WEPA Group
Responsible Procurement Policy

Together for a better life

Preamble

Our suppliers are vital partners in our journey toward sustainability. Open communication and strong collaboration serve as the foundation for fostering and sustaining ethical and sustainable partnerships. With this approach, we thoughtfully evaluate our suppliers' performance, commitment, and continuous progress when establishing and maintaining these relationships.

The WEPA Responsible Procurement Policy stands as a cornerstone of our leadership commitment to sustainability. This commitment steers our daily actions, underpinning our 2030+ WEPA's 4+1 Sustainability Strategy and our Responsible Procurement Agenda. We require our suppliers to uphold the core ethical standards outlined in WEPA 's Business Partner Code of Conduct, as well as our Responsible Procurement Policy, which aligns with our universally applicable Corporate Policy. Furthermore, WEPA encourages suppliers to publish annual sustainability reporting to demonstrate their progress and commitments to responsible business practices.

Ethical and sustainable practices are integral to WEPA's pledge to the UN Global Compact, which encompasses ten principles across human rights, labour rights, environmental stewardship, and anti-corruption. WEPA actively contributes to the advancement of various Sustainable Development Goals and is a member of SEDEX, championing ethical and sustainable practices throughout our value chain.

The WEPA Responsible Procurement Policy is a key pillar in our unwavering dedication to fostering the transition to a sustainable economy and society. This policy plays a crucial role in safeguarding and rejuvenating nature, supporting prosperous communities, and enhancing the confidence of our stakeholders.

Labor & Human Rights in the Value Chain

Our global supply chain influences the lives of countless individuals. This gives it significant potential to create positive change for value chain workers across the globe – and we require every WEPA supplier to work with us to amplify that impact. All of our suppliers must guarantee equitable working conditions and uphold human rights by committing to the following standards, which align with the United Nations Guiding Principles on Business and Human Rights as well as the fundamental conventions of the International Labor Organization (ILO)[1]. Suppliers are obligated to abstain from any actions that clearly and gravely infringe upon human rights outlined in the International Covenant on Civil and Political Rights or the International Covenant on Economic, Social and Cultural Rights. Specifically, the following issues:

Child labour and young workers

Suppliers must refrain from permitting ILO-forbidden forms of child labor. Under no conditions may suppliers hire individuals below the age of 15, below the legal minimum working age, or below the minimum age required for completing compulsory education as mandated by local legislation, whichever is higher. Exceptions are allowed only in accordance with applicable national regulations as defined by the ILO. Workers younger than 18 years must not engage in nighttime work, tasks in hazardous conditions, or activities that disrupt their education. Furthermore, they must not partake in any of the most severe forms of child labour as described by the ILO[2].

Freely chosen employment

All employment must be consensual. Suppliers must not allow or engage in forced, bonded, or indentured labor, slavery, or human trafficking. Mental and physical duress, servitude, and debt bondage are strictly forbidden. ILO indicators are utilized to assess whether a situation qualifies as forced labor[3]. Before beginning employment, all permanent and temporary workers must receive employment agreements that are willingly accepted and that uphold their legal and contractual rights. These documents must be provided in a language the employee comprehends.

Recruitment and employment-related fees and expenses must be borne by the employer, not the worker. Workers' freedom of movement must not be obstructed by the employer through physical constraints, intimidation, threats, or practices such as retaining passports or valuable belongings. Passports may be requested by the employer solely to meet legal requirements. They must be promptly returned to the employee once those obligations are met, and copies of the passports must be supplied to the workers during this period.

