

Code of Conduct

for



Version: August, 2020



Contents

1	Preamble.....	3
2	General principles, law and order	3
3	Corruption/antitrust law	3
3.1	Corruption	3
3.2	Conduct towards competitors	4
4	Principles of social responsibility	5
4.1	Human rights	5
4.2	Forced labour.....	6
4.3	Child labour.....	6
4.4	Discrimination	7
4.5	Health protection.....	7
4.6	Fair working conditions	7
4.7	Environmental protection	7
4.8	Trade secrets	7
5	Suppliers	7
6	Compliance	8

1 Preamble

Wuxi Cast GmbH acknowledges its social responsibility. In particular, all those involved in the procurement process bear responsibility as intermediaries between their own company and the suppliers on the respective procurement markets. Responsibility to our own company and its principles, to customers and suppliers, towards the environment, society as a whole, and each individual within the supply chain.

This code of conduct applies to Wuxi Cast GmbH, its management and its employees, and is intended to serve as a basis for all business relations of the signing company.

The actions of the company and its employees are guided in particular by the values of integrity and fairness.

The ethical guidelines described in this code of conduct are based in particular on the principles of the UN Global Compact, the ILO conventions on labour and social standards, the United Nations 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, and the OECD guidelines for international companies. The following points II to V form minimum standards in the company and are intended to prevent situations that could call the integrity of the company and its employees into question.

The signing / participating company observes the principles of the Global Compact and works in its management to achieve its goals.

2 General principles, law and order

Wuxi Cast GmbH is committed to fulfilling its social responsibility in all business activities.

Wuxi Cast GmbH undertakes to observe the applicable laws and other relevant regulations of the countries in which it operates in all business activities and decisions.

Business partners must be treated fairly. Contracts are adhered to, taking into account changes in the general conditions.

3 Corruption/antitrust law

3.1 Corruption

When dealing with business partners (customers, suppliers) and government institutions, the interests of the company and the private interests of employees on both sides are strictly separated. Actions and (purchase) decisions are made free from irrelevant considerations and personal interests.

The applicable criminal law on corruption must be observed. Among other things, the following should be noted:

Offences relating to public officials:



The granting of personal advantages (in particular of a monetary nature such as payments and loans, including the granting of small gifts over a longer period of time) by Wuxi Cast GmbH and its employees to public officials (such as civil servants or employees in the public sector) with the aim of obtaining advantages for the company or themselves or third parties is not permitted.

Crimes in business transactions:

Personal advantages of monetary value in return for preferential treatment in commercial transactions may not be offered, promised, granted or approved. Similarly, personal advantages of any value may neither be demanded nor accepted in dealings with business partners. Wuxi Cast GmbH makes it clear to its employees that they cannot accept any corresponding benefits.

The management and employees of Wuxi Cast GmbH may not offer, promise, demand, grant or accept gifts, payments, invitations or services in business dealings which are granted with the intention of influencing a business relationship in an inadmissible manner or where there is a risk of jeopardizing the professional independence of the business partner. This is generally not the case with gifts and invitations that are within the bounds of customary hospitality, custom and courtesy.

Wuxi Cast GmbH has issued a binding Policy on accepting and giving gifts, invitations to entertainment and events. This regulates exceptions with regard to appropriate low-value and symbolic gifts, appropriate business meals and appropriate events of our own company and those of business partners (customers, suppliers). The policy is communicated transparently within the company and to existing and potential business partners.

Wuxi Cast GmbH provides a contact person who can be contacted if employees of the company have a conflict of interest or are unsure whether a conflict of interest exists or could arise.

3.2 Conduct towards competitors

Wuxi Cast GmbH respects fair competition. The company therefore complies with applicable laws that protect and promote competition, including, but not limited to, applicable antitrust and other laws regulating competition.

In dealing with competitors, these regulations specifically prohibit agreements and other activities that influence prices or conditions, allocate sales territories or customers or impede free and open competition in an inadmissible manner. Furthermore, these rules prohibit agreements between customers and suppliers aimed at restricting customers' freedom to determine their own prices and other conditions for resale (price and condition determination).

4 Principles of social responsibility

4.1 Human rights

Wuxi Cast GmbH respects and supports the observance of internationally recognised human rights.

Reference is made to the German translation of the Universal Declaration of Human Rights of 10.12.1948, adopted by the United Nations, published by Amnesty International in 2019.

