

Code of Conduct for Suppliers and Service Contractors

Waelzholz is in the tradition of a family business that has existed for over 190 years. The company has gradually developed into a leading global producer of cold-rolled steel strip, profiles and electrical steel. We are present worldwide with subsidiaries and agencies. As an employer we are committed to our resulting social and corporate responsibility, which is expressed in the following Code of Conduct. This Code of Conduct for suppliers and service contractors, hereafter called suppliers, is intended to express the values, principles and practices that apply to Waelzholz. At the same time, we expect our suppliers to behave in accordance with our principles.

We expect that suppliers are compliant with the following contents and that their business activities are fully aligned with these values:

1. Basic understanding

As a globally operating company, we have to comply with different legislations. Our top priority is to comply with the respective laws as well as to adhere to the generally accepted ethical values and principles and the regulations that we impose on ourselves. Our business activities are guided by the Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at the ILO (International Labor Organization) and the principles of the Rio Declaration on Environment and Development. We expect that our suppliers are compliant to these values and principles.

2. Corporate social responsibility

Respectful and tolerant interaction with one another and respect for personal dignity is the basis of our actions and those of our suppliers.

2.1. Personal rights, equal opportunities, privacy

We create a working environment in which equal opportunities and equal treatment of our employees, regardless of gender or age, skin color, nationality, origin, sexual orientation, religion or any disability, are taken for granted and guaranteed. We pay particular attention to this when selecting our employees and business partners. Discrimination of any kind against employees, customers, contractors and suppliers is not tolerated in any way. We protect our employees from physical, sexual, psychological or verbal harassment and abuse in the course of their work and respect and protect their privacy. We expect the same from our suppliers.

2.2. Rejection of forced and child labor

Forced or child labor contradicts our corporate values and those of our suppliers. In the company as well as with our business partners, we strictly observe the rights of those under protection and consistently pursue any violations.

2.3. Working hours / Remuneration / Freedom of association

We recognize the freedom of association of our employees within legal standards. We expect that our suppliers also adhere strictly to the applicable laws and regulations with regard to working hours, remuneration and freedom of association.

2.4. Social responsibility

As a responsible member of society, we are committed to social and economic development at regional and national level. Through our involvement in numerous organizations, we actively participate in social, economic and community progress. We expect of our suppliers to be socially involved as well.

3. Integrity

3.1. Fighting Corruption

Our actions are characterized by trust in our employees. In doing so, we are guided by a basic social understanding based on generally accepted ethical values and principles. We expect the same from our suppliers. We reject corruption and bribery as defined by the valid UN Convention. We assume that our suppliers also strictly reject corruption and bribery. Our managers exemplify integrity and honesty. These are the prerequisites for our sustainable and long-term successful work.

Of course, our employees are prohibited from offering or accepting money or other means to obtain an improper or unreasonable advantage. Violations will be consistently pursued and punished.

3.2. Fair competition / antitrust law

We stand for free and fair competition, therefore we do not participate in price fixing or any form of unlawful distortion of competition. Our employees know the requirements of the applicable competition and antitrust laws and comply with them. We assume that our suppliers are also compliant.

4. Health and safety

The safety and health of our employees is our highest priority. We create a safe and health-oriented working environment for our employees and promote their well-being. We expect our suppliers to maintain a safe and healthy working environment.

5. Handling of (confidential) information

We protect confidential information, know-how as well as company and business secrets in our cooperation with our business partners. Every employee is obliged to treat all trade and business secrets that come to his knowledge as confidential. We collect, process and use personal data in accordance with the applicable data protection regulations. We assume that our suppliers also handle confidential information sensitively and confidentially.

6. Money laundering

We maintain and promote fair economic and financial transactions and take the necessary measures against illegal payments and funds of questionable origin. We expect the same behaviour from our suppliers.

7. Environmental and energy management

Please inform yourself about the environmental and energy policy of our company on our website: www.waelzholz.com under the headings "Company" and "Environmental and Energy Policy".

8. International Trade

In the international exchange with our business partners, customers and suppliers, we comply with all applicable national and international regulations and agreements for the control of international trade in goods. In return, we expect our suppliers to comply with these requirements as well.

9. Preservation of identity and protection against retaliation

We enable every supplier to turn to a direct supervisor or Purchasing Director or the Compliance Representative in confidence if there is any doubt about the fulfillment of the above-mentioned obligations or in the event of unlawful actions. Notices are handled carefully and consistently. We ensure that anyone who submits a complaint report is protected from threat, harassment or other adverse action within the company. Personal rights guide us in our actions and we always regard them as a valuable asset.

10. Implementation of the agreement

This Code of Conduct is part of our company policy. We expect our suppliers to always behave in accordance with the values, principles and policies of this Code of Conduct. Compliance with the Code of Conduct is the basis for a successful and cooperative partnership. The supplier has the duty to report any defects found or a serious suspicion. We will investigate violations of this Code of Conduct and reserve the right to take appropriate measures in case of violations, which may also result in the termination of the business relationship.

Hagen, December 2020



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