Fair working conditions

WEPA suppliers are required to provide employees[4] with opportunities for rest and recovery, along with fair compensation and benefits. The organization must adhere to relevant laws, collective bargaining agreements (if applicable), and industry norms regarding working hours, rest

[1] ILO Convention 29 - Forced Labour Convention (and its 2014 Protocol), ILO Convention 105 – Abolition of Forced Labour Convention, 1957 ; ILO Convention 138 - Minimum Age Convention, Article 2(4), Article 4 – 8 ; ILO Convention 182 – Worst Forms of Child Labor Convention, Article 3 ; ILO Recommendation 190, Nr. 4; ILO Convention 100 – Equal Remuneration Convention, 1951 and ILO Convention 111 - Discrimination (Employment and Occupation) Convention, 1958; ILO Convention 87 - Freedom of Association and Protection of the Right to Organise Convention, 1948; ILO Convention 98 – Right to Organise and Collective Bargaining Convention, 1949; ILO Convention 155 – Occupational Safety and Health, 1981 and ILO Convention 187 – Promotional Framework for Occupational Safety and Health, 2006.

[2] As defined in Art. 3 ILO Convention 182.

[3] As described in the official ILO brochure "ILO Indicators of forced labour", 01/10/2012.

[4] Includes temporary workers and contractors and informal types of work.

periods, and public holidays. The standard work week, excluding overtime, must comply with legal definitions but should not exceed 48 hours. Overtime hours must be limited to a maximum of 12 per week, and employees must receive at least one day off within every seven-day work period.

Wages and benefits must align with local practices and standards. Suppliers are expected to offer a sufficient living wage[5] that is reviewed on a regular basis, and that considers job performance in a non-discriminatory manner. Remuneration must be paid as agreed and without undue delay. Deductions from base wages as a disciplinary measure shall not be permitted, and any deductions made for other purposes must be clearly stated. Adequate vacation entitlement and parental leave must be provided, taking into account local statutory requirements.

Non-discrimination and anti-harassment

Any form of discrimination or harassment based on, but not limited to, race, gender or gender identity, sexual orientation, religion, caste, marital or parental status, political views, trade union membership, disability, nationality, social or ethnic background, age, genetic information, or lawful off-duty conduct is strictly forbidden.

Freedom of assembly and association

Suppliers must honour employees' rights to freedom of assembly and association, as well as their rights to openly express and exchange ideas, including concerns about workplace conditions and management practices, without fear of discrimination, coercion, or reprisal.

Diversity, equity and inclusion

Suppliers are expected to promote diversity, equity, and inclusion. They are encouraged to show dedication to fostering and sustaining a diverse and inclusive workforce.

Environmental impact on human rights

Our company strongly emphasizes respecting the essential relationship between people and the environment. WEPA suppliers are required to prevent harmful soil degradation, water contamination, air pollution, excessive noise, or avoidable greenhouse gas (GHG) emissions. Suppliers shall establish management systems to monitor, reduce, and demonstrate ongoing improvements in the environmental impacts of their operations and their value chains. WEPA encourages suppliers to obtain certifications such as ISO 14001 to demonstrate their commitment to environmental management. Additionally, they must avoid ex-

[5] As defined in the German Act of Corporate Due Diligence in Supply Chains.

cessive water use that compromises individuals' health, access to clean water or sanitation, or significantly harms the natural resources necessary for food production and preservation.

To determine harm or excess, limits for permissible emissions established by the production country's laws must be followed. If such national laws are absent or clearly insufficient, international standards must be adhered to.

Land rights

Suppliers are obligated to uphold land rights, including the collective and traditional rights of women, indigenous peoples, local communities (IP/LC), and other vulnerable groups potentially impacted by their operations and sourcing activities. Suppliers must refrain from any form of land-grabbing. For any legally authorized land use changes, suppliers must secure the free, prior, and informed consent (FPIC) of affected indigenous communities, in addition to complying with any participation requirements mandated by local laws—particularly when a community's access to water or other essential resources is involved. Illegal forced evictions are strictly prohibited.

