Business secrets

The Company shall respect and keep company and business secrets of other parties. No confidential information or confidential documents shall be passed on to third parties, or be made accessible to third parties in any other manner, without authorisation, unless permission has been given in this respect, the information concerned is publicly accessible or this is mandatory on account of an enforceable decision by an authority or court.

IV. Scope of Application, Implementation, Suppliers

1. Scope of application

This Code of Conduct shall apply to all the Company's branches and business units.

2. Implementation and compliance

The Company shall make known to its employees the content of this VHG Code of Conduct and the obligations ensuing herefrom. The Company shall take suitable measures to bring about compliance with this VHG Code of Conduct.

3. Suppliers

The Company is hereby called upon to inform its direct suppliers of the principles of this VHG Code of Conduct, promote to the best possible extent compliance with the content hereof by its suppliers, and call upon its suppliers to likewise follow this VHG Code of Conduct. Furthermore, the Company is hereby called upon to advise its direct suppliers to, in turn, call upon their suppliers to follow this VHG Code of Conduct.

Altena, July 2021



Hagen Hänel
Managing Director



Stephan La Roche
Managing Director