

Code of Conduct

Wohlrab Group

Foreword by the Board of Management

The present Code of Conduct defines the principles that guide our commitment to responsible and sustainable business practices and is an integral part of our corporate values. We aim to consider the social, economic, and environmental impacts of our business activities, minimize potential negative effects, and assume responsibility towards our employees, customers, partners, and society as a whole, within the scope of our capabilities.

This Code of Conduct serves as a binding, universal guideline for our actions across all our locations, characterized by integrity, respect for human rights and ethical standards, compliance with all applicable legal regulations or the adoption of best practices, regardless of the country in which we operate.

Our managers are responsible for serving as role models and demonstrating this commitment credibly and consistently. They ensure that employees understand our internal standards and implement them in their daily work across all business units globally. We communicate these values to our suppliers within our sphere of influence and align our business relationships accordingly. Where violations of this Code of Conduct occur, we reserve the right to take appropriate action, up to and including the termination of business relationships.

Langenzenn, in November 2025



Michael Becker

Wohlrab Group
Chief Executive Officer

Lukas Wohlrab

Wohlrab Group
Chief Operating Officer

Dr. Sandra Wohlrab

Wohlrab Group
Chief Financial Officer

Christian Wohlrab

Wohlrab Group
Owner & Chairman of the
Advisory Board

Our responsibility as an employer

Human rights

We advocate for respect and human dignity

We do not tolerate child labor, forced labor or any form of modern slavery or human trafficking. No one is employed against their will or forced to work under the threat of punishment or reprisals. The special rights of young workers are respected.

We uphold a zero-tolerance policy against all forms of discrimination, including but not limited to skin color, gender identity, age, any disability, national or social origin, religious or political beliefs, sexual orientation, or membership in a workers' organization.

We protect our employees from any form of inhumane treatment in the workplace, including physical or psychological hardship, sexual, verbal, or personal harassment, or threats. This also includes the threat of such treatment.

Remuneration and co-determination

We guarantee labor and social standards

We ensure compliance with applicable labor and social security regulations in all countries of operation, covering contract procedures and the employment of both local and foreign workers.

We ensure compliance with all legally mandated national minimum wages and social benefits. In countries or regions where such legal requirements do not exist or are insufficient, we ensure that the wages paid for regular full-time work cover the basic living needs of employees. Unauthorized wage deductions as a disciplinary measure are not tolerated.

We guarantee compliance with the maximum permissible working hours and ensure adequate rest periods through paid vacation, as well as the observance of religious or cultural holidays.

We respect employees' rights to freedom of association and assembly, as well as the right to collective bargaining in accordance with applicable national laws and regulations. We maintain a trustworthy collaboration with our employee representatives on equal terms.

Healthy working environment

We protect and promote the health of our employees

We comply with applicable national and international occupational health and safety regulations. With a suitable working environment, appropriate protective measures, and training, we aim to prevent accidents, injuries, and occupational diseases while minimizing risks. Additionally, we offer preventive measures for workplace health promotion.

Open working atmosphere

We create space for development

We are committed to continuously questioning and improving our ways of working. We also learn from past experiences. To achieve this, we foster an open and unbiased working and learning environment where every employee can confidently share ideas, suggestions, and feedback.

Diversity

We embrace diversity and equal opportunities

Our team is international and diverse, which we consider a significant asset. Different perspectives help us learn creatively from each other and integrate this into our work for better results. This includes promoting equal opportunities and gender equality in every respect.

Work-Life Balance

We support our employees in balancing professional and private interests, particularly in reconciling family and work.

Local communities

We recognize and understand the importance of the local communities in which we work. Our goal is to improve our contribution to the community by being sensitive to the needs of local people and groups and upholding their rights to local resources.

As a company, we support them by employing local individuals and providing them with development opportunities. Through a transparent process, we support projects and initiatives that address the community's social concerns or focus on local environmental protection with in-kind or monetary contributions.