Article 1: Freedom, equality, solidarity

Article 2: Prohibition of discrimination

Article 3: Right to life and liberty

Article 4: Prohibition of slavery and slave trade

Article 5: Prohibition of torture

Article 6: Recognition as a legal person

Article 7: Equality before the law

Article 8: Right to legal protection

Article 9: Protection against arrest and expulsion

Article 10: Right to a fair trial

Article 11: Presumption of innocence

Article 12: Sphere of freedom of the individual

Article 13: Freedom of movement and emigration

Article 14: Right of asylum

Article 15: Right to citizenship

Article 16: Marriage, family

Article 17: Right of property

Article 18: Freedom of thought, conscience and religion

Article 19: Freedom of expression and information

Article 20: Freedom of assembly and association

Article 21: Universal and equal suffrage

Article 22: Right to social security

Article 23: Right to work, equal pay

Article 24: Right to rest and leisure

Article 25: Right to welfare

Article 26: Right to education



Article 27: Freedom of cultural life

Article 28: Social and international order

Article 29: Basic duties

- 1. Each person has duties to the community, in which alone the free and full development of his or her own personality is possible.
- 2. Everyone shall be subject in the exercise of his rights and freedoms to such limitations as are determined by law solely for the purpose of securing recognition of and respect for the rights and freedoms of others and of meeting the just requirements of morality, public order and the general welfare in a democratic society.
- 3. These rights and freedoms may in no case be exercised in contradiction to the purposes and principles of the United Nations.

Article 30: Interpretation rule

Nothing in this declaration may be interpreted as implying for any state, group or person any right to engage in any activity or perform any act aimed at the elimination of the rights and freedoms set forth herein.

4.2 Forced labour

Wuxi Cast GmbH rejects any form of forced labour.

Forced labour includes:

- 1. Means of political coercion or political education, or as a punishment against persons who hold or express certain political views or who express ideological opposition to the existing political, social or economic order
- 2. Methods of recruitment and use of labour for economic development purposes
- 3. Labour discipline measures
- 4. Penalties for participating in strikes
- 5. Discriminatory racial, social, national or religious measures

Wuxi Cast GmbH shall endeavour to take effective measures to immediately and completely abolish the aforementioned forced or compulsory labour if it is observed in its surroundings.

4.3 Child labour

Wuxi Cast GmbH observes the regulations of the United Nations on human and children's rights. In particular, Wuxi Cast GmbH undertakes to comply with the Convention concerning the Minimum Age for Admission to Employment (Convention 138 of the International Labour Organisation) and the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Convention 182 of the International Labour Organisation).

Wuxi Cast GmbH undertakes to ensure the effective abolition of child labour and to progressively raise the minimum age for admission to employment or work to a level where the full physical and mental development of young people is assured.



The minimum age for admission to any occupation or work which, by reason of its nature or the circumstances in which it is carried out, is likely to be dangerous to the life, health or morals of young people shall not be less than 18 years. Employment or work from the age of 16 is permitted, provided that the life, health and morals of the young people concerned are fully protected and that they have received appropriate relevant instruction or vocational training in the relevant economic industry.

4.4 Discrimination

Wuxi Cast GmbH undertakes to counteract any form of discrimination within the framework of the applicable rights and laws. This refers in particular to discrimination against employees on the basis of gender, race, colour, disability, ethnic or cultural origin, religion or belief, age or sexual orientation.

A distinction, exclusion or preference with regard to a particular employment which is based on the requirements of that employment shall not be deemed to be discrimination.

4.5 Health protection

Wuxi Cast GmbH guarantees occupational health and safety at the workplace within the framework of national regulations. Wuxi Cast GmbH supports continuous development to improve the working environment.

4.6 Fair working conditions

Wuxi Cast GmbH respects the right to freedom of association of its employees within the framework of the applicable rights and laws.

4.7 Environmental protection

Wuxi Cast GmbH is sustainably committed to the goal of environmental protection for present and future generations. Laws enacted to protect the environment must be observed. Wuxi Cast GmbH supports environmentally conscious behaviour of its employees.

4.8 Trade secrets

The Wuxi Cast GmbH obliges its employees to respect company and business secrets. Confidential information and confidential documents may not be passed on to third parties or be made accessible in any other way without permission, unless authorisation has been granted or the information is publicly accessible.

5 Suppliers

Wuxi Cast GmbH communicates the principles mentioned in section III of this code to its direct suppliers and business partners. Wuxi Cast GmbH requires its suppliers and business partners to follow the above mentioned standards of conduct and monitors and promotes their compliance.



6 Compliance

Wuxi Cast GmbH undertakes to work towards ensuring that the company and its employees comply with the principles of this code of conduct, in particular by designing and adapting guidelines and processes. This is achieved in particular by introducing and maintaining appropriate controls and plausibility checks and by publishing guidelines for implementing the requirements in day-to-day business.

This guideline shall come into force on 01.08.2020.

Düren, 01.08.2020


Wuxi Cast GmbH
The Management