Conflict-free supply chains

We require our suppliers to procure materials that are conflict-free and sourced from ethically responsible providers—particularly metals and minerals (including, but not limited to, 3TGs, cobalt, and mica). Suppliers must conduct continuous due diligence on the origin and chain of custody of materials and provide supporting documentation upon request. In accordance with relevant legal frameworks on conflict minerals (such as the OECD Due Diligence Guidance, the EU Regulation, and the Dodd-Frank Act), suppliers must also collaborate with their supply chain partners (including smelters) to ensure a conflict-free verification process. They are required to utilize sources that have been validated by the Responsible Minerals Initiative (RMI) or other business initiatives recognized by the OECD.

Use of security forces

When engaging or utilizing private or public security personnel to safeguard a supplier's operations, appropriate and effective steps[6] must be implemented to ensure the safety of employees and reduce the likelihood of human rights violations.

[6] Measures should be oriented towards relevant guidance and models from the International Code of Conduct for Private Security Providers or the Voluntary Principles on Security and Human Rights.

Climate and Environment in the Value Chain

WEPA is dedicated to continuously enhancing its environmental impact in areas such as energy, waste and wastewater management, greenhouse gas (GHG) emissions, air quality, and water usage– while advancing efforts toward a circular economy because WEPA believes the natural environment is humanity's most valuable resource. Suppliers are expected to take appropriate steps to assist WEPA in reaching these objectives and to establish their own environmental goals, strategies, and policies for their operations and supply chains that are equally ambitious.

Zero deforestation

WEPA is dedicated to achieving zero net deforestation and is central to our strategy. Our objective is to avoid deforestation of primary and secondary forests with critical ecological value, including High Carbon Stock (HCS) forests and peatlands. We expect our suppliers to align with this commitment. Suppliers must make every effort to prioritize sustainable production or sourcing of agricultural or forestry feedstocks. Certification schemes within the supply chain help ensure traceability and credibility throughout the value chain.

Biodiversity

Biodiversity is essential for robust ecosystems and a stable climate. Suppliers are required to monitor protected regions and areas of High Conservation Value (HCV) and to contribute to our goal of stopping and reversing biodiversity decline.

Greenhouse gas and air emissions

WEPA expects from its suppliers to establish science-based targets aligned with the Paris Agreement and implement strategies to decrease GHG and air emissions, reducing their environmental, climatic, and social impacts. This includes GHG emissions from their own operations (Scope 1), indirect emissions from purchased energy generation (Scope 2), and emissions across their upstream and downstream value chains (Scope 3). Suppliers must manage GHG and air emissions from their operations, and actively seeking opportunities for efficiency improvements within their production processes and value chains.

They are expected to implement GHG and air emission management plans, monitor and report emissions, and regularly evaluate their progress in reducing emissions. Suppliers must also provide details about their carbon footprint and the carbon footprint of products sold to WEPA, where applicable. Additionally, they are encouraged to invest in innovative technologies to further mitigate GHG and air emissions.

Water

Suppliers should be aware of their water footprint and prioritize areas experiencing water scarcity. They must limit their impact on the watersheds where they operate and contribute to water preservation by decreasing water use and ensuring groundwater quality is protected and enhanced where negatively affected, as much as possible. Suppliers are required to adhere to local legal obligations for wastewater treatment. WEPA encourages suppliers to introduce water stewardship practices, especially in water-scarce regions.

Energy use and renewable electricity

Suppliers must reduce their energy usage and implement energy-efficient strategies, including a robust plan to shift toward renewable energy sources. Suppliers are anticipated to transition to 100 percent renewable grid electricity within their operations , if available in the region of operations. They are expected to establish energy management systems, monitor their energy usage, and disclose on consumption. Suppliers are encouraged to invest in emerging technologies to lower energy consumption.

Circularity and waste

WEPA is committed to advancing the shift toward a circular economy—where all materials are collected after use and processed for reuse or recycling. This approach eliminates waste and alleviates pressure on the planet's valuable resources and ecosystems. We encourage all suppliers to collaborate with us in striving to reduce and prevent waste generation by keeping materials within the economic loop.

