



Code of conduct

The Gesellschaft für Wolfram Industrie mbH in Nußdorf and Bayerische Metallwerke GmbH in Dachau have been developing, producing and processing metallurgically superior, technically intelligent products from tungsten and molybdenum since 1911. As a family-managed company with production exclusively in Germany, we strive to be the most innovative supplier among our global competitors.

With a customer-centric approach, the owner of this company, family-owned for four generations, retains personal responsibility for quality and is committed to our performance.

For us, compliance is a fundamental component of sound and sustainable corporate management. It signifies far more than simply abiding by laws and regulations. Compliance, to us, is a matter of posture and loyalty to our fundamental pursuits, underpinned by innovation, technical expertise, and by upholding and further developing our economic autonomy through a cooperative behaviour towards our business partners and staff. Values such as reliability, sincerity, credibility, and integrity are not empty phrases to us, but our fundamental watchwords at Wolfram Industrie.

Our current Code of Conduct anchors this value-oriented cooperation and is a key part of our value culture.

1. Basic understanding of socially responsible corporate governance

This Code of Conduct is based on a common basic understanding of socially responsible corporate governance. This means that Wolfram Industrie takes responsibility by considering the consequences of corporate decisions and actions in economic, technological, as well as social and ecological terms, and taking into account the respective interests.

Within the scope of its possibilities and as far as feasible, Wolfram Industrie voluntarily contributes to the well-being and sustainable development of society at all its locations. We are guided by universally accepted ethical values and principles, in particular integrity and probity and respect for human dignity.

2. Applicable scope

2.1 This Code of Conduct applies to the following companies:

- Wolfram Industrie GmbH, D-Nußdorf
- Bayerische Metallwerke GmbH, D-Dachau
- Wolfram Industrie GmbH, CH-Winterthur

2.2 Companies are encouraged to adopt this Code of Conduct in its entirety, taking into account country-specific characteristics.

2.3 Wolfram Industrie undertakes to promote compliance with this Code of Conduct also among its suppliers and in the further value chain within the scope of its respective possibilities and scope of action.

3. Key points of socially legal responsible corporate governance

Wolfram Industrie actively strives to ensure that the following values and principles are observed and complied with in a sustainable manner.

3.1 Compliance with applicable law

Wolfram Industrie complies with the prevailing laws and other legal regulations of the countries in which it operates. However, the laws and legal regulations of the Federal Republic of Germany always represent the minimum standard for action, even in other countries.

3.2 Integrity and organizational governance

3.2.1 Wolfram Industrie bases its actions on universally valid ethical values and principles, in particular integrity, righteousness, respect for human dignity, openness and recognition of any religion, ideology, gender and sexual orientation.

3.2.2 Wolfram Industrie rejects any form of corruption, bribery, competition violations as well as other violations of applicable law and promotes transparency, acting with integrity and responsible management and control in the company in an appropriate manner.

3.2.3 Wolfram Industrie follows clean and accepted business practices and stands for fair competition. In competition, Wolfram Industrie is guided by professional conduct and high quality work. Wolfram Industrie maintains a cooperative and trusting relationship with the relevant authorities.

3.3 Consumer interests

As far as consumer interests are concerned, Wolfram Industrie complies with consumer protection regulations as well as with appropriate sales, marketing and information practices. Particularly vulnerable groups enjoy special attention.

3.4 Communication

Wolfram Industrie communicates openly and dialogue-oriented about the requirements of this Code of Conduct and about its implementation towards employees, customers, suppliers and other stakeholders. All documents and records are dutifully prepared, not unfairly altered and properly stored in accordance with the legal retention periods. Trade secrets and business information of the partners are kept sensitively, confidentially and in compliance with the German Act on the Protection of Business Secrets (GeschGehG).

3.5 Intellectual property

Intellectual property rights such as patents, trademarks, copyrights and confidential know-how are essential to our business success. Protecting them and preventing their misuse are therefore of great importance. We respect the intellectual property rights of third parties and report suspected infringements of intellectual property rights to their owners. We use computer software only in accordance with the licensing conditions and ensure compliance with all licensing requirements.