Our responsibility for the environment & climate

Compliance with relevant environmental regulations

We act in accordance with local and international laws and standards to protect the environment. In doing so, we aim to extend the highest possible standard to all locations.

Employee training

Through internal training, we promote awareness and knowledge of environmental protection and resource consumption, enabling us to improve our environmental performance through appropriate actions.

Emissions & renewable energy

Cross-site energy management enables us to identify potential savings and implement appropriate measures to realize them. The use of renewable energy sources is continually expanding.

Resource consumption & waste management

With low failure rates driven by high production standards and investments in state-of-the-art technologies, we continuously reduce resource consumption across our processes. Where applicable, we emphasize recycling and a circular economy. Unavoidable waste and wastewater are properly handled and disposed of.

Responsible minerals and chemicals management

We comply with applicable laws and industry standards regarding the prohibition or restriction of chemicals. This is supported by a software-based hazardous-substance management system installed at all locations. We are aware of our due diligence regarding the use of so-called "conflict minerals" and have established processes for responsible sourcing to avoid financing conflicts in war-torn and high-risk areas.

Biodiversity

We promote biodiversity on our operational sites through appropriate measures and create recreational and living spaces for both people and nature.

Our responsibility as a business partner

Conflicts of interest, corruption, and money laundering

We reject unfair advantages

Corruption, bribery, or any other unfair practices or benefits intended to secure advantages for the company or individuals will not be tolerated. We will not engage in such practices, whether directly or indirectly.

To avoid conflicts of interest, we expect all company decisions to be based solely on objective criteria rather than personal interests or considerations.

We comply with legal obligations regarding money laundering prevention. Our business activities are based on the highest integrity standards, which we monitor through appropriate internal processes.

Antitrust law and intellectual property

We advocate for fair and free competition

We act in accordance with national and international competition laws and do not engage in price-fixing, market sharing, or other unfair practices. Intellectual property rights are respected, and the exchange of technology and know-how is conducted in a manner that preserves these rights.

Data and IT security

We protect data

We comply with all applicable laws and best practices in data protection, privacy, and IT security in every country where we operate.

Personal data is collected, used, stored, and shared only for legitimate purposes, with appropriate consent where required, and protected by safeguards – including when transferred across borders. We respect individuals' rights over their data and will act promptly in the event of a breach, in line with legal requirements.

We treat all third-party confidential information with the utmost care, and our employees are subject to confidentiality and non-disclosure obligations.

Security in the supply chain

At Wohlrab, customer goods are safe and secure

The processing and storage of our customers' and business partners' goods take place at secure business premises and are protected from unauthorized access. Both the personnel deployed by us and our suppliers are regularly checked against the relevant anti-terrorism lists. The subcontractors responsible for the transportation of the goods are carefully selected.

Cross-border deliveries are always managed in accordance with existing customs and trade regulations, particularly ensuring compliance with sanctions and embargoes

Supplier standards

Our goal is to build and maintain strong relationships with key suppliers and contractors. We strive to select only those suppliers who share our values as outlined in this Code of Conduct. We have therefore introduced a continuous process to ensure best practices together with our value chain.

Communication & measurement

We communicate this Code of Conduct to our employees, suppliers, and other stakeholders through our website, internal memos, and our quality management system. We aim to raise awareness of the potential negative impacts of our business activities and processes in order to minimize them. The Wohlrab Group is proud to be certified by DEKRA in accordance with the requirements of ISO 9001:2015. Our quality management system supports the continuous monitoring and improvement of all aspects of our business. We are committed to continuously optimizing our systems and practices to leave a positive societal footprint.

Compliance violations and reporting channel

Our employees, business partners, and third parties can report violations of this standard confidentially and anonymously at any time through our protected reporting channel. Further information can be found at:

<https://www.wohlrab.de/en/compliance>

This Code of Conduct is based on:

10 Principles of the Global Compact | UN Universal Declaration of Human Rights | ILO Conventions

Wohlrab Group

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Version: 11/2025

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Tailored Coatings