Mercury, persistent organic pollutants (POPs) and hazardous waste

Suppliers must fully comply with all applicable laws and international agreements governing hazardous substances, including the Minamata[7] (Mercury), the Stockholm[8] and the Basel Conventions[9]. These remain binding under German and EU law and are reinforced by evolving due diligence and sustainability reporting requirements.

[7] Minamata Convention on Mercury of 10 October 2013 (Federal Law Gazette 2017 II pp. 610, 611).

[8] Stockholm Convention of 23 May 2001 on Persistent Organic Pollutants (Federal Law Gazette 2002 II pp. 803, 804), as last amended by the decision of 6 May 2005 (Federal Law Gazette 2009 II pp. 1060, 1061).

[9] Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (Federal Law Gazette 1994 II pp. 2703, 2704), as last amended by the Third Ordinance amending Annexes to the Basel Convention of 22 March 1989 of 6 May 2014 (Federal Law Gazette 2014 II pp. 306, 307).

Health and Safety in the Value Chain

We place great importance on the health and wellbeing of everyone connected to our company, supply chain, and products. Suppliers are required to implement effective programs that address the health and safety of their employees, contractors, and visitors. Accordingly, suppliers must adhere to:

Occupational health and safety, and work-related health hazards
Suppliers must implement management systems to identify, evaluate, and mitigate risks to ensure the health and safety of individuals impacted by their operations. To prevent health hazards for all employees, workplace risk assessments must be conducted and documented at appropriate intervals and whenever conditions change. Risks must be evaluated (including comparisons to exposure limits and regulatory standards) and minimized. Preventive and/or corrective actions must be taken, and necessary training must be provided. Employees must be supplied with Personal Protective Equipment that meets legal requirements or industry standards, whichever is stricter.

Occupational medical examinations must be carried out prior to initial job assignments and at specified intervals in accordance with regulatory requirements and the specific risks of the workplace. Medical records must be securely stored and treated as confidential. Suppliers' production facilities and manufacturing processes must be designed and operated to ensure the safety of employees, the public, and surrounding communities. Systems and procedures must be in place to prevent, manage, report, and address occupational injuries, with comprehensive emergency plans established.

WEPA recommends suppliers to adopt international standards such as ISO 45001 for occupational health and safety management.

Process safety
Production processes must be conducted safely and with minimal impact on employees, surrounding communities, and the environment. Suppliers must adhere to all relevant laws and obtain all required permits. Safety programs and management systems should include risk evaluations and audits for all production sites, subcontractors, and logistics centres. Processes with potential for significant incidents must be identified, and associated hazards and risks thoroughly assessed. Appropriate corrective measures must be implemented to mitigate identified risks. This includes properly identifying, labelling, and managing chemicals, waste, and other hazardous materials to ensure their safe handling, transport, storage, usage, recycling or reuse, and disposal.

Product safety
Suppliers' products must adhere to all applicable regulations to guarantee safe transportation, handling, and usage, safeguarding both human health and the environment. Particular care must be taken with hazardous substances. All WEPA suppliers are also required to provide current and accurate information, including safety data sheets, to ensure the safe management and use of their products.

Business Partner's Governance and Management System

Suppliers must guarantee sustainable and ethical business practices, in line with the core principles of our Responsible Procurement Policy and WEPA's Business Partner Code of Conduct. Additionally, all suppliers are required to comply with applicable laws, regulations, and standards relevant to their operations. Management systems should be founded on strong policies and effective risk due diligence systems to identify, prevent, mitigate, rectify, and, where necessary, compensate for violations, while considering the specific impacts and opportunities of each supplier's organization.

Fair competition and anti-corruption
Suppliers are expected to maintain high standards of integrity in their interactions with others. They must comply with all applicable laws and regulations related to fraud, bribery, and corruption. Our suppliers must also uphold the principles of fair competition and adhere to antitrust and fair competition laws in the countries where they operate. If a supplier suspects that an employee or (sub)contractor has engaged in illegal, unethical, or otherwise inappropriate behaviour, they must promptly report the issue to WEPA.

