



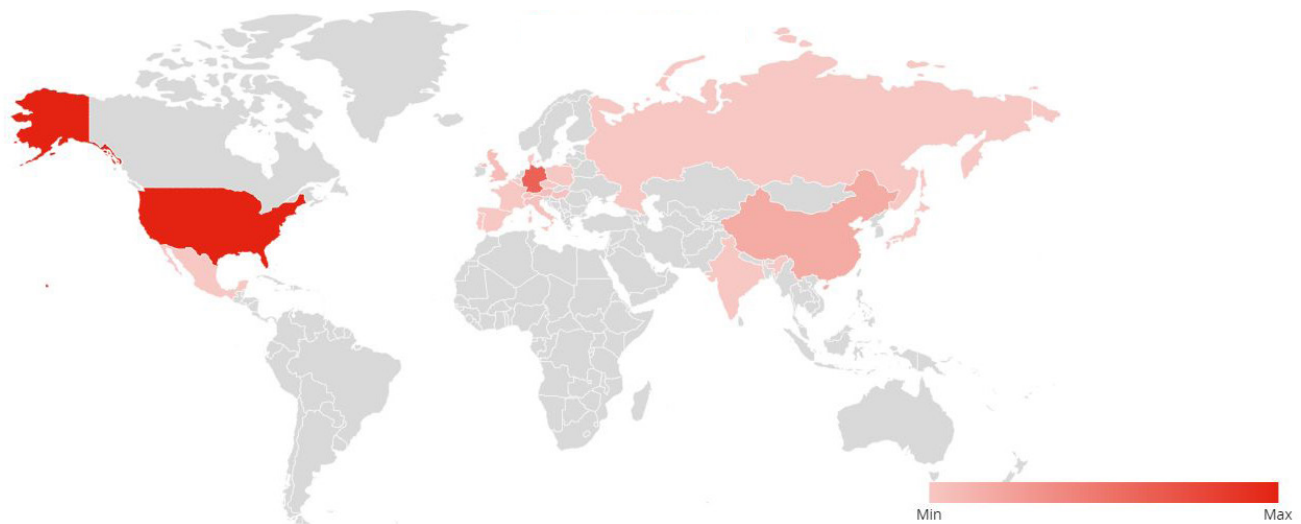
Policy Statement
Human Rights Strategy

Wieland Group

Introduction

Wieland is a leading global supplier of semi-finished copper and copper alloy products. With a global network of production sites, service companies and sales offices, the company offers a broad product, technology and service portfolio. From prototype to series production, Wieland develops solutions for automotive, electronics, refrigeration, air conditioning and other industries. Through high-performance copper materials, Wieland drives the success of its B2B customers in future fields such as electromobility, connectivity or urbanization. High technical competence, customer-oriented thinking and sustainability determine the company's actions and have been the basis of its success since 1820.

The global distribution of Wieland companies is shown in the following chart.



As a manufacturer of semi-finished products, we source raw materials from 60 countries. Supplier management is controlled by the Corporate Functions Global Metals Management and the Corporate Function Global Procurement and Logistics. Global Metals Management handles the procurement of input materials for the foundry and formats from around 1,480 suppliers. Global Procurement and Logistics manages around 12,650 suppliers worldwide, representing 90% of the total supplier base. It is responsible for the procurement of direct materials, logistics services, capital goods and spare parts (CapEx), services, and auxiliary and operating materials.

The Wieland understanding of values

The Wieland Group fundamentally adheres to the UN Guiding Principles on Business and Human Rights, the ten principles of the UN Global Compact and the principles embodied in the provisions of the core labor standards of the International Labor Organization (ILO).

For all employees, we have anchored the resulting rules of conduct in our „Code of Conduct“ (CoC). This contains a clear position of the Wieland Group on the subject of human rights and rejects child labor, forced labor and compulsory labor. Furthermore, the CoC requires us to refrain from any form of discrimination, unlawful unequal treatment, insult or (sexual) harassment. In addition, our CoC commits us to appropriate remuneration and fair working conditions. Of course, we also comply with the applicable legal provisions.

The corresponding requirements were specified in the Human Rights and Working Conditions Policy, which came into force in August 2022 and applies throughout the Group.

We consistently pursue and punish misconduct and violations of the CoC as well as the Human Rights and Working Conditions Policy and the requirements for the protection of human rights contained therein.

