

PRODUCTION AND PACKAGING
SERVICES FOR PHARMACY,
COSMETIC, FOOD AND
BEVERAGES



Code of Conduct

for

WAGENER & CO. GmbH, Lengerich

Preamble

WAGENER & CO. GmbH ("WaCo") is a service provider in the field of contract manufacturing for pharmaceuticals, medical devices, cosmetic and chemical products as well as foodstuffs and beverages.

WaCo's primary objective is to ensure the economic strength of the company to enable it to be a sustainable, reliable partner offering technical expertise, the highest levels of process quality and maximum flexibility for its customers, suppliers, creditors, employees¹ and owners, as well as for the state and society.

This Code of Conduct is intended as a voluntary commitment and applies to all WaCo sites and business units.

The Code of Conduct shall be made known to the employees of the company in an appropriate manner; they shall undertake to act in accordance with the Code of Conduct.

Voluntary commitment

WaCo acknowledges its social responsibility. In particular, all employees, representatives and management bodies of our company have a responsibility towards their company, customers and suppliers, the environment and society.

The actions of our company and our employees are based on the principles of integrity and fairness.

The ethical guidelines set out in this Code of Conduct are based specifically on the principles of the UN Global Compact, ILO Conventions, the UN Universal Declaration of Human Rights, the UN Conventions on the Rights of the Child and on the Elimination of All Forms of Discrimination against Women, as well as the OECD Guidelines for International Enterprises.

The following constitutes minimum standards and is intended to prevent situations that may call the integrity of our company and our employees into question.

With regard to all of its business activities and decisions, WaCo undertakes to comply with the applicable laws and other relevant provisions of the countries in which it operates.

Business partners shall be treated fairly. Contracts shall be adhered to, while allowing for changes to framework conditions.

Our voluntary commitment applies specifically, but not exclusively, to:

- Fairness and honesty
- Confidentiality and secrecy
- Antitrust law
- Bribery and corruption
- Human dignity and human rights
- Child and forced labour
- Working hours and pay
- Free collective bargaining and freedom of assembly
- Operational health and safety
- Environmental protection and conserving resources
- Non-discrimination
- Freedom of opinion
- Use of force and harassment
- Privacy
- Quality

Fairness and honesty

We operate in accordance with universally accepted business practices based on fairness and honesty. Our interaction with authorities is characterised by a spirit of trust.

Confidentiality and secrecy

We and our employees treat our business partners' trade secrets and intellectual property with confidentiality. Disclosure of confidential information to third parties or making it publicly accessible is prohibited. This continues to apply to employees of the company even after their employment relationship has ended.

We protect the personal data of our business partners and employees. We comply with the corresponding provisions of the Federal Data Protection Act.

Antitrust law

WaCo respects fair competition.

We comply with applicable laws for the protection and promotion of competition at all times, specifically applicable antitrust laws and other laws regulating competition.

The provisions of these laws prohibit in particular agreements and other practices in dealings with competitors that may affect prices or conditions, allocate sales territories or customers, or impede free and open competition in an unlawful manner.

Furthermore, these provisions prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to determine their prices and other conditions independently when engaging in resale transactions (determination of pricing and conditions).

Given that making a distinction between prohibited cartels and permissible cooperation can be difficult, WaCo has appointed a contact whom its employees can refer to if in doubt.

Bribery and corruption

The interests of the company and the personal interests of employees on both sides are kept strictly separate when dealing with business partners (customers, suppliers) and public institutions. Transactions and (purchasing) decisions are made free of irrelevant considerations and personal interests. We comply with relevant corruption laws.

The following, among other things, should be noted:

Offences related to holders of public office:

We do not permit the granting of personal benefits (in particular those of a monetary nature, such as payments and loans, including smaller gifts over a longer period of time) by WaCo and our employees to public officials (such as civil servants or public service employees) with the aim of obtaining advantages for WaCo, themselves or third parties.

Offences in business transactions:

We do not offer, promise, grant or approve any personal benefits in exchange for preferential treatment in business dealings. Similarly, personal benefits of value shall neither be solicited nor accepted in dealings with business partners. All WaCo employees shall not accept any promises of such benefits.

The management and employees of WaCo are not permitted to offer, promise, solicit, grant or accept gifts, payments, invitations or services in business dealings that are granted with the intention of improperly influencing a business relationship or where there is a risk of jeopardising the business partner's professional independence. This is generally not the case with gifts and entertainment that are within the scope of normal business hospitality, customs and courtesy.

WaCo has appointed a contact who can be consulted if its employees believe they may have a conflict of interest or are unsure if one has occurred or could arise.

Human dignity and human rights

WaCo explicitly and consistently supports internationally recognised human rights.

Where disciplinary action is taken, all members of staff shall be treated with dignity and respect. Measures shall be taken in accordance with relevant national and international standards.

Child and forced labour

WaCo complies with the regulations of the United Nations on human rights and the rights of the child. In particular, we undertake to comply with the Minimum Age Convention (International Labour Organisation C138) and the Worst Forms of Child Labour Convention (International Labour Organisation C182).

Where a national regulation on child labour provides for stricter standards, we shall comply with them as a matter of priority. We reject all forms of forced labour, including prison labour and bonded labour.

Working hours and pay

Unless national regulations stipulate lower maximum working hours, and except in the case of exceptional company circumstances, employees shall not be required to work more 48 hours per standard working week or a total of more than 60 hours per week (including overtime) on a regular basis. Employees are granted the equivalent of at least one day off in each seven-day period.

Pay, including wages, overtime and additional benefits, shall be at least equal to or greater than the amount specified in the relevant laws and statutes. Pay received for full employment must be sufficient to meet the employee's basic needs.

Free collective bargaining and freedom of assembly

As an employer, we acknowledge and respect employees' legal right to freedom of assembly and free collective bargaining.

Operational health and safety

To prevent accidents and personal injury, as an employer, we provide safe and healthy working conditions that meet the minimum criteria stipulated in the relevant statutory provisions. We are committed to ongoing development with the goal of improving working conditions.

Environmental protection and conserving resources

WaCo is firmly committed to the goal of protecting the environment for the benefit of present and future generations. We employ eco-friendly practices at all of the sites where we operate. We comply with the regulations and standards on environmental protection that apply to our respective operations, treat natural resources responsibly, and support our employees' efforts to protect the environment.

Non-discrimination

We are committed to opposing all forms of discrimination within the bounds of prevailing laws and statutes. This applies in particular to discrimination against employees on the basis of sex, race, disability, ethnic or cultural origin, religion or beliefs, age or sexual orientation.

All employees shall be treated strictly in accordance with their abilities and qualifications in all employment decisions, including, but not limited to, recruitment and promotions, remuneration, employment benefits, training, dismissals and terminations.

Freedom of opinion

We uphold the right to freedom of opinion and expression.

Use of force and harassment

Employees shall not be subjected to any form of corporal punishment or other physical, sexual, psychological or verbal harassment or abuse.


Privacy

The rights to privacy shall be respected.

Quality

The quality of our services is of great importance to us. We maintain corresponding management systems and put them into practice.

Lengerich, September 2021



Jürgen Wagener, Managing Director

WAGENER & CO. GmbH
Lohesch 60
D-49525 Lengerich
www.wagener-co.de