Cybersecurity and protection of personal data
The preservation of fundamental rights and freedoms of individuals, particularly their right to personal data protection, is a priority for WEPA and is governed by legal regulations. Protection against cyber threats is essential for ensuring personal data protection and for guarding our supply chains from disruptions caused by cyber-attacks.

As such, we expect our suppliers to implement, maintain, and continually enhance cybersecurity measures that meet market standards, to defend against cyber incidents, and to comply with applicable data protection laws.

Supply chain transparency and traceability
WEPA aims to establish fully transparent supply chains, fostering a culture of continuous improvement both within the organization and throughout its value chains. We expect our suppliers to contribute to this goal by creating transparency and traceability, ensuring materials can be tracked from the start of the supply chain to WEPA. This provides visibility into inputs and processes across the value chain, enabling us to evaluate and monitor related risks as part of our due diligence efforts.

Training and capability building
Continuous improvement in sustainability performance and responsible procurement practices is a core expectation for our suppliers. Enhancing capabilities through relevant training initiatives will support suppliers in gaining a deeper understanding of our expectations, along with applicable laws, regulations, and recognized standards.

We strongly encourage our suppliers to utilize the SEDEX Academy. Its resources build on existing knowledge and offer opportunities to develop skills in critical areas of sustainability and responsible procurement.

Compliance in the supply chain
Suppliers must ensure adherence to the requirements of our Responsible Procurement Policy and are obligated to convey appropriate measures to their suppliers to secure compliance throughout the supply chain. To accomplish this, suppliers are expected to make reasonable efforts to establish agreements with their own suppliers that align with or are equivalent to this policy.

Control of compliance by WEPA
To ensure the consistent implementation of our Responsible Procurement Policy, WEPA must

monitor its suppliers and conduct evaluations on a periodic basis. As part of this process, WEPA may ask suppliers to complete assessments and/or provide relevant policies, procedures, data, or other information. WEPA may also carry out on-site audits of a supplier's operations to confirm compliance. During the collection of documents, data, or other information, and while conducting audits, it is essential to comply with data protection and antitrust laws and to avoid violating any legally binding or enforceable confidentiality obligations.

Responsibility for compliance

To ensure compliance with this Responsible Procurement Policy, WEPA reserves the right to verify suppliers' adherence to this Responsible Procurement Policy in an appropriate manner. During such a verification process, suppliers are obligated to grant WEPA access to all data and information that is necessary for the implementation of this Policy.

To this end, suppliers allow the WEPA Group, under the condition of adequate prior notice, to verify its compliance with the standards and due diligence requirements set out in this Responsible Procurement Policy, either directly or through third parties who are bound to secrecy, by means of inspections in the facilities that are involved in the production/delivery of the articles for WEPA that are covered by the contract. This also encompasses the inspection of the supplier's plants, its business premises and the records that document its compliance with the standards in the Responsible Procurement Policy.

The supplier is obligated to correct all deviations from the requirements in accordance with the standards and due diligence requirements defined in the Responsible Procurement Policy. In case of a suspected violation, the supplier commits to adequately review the facts and circumstances in question.

WEPA reserves the right to conduct its own investigation into suspected violations in cooperation with the supplier. In case of a violation of this Policy or the principles defined in it, WEPA additionally reserves the right to take appropriate legal steps. This includes in particular the right of WEPA to terminate specific individual or all existing agreements between the supplier and WEPA without notice, or to withdraw from these, should the supplier fail to comply with one or more of the above standards and due diligence requirements and, despite the setting of an appropriate deadline, fail to redress the point or points at issue.

Our suppliers commit to adequately informing their employees, representatives and subcontractors about the content of this Responsible Procurement Policy and to taking all measures necessary for the implementation of the defined principles. Other, in particular farther-reaching, contractual obligations remain unaffected by this Responsible Procurement Policy for suppliers and take precedence over the standards and due diligence requirements laid out in this document. This applies in particular to terms of the contract that obligate the supplier to comply with or implement certain standards and/or requirements for the supply chain in accordance with applicable legal provisions.