To strengthen Wieland’s understanding of human rights and as a central point of contact, the Senior Vice President Human Resources was also appointed as Wieland Human Rights Officer in August 2022.

Of course, we also expect our business partners, suppliers and service providers to comply with the values that are firmly anchored in the Wieland culture. We have created a corresponding framework of requirements in our Supplier Code, which is directed at our direct business partners. In particular, we expect our suppliers to pass on and actively live our requirements in their respective supply chains.

These requirements are also reflected, for example, in our General Terms and Conditions of Purchase, which form a fundamental element of our supplier contracts.

Any violations of the Supplier Code or legal regulations may have significant consequences for the Wieland Group and the joint business relationship. Therefore, in the event of violations, we reserve the right to take appropriate measures, which may include termination of the business relationship.

Dealing with conflict minerals

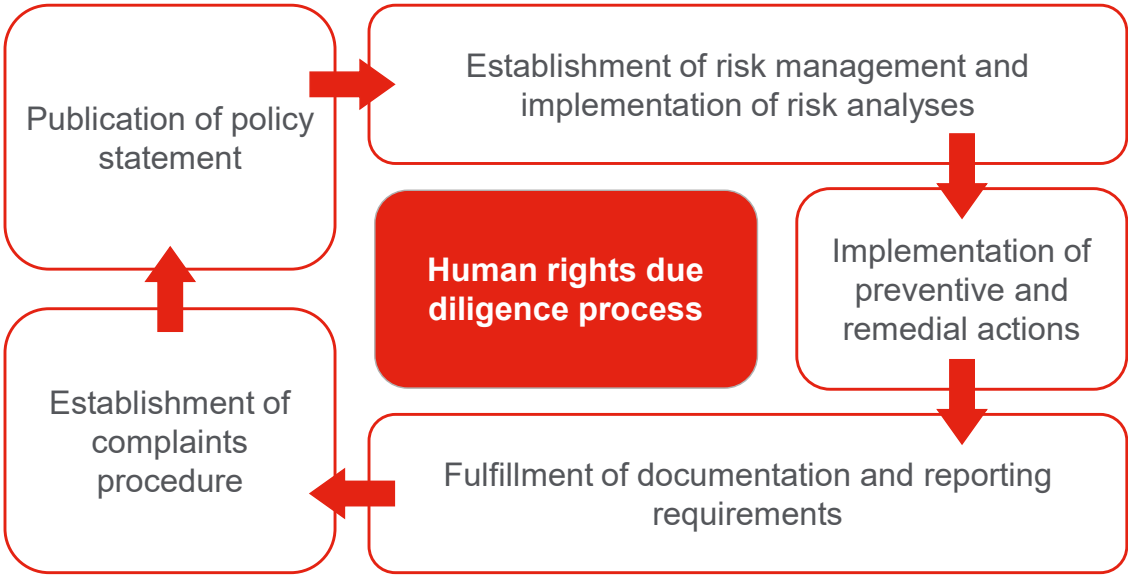
Wieland uses tin as an alloying element in some of its materials. In addition, the surfaces of some products are tin-plated or even gold-plated. We ensure through our sources of supply that the tin and gold we use is not a conflict mineral.

Wieland strictly adheres to the EU Conflict Minerals Regulation as well as other applicable legislation regarding conflict minerals. We follow an integrated risk-based management approach based on the five steps of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA). We have anchored our guidance in the Conflict Minerals Policy issued in 2021.

We expect our business partners to make comparable efforts to comply with the relevant regulations and requirements.

The Wieland human rights due diligence process

The basic process for the fulfillment of the human rights due diligence obligation by the Wieland companies is shown in the following diagram.



As a globally active manufacturer of semi-finished products, we source raw materials from all over the world and thus also from countries with deviating human rights standards. We are aware of our due diligence obligations regarding human rights and working conditions in these countries. A central element of due diligence is to establish a process (risk management) to ensure that potential impacts of business activities on human rights are identified, prevented or mitigated. The basis of appropriate and effective risk management is the structured identification and assessment of human rights and environmental risks in our own business operations and those of our direct suppliers.

Risk analysis of own business area

The risk analysis in our own business unit was integrated into the Group-wide Compliance Risk Assessment, which was performed in Q2 / Q3 2022. In this context, the relevance, probability of occurrence and extent of damage of comprehensive risk situations were analyzed in all active Wieland companies, which can be derived from the corresponding human rights and environmental risks in accordance with the German Supply Chain Act. The consolidated results are used to create the Group-wide risk profile and identify potential high-risk areas thematically and geographically.