3.6 Export control and customs

It is essential for us to comply with the export control and customs regulations applicable to national and international trade. We take great care to ensure that applicable customs and foreign trade regulations are reviewed, implemented and complied with when trading or transporting goods, providing services or otherwise transferring technical know-how. We conduct an expanded audit when doing business in sanctioned countries. We ensure that all applicable export control regulations are complied with in business activities.

3.7 Human rights

Wolfram Industrie is committed to the promotion of human rights and, in particular, upholds the following human rights as set out in the UN Human Rights Charter:

3.7.1 The preservation and protection of privacy

3.7.2 Health and safety: Maintaining health and safety at work, in particular ensuring a safe and healthy working environment to prevent accidents and injuries.

3.7.3 Harassment / protection of employees from physical, sexual, psychological or verbal harassment or abuse.

3.7.4 Freedom of opinion / protection and granting of the right to freedom of opinion and expression

3.8 Working conditions

Wolfram Industrie complies with the following core labour standards of the International Labour Organisation (“ILO”):

3.8.1 Child labour / The prohibition of child labour, i.e. the employment of persons younger than 15 years, unless local legislation sets higher age limits.

3.8.2 Forced labour / Wolfram Industrie rejects any form of forced labour.

3.8.3 Remuneration / The labour standards with regard to remuneration, in particular with regard to the level of remuneration in accordance with the applicable laws and regulations (e.g. Minimum Wage Act).

3.8.4 Workers’ rights / Wolfram Industrie respects the rights of workers to freedom of association, freedom of assembly and collective bargaining.

3.8.5 Prohibition of discrimination / The treatment of employees free from any form of discrimination

3.9 Working hours

Wolfram Industrie complies with the working standards on the maximum permissible working hours.

3.10 Social commitment

The social and economic development of the country and the region is important to Wolfram Industrie and Wolfram Industrie therefore supports corresponding voluntary activities of its employees.

4. Environmental protection

Wolfram Industrie complies with current and applicable regulations and standards on environmental protection and acts in an environmentally conscious manner at all its sites. In the course of its activities, Wolfram Industrie uses natural resources responsibly and is guided by the principles of the “Rio Declaration on Environment and Development” of 1992.

4.1 Greenhouse gases, sustainable resource management and waste management

Our processes are designed to conserve resources along the entire product life cycle, reduce disposal waste and make our own business operations CO₂-neutral. Our environmental portfolio is our response to climate change, resource scarcity and environmental threats. Our company meets the ecological demands of its partner companies by developing future-oriented and resource-efficient products. Consistent and innovative environmental protection management is an integral part of our business processes.

4.2 Energie

Climate protection is closely linked to energy consumption. We use energy rationally and efficiently and constantly strive to improve energy efficiency. As far as possible, we give priority to the use of renewable energies.

4.3 Air and water

We design our processes in such a way that the best possible environmental compatibility of our products is achieved, no unnecessary air emissions and noise pollution are generated, and water is used in a resource-conserving manner and is not polluted.

4.4 Chemicals

We ensure that hazardous substances and other chemicals are stored, used and transported properly and safely. Products containing hazardous substances are accompanied by all necessary documents for proper documentation.

5. Whistleblowing Policy

This Code of Conduct sets out the essential values of Wolfram Industrie. It is the responsibility of all Wolfram Industrie employees to ensure that these values are upheld.

5.1 Input from employees

Should employees become aware of issues and facts that could contradict the essential values, we urge everyone to contact their superior, the management and/or the Compliance Officer of Wolfram



Industrie in confidence. The involvement of a member of the works council is of course possible at any time. The management of Wolfram Industrie guarantees all employees that the protection of whistleblowers is essential for Wolfram Industrie and that no negative measures will be taken on the part of Wolfram Industrie.

5.2 Input from external parties

Should any external parties become aware of issues and facts that could contradict the essential values of Wolfram Industrie, they can contact the Compliance Officer of Wolfram Industrie and /or the management directly at any time.

5.3 Reporting office

Reporting office In addition to the possibility of contacting the management and/or superiors, the following reporting channels are available to you The following reporting channels are available: by eMail: compliance@wolfram-industrie.de

5.4 Handling inputs

Wolfram Industrie shall take all reported issues seriously, conduct investigations and take appropriate action.

6. Implementation and enforcement

Wolfram Industrie shall make all appropriate and reasonable effort to continuously implement and apply the principles and values described in this Code of Conduct.