



PREAMBEL

As a leading international supplier of refrigeration components, we, TH. WITT Kältemaschinenfabrik GmbH, are committed to our social responsibility (Corporate Social Responsibility / CSR) and thus to ethical, lawful, environmentally conscious and socially responsible corporate management. We expect the same behavior from all those with whom we do business. We strive to continuously optimize the sustainability of our business activities and products and call on all suppliers to also underlay their business activities with sustainable practices.

Our Code of Conduct sets out the requirements we consider binding with regard to compliance with laws and regulations, corruption and bribery, social and working conditions, and environmental protection. Our Code is based on internationally recognized principles, including the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the OECD Guidelines for Multinational Enterprises, and the International Labor Organization (ILO) Conventions of Principles.

COMPLIANCE WITH LAWS AND REGULATIONS

We comply with all applicable national and international laws and regulations, industry standards and all other relevant legal requirements.

BUSINESS INTEGRITY

We conduct our business in accordance with the highest ethical standards. We comply with all applicable national and international laws and regulations, in particular with regard to corruption, bribery, cartels/competition, intellectual property and conflicts of interest.

Fight against corruption and bribery

We do not engage directly or indirectly in acts of corruption, extortion, embezzlement or bribery in any form. Among other things, it is prohibited to promise, offer, award or accept excessive monetary benefits or other rewards such as kickbacks, improper entertainment and gifts, or other unfair trading practices.

Cartel/Competition

We adhere to the principles of free competition and do not participate in collusive tendering, price fixing, price discrimination or other unfair trade practices.

Intellectual property

We respect the intellectual property of others and take all reasonable measures to protect and preserve confidential and internal information or trade secrets of our business partners, and such information will only be used for the purposes permitted under the contractual agreements. In the case of subcontracting business, confidential information will only be disclosed by us with the consent of the partner.

Conflicts of interest

We are committed to alerting our business partners to constellations that may imply a conflict of interest.



SOCIAL AND WORKING CONDITIONS

We recognize and undertake to respect the fundamental rights of our employees and to treat employees with dignity and respect as understood by the international community. We adhere to the following standards, regardless of the applicable employment agreement. It does not matter whether it is direct employment, temporary employment, subcontracting, telecommuting or other forms of employment.

Free choice of employment

Under no circumstances do we resort to forced, bonded or indentured labor or involuntary prison labor. Employment is voluntary.

No child labor

The use of child labor is strictly prohibited in accordance with the United Nations Convention and/or national laws.

national laws is strictly prohibited. This is a matter of course for us.

Compensation and benefits

We comply with all applicable laws, regulations and industry standards on compensation and benefits. Deductions from wages as a disciplinary measure are permitted only to the extent permitted under applicable laws and a valid, freely negotiated collective bargaining agreement.

Working hours

We comply with all applicable laws, regulations and industry standards on working hours. Unless the applicable laws, regulations and industry standards are stricter in individual cases, the German laws and regulations on working hours apply as a benchmark for us.

Equal rights

We comply with all applicable laws prohibiting discrimination in hiring and employment with respect to sex, age, religion, political opinion, union membership, medical condition, national or social origin, sexual orientation, ethnicity, color or any other distinction prohibited by law.

Harassment, abuse and disciplinary proceedings

We refrain from any physical, psychological, verbal or sexual harassment or abuse, inhuman or degrading treatment, corporal punishment or intimidation. We comply with laws and regulations governing disciplinary procedures.

Health and safety

We offer our employees a healthy and safe workplace that complies with all applicable laws, regulations and industry standards. This relates in particular to building safety, electrical systems, machine safeguarding and personal protective equipment. We involve our workers in the process of identifying and mitigating risks to worker health and safety.

Working conditions

We provide our employees with adequate working facilities.



Environment

We take environmental responsibility for producing high quality products and continuously strive to improve our environmental performance. We comply with all applicable environmental laws, regulations and industry standards. In addition, we implement policies and procedures to identify, prevent and minimize relevant negative environmental impacts. This also includes informing and training relevant on the job.

Hazardous materials

We minimize the use of hazardous materials and ensure that all hazardous materials are transported, stored and disposed of safely. We educate our workers on relevant safety procedures and ensure appropriate training.

Resources

We minimize harmful impacts on natural resources, including air, land, forests and water. We also optimize our use of resources, including raw material, water and energy consumption.

Waste and emissions

We minimize the disposal of waste and wastewater as well as other emissions in order to avoid pollution of air, water and soil. We keep our greenhouse gas emissions as low as possible.

COMMUNICATION AND IMPLEMENTATION

We communicate the contents of this Code effectively to all our employees, contractors, subcontractors, suppliers and sub-suppliers, and ensure the implementation of the Code with reasonable care.

INTERACTION WITH SUPPLIERS AND SUBCONTRACTORS

We take reasonable care to verify that our subcontractors, suppliers and sub-suppliers comply with this Code. Based on this, we assess the risk of potential violations of this Code in our own supply chains and take appropriate compliance monitoring measures based on this risk assessment. If violations are identified, we request improvement measures to comply with the Code or terminate conducting business with subcontractors, suppliers and sub-suppliers if no improvements are conceivable.

DOCUMENTATION

We keep the necessary documentation on our own operations to demonstrate compliance with the Code. We also keep documentation on the due diligence process in our own supply chain.

UPDATE OF THE CODE

We regularly review this Code and make changes where necessary. If such amendments should, in exceptional cases, significantly reduce the standards, we inform our business partners accordingly. We publish the currently valid version of the Code on our homepage.