Reporting on violations

Suppliers, their employees, contractors, and all individuals impacted by WEPA's business activities are required to report any actual or suspected violations of this Responsible Procurement Policy to WEPA's Compliance department. Various channels are provided for whistleblowers to report potential misconduct through WEPA's Complaint Mechanism. All reports submitted are handled with confidentiality. Suppliers are expected to maintain comparable whistleblowing systems. Various channels are provided for whistleblowers to report potential misconduct through WEPA's Complaint Mechanism accessible via WEPA homepage.

Supplier Management System at WEPA

Supplier management is a core element of our Responsible Procurement Policy, ensuring that our supply chain aligns with our sustainability goals. We aim to create a transparent and accountable network of suppliers who share our commitment to ethical practices, environmental protection, and human rights. Our approach is built on proactive engagement, monitoring, and collaboration with suppliers to address any risks and drive continuous improvement.

We have established a comprehensive procurement strategy in which we set out our Environmental, Social, and Governance (ESG) agenda and targets. This strategy defines our long-term ambitions and provides the procurement organization with guidance in sourcing responsibly. The Procurement Strategy translates into Purchase Category Strategies that sets targets for fostering partnerships with those suppliers which mutually share WEPA's Environmental, Social, and Governance agenda, targets, and principles.

We have established a robust supplier management process to enhance the sustainability of our value chain. This includes risk assessment for new suppliers that require onboarding, continuous risk surveillance of strategic supply partners and preferred suppliers, periodic evaluations of non-strategic supply partners (transactional) suppliers, and active engagement with our suppliers to drive sustainability practices.

Suppliers are expected to adhere to our Business Partner Code of Conduct, which lays out the minimum requirements for ethical conduct, environmental responsibility, and social standards. All suppliers must agree to this code as a prerequisite for doing business with us. Additionally, Sustainability Agreements, which are part of the General Procurement Framework Agreements, are agreed upon with our strategic supply partners to ensure alignment with our long-term sustainability goals.

In line with our sustainability objectives, we select suppliers who hold recognized certifications and management systems for Environmental Protection, Worker Health & Safety, Human Rights & Labor, Anti-bribery & Anti-corruption, and Responsibilities in the Supply Chain, and demonstrate resource-efficient production. Suppliers demonstrating high performance in those criteria have a clear advantage of being awarded for new business.

We conduct regular SMETA (SEDEX Members Ethical Trade Audit) audits and assessments to ensure that our suppliers meet the standards outlined in our Business Partner Code of Conduct and this policy. Suppliers found not meeting these requirements are required to develop corrective action plans; otherwise, the business relationship may be terminated.

We provide regular training for our procurement teams to ensure that they are equipped to make informed decisions that promote sustainable procurement. These training sessions help our procurement teams understand the importance of ethical procurement and the practical steps they can take to integrate sustainability into their procurement decisions.

We also offer dedicated training programs for our suppliers as preventive and corrective action to enhance their understanding of our sustainability standards and expectations. These sessions focus on building supplier capabilities in areas such as ethical sourcing, environmental management, and compliance with human rights standards. Through these programs, we aim to foster a collaborative approach to achieving responsible procurement across our entire supply chain.

Responsibilities

The implementation and oversight of this Responsible Procurement Policy are assigned to the procurement leadership team, who are responsible for ensuring that all procurement activities align with our sustainability commitments.

Commitment to Improvement

We understand that sustainability is a journey of continuous improvement. Our Responsible Procurement Policy is reviewed regularly to ensure alignment with current laws, organizational strategies, and emerging sustainability trends. We also welcome feedback from stakeholders, including suppliers, customers, and employees, to strengthen our approach to responsible procurement.

WEPA is committed to collaborating with our suppliers and partners to create a positive impact across our value chain, reducing our environmental footprint, supporting human rights, and fostering economic resilience. Together, we can contribute to a sustainable future.

Document History

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Legal information

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