

Our Code of Conduct

The basis and condition for the success of our business activities is the high quality of our products and services. Ensuring the quality and a targeted, continuous improvement is a task for all of our company's employees. It requires conscious commitment and active collaboration across departmental and functional boundaries. We can only fulfil our principles set out below by creating an optimal working environment in which occupational safety, sustainability and the effective and considered use of technical-, natural- and human-resources are taken into account.

Compliance with law

It is a matter of course for us to comply with all applicable laws and legal regulations.

We do not participate in business transactions that are clearly intended to circumvent or violate legal or labour regulations.

We undertake to behave fairly on the market and towards competitors and to work exclusively with fair means.

We do not tolerate exploitation, child labour or forced labour.

All employees are paid well above the statutory minimum wage. Applicable statutory working hours and rest periods are observed.

All forms of corruption, such as extortion or bribery, are not tolerated.

Gifts or other benefits are permitted as long as they are made within an appropriate, customary business context.

Security

The protection and security of our employees' and customers' personal data, as well as the protection of our own business secrets and our customers' information, have the highest priority. To this end, we have taken organisational measures and installed technical security systems. The concrete implementation of measures to minimise security risks includes access regulations for the company premises, camera surveillance and modern IT security systems.

Occupational safety and health protection

Employees are required to remind each other of potential hazards and to comply with health and safety regulations.

We take strict precautions to comply with accident prevention regulations in order to minimize the risk of any accidents and injuries.

Medical care is ensured by a specialist medical service with a large team of company physicians who are also responsible for conducting regular preventive medical screening.

We provide modern PPE for every employee and also take care of its necessary cleaning and maintenance.

To safeguard health, we respond appropriately to pandemics in line with the requirements of the government and authorities.

Employees

We have a zero tolerance towards discrimination (based on disability, sexuality, age, gender, skin colour, religion, nationality, ideology, etc.), physical, sexual, psychological or verbal harassment or violence.

We expect respectful behaviour and appreciation among each other and respect the privacy and dignity of each individual. Compliance with human and personal rights is our first priority.

We maintain open communication and we reward active cooperation through an improvement suggestion system. We always focus on motivation and trust.

Our Code of Conduct

Environmental Protection

Through regular training and the communication of information, we are constantly working to promote the environmental awareness of our employees and managers.

We apply the principle of prevention rather than aftercare.

We actively protect the environment and resources by installing a photovoltaic system, recycling metal waste in production, installing the latest filter systems for our emissions and using recyclable packaging.

We are committed to avoid environmental pollution, continuously improve our environmental performance and permanently reduce our energy consumption.

Furthermore, we undertake not to purchase or process any mercury, products containing mercury or persistent organic substances.

We comply with the applicable legal regulations on the disposal and recycling of hazardous waste.

Our company has been licensed in accordance with the Federal Immission Control Act (BImSchG) for many years and is regularly inspected by the district government Arnsberg for compliance with laws and regulations.

Quality

Our ultimate goal is to fully satisfy our customers and to continuously improve. In doing so, we rely on a long-term partnership with all our business partners.

Our quality management system has been certified to DIN 9001 since 2001.

We are committed to maintain and strengthen the reputation and success of our company and to fully meet customer requirements.

We want to provide our customers with the best possible service and support before the purchase, during production and after delivery and guarantee the highest level of quality, safety and reliability of our products. All processes and the organization are focused on avoiding errors and learning from mistakes.

All employees share responsibility for achieving the required product quality.

As role examples, managers practise these corporate principles and monitor compliance with them.

To achieve all this, periodic reviews of the established procedures are performed, the quality management system is regularly evaluated and new quality targets are set every year.

Conflict Minerals

Tin, tantalum, tungsten and gold (also known as 3TG) are extracted in mines in the eastern provinces of the Democratic Republic of the Congo and neighbouring countries, among others. The inhumane working conditions in these mines directly or indirectly finance armed groups and result in violations of human rights and international law.

For this reason, these four minerals are described as "conflict minerals", regardless of whether they are sourced from the above-mentioned regions or not.

In order to reduce the financing of armed conflicts, the US Securities and Exchange Commission implemented the requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act for short) in 2012. This included regulations on reporting and transparency relating to the use of conflict minerals.

Since then, companies listed on the US stock exchange have been obliged to inform the US Securities and Exchange Commission in an annual report whether their products contain conflict minerals that are necessary for their function or production.

We are not listed on the US stock exchange and are therefore not subject to these reporting and disclosure requirements.

Our Code of Conduct

As a producer of i.a. anodes and solder made from tin or parts of tin, we have no possibility to avoid the use of conflict minerals.

Nevertheless, we are aware of our social responsibility with regard to human rights. For this reason we do not buy, process or sell any minerals that originate from conflict areas. We expect the same from all our suppliers.

Corporate Due Diligence Obligations in Supply Chain (Lieferkettensorgfaltspflichtengesetz)

Due to the small number of employees, the German Supply Chain Due Diligence Act does not cover our company directly. Nevertheless, we have analysed the requirements for our customers and discussed them with our employees and managers.

We are convinced that our business activities can only be successful in the long term if we work in accordance with human rights and environmental protection.

We are confident that our behavioural policy provides an ideal basis for complying with the requirements of the Supply Chain Due Diligence Act. We recognise that due diligence in relation to human rights and environmental protection is an ongoing process. For this reason, our company and conduct policy, as well as our business relationships, are regularly analysed and adapted to current circumstances. This preventative procedure enables risks within the supply chain to be identified and minimised or even avoided. Any violations identified are not tolerated. In this case, we take appropriate consequences.

Business Partners

We expect all of our business partners to support our Code of Conduct and to ensure in all cases that the standards relating to human rights and environmental protection are observed throughout the entire supply chain.

We are aware that despite all the care taken within the supply chain, risks and breaches in compliance with due diligence obligations may occur. For this reason, we established an email address for all parties in the supply chain to report suspected violations: info@westfalenzinn.de.

Remark

With this Code of Conduct we are guided by a.o. SA 8000, the UN Guiding Principles on Business and Human Rights and the four basic principles of the ILO Core Labour Standards.

Marcus Jost
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