Risk analysis direct suppliers

A business partner screening tool was introduced within the Wieland Group to implement the risk analysis with regard to direct suppliers.

As part of the basic risk assessment, the country risk and the industrial risk of the respective supplier are evaluated. Based on this, potentially risky suppliers are subjected to an extended risk analysis which includes, among other things, relevant facts already known to the public and our potential influence on the respective supplier. Individual measures are prioritized and derived on the basis of the specific individual risk identified in this way.

In addition, the screening tool acts as an early warning system for increased risk potentials and possible violations of human rights and environmental due diligence obligations through proactive evaluation of relevant media reports.

Minimizing risks through preventive measures and taking remedial action

Our aim is to prevent or mitigate the identified and prioritized risks through appropriate measures and, if possible, to eliminate them completely. This is also reflected in the design of our management processes and purchasing practices. We are aware that our business partners, their experience and their quality are an essential part of our corporate success. Only in cooperation with them can we fulfill our corporate duty of care and, in addition to fair competition, make our contribution to humane working conditions and compliance with environmental obligations in the value chain. For this reason, our actions focus on dialog with suppliers and those affected, joint processing, and awareness-raising and training of relevant employees, business partners and suppliers. In the event of repeated or serious violations, however, we reserve the right to terminate business relationships. For this purpose, the Supplier Risk Committee (which is composed of the VP Global Procurement & Logistics (Chairman), the Group Compliance Officer (Co-Chairman), the Recycling WNA and SVP Global Metal Supply President, the VP Global Function RD&I | Sustainability and the Human Rights Officer) has been established as a decision-making body at the Wieland Group level.

We also strive to continuously improve working conditions throughout the supply chain. We are, therefore, involved in various industry associations and initiatives.

Our main industry associations, Wirtschaftsvereinigung Metalle (WVMetalle), the International Copper Association (ICA), and the Copper Development Association (CDA) support their members in establishing sustainable supply chains. For example, we are involved in the WVMetalle's MARS (Metal Alliance for Responsible Sourcing) initiative. MARS supports its members in the procurement of sustainable raw materials. In addition, Wieland is a partner of The Copper Mark, a spin-off of

the ICA. The Copper Mark defines a framework and standards for sustainable copper production. Until now, this process has only been applied to mines and copper smelters. Together with The Copper Mark, we are working to extend it to other players along the supply chain.

Establishment complaint procedure

Our employees, suppliers, business partners, and all other stakeholders, such as private individuals, have the right and the opportunity to confidentially report deficiencies or violations regarding human rights and environmental due diligence within the Wieland Group or at our suppliers and their upstream suppliers at any time via our anonymous whistleblower system.

Reporting

In addition to the annual report on the fulfillment of the due diligence obligations enshrined in the German Supply Chain Act, which will be published on our homepage, we also report on current developments in Wieland governance structures and sustainable procurement in our Sustainability Report which is also available to the public at wieland.com.

Current measures for the continuous improvement of the due diligence process

We are currently in the initial implementation phase of the human rights due diligence process as required by the German Supply Chain Act.

We plan to complete the preparation of the risk profile and thus the identification of high-risk areas in our own business area by the end of January 2023 in order to review and, if necessary, enhance our already implemented preventive measures.

No material issues with human rights-related or environment-related obligations in accordance with the German Supply Chain Act could be identified in any of the active Wieland companies. Remedial measures, therefore, do not need to be taken in our own business area.

The detailed risk analysis of the existing direct suppliers by the Business Partner Screening Tool is also scheduled to be completed by the end of January 2023. Currently, the system is being adapted to Wieland's specific requirements.

Based on the results of the risk analysis, if warranted further audits will then be initiated for high-risk suppliers and appropriate preventive measures will be discussed and implemented with the suppliers concerned. If violations in accordance with the German Supply Chain Act of human rights-related or environmental obligations are identified, appropriate remedial action is taken.

Wieland is currently examining how a timely and formalized supplier review can be optimized during the supplier onboarding process across the Group.

The methodology, the procedural flow of the risk analysis as well as the anchoring of preventive measures and the taking of remedial action are currently being formalized in a Wieland policy for the implementation of the German Supply Chain Act requirements. The policy is scheduled to come into force by March 2023.

In addition, a training program on human rights and working conditions for relevant Wieland employees has been rolled out. An updated version of the training for suppliers and business partners will be made available in due course.

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